

# Modern Slavery Act Transparency Statement 2023

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## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Irwin Mitchell Group's slavery and human trafficking statement for the financial year ending 30 April 2023.

## Our Structure

The Irwin Mitchell Group consists of Irwin Mitchell Holdings Limited, the parent company of Irwin Mitchell LLP and a number of subsidiaries, including Ascent Performance Group Limited, and IM Asset Management Limited, (the Group), with an established office network covering England and Wales.

The Group provides a wide range of legal services to over 200,000 clients a year, with particular strengths in litigation. The Group largely has a UK centric supplier base and is therefore considered low risk in engaging in modern slavery or trafficking activities. Despite this, the Group takes modern slavery risk very seriously.

Irwin Mitchell LLP comprises the Client Services Team, Commercial Growth Team and Group Services. It adopts a partnership approach to its clients, underpinned by the latest technology, innovative pricing, and excellent service delivery.

Irwin Mitchell LLP is unique, both in its culture and its approach to law. Nationally acclaimed, with international capabilities, Irwin Mitchell LLP is one of a few law firms to provide a diverse range of legal services to businesses and private individuals. It has a strong customer service culture and a high level of client retention.

## Responsible Business

The Group has made a commitment to being recognised as a leading responsible business and is a signatory of the United Nations Global Compact.

The Group has increased its focus on ensuring there is transparency in its supply chains, responsible procurement of new suppliers, and taking steps to prevent modern slavery and human trafficking.

## Group Policies

As part of our ongoing commitment to discourage modern slavery, we review annually a number of our Group wide policies, including but not limited to:

- Whistleblowing Policy
- Responsible Business Policy
- Health & Safety Policy
- Gifts, Hospitality and Charitable Donations Procedure
- Anti-Bribery & Corruption Policy
- Procurement Policy

- Supplier Relationship Management Policy
- Contracts Policy
- Supplier Code of Conduct
- Employment and recruitment policies which comply with all UK law
- Ways of Working Guidance (including the Flexible by Choice Framework)

Our Whistleblowing Policy includes a mechanism for reporting genuine suspicion of any criminal conduct or breach of a legal or professional obligation, by anyone in the Group, or by a client or contractor, which includes instances of modern slavery.

During the Coronavirus pandemic, the Group followed all government guidelines to safeguard its employees and local communities. The Group reassessed its risk levels due to the pandemic and recognised that the working environment had to change substantially to protect our employees, clients and local communities.

The Group continues to operate on a 'Flexible by Choice (FBC)' basis, a hybrid of home, office working and other workspace working. This is based on trusting colleagues to do the right work, at the right time, in the right way. A 'Ways of Working FBC Hub is available on our intranet site so colleagues have access to all vital information, policies and procedures whilst working remotely in different workspaces. This means colleagues have access to appropriate support and can remotely continue to learn and develop themselves on relevant topics including the issue of modern slavery.

### **Supplier Due Diligence Processes**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have taken the following steps:

- We have implemented a new supplier segmentation process to ensure appropriate levels of oversight within our supplier relationships, and increase the frequency of review where relevant.
- We have put checks in place to ensure that our suppliers have policies for ESG issues and are working to improve this process so that no matter what stages of maturity our suppliers are at, we can rest assured that they are demonstrating progress.
- We also require our critical suppliers to demonstrate their responsible business credentials which are evaluated and scored, as part of our tender process or as part of our on-going supplier management approach.
- We have reviewed our comprehensive supplier due diligence assessment matrix to ensure additional risks, post peak Coronavirus pandemic, are considered and assessed as part of our procurement process and routine supplier audits.
- We are implementing our Supplier Code of Conduct to ensure suppliers are aware of our high standards of safe working and expectations around conduct and behaviours to encourage a collaborative and compliant based working relationship.
- We are reviewing and further developing our existing clauses around modern slavery to ensure suppliers are contractually committed to operational compliance.
- We have drafted a standard suite of ESG (Environmental, Social, and Governance) schedules to be included within all relevant supplier contracts.
- We will ensure key stakeholders across the Group are kept up to date on modern slavery requirements via annual training.

The Group has robust and effective policies, and collaborative working amongst the Group Services function, which ensures that now and in the future, the Group's approach to the procurement and on-boarding of new critical suppliers is efficient, transparent and risk-based.

These steps have been taken to enable us to:

- Establish and assess areas of potential risk in our businesses and supply chains;
- Monitor potential risk areas in our businesses and supply chains;
- Reduce the risk of slavery and human trafficking occurring in our businesses and supply chains; and
- Provide adequate protection for whistle-blowers.

## **Risk and Compliance**

The Group has taken steps to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. We do not consider that the Group operates in high-risk sectors or locations. The Group does not tolerate slavery and human trafficking within its supply chains and would immediately seek to remediate this with the supplier where evidence of a failure to comply with the Group's policies is discovered.

The statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's annual slavery and human trafficking statement for the financial year commencing 01/05/2022 and ending 31/04/2023.

This statement was approved by the Irwin Mitchell Holdings Limited Board on 19 October 2023.

The Group's previous financial years Modern Slavery Act Transparency Statement can be obtained by contacting [press.office@irwinmitchell.com](mailto:press.office@irwinmitchell.com).



Craig Marshall  
Group Chief Executive

Irwin Mitchell Group

October 2023