

# Modern Slavery Act Policy Statement 2024/25

## Organisational structure and supply chains

- 1.1 Steer provides commercial, economic, technical and planning professional services in relation to cities, infrastructure and transport. We have a global operation comprising offices in Europe, North America, Latin America and Asia. Steer is owned in trust for its employees. This trust structure, which is part of our constitution, explicitly requires the Company, its Board and all employees to meet high ethical standards, our Mission and Principles, in all aspects of their business activities and interactions with society.
- 1.1 In relation to the UK Modern Slavery Act 2015, the Trust requires us to:
- respect both the letter and spirit of law;
  - uphold high standards of care, diligence, objectivity, accuracy in all our work and business relationships;
  - conduct business relationships with honesty, respect and integrity;
  - support and contribute positively to the communities and local environment in which we work; and
  - to publish each year to the Company a report compiled by the independent trustee that demonstrates the extent of our compliance.
- 1.2 It is within this framework that our commitment to ensuring there is no slavery or human trafficking within our business or supply chain is vested and it is through the operation of our corporate governance processes and ISO certified business procedures that we enact and operationalise this commitment.
- 1.3 We recognise our responsibility to identify and address potential or actual human rights impacts linked to the products and services we procure. Our approved suppliers process requests that our suppliers<sup>1</sup> confirm they do not commit any of the offences included in the UK Modern Slavery Act 2015 and for their modern slavery statement to be provided, where applicable.
- 1.4 We apply the principles of the UK Modern Slavery Act 2015 to our operations globally.

## Organisational policies

- 1.5 We are committed to ensuring there is no slavery or human trafficking in our business and operate a zero-tolerance approach with respect to our supply chain. This is reflected in all relevant policies within Steer and is considered as part of our policy development.

### Whistleblowing and Reporting

- 1.6 We operate and publish, via our Company intranet, a Whistleblowing Policy that provides all employees with multiple means of raising concerns on all issues, including in relation to

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<sup>1</sup> Suppliers refers to our suppliers, subcontractors and third-party service providers.

modern slavery and human trafficking. This policy also allows staff to contact independent Non-Executive Directors, a Staff Forum member or a Trustee.

## **Complementary Policies**

1.7 Supporting our zero-tolerance approach to modern slavery and human trafficking are:

- Our commitment to paying living wage and our requirement for suppliers to do likewise.
- Our Environmental Policy (certified to ISO 14001) and our Net Zero Policy form the foundation of how we intend to manage and monitor our environmental impact. Recognising that the climate emergency has a direct impact on forced migration, these policies make a clear commitment to working with employees, clients and supply partners to address climate change. which addresses how in accordance with continually improve
- Our Equality, Diversity and Inclusion Policy, which encourages all our people to value diversity and respect each person's individuality, and to ensure that no employee, agency worker, sub-contractor, job applicant or ex-employee, client or third party receives less favourable treatment based on their personal characteristics whether protected under law or not. We are awarded gold standard by the Employers Network for Equality and Inclusion.
- Our Anti-Bribery and Corruption Policy which sets out the Company's rules and what is expected of all our employees. We require the same standard of conduct from the company's suppliers in all dealings on our behalf.
- Our Health and Safety Policy (certified to ISO 45001) which outlines our commitment to addressing the health and wellbeing of our employees. We provide access to support including free and confidential advice and assistance on matters which include work related or personal concerns for employees and their families through our global Employee Assistance Programme, provided by independent suppliers.
- Our Risk Management policy which ensures robust risk management activities are regularly carried out, including the development and implementation of appropriate mitigations and monitoring arrangements for all business risks, allocation of risk owner(s) and ongoing reporting requirements.
- Our Social Value policy ensures we consider the United Nations Sustainable Development Goals. We do this through our services and the ways we provide them to our clients, and by supporting and facilitating our company and employees to engage with, and help enhance, the communities within which they live and work. We will identify and deliver our Social Value commitments through our operations, activities and in the decisions that we make.

