

Steeper Group modern slavery and human trafficking annual statement 2018

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 440 employees in the UK and USA and have customers and suppliers worldwide. The turnover of the Group for the period ending 28 February 2018 was £40.1m.

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. Openness and honesty is encouraged in line with our business and people 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 respected 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 that they are rewarded with an appropriate benefits package.

To prevent the possibility of modern slavery occurring within our Group, information has been provided to all relevant Steeper Group employees to ensure they are aware of the Modern Slavery Act 2015 and its requirements. We have embarked on a training programme which ensures employees at all levels have an understanding on their roles and responsibilities under the Act, including their duty to raise any concerns to any member of the Board without fear of recrimination. In addition, we have included training on modern slavery in our corporate induction programme.

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.

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 Small or Medium Enterprises (SMEs) who fall below the £36m turnover threshold which would require them to issue an official Modern Slavery statement. We estimate only 3% of our supply base fall above the threshold. 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 introduced a standard supplier agreement 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 new agreement has been issued to our current supply base, and will be provided to 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 2018 and was approved by the Board of Directors on 21 November 2018.



Paul Steeper

CEO, Steeper Group Holdings Ltd

21 November 2018