



## 1.4 SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025/26

### INTRODUCTION

At Minster Law, we believe that everyone should be treated with dignity, respect and fairness. We are committed to doing business responsibly and to ensuring that modern slavery and human trafficking have no place in our organisation, our supply chain or the wider communities in which we operate.

This statement sets out the steps we have taken to prevent modern slavery and human trafficking within our business and supply chain, in accordance with Section 54 of the Modern Slavery Act 2015 (the 'Act'), for the financial year ending 30 June 2026.

We take a zero-tolerance approach to all forms of modern slavery, including forced, bonded or compulsory labour and human trafficking. Our commitment extends beyond simply meeting our legal obligations. We expect our people, suppliers and partners to share our commitment to acting ethically, responsibly and with respect for human rights.

This statement was approved by the Board of Directors on 26<sup>th</sup> October 2026 and signed by our Chief Executive, Shirley Woolham. A signed copy of this statement is available on request.

### OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

Minster Law Ltd (registered number 4659625) is a limited company and subsidiary of BHL (UK) Holdings Limited. We are authorised and regulated by the Solicitors Regulation Authority (registered number 383018).

We provide legal services within the UK specialising in personal injury claims, particularly in respect of road traffic accident claims.

We are the partner of choice for many well-established insurers, brokers and trusted strategic partners, providing their customers with associated legal services.

Due to the nature of the services we provide, some of our supply chain is made up of providers of professional services which support and facilitate the progression of our customers' matters such as medical agencies and barrister's chambers. In addition, there are other types of experts who support our customers' claims as and where required.

Furthermore, we also procure the services of various suppliers whose functions support the day-to-day running of the business.

### WITHIN OUR BUSINESS

#### Remuneration

During the period covered by our statement, we have conducted our annual salary benchmarking review to ensure that our colleagues are appropriately recognised for the work that they do in relation to prevailing market sector conditions and salary levels. In addition to annual salary, colleagues are part of a discretionary and non-contractual bonus scheme which is awarded positive contribution towards the success of the business, more specifically based on performance and achievement of objectives.

#### Pre-employment checks



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We have a robust recruitment process which is supported by our Recruitment, Selection and Referencing Policy whose provisions reinforce our commitment to the prevention of slavery and human trafficking.

All prospective colleagues continue to undergo an array of pre-employment checks including verifying their identity, right to work in the UK, financial background checks, and their professional qualifications where applicable. A regular audit is undertaken to ensure that current employees continue to have a right to work in the UK.

#### Recruitment

For the period of reporting, we have operated a hybrid approach to onboarding new colleagues with assessments/interviews taking place both onsite and remotely. We remain alive to the risks of recruiting new colleagues remotely and where possible onsite interviews are the preferred method.

During this period of reporting Minster Law has expanded its geographical reach for colleagues into the London city area and opened a new London office hub. It is also recognised that Minster Law are looking to further expand the geographical locations in the next reporting period.

Where recruitment agencies are used to source new colleagues, they are trusted organisations with which we have an established relationship. They must comply with their obligations using all due skill, care and diligence in accordance with good industry practice and they must have a policy recognising, respecting and protecting the human rights of their employees and candidates. Prospective colleagues recruited via recruitment agencies are required to complete a detailed pre-screening questionnaire which is designed to highlight any potential issues that might require further investigation.

Our Recruitment, Selection and Referencing Policy makes it clear that liaising or negotiating with recruitment agencies should only be carried out by our HR Department.

#### Wellbeing

At Minster Law, we recognise that supporting the wellbeing of our colleagues is an important part of creating a safe, inclusive and supportive workplace. We remain committed to helping our people maintain positive mental and physical health, and to making sure that support is accessible whether colleagues are working remotely or in one of our offices.

Throughout the reporting period, we have continued to provide a range of wellbeing resources and opportunities for support, including regular face-to-face 1:1 conversations, practical hints and tips, webinars and self-help resources. These provide colleagues with opportunities to talk openly about their wellbeing and raise any concerns they may have.

Our colleagues also have access to our Employee Assistance Programme and Mental Health First Aiders, providing additional support when it is needed. During this reporting period, we increased the number of Mental Health First Aiders across the business and doubled the number of virtual counselling sessions available to each colleague per year.

Creating an environment where colleagues feel safe, supported and able to speak openly is an important part of our wider commitment to protecting our people. Our regular colleague conversations and wellbeing support also provide opportunities for concerns or vulnerabilities to be identified and appropriately supported, including where these may indicate a risk relating to modern slavery or exploitation.



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#### Equality, Diversity, Inclusion and Belonging (EDI) Committee

At Minster Law, we believe that creating an inclusive and supportive workplace, where everyone feels respected, valued and able to be themselves, is fundamental to the wellbeing of our colleagues. Our people bring a rich diversity of experiences, perspectives, beliefs and backgrounds, and we recognise the important contribution this makes to our business and our culture.

We also recognise that a culture of inclusion, openness and psychological safety plays an important role in supporting our commitment to identifying and preventing modern slavery and exploitation. Individuals who may be experiencing exploitation can face barriers to speaking out, including fear of repercussions, unequal power dynamics, cultural or language barriers, or a lack of confidence that their concerns will be heard. By fostering an environment where different experiences are understood and respected, we aim to reduce these barriers and encourage greater awareness of potential vulnerabilities.

