

Modern Slavery Act Statement 2020

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Irwin Mitchell LLP's slavery and human trafficking statement for the financial year ending 30 April 2020.

During this unprecedented period, we have had to reassess our risk levels due to the Coronavirus (COVID-19) pandemic. We recognised that the working environment had to change substantially to protect our employees, clients and local communities. In particular, we increased our focus on ensuring that there is transparency within our supply chain. We are taking all necessary steps to prevent modern slavery and human trafficking.

However, it should also be seen as reflective of the approach taken by the whole Irwin Mitchell Group of companies in ensuring there is transparency in the Group's supply chains, responsible procurement of new suppliers and taking steps to prevent modern slavery.

Part of the Irwin Mitchell Group, 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.

Our Structure

The company has a group structure with Irwin Mitchell Holdings Limited sitting above Irwin Mitchell LLP and a number of subsidiaries. It has an established office network covering England. Irwin Mitchell Scotland LLP is a separate Scottish legal practice regulated by the Law Society of Scotland and has an office in Glasgow.

Irwin Mitchell LLP provides a wide range of legal services to over 200,000 clients a year, with particular strengths in litigation. The firm is divided into three divisions: Personal Injury, Private Wealth and Business Legal Services. It adopts a partnership approach to its clients, underpinned by the latest technology, innovative pricing and excellent service delivery.

Irwin Mitchell LLP largely has a UK centric supplier base and are therefore considered to be low risk in engaging in modern slavery or trafficking activities. Despite this, Irwin Mitchell LLP takes modern slavery risk very seriously.

Our Group Policies

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

- Whistleblowing Policy
- Anti-Bribery & Corruption Policy
- Procurement Policy
- Contracts Policy
- Employment and recruitment policies which comply with all UK law
- COVID-19 Home Working Guidance.

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 firm or the Group, or by a client or contractor, which includes instances of modern slavery.

During the Coronavirus pandemic, the firm and the Group followed all government guidelines to safeguard its employees and local communities.

A 'Working from Home' Hub is available on the firm's intranet site so employees have access to all vital information, policies and procedures whilst working remotely. This means staff have access to appropriate support and can remotely continue to learn and train themselves on relevant topics including the issue of modern slavery.

Our 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:

- Analysed financial data in respect of the Group's suppliers as part of a cost review programme
- Identified a sample of suppliers to our businesses by reference to level of annual financial spend and defined those with the largest spend as part of our critical supplier programme
- Gathered information in respect of some of our critical suppliers in relation to either their own compliance with the Modern Slavery Act (where appropriate) and / or their commitment to ethical business practices and transparency in their own supply chains.
- We are currently in the process of enhancing our supplier management capability to further strengthen our approach to ensuring transparency, and minimising the risk of modern slavery within our supply chain.

Since the Coronavirus pandemic, the firm and the Group have engaged with a number of existing and new suppliers across the Group to discuss the impact and risks to the wellbeing of employees.

The landscape has rapidly changed, so we are now in the process of reviewing our comprehensive supplier due diligence assessment matrix to ensure additional risks, during and post the Coronavirus pandemic, are considered and assessed as part of our procurement process and routine supplier audits.

The firm and the Group have 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 robust, 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
- Provide adequate protection for whistle-blowers.

Risk and Compliance

Irwin Mitchell LLP and the Irwin Mitchell Group have 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 Irwin Mitchell Group operates in high-risk sectors or locations.

The Irwin Mitchell Group does not tolerate slavery and human trafficking within its supply chains and would immediately seek to terminate its relationship with a supplier where evidence of a failure to comply with the Group's policies was discovered.

Approved by Andrew Tucker, Group Chief Executive, on behalf of Irwin Mitchell LLP's Executive Board.

Andrew Tucker

Group Chief Executive

Irwin Mitchell LLP

October 2020