

Global Anti-Bribery and Corruption Policy

Policy Statement

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. We recognise the need to monitor this and have therefore put systems in place to prevent bribery and corruption and review these systems regularly.

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.

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/hers duties.

Corruption is the misuse of entrusted power for private gain.

Appropriate Gifts and Hospitality

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

Implementation

The Global Operations Director is specifically responsible for the effective implementation of this policy and that 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
- Provide relevant anti-bribery and corruption training to employees and relevant others where we feel their knowledge of how to comply with the relevant bribery legislation needs to be enhanced

- 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.

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.

Review and Monitoring

The Global Operations Director will review the effectiveness, suitability and adequacy of this policy on a regular basis. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice. Any need for improvements will be applied as soon as possible.

Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Global Operations Director.