

May 2021

Responsible Procurement and Supply Chain Policy

Statement of Principles

- 1.1 Steer seeks excellence in every aspect of our business. Our objective is to procure goods and services that meet our commercial, legal and functional requirements whilst minimising negative and enhancing positive impacts on the environment and society by incorporating quality, social, environmental and ethical considerations into purchasing decisions. To this end, we have developed this Statement of Principles which seeks to ensure that our supply partners act in a manner consistent with our own values and behaviours and delivers the high standards of quality, social responsibility, safety and value for money that our clients and industry partners expect.

Governance and Oversight

- 1.2 In support of this Statement of Principles, Steer:
- Assigns responsibility for our Responsible Procurement and Supply Chain Policy (“the Policy”) and this Statement of Principles (“the Statement”) to named responsible roles and provides Executive oversight of both.
 - Allocates funds for the effective direction and implementation of the Policy and Statement.
 - Measures and monitors the application of the Policy and Statement with particular emphasis on encouraging continuous improvement.
 - Reviews and revises the Policy and Statement on an annual basis.
 - Ensures individuals undertaking procurement in the business are aware and using the Policy and Statement in their procurement activities.
 - Bases our selection of supply partners on objective and transparent criteria that include the consideration of commercial and functional requirements, environmental, social and ethical performance.
 - Ensures that purchases are undertaken in line with agreed procedures, utilising approved supply partners which are listed on the Approved Supplier List, where this process is used.
 - Ensures that any employees of supply partners working on our premises are treated with the same respect for diversity and workplace safety as our own employees.
 - Seeks to use our commercial influence where we believe improvements can be made in the performance of our supply partners.
 - Uses a risk and value-based approach to ensure we focus on those areas where the risk is greatest and maximum impact can be achieved.
- 1.3 This Statement of Principles is reviewed and updated on an annual basis.

Compliance

- 1.4 Our supply partners must comply with all national, local and other applicable laws and regulations. Where there is conflict between these and the Statement, the highest standards of those national, local and other applicable laws and regulations shall be applied. Steer requires our supply partners to actively inform us of any non-compliance issues and we will cease trading with that entity as soon as is practicable. Where compliance is maintained, but it is considered that a supply partner’s conduct is not in accordance with this Statement, we will engage and encourage continuous improvement in

their performance or implement remedial plans. Steer would cease trading with supply partners showing persistent disregard of these principles.

Principles

1.5 There are four main areas of principles:

- Quality
- Safety
- Sustainability
- Commercial

Quality Principles

1.6 Steer's reputation is built upon the quality of the advice and support we provide to our clients. We aim for each and every assignment to deliver the very best Steer has to offer. Our Quality Management System is certified to ISO9001:2015 and is designed to help us achieve these aims in a cost-effective manner.

1.7 Where supply partners are accredited to ISO9001:2015, Steer validates and monitors this accreditation through our Approved Supplier Process. Steer expects supply partners to evidence their certification and for supply partners to advise us on any changes affecting their certification as soon as they are known. Supply partners may be asked to re-affirm compliance periodically.

1.8 Where supply partners are not accredited to ISO9001:2015, supply partners should be able to demonstrate:

- Documented policies regarding quality management.
- The ability to monitor and review performance quality.
- The degree to which operations are covered by recognised quality management systems or the organisations intentions towards such accreditation.
- The awareness of potential quality risks inherent in their production, service or sourcing activities and the implementation of processes to mitigate or minimise potential quality risks.
- A commitment to continuous improvement to enhance the quality of products and services and that the supply partner actively looks for ways to enhance their business.

Safety Principles

1.9 Steer is committed to prioritising Health and Safety in all our activities. Effective Health and Safety Management is an integral part of our employee-ownership culture and represents a key element in all of our business objectives.

1.10 Where supply partners are accredited to ISO45001:2018 Steer validates and monitors this accreditation through our Approved Supplier Process. Steer expects supply partners to evidence their certification and that supply partners advise us on any changes affecting their certification as soon as they are known. Supply partners may be asked to re-affirm compliance periodically.

