



Modern Slavery Act Transparency Statement

Our Values

As a law firm, we are rightly held to high standards in all that we do. To operate a sustainable and successful business we must inspire trust and confidence in all of our stakeholders. We are committed to taking a robust approach to opposing slavery and human trafficking. This is consistent with our values – People First, Doing the Right Thing and Forward Thinking.

We similarly expect high standards from those we work with and are committed to ensuring there is no modern slavery or human trafficking in our supply chains.

Business organisational structure and supply chains

Capsticks is a law firm which operates within the UK, we have six offices and a headcount of over 850 including lawyers and business services staff. Led by our Senior Management Team, each of the firm's offices is managed by one of our partners.

We specialise in providing a full range of legal services to clients in the health and social care, regulatory, housing, emergency services, local government and insurance sectors. For more information about what we do see – [About us](#).

Our supply chains provide us with people, goods and services to support the services we provide to our clients. While our suppliers are generally local, some are part of global businesses, and we take great care to identify and mitigate vulnerabilities, as set out in detail throughout this statement.

Policies

Capsticks opposes all forms of slavery, forced labour and human trafficking. We are committed to conducting our business with integrity and to taking effective measures to prevent modern slavery and human tracking within our operations and throughout our supply chain.

Our Anti-Slavery Policy reflects our commitment to ethical business practices and responsible corporate behaviour. We expect all colleagues to comply with relevant laws and professional Codes of Conduct as well as firm policies and procedures.

To support this commitment, we have implemented policies and procedures designed to identify, prevent and mitigate the risk of modern slavery. We also maintain robust recruitment and employment practices to ensure that all persons working for or on behalf of the firm are engaged legally, voluntarily and in conditions that respect their dignity and rights.

Due diligence and risk assessment processes

We acknowledge that slavery and human trafficking exist. As a professional services firm strictly regulated by our regulatory body, the Solicitors Regulation Authority, our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our business. We do keep this assessment under review and as part of our recruitment and onboarding processes, all new joiners are subject to right to work verification checks before employment commences. Depending on the nature of the role, additional pre-employment screening may include criminal records checks and other suitability assessments. We also obtain appropriate references to verify an individual's recent employment, educational history or other relevant background information. For legal professionals, we undertake regulatory checks to confirm practising status and identify any relevant disciplinary findings. These measures help us verify identity, employment eligibility and professional credentials, reducing the risk of exploitation, illegal working and other forms of labour abuse within our workforce.

In respect of our supply chains, we recognise there may be a risk dependent upon the goods or services provided to us and our assessment and due diligence process focus primarily on our supplier relationships. We recognise that monitoring the risks in our supply chain is an ongoing process and we continue to review and refine our risk assessment process in this area.

We require our suppliers to answer our supplier assessment questionnaires, and to comply with the provisions in our supplier contracts and our supplier code as part of our procurement requirements.

Our overall objective is to ensure that when we establish and maintain supplier relationships, we undertake a full assessment which helps us to identify the risk of slavery and human trafficking within our supply chains. If these are identified at any stage, in addition to our standard supplier contractual requirements, we may also seek additional contractual clauses to ensure that the risks are properly mitigated.

Procurement Process

We look to ensure that our supply chains operate in an honest, fair and transparent manner. Obtaining sufficient supplier information serves as an essential means of identifying, assessing and addressing the risk of modern slavery.

Our procurement due diligence process includes a risk assessment process, which analyses the size, geographical location and risk profile of the industry sector, which in turn informs any additional checks we undertake.

As part of our supplier management processes, we undertake specific due diligence in relation to suppliers that provide services to our offices, including facilities management, cleaning,

courier, catering and confidential waste disposal services. Given that some of these sectors can present a higher risk of labour exploitation, we request suppliers to provide their Modern Slavery Statement or, where a statement is not available, evidence of their policies and procedures relating to ethical employment practices and the prevention of modern slavery.

We require our suppliers to comply with our Supplier Code of Conduct, which sets out our requirements regarding ethical business conduct, compliance with applicable laws and the protection of workers' rights. This approach supports our ongoing assessment of modern slavery risks within our supply chain and helps ensure that suppliers share our commitment to preventing slavery, forced labour and human trafficking.

We are also undertaking steps to review our procurement processes to ensure that we have robust supplier management arrangements. To support this objective, we have appointed dedicated personnel to review contracts and we have deployed a contract management software system to help us build processes that enable us to monitor key supplier dates, contractual obligations and terms more effectively in a central repository.

Training and awareness

Capsticks is committed to ensuring that our people understand what modern slavery is, the circumstances in which it may occur and are aware of modern slavery indicators, so they are equipped to identify instances of possible slavery and human trafficking.

All new joiners are now required to complete training to make them aware of the risks around modern slavery and human trafficking. Training completion is tracked and monitored, with regular reporting to our Governance and Risk team. Non-completion may result in restricted access to the firm's systems. Refresher training is scheduled periodically to reinforce awareness across the firm.

Our Raising Concerns Policy includes a mechanism for reporting genuine suspicion of criminal conduct, or a breach of a legal, regulatory or professional obligation by anyone in the firm and this would include instances of modern slavery.

Measuring effectiveness

The firm's Senior Management Team is responsible for monitoring performance against our objectives and reviewing our objectives. Building on the steps we have taken to date, we have identified the following as objectives for the coming year:

- We continue to communicate our objectives in relation to the prevention of slavery both internally and externally.
- We continue to develop our contract management and procurement processes which will enable us to further embed our risk management strategy to monitor our relationships with our suppliers and to undertake more effective supplier reviews.
- We have begun a dedicated procurement review project which focuses on our internal contract escalation procedures, to ensure that our supplier contracts follow the correct escalation process depending on the risks associated with them.

Planning and priorities

The firm's Senior Management Team is responsible for monitoring performance against our objectives and reviewing our objectives. Building on the steps we have taken to date, we have identified the following as objectives for the coming year:

- Continuing to enhance our training for colleagues involved in the procurement of new systems and services, ensuring they are equipped to recognise and respond to potential modern slavery risks;
- Continuing to strengthen our supplier due diligence processes through a renewed questionnaire reflecting current best practices, and by implementing enhanced due diligence for higher risk suppliers; and
- Introducing measurable performance indicators to monitor our progress and undertake audits to assess the effectiveness of our Procurement and Supplier Management Policy, thereby ensuring that the risk of modern slavery within our business and supply chain remains low and is subject to continuous review.

Governance

Responsibility for overseeing compliance with our Modern Slavery obligations and the objective of this statement sits with the Chief Operating Officer. Modern slavery risks are actively monitored and updates provided to the Senior Management team.

Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the "Act"). The firm's financial year-end is 30 April, and this statement covers the period 2025/2026. This statement was approved by the firm's Senior Management Team on 27th October 2026 and signed by our Managing Partner on behalf of the firm. Our previous Modern Slavery Act Transparency statement can be viewed [here](#).

Signed:

Date: 27.10.2026

A handwritten signature in black ink, appearing to be 'Victoria Watson', written over a light blue horizontal line.

Victoria Watson

Managing Partner, Capsticks Solicitors LLP