

UN Global Compact Communication on Progress

February 2022

steer



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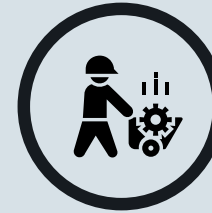
Statement of Support

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Statement of Support



I am pleased to confirm that Steer reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication by providing this report on our Company website and submitting this detail to the United Nations.

Hugh Jones, Chief Executive Officer
January 2022



Human Rights



Ensure workers are provided safe, suitable and sanitary work facilities



Protect workers from workplace harassment, including physical, verbal, sexual or psychological harassment, abuse or threats



Take measures to eliminate ingredients, designs, defects or side-effects that could harm or threaten human life and health during manufacturing, usage or disposal of products



Policies in place

UK Modern Slavery policy adopted in UK and principles applied globally
 ISO 45001 accredited (UK) and principles applied globally
 ISO14001 accredited (UK) and principles applied globally
 Responsible Procurement and Supply Chain Policy (global)
 Construction (Design and Management) (CDM) Regulations UK



Actions

Annual risk assessment of modern slavery in our business
 ISO14001 accreditation successively rolling out globally
 Full-suite of H&S policies refreshed and adopted globally
 Introduced Responsible Procurement and Supply Chain Policy and updated Approved Supplier Process and introduced revised code of conduct to ensure policy compliance through our supply chains
 Refresh of Employee Assistance Programme
 Whistleblower hotlines
 Introduction of mental health first-aiders (global)
 Refresh training Construction (Design and Management) (CDM) Regulations UK
 Review new starter induction training



Measurement

Company Balanced Scorecard measures:

- 100% employees work to the Blue Book behaviours/values and achieve Company/BU targets as well individual success
- Deliver and operating a healthy and safe environment that is free of accident - 0 accidents target.
- 100% of Local Environmental Actions Plans in operation for all Steer offices
- 100% policy compliance

Company Balanced Scorecard measures are cascaded to Senior Leadership Team and Local Business Managers, key functional roles in the organization and individual Balanced Scorecards where appropriate.

Annual EDI objective setting and measurement of all protected characteristics – see EDI Report 2021/2022.

2021: 0 HR claims, 0 policy non-compliance, 0 accidents
 100% new starter induction policy training
 100% annual employee training on H&S and CDM

Labour




Ensure that the company does not participate in any form of forced or bonded labour



Comply with minimum wage standards



Ensure that employment-related decisions are based on relevant and objective criteria

 Policies in place	 Actions	 Measurement
<p>UK Modern Slavery policy adopted in UK and principles applied globally</p> <p>Responsible Procurement and Supply Chain Policy</p> <p>Steer's suite of employment policies including Living Wage policy and London Living Wage policy</p> <p>Performance, salary and bonus policies</p> <p>Fair/equal pay policy</p> <p>Recruitment policies</p>	<p>Annual risk assessment of modern slavery in our business and development</p> <p>Introduced Responsible Procurement and Supply Chain Policy and updated Approved Supplier Process and introduced revised code of conduct to ensure policy compliance through our supply chains</p> <p>Staff Forum</p> <p>Market abuse training (partial)</p> <p>Trustees' business reviews</p> <p>Gifts and Hospitality Policy/portal</p>	<p>Company Balanced Scorecard measures:</p> <ul style="list-style-type: none"> • 100% employees work to the Blue Book behaviours/values and achieve Company/BU targets as well individual success • ≥90% % of employees state within Employee Satisfaction Survey: "I like working here" • 100% policy compliance <p>Company Balanced Scorecard measures are cascaded to Senior Leadership Team and Local Business Managers, key functional roles in the organization and individual Balanced Scorecards where appropriate.</p> <p>Annual EDI objective setting and measurement of all protected characteristics – see EDI Report 2021/2022 EDI Report 2021 1.pdf (steergroup.com)</p> <p>Global Gender Pay Gap Reporting by region Gender Pay Gap as at October 2020 (steergroup.com)</p> <p>2021: absenteeism 4%, 0 accidents</p>

Environment






Commitment to carbon neutral by 2022 and Net Zero Carbon by 2025



Ensure emergency procedures to prevent and address accidents affecting the environment and human health



Avoid environmental damage via regular maintenance of production processes and environmental protection system (air pollution control, waste, water treatment systems, etc.) . Minimize the use and ensure safe handling and storage of chemical and other dangerous substances

 Policies in place	 Actions	 Measurement
<p>ISO14001 accredited (UK) Environmental Policy Responsible Procurement and Supply Chain Policy Construction (Design and Management) (CDM) Regulations UK Introduction of Net Zero Carbon policy</p>	<p>ISO14001 accreditation successively rolling out globally Local Environmental Action Plans for every office setting local environment targets seeking to deliver year-on-year improvement in all our offices and evidence of application of waste hierarchy and responsible procurement Full-suite of H&S polices refreshed and adopted globally Introduced Responsible Procurement and Supply Chain Policy and updated Approved Supplier Process and introduced revised code of conduct to ensure policy compliance through our supply chains Refresh training Construction (Design and Management) (CDM) Regulations UK Commitment to carbon neutral by 2022 and Net Zero Carbon by 2025</p>	<p>Company Balanced Scorecard measures:</p> <ul style="list-style-type: none"> • 100% employees work to the Blue Book behaviours/values and achieve Company/BU targets as well individual success • Deliver and operating a healthy and safe environment that is free of accident - 0 accidents target. • 100% of Local Environmental Actions Plans in operation for all Steer offices • 100% application of waste hierarchy in all operations • >70% waste recycling rate • >60% of core stationery products are 'green' procurement choices (>75% recycled content or >90% recyclable) <p>Company Balanced Scorecard measures are cascaded to Senior Leadership Team and Local Business Managers, key functional roles in the organization and individual Balanced Scorecards where appropriate.</p>

Anti-Corruption






Assess the risk of corruption when doing business



Mention “anti-corruption” and/or “ethical behavior” in contracts with business partners



Ensure that internal procedures support the company’s anti-corruption commitment

 Policies in place	 Actions	 Measurement
<p>Whistleblowing policy Anti-Bribery and Corruption policy Corporate Criminal Offence of failure to prevent the facilitation of Tax Evasion policy Risk management policy</p>	<p>Implemented a new anonymous whistleblower portal Refreshed mandatory Anti-Bribery and Corruption training globally Continued quarterly risk and compliance reporting to the Steer Board</p>	<p>Company Balanced Scorecard measures:</p> <ul style="list-style-type: none"> • 100% employees work to the Blue Book behaviours/values and achieve Company/BU targets as well individual success • 100% policy compliance <p>Company Balanced Scorecard measures are cascaded to Senior Leadership Team and Local Business Managers, key functional roles in the organization and individual Balanced Scorecards where appropriate.</p> <p>2021 - 0 non-compliance incidents 100% annual employee training on Anti-Bribery and Corruption</p>



Complex questions.
Powerful answers.

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