

Steptoe International (UK) LLP
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Recognised body
635838

[Agreement Date: 24 June 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 24 June 2025

Published date: 24 June 2025

Firm details

No detail provided:

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Steptoe International (UK) LLP (the firm), a recognised body, agrees to the following outcome to the investigation of its conduct by the Solicitors Regulation Authority (SRA):

- a. it is rebuked
- b. to the publication of this agreement
- c. it will pay the costs of the investigation of £600.

2. Summary of Facts

2.1 We carried out an investigation following a self-report by the firm.

2.2 Our investigation identified areas of concern in relation to the firm's compliance with The Russia (Sanctions) (EU Exit) Regulations 2019 (the Russia Regulations) and the SRA Code of Conduct for Firms 2019.

2.3 Regulation 67(2) of The Russia Regulations states that a 'person who purports to act under the authority of a Treasury licence but who fails to comply with any condition of the licence commits an offence.'

2.4 The firm's self-report and subsequent correspondence set out multiple breaches of Treasury licence conditions in respect of two clients, in breach of Regulation 67(2) of The Russia Regulations.

2.5 While appropriate licences had been obtained in respect of these matters and the firm had policies and processes in place, the firm failed to comply with all conditions of the relevant licences, owing to inadvertent human error (largely on the part of one particular individual).

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with Regulation 67(2) of the Russia Regulations, the firm has breached Paragraph 3.1 of the SRA Code of Conduct for Firms 2019 which states you keep up to date with and follow the law and regulation governing the way you work.

4. Why a written rebuke is an appropriate outcome

4.1 The SRA's Enforcement Strategy sets out its approach to the use of its enforcement powers where there has been a failure to meet its standards or requirements.

4.2 The SRA considers that a written rebuke is the appropriate outcome because:

- a. There was no lasting significant harm to consumers or third parties. The breaches were borne out of administrative and human error. The breaches are isolated and do not cause severe or lasting damage to the purposes of the sanctions regime.
- b. The firm has put additional policies in place to prevent reoccurrence of the breaches and has completed a thorough investigation of all relevant matters, to ensure that any issues have been identified.
- c. There is a low risk of repetition owing to the additional policies and processes now in place at the firm.
- d. Some public sanction is required to uphold public confidence in the delivery of legal services. We do not consider that any less serious sanction or outcome would be appropriate to protect the public and the public interest.

5. Publication

5.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. The firm agrees to the publication of this agreement.

6. Acting in a way which is inconsistent with this agreement

6.1 The firm agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

6.2 If the firm denies the admissions or acts in a way which is inconsistent with this agreement, the conduct which is subject to this agreement may be considered further by the SRA. That may result in a disciplinary outcome or a referral to the Solicitors Disciplinary Tribunal on the original facts and allegations.

6.3 Acting in a way which is inconsistent with this agreement may also constitute a separate breach of Principles 2 and 5 of the SRA Principles 2019 and Paragraph 3.2 of the SRA Code of Conduct for Firms 2019.

7. Costs

7.1 The firm agrees to pay the costs of the SRA's investigation in the sum of £600. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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