## **Supplier Management and Compliance**

1.8 Suppliers to Steer are vetted and subject to approval before we conduct business with them. This approvals process considers the business activities of the potential supplier and their policies in respect of modern slavery and human trafficking. We require our suppliers to demonstrate compliance with our policies and relevant legislation relating to modern slavery and human trafficking.

1.9 Steer has a Responsible Procurement and Supply Chain policy which applies globally. In the UK, Steer has supplier engagement processes and explicitly ask suppliers to sign our 'Code of Conduct'. The Code states that Steer seeks to ensure the working conditions of our supply partners meet the standards of the Universal Declaration of Human Rights (UDHR). We expect

our supply partners to adopt and demonstrate adherence to the UK Modern Slavery Act 2015 in our UK operations or to the principles of the legislation outside of the UK.

- 1.10 We continue to move towards full implementation of our supplier processes across all our offices. The next stage of this is to review implementation of an onboarding tool which will enable a professional searchable online tool to gather and store supplier information and documentation, manage supplier approval and risk and improve internal efficiency. Following on, information and data about our suppliers should be more easily retrieved and monitored.

## **Due diligence**

- 1.11 Our employees are at the centre of our business, not only in delivering work to our clients but as key stakeholders as well. We have a number of processes and programmes in place which support a safe, fair and inclusive working environment and seeks to support wellbeing and learning for everyone.
- 1.12 Steer's reputation is based on the proven ability to deliver high quality consultancy services that are valued by our clients. To ensure we achieve this objective, and to continually improve, we operate in accordance with our ISO 9001:2015 certified Quality Management System (QMS). The QMS provides the framework in which we operate, and it is designed to deliver high quality work to clients, develop and inform our employees, manage risk and facilitate continuous improvement. Its correct application ensures we meet contractual requirements and comply with relevant policies, procedures and legislation.

## **Risk assessment**

- 1.13 On an annual basis, the Board and Executive consider and assess risks, including modern slavery, in relation to Steer's stakeholders. Risks are prioritised and form part of the Company risk register.
- 1.14 We continue to carry out specific modern slavery risk assessments as part of our risk management process. Latest findings show that all our suppliers are low risk in terms of modern slavery being in their organisation or supply chain. However, this assessment will take place on an annual basis. There is no change to this current position.
- 1.15 We will continue to review relevant policies and procedures and will continuously improve how risks can be better investigated, remediated and mitigated.

## **Performance indicators**

- 1.16 As part of our annual Company Plan, we set a number of objectives to support our zero-tolerance approach to modern slavery. These include ensuring that;
- all staff work in a manner consistent with the behaviours and values contained within our Mission and Principles;
  - the Executive provides clear vision and leadership; and
  - 100% of staff complete training according to our policies. This includes Modern Slavery Awareness training.
- 1.17 These objectives are reflected throughout the Company at business unit and individual responsibility levels.

- 1.18 We foster a culture of openness and transparency, which is demonstrated in our Mission and Principles. Our adherence to the Mission and Principles are assessed each year by our Trustees.

## Training and awareness

- 1.19 Delivery of our modern slavery policy is dependent on our employees having a good understanding of the issues, the legislative requirements of our business and of our approach to risk identification and management.
- 1.20 All employees receive training in relation to modern slavery and human trafficking so that they are aware of the legislation, high risk sectors and the Company's zero tolerance approach to modern slavery and human trafficking. They also receive training on our Business Procedures. This is included as part of our induction and compliance training and is accessible to all employees throughout the year via our online learning hub.
- 1.21 Where applicable this training is further embedded in related training, for example, recruitment and procurement.

## Summary of actions

- 1.22 In 2024/25 we:
- continued to assess the risks of modern slavery in our supply chain;
  - continued our awareness training for those in the Company that procure suppliers in areas, industries, geographies that we have identified as having a higher risk of modern slavery; and
  - Embed the Social Value policy and commitments which are set out and measured.
- 1.23 In 2025/26 we are committed to:
- refresh specific procurement training for those who engage with suppliers; and
  - implementing our revised approved supplier process and Responsible Procurement Policy across all our regions.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 March 2025.**

**Signed:**



**Sharon Daly**  
**Chief Operating Officer**  
**Steer Group Ltd**  
**Date: 31 March 2025**