



NEWTON WATERPROOFING SYSTEMS: MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31ST OCTOBER 2019, ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015.

Newton Waterproofing Systems is committed to combatting slavery and human trafficking in its business and supply chains, and we make this statement to assist with compliance with the Modern Slavery Act 2015. This statement relates to the calendar year ending 31st December 2019.

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- a. We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation;
- b. We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

To that end, we confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain and we confirm the following:

1. We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.
2. Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence of slavery or human trafficking.

Further details about our business and supply chain are provided below.

Our Business

Newton operates in the United Kingdom as a supplier and distributor of structural waterproofing and damp proofing products to the UK construction industry. Newton products can be used on any project from commercial developments to residential projects or civil infrastructure, in both new-build and refurbishment scenarios.

Our business structure consists of a total of 34 individuals employed on permanent contracts by Newton Waterproofing Systems, all of whom work out of one location at our head office in Tonbridge, Kent. There are no other business units or company sites.

The organisational structure is also relatively simple, consisting of a Chairman, Managing Director, and five other Directors of the Finance, Technical, Product, Commercial and Marketing departments respectively. Beneath this there are seven managers across the Sales, Technical and Warehouse teams, to whom the remaining

NEWTON WATERPROOFING SYSTEMS

Newton House, 17-20 Sovereign Way
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tech@newtonwaterproofing.co.uk | www.newtonwaterproofing.co.uk

Company No. 221080 | VAT No. 235 6181 67



20 employees all report.

Our Supply Chain

As an independent company, Newton is not tied to a supplier, but can select the best manufacturers for the most suitable products for the UK waterproofing industry. All of Newton's suppliers are located in Europe or the USA, and although the exact identities are confidential, the main suppliers are located in the following countries:

- United Kingdom – 20 suppliers
- Belgium – 3 suppliers
- Germany – 3 suppliers
- Italy – 1 supplier
- Netherlands – 2 suppliers
- Norway – 1 supplier
- Portugal – 1 supplier
- USA – 1 supplier

Assessing Risks

We understand that certain industry sectors and geographical regions entail greater risk of exploitation than others. We do not believe that our supply chain is in one of those sectors.

Our Policies

Although we are not legally obliged to complete a modern slavery statement, Newton has adopted a number of company policies, of which all staff are apprised, that are relevant to the identification and eradication of modern slavery in our operations. These include our:

- ISO certifications:
 - ISO 9001
 - ISO 14001
 - OHSAS 45001
- Quality & Environmental Policy
- Countering Corruption & Bribery Policy
- Health and Safety Policy
- Employee Code of Conduct

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Newton also perform annual reviews on our main suppliers, which take the form of visits to the supplier's manufacturing facilities in order to ensure the quality of the production, and to ensure that each supplier meets the environmental and health and safety standards required by Newton's own ISO certifications.

Due Diligence & Training

Where it is reasonably practicable, we ensure that businesses in our supply chain have made a similar statement relating to slavery and human trafficking. The person in our business responsible for assessing matters relating to slavery and human trafficking is David Hall, Finance Director.

We also encourage all employees to report on any matters relating to slavery or human trafficking in our supply chains of which they become aware.

Signed:

A handwritten signature in black ink, appearing to read 'D Hall'.

David Hall, Finance Director

A handwritten signature in black ink, appearing to read 'Warren Muschialli'.

Warren Muschialli, Managing Director

Date: 25th February 2019

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