1.11 Where supply partners are not accredited to ISO45001:2015, supply partners should be able to demonstrate:

- Documented policies regarding health and safety management.
- The ability to monitor and review health and safety performance.
- The awareness of potential risks to the health of safety of their employees or others affected by their services or activities.
- The implementation of systems to mitigate or minimise potential health and safety risks.

1.12 Supply partner employees working on Steer premises are treated with the same respect for diversity and workplace safety as our own employees.

Sustainability Principles

1.13 Steer is a member of the United Nations Global Compact (www.unglobalcompact.org) and we are committed to its principles of working towards the vision of a more sustainable and inclusive global economy. The Compact informs our [Supplier Code of Conduct](#) and this Statement.

1.14 Steer expects that all our supply partners adhere to the principles set out below.

- Supply partners are expected to have management systems in place for delivering alignment with this Statement in their own operations and those of their suppliers. Where supply partners are small and medium-sized enterprises (SMEs) or sole traders, we expect adherence to our Supplier Code of Conduct.
- Supply partners are expected to communicate their expectations for compliance on all the issues raised within this Statement to all relevant employees and suppliers.
- Supply partners should provide evidence to enable assessment of the implementation of this Statement by Steer, those acting on their behalf and other relevant independent third parties or their suppliers.
- Supply partners should demonstrate continuous improvement in their approach to sustainable and responsible purchasing.

Social

1.15 Steer seeks to ensure that the working conditions of our supply partners meet the standards of the Universal Declaration of Human Rights. We expect our supply partners to adopt and demonstrate the following standards:

- Labour: Combatting slavery and human trafficking in our operations and across our supply chains. Adherence to the UK Modern Slavery Act 2015 where applicable or otherwise to the principles of the legislation.
- Health and Safety: All employees should expect to work in an environment that is safe and healthy. Adequate steps should be taken to prevent accidents occurring. Employees should receive suitable health and safety training and have access to clean facilities and drinking water.
- Discipline: Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable. Disciplinary and grievance procedures must be clearly documented and communicated to all employees. All disciplinary measures of a serious nature shall be recorded.
- Freedom of Association and Employee Representation: Employees have the right to form and join organisations of their own choosing without prior authorisation.
- Working Hours: Working hours should not be excessive and must comply with national laws.
- Equality, Diversity and Inclusivity: Supply partners must seek to eliminate discrimination in access to employment, training and working conditions, on grounds of ethnicity, gender, age, religion, national extraction, sexual orientation, disability or social origin and promote equality, diversity and inclusivity of opportunity and treatment.
- Employment: Wages and benefits must meet national standards and, where identified for specific geographies, should be at least the minimum living wage. All employees should be provided with simple, written contracts which detail the terms and conditions of their employment. Work performed should be on the basis of recognised employment law and practice.
- Local Economy: Supply partners should support the use of local workforces and SMEs where practically possible.
- Community impact: Supply partners are encouraged to support the communities in which they operate through appropriate community initiatives.

Environmental

1.16 We seek to ensure that appropriate consideration is given to environmental issues when Steer purchases products and services. In all cases supply partners should be able to demonstrate

environmental policies and management systems sufficient to ensure continuous improvement in environmental performance.

- 1.17 Where supply partners are accredited to ISO14001:2015 Steer validates and monitors this accreditation through our Approved Supplier Process. Steer expects supply partners to evidence their certification and that supply partners advise us on any changes affecting their certification as soon as they are known. Supply partners may be asked to re-affirm compliance periodically.
- 1.18 Where supply partners are not accredited to ISO14001:2015, supply partners should be able to demonstrate:
- Documented policies regarding environmental management.
 - The ability to monitor and review environmental performance.
 - The degree to which operations are covered by recognised environmental management systems or the organisations intentions towards such accreditation.
 - Awareness of environmental risks inherent in their production, service or sourcing activities and the implementation of processes to mitigate or minimise potential environmental risks.
 - The degree to which products and services have been designed with environmental considerations in mind. Supply partners should seek to:
 - Minimise the use of energy, water and raw materials where practical.
 - Maximise the use of recyclable and renewable materials including energy where possible.
 - Make practical efforts to minimise waste and dispose in an environmentally responsible way.
 - Avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits.
 - The degree to which products and services can be sourced locally thereby reducing freight or travel mileage.
 - That they are working towards carbon neutral / Net Zero carbon.

