

# IM's Modern Slavery Act Transparency Statement 2025

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 2025.

## Introduction

Irwin Mitchell LLP is a leading full-service law firm and provides comprehensive legal services to both individuals and businesses across the UK and internationally.

Our core strengths lie in our breadth of expertise, specialist knowledge and commitment to client satisfaction. We understand the unique needs of our clients and deliver tailored, practical, and commercially minded advice.

The Group's supplier base is predominantly UK based and is therefore considered low risk with regards to modern slavery or human trafficking. Despite this, the Group takes a zero-tolerance approach.

## Our Structure, Governance and Supply Chain

The Irwin Mitchell Group (the Group) comprises Irwin Mitchell Holdings Limited, the parent company of Irwin Mitchell LLP and a number of subsidiaries, including Ascent Performance Group Limited.

We monitor modern slavery risks by a cross-functional working group, including representatives from our Procurement and Supplier Relationship Management, Responsible Business and General Counsel teams, to ensure input is received from all necessary disciplines.

The Group's supply chain is predominantly UK based and comprises the procurement of various goods and services to ensure our clients and colleagues remain supported in all aspects. Our third-party engagements span across information technology suppliers, professional services, consultancy, marketing and property (including facilities management).

## Responsible Business

As a United Nations Global Compact signatory, the Group upholds responsible business practices aligned with its Ten Principles on Human Rights, Labour, Environment, and Anti-Corruption. Our [Code of Ethics](#) also helps organisations that we work with to uphold the basic principles and standards.

The Group has established an Ethical and Commercial Decisions Forum, made up of senior leaders to address ethical concerns and ensure fair, sustainable outcomes to complex matters. The Forum maintains strict ethical standards and will not tolerate modern slavery, bribery, corruption, or any illegal activity.

The Group's commitment to transparency continues through ethical supplier integration and efforts to prevent modern slavery. As a Living Wage Employer, we ensure fair pay and embed this into our supplier contracts, encouraging suppliers to adopt a similar approach.

## Group Policies

The Group has various policies and procedures as part of its ongoing commitment to discourage modern slavery and human trafficking, which are reviewed annually. Please click [here](#) to find out more.

## Supplier Due Diligence Processes

To monitor and reduce the risk of modern slavery in our supply chain, our supplier due diligence process comprises the following:

- 1 Supplier segmentation for tailored oversight and reviews across our supply chain.

- 2 Controls to ensure critical and strategic suppliers have ESG policies and/or processes in place and, which we continue to improve.
- 3 Critical suppliers must demonstrate responsible business credentials which are evaluated and scored as part of our tender process or on-going supplier management.
- 4 Our supplier due diligence assessment matrix ensures additional risks are considered and assessed as part of our procurement process, including routine supplier audits.
- 5 Our Supplier Code of Conduct sets clear expectations for our critical and strategic suppliers around safe working and ethical behaviours to encourage a compliant based working relationship.
- 6 Strategic suppliers are contractually bound with modern slavery clauses to ensure operational compliance.
- 7 As a Living Wage Foundation accredited member, we ensure qualifying suppliers meet the living wage standards and have audit processes in place.
- 8 We have developed a Third-Party Risk Model to track fourth party risks in our supply chain and extend ESG compliance beyond direct relationships.

The Group has robust policies, clear governance and collaborative Corporate Services functions that ensure efficient, transparent and risk-based procurement of critical suppliers. Third party risk and resilience are treated as a Principal Risk, with oversight via our Risk and Audit Committee. Our reporting framework covers key and sub risks, providing comprehensive visibility and prioritisation at board level. These steps enable us to establish, assess, monitor and reduce areas of potential risk, including modern slavery, in our business and supply chains and provide adequate protection for whistle-blowers.

## Colleague wellbeing

Colleague health and wellbeing is central to our Colleague Commitment and Responsible Business strategy. The Group is committed to ensuring colleagues remain thoroughly supported to raise concerns and receive support, including issues around modern slavery. Our HR team host a wide range of resources to support colleagues' physical, psychological and financial wellbeing on the Colleague Wellbeing Hub (intranet). Some of these initiatives include:

- **Healthy Mind Advocates (HMA) and Mental Health First Aiders (MHFA)** trained by MHFA England to help colleagues seek the right support
- **Employee Assistance Programme (EAP)** is provided by Care First and offers invaluable support to colleagues on a variety of issues via fully trained counsellors.

## Training

The Group is committed to ensuring colleagues are aware of modern slavery risks.

