

LAWFRONT HOLDINGS LIMITED

2025 Modern Slavery and Human Trafficking Statement

Modern Slavery and Human Trafficking Statement

For the Financial Year Ending 31 March 2025

Prepared in accordance with Section 54 of the Modern Slavery Act 2015

1 Opening statement from senior management

- 1.1 At Lawfront Holdings Limited (**Lawfront**) we are committed to preventing modern slavery and human trafficking from occurring within our operations and supply chain, and we seek to impose the same high standards on our suppliers. We have a zero-tolerance approach.
- 1.2 This statement which was approved by Lawfront's Board on 18 September 2025 and signed by Neil Lloyd, Chief Executive Officer, on behalf of Lawfront, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines the steps taken by Lawfront to prevent modern slavery and human trafficking in our operations and supply chains during the financial year ending 31 March 2025 (**reporting period**).
- 1.3 This is Lawfront's second transparency statement.

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 regional law firms.
- 2.2 In the reporting period, Lawfront increased its ownership of regional law firms from 3 to 6. The number of offices has increased from 19 to 27 offices throughout England & Wales and the number of employees has increased from 510 to 1,287 as at 31 March 2025.
- 2.3 Our businesses provide legal services across corporate/commercial, dispute resolution, employment, family, personal injury, private client, real estate and residential conveyancing. Our businesses also provide investment management services and debt collection/debt recovery 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>.
- 2.4 For the reporting period, Lawfront's annual turnover was over £70m.

3 Our supply chain

- 3.1 In order to deliver our legal and investment management services, we work with suppliers who supply us with employees, goods, and services to support the services we in turn provide to our clients. Our supply chain is in fact relatively limited and the vast majority of our suppliers and supply chains are UK based.
- 3.2 Our suppliers 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 and Governance

- 4.1 As part of our commitment to combating modern slavery and human trafficking, we have implemented group-wide policies which recognise that we play an important part in tackling modern slavery and sets out the responsibilities of our organisation and its managers and employees.
- 4.2 **Modern Slavery Policy:** Prohibits all forms of slavery and trafficking and outlines the appropriate reporting mechanisms.
- 4.3 **Whistleblowing Policy:** Enables employees to report concerns confidentially.
- 4.4 We continue to develop our **Procurement Policy** and our **Supplier Due Diligence Policy** which sets out our approach in relation to supplier due diligence.
- 4.5 Our ethical approach is reinforced by our employment policies such as those relating to inclusion and diversity.
- 4.6 We conduct an annual review of these policies.
- 4.7 We also seek to make sure our suppliers are aware of our policies and adhere to the same high standards.

4.8 Our procedures are being designed to:

4.8.1 establish and assess areas of potential risk in our business and supply chains;

4.8.2 monitor potential risk areas in our business and supply chains;

4.8.3 reduce the risk of modern slavery and human trafficking occurring in our business and supply chains; and

4.8.4 provide adequate protection for whistleblowers.

5 Risk assessment and due diligence

5.1 At Lawfront we continue to develop the process for evaluating the nature and extent of our exposure to the risk of modern slavery and human trafficking occurring in our supply chain.

5.2 Lawfront's business and operations have grown, and continue to grow, very rapidly which presents a practical challenge to being able to systematically introduce change. As contracts fall due to be renewed, we are constantly seeking to improve our procurement processes.

5.3 We seek to assess modern slavery risks in our supply chain using a risk-based approach. Key suppliers are evaluated based on the nature of the services being provided, geographic location and industry risk profile. Where we identify high risks, we will conduct enhanced due diligence including reviewing supplier policies and requesting completion of modern slavery questionnaires.

5.4 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.

5.5 Our assessment is that we do not operate in high-risk sectors or locations and that we are at low risk of modern slavery and human trafficking occurring within our own business. We consider there to be a greater risk of modern 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.

5.6 As part of our efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chains, we have the following due diligence procedures:

- 5.6.1 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;
- 5.6.2 during the reporting period we onboarded an experienced Head of Central Operations to work alongside our Procurement Consultant and they are working together to improve our supplier due diligence;
- 5.6.3 we have introduced a new Lawfront Procurement Data Request Form which addresses modern slavery and human trafficking in detail (see further below);
- 5.6.4 we are also seeking to educate those individuals responsible for managing third party relationships on the practical implementation of our anti- modern slavery and human trafficking policy.

6 Measuring effectiveness

- 6.1 Lawfront continues to develop ways in which to measure how successful we have been in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains. We had, during the reporting period, intended to develop some key performance indicators but we have found that prior to being able to do so we need to establish improved data collection.
- 6.2 We have therefore started to maintain records of our due diligence activities and responses to our Lawfront Procurement Data Request Form.
- 6.3 We continue to monitor whistleblowing reports although none to date have related to modern slavery/human trafficking issues.

7 Training and Awareness

- 7.1 We provide a training and education programme for all our employees which includes training on recognising and reporting on criminal conduct and activity.
- 7.2 Our aim is for all employees to understand the benefits of stringent measures to tackle modern slavery and human trafficking, as well as the consequences of failing to eradicate modern slavery and human trafficking from our business and supply chains.
- 7.3 We had hoped to have developed a training programme on modern slavery during the last reporting period but given the fast growth of the business that has proved to be a challenge. We have, however, recently recruited a Head of Talent Development and anticipate making progress in the next reporting period. The aim is to provide training which is tailored towards the employees' roles in the business

with those involved in procurement and supplier management having more in-depth training to help them identify and respond to modern slavery risks.

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

8 Progress in the reporting period

8.1 We have recruited key personnel in the form of a Head of Central Operations and Head of talent Development to support our work in this area.

8.2 We have introduced a Lawfront Procedure Data Request Form which we require to be completed as part of every tender or agreement reached between a supplier/contractor and Lawfront (or group company). This seeks information from suppliers on the following:

8.2.1 whether a supplier has a formal policy on modern slavery and human trafficking;

8.2.2 how it makes its employees and sub-contractors aware of its policies and procedures;

8.2.3 how compliance with legislation is enforced;

8.2.4 what processes are in place to prevent forced labour and human trafficking in their recruitment practices;

8.2.5 if they use recruitment agencies, whether those agencies are vetted to ensure adherence to ethical practices;

8.2.6 how they monitor to identify and mitigate risks of modern slavery and human trafficking;

8.2.7 their supply chain mapping and due diligence processes;

8.2.8 details of training for their employees.

8.3 We have also reviewed and updated our policies and processes.

9 Future commitments

9.1 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.

9.2 Our key priorities for the next reporting period are set out below.

- 9.3 Assessing existing contracts - we intend to continue to review our existing contracts as they fall due for renewal.
- 9.4 Identifying and managing risks in new procurements - we intend to review and revise our central contract management processes and any related documentation and to continue to deploy the Lawfront Procurement Data Request Form to seek additional information from suppliers.
- 9.5 Collaboration- we will collaborate with industry peers to share best practice.
- 9.6 Monitoring – we will review our programme and continue to develop metrics for measuring our effectiveness at preventing modern slavery and human trafficking.
- 9.7 Training – we will 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.

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

Signed:



Neil Lloyd

Chief Executive Officer

Lawfront Holdings Limited

Date: 18 September 2025