

LAWFRONT HOLDINGS LIMITED

2024 Slavery and human trafficking statement

1 Opening statement from senior management

- 1.1 Lawfront Holdings Limited (**Lawfront**) is committed to preventing slavery and human trafficking from occurring within our business and supply chain, and we will impose the same high standards on our suppliers. We have a zero-tolerance approach.
- 1.2 This is a statement of the steps that Lawfront has taken in the financial year ending 31 March 2024 (**the reporting period**). It is Lawfront's first transparency statement.
- 1.3 Approved by Lawfront's Board on 19 September 2024 and signed by Neil Lloyd, Director, on behalf of Lawfront, this statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Lawfront's slavery and human trafficking statement for the financial year commencing 1 April 2023 and ending 31 March 2024.

2 Lawfront's structure and business during the reporting period

- 2.1 Lawfront is a limited company based in England & Wales operating in the legal and investment management sectors specifically being the parent company of a number of law firms.
- 2.2 In the reporting period, Lawfront owned 3 solicitors' businesses with 19 offices throughout England & Wales and over 510 employees as at 31 March 2024. We provide legal services across corporate/commercial, dispute resolution, employment, family, personal injury, private client, real estate and residential conveyancing. We also provide investment management services. Our clients are predominantly individuals and SMEs. To find out more about the nature of our business, please visit Lawfront's website at <https://www.lawfront.com>.
- 2.3 For the reporting period Lawfront had an annual turnover of £67,344,000.

3 Our supply chains

- 3.1 In order to deliver our legal and investment management services, we work with a range of suppliers who supply us with employees, goods and services to support the services we in turn provide to our clients. The vast majority of our suppliers and supply chains are UK based.
- 3.2 They fall into the following categories:
 - 3.2.1 Building services including cleaning, security and other facilities management;
 - 3.2.2 Business support services including document production and storage;
 - 3.2.3 Employee benefits;

- 3.2.4 IT hardware, software and infrastructure including hosting;
- 3.2.5 Professional services including barristers, experts, medical professionals and various consultants;
- 3.2.6 Recruitment agencies;
- 3.2.7 Telecommunications.

4 Policies

- 4.1 As part of our commitment to combating modern slavery and human trafficking, we are developing a group-wide policy on anti-modern slavery and human trafficking which recognises that we play an important part in tackling slavery and sets out the responsibilities of our organisation and its managers and colleagues.
- 4.2 We are developing a procurement policy and have a whistleblowing policy. We also have a supplier due diligence policy which sets out our approach in relation to supplier due diligence.
- 4.3 Our ethical approach is reinforced by our employment policies such as those relating to inclusion and diversity.
- 4.4 We will conduct an annual review of these policies.
- 4.5 We are also seeking to make sure our suppliers are aware of our policies and adhere to the same high standards.

5 Due diligence

- 5.1 As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have the following due diligence procedures:
 - 5.1.1 Lawfront Group Limited's Chief Risk Officer is responsible for the development and oversight of third-party risk management processes including supplier onboarding and due diligence;
 - 5.1.2 We employ a procurement consultant expert who is responsible for negotiating our main external contracts and she is building into her enquiries questions about modern slavery and human trafficking;
 - 5.1.3 We are also seeking to educate those individuals responsible for managing third party relationships on the practical implementation of our anti-slavery policy.
- 5.2 Our procedures are being designed to:
 - 5.2.1 establish and assess areas of potential risk in our business and supply chains;

- 5.2.2 monitor potential risk areas in our business and supply chains;
- 5.2.3 reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- 5.2.4 provide adequate protection for whistleblowers.

6 Risk management

- 6.1 Lawfront is in the process of evaluating the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by auditing suppliers with whom we are currently in negotiations for new or renewed contracts.
- 6.2 Lawfront operates through businesses which are regulated by professional regulatory bodies with strict ethical frameworks and which primarily involve permanently employed, skilled employees in a client-focused service sector. We implement high workplace standards and have remuneration policies designed to be competitive. We generally do not employ low wage or unskilled workers.
- 6.3 Our assessment is that we do not operate in high-risk sectors or locations and that we are at low risk of slavery or human trafficking occurring within our own business. We consider there to be a greater risk of slavery or human trafficking occurring within our supply chains. We have therefore in the first instance decided to focus on our higher-risk suppliers and we will aim to refine our approach as our policy implementation matures.
- 6.4 Lawfront is a relatively new business which is growing quickly and we are aware of the potential for there to be risks in our supply chain. As contracts fall due to be renewed, we are seeking to improve our procurement processes and conduct appropriate due diligence.

7 Effectiveness and KPIs

- 7.1 Lawfront are in the process of developing key performance indicators (KPIs) to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. We will set these out in our next annual statement and report on the same.

8 Training and awareness

- 8.1 We provide a training and education programme for all our employees which already includes training on recognising and reporting on criminal conduct and activity. However, we have not yet included training specific to modern slavery and human trafficking and our aim is to do so.
- 8.2 We want to invest in educating our employees so that they recognise the risks of modern slavery and human trafficking in our business and supply chains and understand when and how they should report any concerns which they may have.

8.3 Employees will be taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

8.4 Training will be compulsory for key employees in the Lawfront business.

9 Progress in the financial year ending 31 March 2024

9.1 We undertook a review of our key supplier contracts and determined which areas were to be considered high-risk for the purposes of slavery and human trafficking.

9.2 We introduced a supplier vetting process.

9.3 We appointed a procurement consultant with experience and knowledge of the MSA 2015.

9.4 We began to consider metrics as a key priority for measuring our effectiveness at preventing modern slavery and human trafficking.

9.5 We introduced a whistleblowing process which includes a mechanism for reporting genuine concerns around criminal conduct including but not limited to slavery and human trafficking.

10 Further actions and sign-off

10.1 We recognise the importance of our relationships with third party suppliers and of encouraging ongoing open and honest dialogue about challenges that we may face in the field of modern slavery and human trafficking. We will continue to make efforts to ensure we have the right policies and processes in place and to take steps to improve them where any weakness is identified.

10.2 We will review our approach to supplier relationship management with a view to creating transparency when it comes to the minimum standards we expect from our key suppliers.

10.3 Our key priorities in the current financial year are to:

10.3.1 review our active supplier list and begin to conduct a rolling review of those suppliers in sectors which we believe to be the highest risk for modern slavery namely cleaning, construction, hospitality (catering and hotels), transportation (car services) and electronics in order to identify areas where we can drive corrective action and process improvement and to pick these issues up with our contract managers;

10.3.2 ensure that all new third party suppliers are appropriately vetted;

10.3.3 review our programme and continue to develop metrics for measuring our effectiveness at preventing modern slavery and human trafficking;

10.3.4 ensure that our key employees (especially those who are specifically involved in third party procurement) receive appropriate training as set out above in order to understand what modern slavery is and the circumstances in which it may occur and to make sure they are equipped to identify instances of possible slavery and human trafficking and understand how to report any concerns. This training will be repeated/refreshed at appropriate intervals;

10.3.5 continue to monitor our policies, processes and programme.

10.4 This statement is made on behalf of Lawfront Holdings Limited and those entities which operate as part of the Lawfront Group.

Signed:

A handwritten signature in black ink, consisting of a stylized 'N' followed by a checkmark-like flourish.

Neil Lloyd

Director

Lawfront Holdings Limited

Date: 19 September 2024