

# Modern Slavery Act Transparency Statement

# Modern Slavery Act Transparency Statement 2024

## 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 2024.

## 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, with particular strengths in personal and business legal services. 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.

Nationally acclaimed, with growing international capabilities and presence, 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.

Please note that this statement does not currently apply to Silk Family Law Limited and Wright, Johnston & Mackenzie LLP as these entities became part of the Group after the financial year ending 30 April 2024 and will therefore be included in next year's Modern Slavery Act Transparency Statement.

## 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. Our Code of Ethics acts as a guide for the people and organisations who work with us to support this, outlining the basic principles and standards which govern the way we do business, which we are proud to uphold and share. [Download our Code of Ethics.](#)

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.

As an additional step to combat the risks of modern slavery, the Group has also formalised its commitment to being an accredited Living Wage Employer which demonstrates our ongoing commitment to ensuring all colleagues receive a fair wage that meets the cost of living.

## 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
- Health & Safety Policy
- Gifts, Hospitality and Charitable Donations Procedure
- Anti-Bribery & Corruption Policy
- Sustainable Procurement 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.

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. We continue to monitor any changes to our working environments to ensure our colleagues, clients and local communities remain protected.

## 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 controls 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 are considered and assessed as part of our procurement process and routine supplier audits.
- We have implemented 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 have reviewed and further developed our existing clauses around modern slavery to ensure strategic suppliers are contractually committed to operational compliance.

The Group has robust and effective policies, and collaborative working amongst the Corporate Services functions, 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.

## Training

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

Certain areas within our Corporate Services Management Team, including Procurement and Supplier Relationship 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.

Other colleagues across our Corporate Services Management Team are committed to undertake shorter courses annually, aimed at law firm-specific training.

## 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 01/05/2023 and ending 30/04/24.

This statement was approved by the Irwin Mitchell Holdings Limited Board on 24 October 2024.

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 2024