Our colleague-led EDI Committee continues to play an important role in shaping our approach to equality, diversity, inclusion and belonging. During the reporting period, we continued our focus on creating opportunities for courageous conversations, encouraging colleagues to listen, learn from one another and feel confident to speak openly about their experiences.

As part of this commitment, we introduced our Reciprocal Mentoring Programme, 'What It's Like to Be Me', creating opportunities for colleagues from different backgrounds, experiences and levels of the organisation to learn from one another. Through open and honest conversations, the programme is designed to build greater understanding, challenge assumptions and strengthen connections across our business.

These initiatives are also relevant to our wider approach to modern slavery risk identification. By encouraging colleagues to consider experiences and perspectives different from their own, we can help build greater awareness of the circumstances that may make individuals more vulnerable to exploitation, including those working within our own operations and wider supply chain. Challenging unconscious bias and recognising unequal power relationships can help colleagues remain alert to potential concerns that might otherwise be overlooked.

We remain passionate about creating a culture where everyone feels a genuine sense of belonging, is treated with dignity and respect, and feels able to raise concerns or ask for support when they need it. This is particularly important in the context of modern slavery, where fear, dependency or a perceived lack of support may prevent individuals from disclosing concerns. We recognise that strong colleague relationships, trust and open communication can support the early identification and appropriate escalation of potential warning signs of exploitation.

Our EDI approach continues to be shaped by our EDI Committee and our colleagues, ensuring that it reflects the experiences and needs of our people and evolves as our business grows. While our EDI initiatives are not a substitute for formal modern slavery risk assessments and reporting arrangements, they provide an important foundation for a culture in which potential risks are more likely to be recognised, concerns can be raised without fear, and the protection of individuals remains a shared responsibility.

#### **OUR POLICIES**

Our policies continue to support our zero-tolerance stance on slavery and human trafficking. Key policies that relate to our approach to minimising the risk of modern slavery occurring within our



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supply chain are our Recruitment and Selection Policy, Contract Approval and Monitoring Policy, Internal and Anti Bribery and Corruption Policy, CSR Policy and Whistleblowing Policy.

We strive to foster an ethical, safe, supportive environment for our colleagues. Our Whistleblowing policy outlines the mechanisms in place for colleagues to highlight any concerns that they may have in relation to a breach of our regulatory, legislative duties, unethical conduct, or a deliberate attempt to conceal the same. Modern slavery concerns would be included within this and are specifically referenced in the policy.

All of our policies are published for all colleagues on our internal intranet site where instant access is available should they need to access them.

Each of our policies is owned by a key stakeholder who takes ownership for completing a regular review of the content to ensure it remains relevant and fit for purpose. As part of the review cycle, each policy is considered and approved by our Executive Risk Committee. Key policies are also Board reserved to ensure visibility and oversight at this level. All Board reserved policies have been rigorously tested within the last 12 months to ensure they are being operated effectively.

#### **SUPPLIER DUE DILIGENCE**

Minster Law continues to strive to work with organisations who share our values and culture.

In the previous 12 months we have successfully onboarded new trusted partners. As part of this process, we gain assurance that we continue to work with organisations whose values and approach to doing business are aligned with our own.

We primarily (and purposefully) rely on our contractual mandates and clauses with suppliers and partners to ensure these obligations are fulfilled throughout all the businesses we partner with. The contractual discussions take place prior to onboarding a new supplier or partner which ensures commitment and alignment prior to any work being provided to the supplier.

There are also contractual provisions relating to legislative compliance within our agreements with suppliers. All our key supplier and contracts have specific reference to the Modern Slavery Act.

Ensuring our suppliers continue to comply with their Modern Slavery Act obligations remains a key focus for Minster Law.

#### **RISK ASSESSMENT**

We continue to operate a robust risk management framework. Our Corporate Risk Register provides for the monitoring and management of risks relating to new and existing partners and suppliers as well as compliance with our legal and regulatory obligations.

Risk mitigation activities continue to feature in monthly risk reviews with key stakeholders.

All risks are owned, managed and monitored by a member of our Executive Team with relevant reporting to our monthly Executive Risk Meeting and to the Minster Law Board on a quarterly basis.

#### **TRAINING**

It is recognised that our colleagues are a key resource in relation to identifying potential areas of concern. For this reason, the topic of modern slavery is regularly reviewed to ensure that colleague learning remains relevant and up to date. We have mandatory training modules for all new and



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existing colleagues to raise awareness, understanding and empowerment to embrace our EDI culture.

### **CONTROL FRAMEWORK**

As part of our key control framework, we continue to monitor the effectiveness of the mechanisms we have in place by:

- completion of the annual review of our policies;
- regular testing of our policy controls;
- the delivery and completion of relevant training modules;
- completion of pre-employment checks;
- regular review and monitoring of our Colleague Benefits package;
- annual salary benchmarking with consideration of the real living wage;
- contract governance monitoring;
- calibration of end of year performance and achievements; and
- Pre-employment checks.

Board Approval Date: 26<sup>th</sup> October 2026