Ethical

- 1.19 Steer has clear arrangements to promote and encourage compliance with laws and ethical standards and requires this of our supply partners. We expect all supply partners to comply with the law, and act with integrity, constantly striving to uphold the highest standards of ethical practice.
- 1.20 Supply partners must be able to demonstrate the existence of processes and procedures to implement appropriate staff guidelines and codes of conduct. Supply partners must ensure that management systems and practices are in place to ensure the prevention of:
- Money Laundering.
 - Insider Trading.
 - Conflicts of Interest.
 - Fraud, Bribery, Corruption and other improper Payments or Gifts, and Tax evasion.
 - Unauthorised access to personal and business information.
- 1.21 Supply partners must have a policy and process for reporting of workplace concerns. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation.
- 1.22 Supply partners must have their own prevention procedures in respect of Tax Evasion.
- 1.23 Steer respects the privacy and confidentiality of information relating or belonging to its clients, its partners and employees and others with whom we do business. Steer protects personal and other confidential information in all forms. Steer is committed to protecting information entrusted to us, as well as physical and IT assets, through the development and implementation of our data, information and security policies and controls.

1.24 Steer requires our supply partners to:

- Comply with the UK Data Protection Act 2018 or local equivalent data protection laws.
- Process personal data, Steer data, Client data and confidential data securely by means of implementing appropriate technical and organisational measures to ensure a level of security appropriate to the risk.
- Suppliers who access Steer's network must comply with Steer's Global Data Security and Acceptable Use Policy.

Commercial Principles

1.25 Steer requires our supply partners too:

- Use contractual terms and conditions that support this Statement.
- Take responsibility to ensure payment terms and other terms and conditions are fulfilled.
- Facilitate our review of their performance, and anyone acting on their behalf, in order to ensure compliance with this Statement.
- Provide value for money goods and services meeting our specified time, cost and quality.

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Policy Statement

Steer seeks excellence in every aspect of our business. Our aim is to procure goods and services that meet our commercial, legal and functional requirements whilst minimising negative and enhancing positive impacts on the environment and society by incorporating quality, social, environmental and ethical considerations into purchasing decisions.

Our Responsible Procurement and Supply Chain Statement of Principles seeks to ensure that we and our supply partners act in a manner consistent with our values and behaviours and delivers the high standards of quality, safety and value for money that our clients and stakeholders expect.

Our supply partners should meet with the requirements of the policy, and business conducted between Steer and its supply partners must be done so in full compliance with all prevailing legislation.

Steer also seeks to engage with supply partners to encourage continuous improvement in their quality, environmental, social and ethical performance.

Our Responsible Procurement and Supply Chain Statement of Principles covers four main areas:

- **Quality:** supply partners must match our own high-quality standards in the delivery of our advice to our clients and in the management of our business.
- **Safety:** supply partners must prioritise Health and Safety in all their activities.
- **Sustainability:** Steer is a member of the United Nations Global Compact and we are committed to its principles of working towards the vision of a more sustainable and inclusive global economy. The Compact informs our Supplier Code of Conduct and our Statement of Principles. Our supply partners must demonstrate continuous improvement in their approach to sustainable and responsible purchasing across the areas of social, environmental and ethical standards.
- **Commercial:** supply partners must provide value for money goods and services meeting our specified time, cost and quality standards or criteria.

Steer measures and monitors the application of the Policy and Statement of Principles with particular emphasis on encouraging continuous improvement and we use a risk-based approach to ensure we focus on those areas where the risk is greatest and maximum impact can be achieved.

Steer ensures individuals undertaking procurement in the business are aware and using the Policy and Statement of Principles in their procurement activities and base our selection of supply partners on objective and transparent criteria that include the consideration of environmental, social and ethical performance, deploying the Statement of Principles through our Approved Supplier List process.

Steer reviews and revises our Statement of Principles on an annual basis.