Certain areas within our Corporate Services Management Team, including Procurement and Supplier Relationship Management, CIO and Facilities Management routinely engage with suppliers where modern slavery and/or human trafficking risks are most prevalent (albeit low risk). These colleagues are committed to undertake the necessary training to develop enhanced awareness to actively manage the risk of modern slavery throughout the supply chain on an annual basis. The LLP Board, Ethical and Commercial Decision Forum members and colleagues that can approve expenditure over £50,000 are also expected to complete mandatory training.

## Professional advisory services

Our team of legal experts help clients to ensure compliance with their legal and regulatory obligations, including modern slavery compliance:

- **Our Business Services Group** help clients navigate through the complex landscape of modern slavery by assessing their compliance needs, drafting anti-slavery and anti-human trafficking policies for their business and supply chains, providing relevant training for staff, preparing transparency statements and supporting any investigation processes

- **Our Business Immigration Team** help clients comply with immigration laws through audits, policy development, training and representation during home office investigations. These measures also help combat modern slavery and human trafficking by ensuring ethical recruitment practices, verifying right to work documentation and maintaining record keeping to prevent exploitation.

## Communities

We are committed to working in partnership with the Irwin Mitchell Charities Foundation (IMCF) to support initiatives that reflect our commitment to the UNGC's Ten Principles. This has included supporting charities that address issues such as modern slavery and help survivors rebuild their lives with dignity and hope.

## 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 1 May 2024 and ending 30 April 2025.

This statement was approved by the Irwin Mitchell Holdings Limited Board on 25 October 2025.

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).

Signed



Craig Marshall  
Group Chief Executive  
Irwin Mitchell Group  
October 2025

## Group Policies

A 'Ways of Working' Flexible by Choice Hub is available on our intranet site, so colleagues have access to all of our vital policies, procedures and information 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. We continue to monitor any changes to our working environments to ensure our colleagues, clients and local communities remain protected. Our group policies and procedures include:

- **Whistleblowing Policy:** An internal reporting mechanism for 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 or human trafficking. Clients can report concerns via our [complaints procedure](#) and other external stakeholders can email our [General Counsel team](#)
- **Health & Safety Policy:** Ensures a safe working environment, regular reviews and overall compliance with our statutory duties towards our clients, colleagues and third parties
- **Gifts, Hospitality and Charitable Donations Procedure:** Outlines the requirements for offering and receiving gifts, hospitality and charitable donations, including a thorough review and approval process and value thresholds, to ensure compliance with our legal, regulatory and ethical requirements
- **Anti-Bribery & Corruption Policy:** Prohibits bribery and corruption, mandates training, encourages overall vigilance and supports the fight against modern slavery by ensuring ethical practices
- **Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Policy:** Ensures compliance with financial crime legislation through robust procedures and controls, which prevents financial activities that could facilitate modern slavery or human exploitation
- **Alleging Fraud, Crime or Serious Misconduct Policy:** Requires the reporting of any fraud, crime or serious misconduct and prevents modern slavery by instilling ethical practices and vigilance against exploitation
- **Identifying Vulnerable Clients and Safeguarding Policy:** Ensures colleagues are aware of the measures required to support and safeguard vulnerable clients, including those that may be at risk of exploitation
- **Sustainable Procurement Policy:** Ensures our supply chain and sourcing practices remain fair and ethical and promote sustainability to prevent modern slavery risks
- **Contracts Policy:** Mandates compliance with legal, regulatory and commercial requirements through robust end to end contract management and governance oversight
- **Supplier Code of Conduct:** Outlines ethical standards for suppliers which helps with promoting trust, integrity and transparency, and further mitigates modern slavery by enforcing compliance with human rights and labour standards
- **Fraud Prevention Policy:** Our Fraud Prevention Policy embeds a robust anti-fraud framework and has been updated to reflect the Economic Crime and Corporate Transparency Act 2023, including the new 'failure to prevent fraud' offence. These measures strengthen our overall governance and escalation environment
- **Data Protection Policy, Privacy Notice and Information Security Policy:** Ensures all processing of personal data remains lawful, ethical and transparent, combined with robust security measures to safeguard and protect the integrity of personal data, minimising data leaks and breaches that could expose clients, colleagues and third parties
- **Diversity, Equity and Inclusion Policy:** Promotes an inclusive culture and values diverse perspectives, ensuring a zero-tolerance approach to discrimination, harassment or victimisation and fostering an environment where all individuals are respected and protected
- **Conduct and You Policy:** Ensures high professional standards and mutual respect amongst colleagues, irrespective of hierarchy, requiring all conduct issues to be addressed promptly and fairly and clarifying colleague responsibilities to encourage an open and ethical workplace
- **Employment and recruitment policies which comply with all UK law:** Ensures all recruitment practices are fair, transparent and in compliance with our legal and regulatory duties, which inherently prevent risks around modern slavery and human trafficking.