

Steeper Group modern slavery and human trafficking annual statement 2024

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 understand all potential modern slavery risks related to our business and to ensure that slavery or human trafficking is not taking place in our business or supply chain.

The Steeper Group includes Ortho Dev UK Limited, Steeper Group Holdings Limited, Steeper Holdings Limited, RSL Steeper Group Limited, Steeper Rehabilitation Limited, Meditech Group Limited, and Hugh Steeper Limited. The Steeper Group's ultimate parent undertaking is Ovalie Développement 4 SAS, a member of the Eqwal Group. Eqwal are a leading player in the global prosthetics and orthotics market.

Our statement

Steeper Group designs, manufactures, distributes, supplies, fits, and repairs orthotic, prosthetic, and assistive technology products and associated consumables. We employ over 460 employees in the UK and USA and have customers and suppliers worldwide. The turnover of the Group for the seven month period ending 30 September 2023 was £27.7m.

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. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and are absolutely committed to preventing modern slavery and human trafficking in our corporate activities.

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 internal audit to confirm our employees are eligible to work within their region of employment, and we have reviewed all wages to ensure compliance with the National Minimum Wage and National Living Wage.

Our employee code of conduct makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.

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. Our modern slavery training covers what modern slavery is; how to identify the signs of slavery and human trafficking; what steps should be taken if slavery or human trafficking is suspected; and what external help is available. 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.

The Group's Governance Committee oversees all compliance activities, including compliance with the Modern Slavery Act 2015, and a whistleblowing hotline and email address 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 these agencies are required to confirm the procedures they have in place to identify workers who may be at risk of being a victim of modern slavery or human

trafficking as part of our supplier setup process. Agencies who fail to provide the information requested will not be added to the preferred agency list until we are satisfied that they have appropriate controls and procedures in place.

In addition, we have displayed posters around our sites in a number of languages that will provide information to all staff and visitors about the process for reporting concerns relating to modern slavery. These posters explain to staff what they can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation and what external help is available, for example through the Modern Slavery Helpline.

Our supply chain

The Group's supply chains are located in both the UK and overseas. We use the Global Slavery Index to assess whether or not our activities in overseas territories are high risk in relation to slavery or human trafficking and undertake due diligence when considering taking on new suppliers.

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, 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. 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 seven month period ending 30 September 2023 and was approved by the Board of Directors on 15 March 2024.



Paul Steeper

CEO, Steeper Group

15 March 2024