

Modern Slavery Statement

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54 (1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st March 2023.

Steer Automotive Group (the Company, "we", "us" or "our") is committed to preventing slavery and human trafficking violations in its own operations, its supply chains, and its products. We have zero tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Steer Automotive Group has business operations in the United Kingdom.

We operate in the automotive repair sector. The nature of our supply chain is as follows:

We work with a number of key direct suppliers, who provide us with goods such as parts, paint, dry goods, outsourced business processes, software, equipment and tooling.

For more information about the company please visit our website: www.steer.co.uk

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner:

These include the following:

- **Recruitment and selection policy:** we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Supplier and Business codes of conduct:** Ensure that Steer continuously considers sustainability, social responsibility, safety and compliance to all regulations and standards in all of its operations and business decisions, including those of its associated business partners.
- **Whistleblowing policy:** enables colleagues to make a report of potential slavery or human trafficking as a protected disclosure.
- **Colleague code of conduct:** sets out expectations of colleagues in respect of Steer policies and processes.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains and wider business, we have adopted the following due diligence procedures:

- Internal supplier audits
- Internal compliance audits including working processes, health & safety and
- Internal people processes that vet all new starters for ability and training to do the role they have applied for and right to work in the UK

- External and independent operations audits to maintain BS10125 standard across all repair locations
- External and independent ESG audits to maintain a high standard of ESG performance and ensure policies are all relevant and appropriate for the latest laws and governmental policy

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide protection for whistle-blowers

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking in its supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We consider that we operate in a relatively low risk environment because of:

- The predominance of low volume of high profile, global suppliers within Steer's supply chain that operate their own modern slavery statements and initiatives
- The low volume of contract and agency workers within the business
- The high barrier of skill requirement and qualifications that are vetted to repair vehicles to the highest standard
- The continuous focus on policies and initiatives that focus on our wider ESG performance, which incorporates Modern Slavery considerations

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its businesses and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every six months
- We will train our colleagues about modern slavery issues and increase awareness within the Company
- We will maintain records of right to work and training qualifications for all employees

Training colleagues

The company is implementing digital training that colleagues need to complete at induction and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.

Next steps

In the next financial year we intend to take the following steps to tackle slavery and human trafficking by:

- Internal communication campaigns
- Further development of procurement policies and frameworks.

This statement was approved by the Board of Directors on:

Date: 31/10/2023

Signed: 

Richard Steer
Chief Executive Officer