

Steeper Group modern slavery and human trafficking annual statement 2019

What is modern slavery?

Modern slavery is an international crime that includes human trafficking and forcing vulnerable people to work against their will. The Modern Slavery Act 2015 requires companies supplying goods or services with a turnover of £36 million or more to publish an annual 'Slavery and Human Trafficking Statement'. This statement sets out the steps Steeper Group has taken to ensure that slavery or human trafficking is not taking place in our business.

The Steeper Group includes Steeper Group Holdings Limited, Steeper Holdings Limited, RSL Steeper Group Limited, RSL Steeper Trustees Limited, Steeper Rehabilitation Limited, Meditech Group Limited, Rehabilitation Services Limited, Meditech IT Limited, Insearch Limited, and Hugh Steeper Limited.

Our statement

Steeper Group designs, manufactures, distributes, supplies, fits, and repairs orthotic, prosthetic, and assistive technology products and associated consumables. We employ over 420 employees in the UK and USA and have customers and suppliers worldwide. The turnover of the Group for the year ending 28 February 2019 was £36.8m.

Steeper Group complies with all applicable laws, rules and regulations when conducting its business. This applies to all persons employed by or affiliated with the Group. We adopt procedures that are in line with our values, and we expect all organisations we work with, including our supply chain, to adhere to our ethical standards and to enforce policies that comply with all relevant legislation. Integrity (being honest and having strong moral principles) is one of our core business values.

Our employees

We have robust recruitment processes in place that comply with both UK and international employment laws. We verify all Group employees are not only eligible to work in their respective countries and regions but also within their stated profession. In the UK we take this step further to ensure that, within our clinical services business, we also adhere to the NHS employment checks as governed by our NHS partners.

Our employment policies are fair, ethical, and non-discriminatory and we follow this principle when remunerating all our employees. During the past 12 months we have performed an audit of all Group employees to confirm they are eligible to work within their region of employment, and we have reviewed all wages to ensure that everyone is rewarded with an appropriate benefits package and in compliance with the National Minimum Wage and National Living Wage.

To prevent the possibility of modern slavery occurring within our Group, our supply chain managers and HR professionals are required to complete training on recognising modern slavery. In addition, information on modern slavery is included in our corporate induction programme, which enables us to ensure that employees at all levels have an understanding of their responsibilities under the Modern Slavery Act 2015, including their duty to raise any concerns to any member of the Board without fear of recrimination. Additional training is being rolled out to senior management in November 2019 to make them aware of the warning signs of modern slavery.

The Group's Governance Committee oversees all compliance activities, including compliance with the Modern Slavery Act 2015, and a whistleblowing hotline is in place to enable employees to raise any concerns directly with the Committee.

The Group has preferred agencies in place for providing temporary workers, and an audit of agency Modern Slavery statements is currently underway to ensure they meet our ethical standards. As part of this we will be updating our temporary agency agreements, with a view to including explicit confirmation that the agencies we work with are compliant with the Act. This exercise is due to be completed by the end of December 2019. As part of this we will be obtaining assurance that they perform the appropriate

checks to ensure all temporary workers have the necessary documents confirming their right to work, and perform background checks to assure themselves the workers they are providing do not display any indicators of being a victim of modern slavery.

In addition, we will be rolling out a communications programme at the end of 2019, in a number of languages, that will provide information to all staff and visitors to our sites about the process for reporting concerns relating to modern slavery.

Our supply chain

The Group's supply chains are located in both the UK and overseas. We have taken steps to map our supply chain and have identified that over 98% of our suppliers are based in the lowest risk countries (as defined by the Global Slavery Index).

We have identified that there is a greater risk where we are working with companies who are based outside of this low risk group. As part of our procurement process, we therefore consider the country of origin of our products and raw materials, and strive to engage only with suppliers and contractors who respect human rights in the supply chain. Through analysis of our supply chain, we have identified our highest risk vendors are located in India, China, Hong Kong, Taiwan, and the Dominican Republic. Although these account for less than 1% of total spend, they are carefully reviewed to ensure they comply with our ethical standards.

The nature of our operating environment means that the majority of our business is conducted with SMEs who fall below the £36m turnover threshold; we estimate only 3% of our supply base fall above the threshold. However, we continue to work with all our suppliers to ensure that they are familiar with and adhering to the requirements of the Modern Slavery Act.

To this end Steeper Group has a standard supplier agreement in place for all of our suppliers, requiring them to comply with all UK statutory regulations and explicitly stating that we require all of our suppliers to comply with the Modern Slavery Act 2015. This also incorporates a right to audit all of our suppliers to ensure transparency within our supply chain. The agreement has been issued to our current supply base, and is provided to all new suppliers as part of our Supplier Approval process. Through this process, prospective suppliers are required to complete a detailed questionnaire which covers the requirements for due diligence procedures in their own supply chains to mitigate the risks of human rights violations including Modern Slavery. This includes requirements for training of the supplier's employees on the fundamentals of the Modern Slavery Act 2015 and the supplier's ability to produce a Modern Slavery statement of steps and measures taken if requested.

Performance indicators are also in place with all of our main suppliers. These include delivery and quality performance and are used to determine requirements for audits or on-site visits.

Declaration

This statement has been made in accordance with Section 54 of the Modern Slavery Act 2015 for the year ending 28 February 2019 and was approved by the Board of Directors on 27 November 2019.



Paul Steeper

CEO, Steeper Group Holdings Ltd

27 November 2019