

This Statement acknowledges Royal Assent of Bill S-211 known as the Modern Slavery and Child Labour Act on May 11 2023, and the need for compliance and obligations to that end by providing the following policies, procedures and guiding principles as risk prevention.

### **COMPANY STRUCTURE, OPERATIONS and SUPPLY CHAIN**

Newton Group Ltd., is an engineering design, manufacturing, and build company specializing in sustainable modular buildings for the built environment “where innovation, technology and integrity come together” as our motto.

Newton Group’s customer and supplier base is mostly in the GTA and have been successful in completing projects as far away as St. John’s Newfoundland. We offer low-cost and affordable housing through our Kiwi Precast System covering residential and condominiums. The Kiwi Precast System also covers the institutional, commercial and industrial sectors. Our Kiwi CarPark System is a pre-engineered modular parking structure where the carbon footprint is half of any other competitor building structure. Our complements currently number 85 and are dedicated to bringing forth high quality design, fabricated structural steel and manufactured precast building products, as well as at the construction site since 1994 as a private enterprise.

Our fiscal year follows November 1 through to October 31.

Our supply chain is mostly in the GTA and supplies of structural steel are mostly out of the USA and often through Canadian subsidiaries. Some Canadian suppliers may have sources outside internationally such as Turkey and China in specialized steel and directly with Germany and Italy in automated process equipment.

### **RISK MITIGATION VIA CODES, STANDARDS, REGULATION COMPLIANCE, ASSOCIATIONS AND CERTIFICATIONS**

Newton Group operates under and is strictly guided by adherence to several codes, standards, regulations which is a major part of risk management while also mitigating risks through its associations and certifications.

- OGCA - Distinguished Achievement in Safety – Zero Injury Frequency

- Certificate of Authorization, Professional Engineers of Ontario
- (CPCQA) - Canadian Precast Concrete Quality Assurance Program: Certificate
- (ECRA) Electrical Contract Registration Agency of Electrical Safety: Licensed Electrical Contractor
- CSA Standard A23.4 including Appendices A and B / PCI Quality Control Manuals MNL116/MNL117
- (CWB W47.1) Canadian Welding Bureau – Certification of Companies for Fusion Welding of Steel
- NFPA 13 Sprinkler Testing (Completed in Factory)
- (ECRA) Electrical Contract Registration Agency of Electrical Safety: Licensed Electrical Contractor
- Integrated Electrical: Tested in accordance with the Ontario Building Code and CSA C22.1:21
- Integrated Plumbing: Tested in accordance with the Ontario Building Code 332/12. Static Water Test, Air Test, In-service Test
- WSIB CAD-7 Organization Summary Statement with Hiring minimum age of 16 as per OHS
- COR Certified

(OGCA) Ontario General Contractors Association – Member

- <https://ogca.ca/>
- (GVCA) Grand Valley Construction Association – Member
- <https://www.gvca.org/en/index.aspx>
- (IHSA) Infrastructure Health and Safety Association – Member
- <http://www.ihsa.ca/>
- Passive House Canada – Member
- <https://www.passivehousecanada.com/>
- League of Champions – Member
- <https://www.theleagueofchampions.com/home.html>
- (CPA) Canadian Parking Association – Member
- <https://canadianparking.ca/>

Newton Group utilizes robotics and automation with updated upskill training of its workforce while providing a safe working environment, competitive compensation, growth opportunities and the ability to contribute to all facets.

Supply chain risks are reduced by investments in automated equipment to complete parts in our manufacturing facility and relying less on suppliers and supply interruptions increasing our ability to control our production and increase a trained and skilled workforce.

These measures stated above mitigate the risks of forced labour and/or child labour.

Further review of Bill S-211 will assist in the training and assessment of assurance that any risks are fully negated followed by written policies and procedure as per Newton Group's "Inclusive

Hiring Practices” promulgated in 2019 shown below.

NEWTON GROUP LTD.	
	Revision:
Subject: <b>Inclusive Hiring Practices</b>	Approved by: Edwin (Ed) Newton, President
Policy Date: July 5, 2019	Latest Revision:
HR Rep: Wesley Thomson	Page: 1 of 5

**PURPOSE:**

Newton Group Ltd. Is committed to creating and providing a diverse work environment which include inclusive hiring practices. It is every candidate’s right to be evaluated on merit, experience and skillset.

Newton Group Ltd. is committed to providing a culture of “friendly to diversity”. The company has created a culture and an environment that is safe and friendly for all people. The intent of these guidelines is to help the firm take positive steps to be prepared and diminish the likelihood of non-inclusive hiring practices.

**SCOPE:**

This policy and these procedures apply to all personnel within Newton Group Ltd. and Kiwi Constructors Ltd. who are in a hiring capacity and who are expected to uphold and follow this policy while working together to promote a healthy working environment

**DEFINITION:**

*Equity:* the guarantee of fair treatment, access, opportunity, advancement and career development for all, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups. Newton Group Ltd. acknowledges that there are historically underserved and underrepresented populations and that fairness regarding these unbalanced conditions is needed to assist in the effective provision of equal opportunities for all groups at Newton Group.

