



Anti-Bribery and Corruption Policy

1. Statement of Policy

Steps is committed to conducting all of its business in an honest and ethical manner. Our ethos is based on integrity and transparency. To this end, we act fairly, openly and ethically with all our stakeholders and take a zero-tolerance approach towards bribery and corruption in accordance with the Bribery Act 2010. We recognise the need to monitor this and have therefore put effective systems in place to prevent bribery and corruption and review these systems regularly.

2. Scope

This policy applies to all Steps employees, associates, consultants, business partners and contractors who work for and on behalf of Steps and its subsidiaries in any capacity.

3. What is Bribery & Corruption?

A bribe is a financial or other advantage promised, offered or given to anyone to persuade them to or reward them for performing their duties improperly or to any public official with the intention of influencing the official in the performance of his duties.

Corruption is the misuse of entrusted power for private gain.

4. Appropriate Gifts and Hospitality

This policy does not prevent normal and appropriate hospitality (given and received) to or from third parties.

5. Implementation

The Operations Director is specifically responsible for the effective implementation of this policy. Each director and manager also ensures that within their areas of responsibility, the standards established within this policy are followed. We expect all our employees to abide by the policy to help create an ethical environment. All employees, associates and other stakeholders must not:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received

- accept payment from a third party with the expectation that it will create a business advantage for them
- accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Steps in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity that might lead to a breach of this policy

To implement this policy Steps will:

- Communicate the policy to employees and relevant others
- Ensure Anti-Bribery and Corruption training is part of Steps induction process
- Encourage employees and other stakeholders to raise concerns about any issue or suspicion of malpractice at the earliest possible stage
- Obtain commitments from other parties we deal with confirming that they will comply with the policy in their dealings with our organisation.

6. Record Keeping

Steps will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. No accounts will be kept off-record to facilitate or conceal improper payments.

7. Monitoring & Review of Action Plan

We will review the effectiveness of the policy and all related action plans at least annually and establish appropriate information and monitoring systems to assist its effective implementation. Monitoring anti-bribery and corruption is incorporated into Steps' critical success factors which are reviewed on a monthly basis by the management board.