



Modern Slavery Statement

Our Organisation

Thorntons is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Thorntons Law LLP is a limited liability partnership registered in Scotland (No. SO300381). We are regulated by the Law Society of Scotland and are authorised and regulated by the Solicitors Regulation Authority in relation to English law property matters. We are an independent, full-service law firm providing legal services to individuals, businesses and organisations across a number of locations throughout Scotland.

We recognise our responsibility to take appropriate steps to identify and mitigate the risk of modern slavery within our business and supply chains, and are committed to maintaining effective systems and controls to support this.

Supply Chain

Our supply chain supports the delivery of our legal services and includes a range of suppliers across the following key areas:

- ▶ Operational and Business Support Services: including services such as catering, cleaning, travel and general business support
- ▶ Professional and Advisory Services: including services provided by auditors, advisors, consultants and other specialist providers
- ▶ Property and Facilities: including office premises, maintenance and security services
- ▶ People and HR Services: including recruitment, training, payroll and employee benefits
- ▶ Technology and Systems: including IT systems, software, equipment and related support services

Our supply chain is primarily UK based, although we recognise that some suppliers may operate internationally or have their own extended supply chains.

We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our commitment to addressing the issue of modern slavery and human trafficking is built into our new supplier process and is communicated to all suppliers, contractors and business partners at the outset of any potential business relationship and reinforced as appropriate thereafter.

Policies and Due Diligence

We are committed to maintaining effective policies and processes to support our approach to preventing modern slavery within our business and supply chains.

Our approach is supported by a range of internal policies and procedures, including our Modern Slavery Policy, Whistleblowing Policy and our Code of Conduct, which together set out the standards we expect across our business and supply chains. These policies are communicated to all employees and Partners as part of our induction processes and are reviewed periodically to ensure they remain effective and compliant.

We maintain a consistent, compliant and transparent approach to modern-slavery due diligence by embedding mandatory checks into our supplier onboarding process, including checking whether all prospective suppliers have an appropriate modern slavery policy or statement. All new employees and partners undergo verification through an

approved third-party screening service.

Additionally, we provide all colleagues with access to a confidential and anonymous helpline environment to raise any concerns about wrongdoing or misconduct.

Risk Assessment

As a law firm, we consider the overall risk of modern slavery within our direct operations to be low. This reflects the nature of our business, the professional and regulatory environment in which we operate, and the controls and processes we have in place.

We recognise, however, that there is a potential risk of modern slavery within our supply chain, particularly where services are outsourced or where suppliers operate across multiple jurisdictions or rely on their own extended supply chains.

We take a risk based approach to managing these risks, supported by our supplier onboarding processes and due diligence checks, which are designed to identify and mitigate potential areas of concern.

We will continue to review and develop our approach to risk assessment over time to ensure it remains appropriate and proportionate to the nature of our business and supply chain.

Measuring Our Effectiveness

We recognise the importance of not only having appropriate policies in place, but also monitoring how effective these are in practice.

We assess the effectiveness of our approach to modern slavery by monitoring a number of key indicators including:

- ▶ Completion and monitoring of due diligence checks as part of our new supplier onboarding process
- ▶ Completion rates for mandatory modern slavery and whistleblowing training, together with mandatory Code of Conduct policy acknowledgement
- ▶ The number of concerns raised through our confidential whistleblowing reporting service

These measures help us to ensure that our approach remains effective and that any potential issues can be identified and addressed at an early stage. We will continue to review and develop these measures over time to ensure they remain appropriate and support ongoing improvement.

Training

Training on our Modern Slavery Policy and Whistleblowing Policy forms part of our induction process for all new colleagues. This training is mandatory and is designed to raise awareness of modern slavery issues, how to identify potential risks and the appropriate steps to take where concerns arise.

Our Code of Conduct is also assigned to all new colleagues as a mandatory read as part of induction.

We will continue to review our training provision to ensure all colleagues have appropriate awareness of modern slavery risks and reporting processes.

Future Priorities

We are committed to continually reviewing and strengthening our approach to preventing modern slavery within our business and supply chains.

Over the next reporting period, we will focus on further developing our existing processes and controls, including:

- ▶ Reviewing and enhancing our supplier due diligence processes and broader approach to identifying and monitoring modern slavery risks, across all stages of the supplier relationship
- ▶ Continuing to develop our approach to policy awareness and compliance training across key compliance areas
- ▶ Exploring opportunities for more targeted training in higher-risk operational areas, including procurement and supplier management

We will continue to keep our approach under review to ensure it reflects and supports our ongoing commitment to preventing modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31 May 2026. It was approved by the Board on 20 August 2026.



Lesley Larg

Managing Partner
for Thorntons Law LLP
20 August 2026



03330 430150
thorntons-law.co.uk

Thorntons is a trading name of Thorntons Law LLP