*Inclusion:* the act of creating environments in which any individual or group can be and feel welcomed, respected, supported, and valued. An inclusive and welcoming climate embraces differences and offers respect in words and actions so that all people can fully participate in the firm’s opportunities.

*Diversity:* Diversity refers to human qualities that are different from our own and those of groups to which we belong; but that are manifested in other individuals and groups. Dimensions of diversity include but are not limited to: age, ethnicity, gender, physical abilities/qualities, race, sexual orientation, educational background, geographic location, income, marital status, military experience, parental status, religious beliefs, work experience, and job classification.

#### PROCEDURES:

Newton Group Ltd. has ensured that our organization has current definitions for inclusion and diversity. The definitions address the needs of as many groups as possible including individuals who represent global, cultural and religious diversity. Hiring personnel are positioned to ensure that these definitions are kept at the forefront of their minds as they look for candidates to fill open positions when advised of hiring requirements.

- Ensure corporate media and web pages represent Newton Group's commitment to diversity
- Prioritize skills during the hiring process
- Using data and facts evaluate all candidates the same way
- Search for candidates in overlooked places
- Evaluate hiring practices that could result in biased decision-making

#### RECRUITING BEST PRACTICES

These best practices have been collected from academic sources, interviews with hiring professionals as well as best practices from other recruiting toolkits and internet resources.

#### ADVERTISING FOR DIVERSITY

- Advertise with professional organizations
- Ask professional organizations for names of potential candidates
- Include affirmative action policy or statement in advertisements, career page and websites.

#### TARGET RECRUITMENT ACTIVITIES TO UNDERREPRESENTED POPULATIONS

- Human Resources will discuss hiring goals with senior management and obtain the profile from the department and will determine any affirmative action goals
- Include the ways in which the work would help underrepresented populations in all messages
- Provide opportunities for potential candidates to get a sense of the diversity in the workplace or broader community (such as a plant tour or attendance at an event)
- Personalize recruitment; call applicants and follow up.
- Reach out and find candidates directly
- Use the internet and social media tools like LinkedIn to find competitive candidates.
- Recruit continuously—not only when there are openings
- Maintain professional networks and make note of potential candidates from underrepresented groups
- When possible, build and develop relationships with potential candidates, keeping them in mind for future openings
- Maintain a file of resumes and contact information for potential candidates from underrepresented groups

#### ON-THE-JOB MENTORSHIPS AND CAREER LADDERS

- Increase (and publicize) ability for advancement for any good working candidate inclusive of all
- Provide information on training and mentorship opportunities.
- Create career development and mentorship opportunities within the organization.

DEMONSTRATING AN ORGANIZATIONAL COMMITMENT TO DIVERSITY

- Make Newton Group's commitment to diversity public
- Integrate elements of diversity, equity, and inclusion into management and employee performance reviews and professional development plans
- Enforce accountability among staff and departments to demonstrate a commitment to providing a high-quality level of care to all

COMMUNICATION:

- This Policy to be posted in a conspicuous place at all workplaces
- All staff to be formally made aware of Newton Group Ltd.'s Inclusive Hiring Policy via payroll correspondence, company email, at new employee orientation and/or at the yearly review of this policy

TRAINING:

We have:

- Processes to ensure our job descriptions are clear and free of bias
- Procedures to ensure bias free interviewing and selection

EVALUATION:

When assessing whether an applicant:

- Demonstrate awareness of generational differences in work styles
- Infuse equity, inclusion and diversity concepts in response to questions not directly prompting for
- Use inclusive language.
- Appear comfortable discussing issues related to EID
- Indicate experience, commitment, and/or willingness to promote issues related to EID at Newton Group Ltd.
- Demonstrate recognition that diversity is threaded through every aspect of management's core competency for inclusiveness:
  - Show respect for people and their differences; promotes fairness and equity.
  - Engage the talents, experiences, and capabilities of others
  - Foster a sense of belonging; works to understand the perspectives of others.

An evaluation and review of this procedure will be done on an annual basis by senior management in cooperation with Human Resources. Internal data relating to employee demographics and segments will be collected and resources that are needed to make changes and bridge any gaps will be addressed.

FORMS:

NG.corporate-tracker.001

Hiring Tracker



ATTESTATION

In accordance with the requirements of the Act, and in particular S-11, it is attested that the information has been reviewed, and the information contained in the report is for the entity described. Based on the knowledge and having exercised reasonable diligence, it is with this attestation that the information provided is accurate and complete in all material aspects for the purposes of the Act in the current fiscal year of Newton Group.

Signed by:

A handwritten signature in black ink, appearing to read 'Edwin H. Newton', is written over a horizontal line.

Edwin H. Newton  
President and CEO  
Newton Group Ltd.

May 30, 2024

*This Policy applies to Kiwi Management Consultants Ltd., Kaipikari Holdings Ltd. and all subsidiaries which include; Newton Group Ltd., Kiwi Constructors Ltd., 2065584 Ontario Ltd., 1000142247 Ontario Inc. and Kiwi Newton Construction LLC.*