

# Modern Slavery Act Policy Statement 2018

## Our commitment

1. Steer is a professional services firm specialising in the provision of services in relation to infrastructure, cities and transport. We are headquartered in London and have a global operation comprising our companies 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 staff to meet high ethical standards in all aspect of their business activities and interactions with society. In particular and in relation to this Modern Slavery Act Statement 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;
  - to publish each year to the company a report compiled by the independent trustee that demonstrates the extent of our compliance.
2. It is within this framework that our commitment to ensuring that 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 accredited business procedures that we enact and operationalise this commitment.

## Our Approach

3. 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. Our approach comprises the following components, each of which is summarised in the following paragraphs:
  - Supplier management and compliance;
  - Staff training and awareness;
  - Whistle blowing and reporting; and
  - Complementary policies.

### Supplier management and compliance

4. All 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 that our suppliers to demonstrate full compliance with both our policies and relevant legislation relating to modern slavery and human trafficking.

### **Staff Training and Awareness**

5. All staff 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.

### **Whistle Blowing and Reporting**

6. We operate and publish via our staff intranet an escalation policy which provides all staff with multiple means of raising concerns on all issues including in relation to modern slavery and trafficking. This policy also allows staff to contact independent non-executive directors, a Staff Forum member or if needed, a trustee.

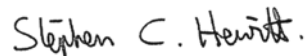
### **Complementary Policies**

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

- Our commitment to pay living wage and our requirement for suppliers to do likewise;
- Our environmental policy which requires the use of international accredited methods of production of items such as paper, energy and food and drink.

*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 2018.*

**Signed:**



Stephen C. Hewitt  
**Chief Operating Officer**  
**Steer**

**Date: 12/07/2018**