

LAWFRONT HOLDINGS LIMITED

2026 Modern Slavery and Human Trafficking Statement

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Lawfront Holdings Limited (**Lawfront**) and those entities which operate as part of the Lawfront Group for the financial year ending 31 March 2026.

It is prepared in accordance with Section 54 of the Modern Slavery Act 2015.

1 Opening statement from senior management

- 1.1 At Lawfront we are committed to preventing modern slavery and human trafficking from occurring within our operations and supply chain, and we require the same high standards from our suppliers. We operate a zero-tolerance approach to all forms of modern slavery including forced labour, debt bondage, servitude and human trafficking.
- 1.2 This statement was reviewed and approved by Lawfront's Board of Directors at its meeting on 25 September 2026 and is signed by Peter Martin-Simon, Chief Executive Officer, on behalf of Lawfront. It is made pursuant to section 54(1) of the Modern Slavery Act 2015 (**Act**) 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 2026 (**reporting period**). This statement is published on the homepage of Lawfront's website in accordance with section 54(7) of the Act. It is also published on the websites of the group's businesses.
- 1.3 This is Lawfront's third transparency statement. We recognise that compliance with the Act is an ongoing process, and this statement reflects our continued progress in strengthening our approach.

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. It is the parent company of a number of regional law firms.
- 2.2 In the reporting period, Lawfront had ownership of 6 regional law firms. The number of offices increased from 27 to 29 offices throughout England & Wales and the number of employees increased from 1,287 to 1,351 as at 31 March 2026.
- 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 £130m.
- 2.5 During the reporting period, we acquired Trethowans LLP. Newly acquired businesses are required to adopt Lawfront's group policies, including those relating to modern slavery within 3 to 6 months of acquisition. Their existing supplier contracts are reviewed as part of the integration process and any contracts that do not meet our standards are prioritised for renegotiation or termination at the earliest opportunity.

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 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, SaaS, 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 Subscriptions;
 - 3.2.8 Telecommunications.
- 3.3 We recognise that our visibility is currently limited to Tier 1 (direct) suppliers. We acknowledge that modern slavery risks may also exist deeper in our supply chain, for example, in the manufacture of IT hardware overseas or in the sub-contracted labour used by our cleaning, security and facilities management providers. Improving visibility beyond Tier 1 is a priority for the next reporting period (see Section 10 below).

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, 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 without fear of retaliation.
- 4.4 **Procurement Policy:** Sets out our approach in relation to supplier selection, onboarding and ongoing due diligence.
- 4.5 Our ethical approach is reinforced by our employment policies such as those relating to inclusion and diversity, and by the professional regulatory frameworks that govern our businesses.
- 4.6 Our policies were reviewed and updated during the reporting period.
- 4.7 We require our suppliers to be aware of our policies and to adhere to equivalent standards. Where a supplier is unable or unwilling to meet our requirements, we will consider whether the relationship should continue.
- 4.8 Our procedures are 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 on an ongoing basis;
 - 4.8.3 Reduce the risk of modern slavery and human trafficking occurring in our business and supply chains;
 - 4.8.4 Provide adequate protection for whistleblowers; and
 - 4.8.5 Ensure appropriate remedial action is taken where concerns are identified.

5 Risk assessment and due diligence

- 5.1 We 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, industry risk profile and the extent to which they use low-skilled or temporary labour.

5.2 We have identified the following supplier categories as presenting a higher inherent risk of modern slavery:

5.2.1 Cleaning, security and facilities management: This category is recognised as presenting elevated risks due to the prevalence of outsourced, low-paid and temporary labour;

5.2.2 Recruitment agencies: Particularly those supplying temporary or agency workers where there is a known risk of exploitative practices;

5.2.3 IT hardware: Where products may be manufactured in jurisdictions with weaker labour protections and limited supply chain transparency.

5.3 Where we identify elevated risks, we conduct enhanced due diligence including reviewing supplier policies, requesting completion of modern slavery questionnaires, and where appropriate we would conduct site visits or request third party audit reports.

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 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 focused our efforts on our higher-risk supplier categories identified above.

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 Our Head of Central Operations works alongside our Procurement Team to implement and improve our supplier due diligence processes;

- 5.6.3 All new suppliers are required to complete the Lawfront Procurement Data Request Form which addresses modern slavery and human trafficking in detail (see Section 8 below);
- 5.6.4 Existing suppliers in higher-risk categories are subject to periodic re-assessment;
- 5.6.5 Individuals responsible for managing third-party relationships receive training on the practical implementation of our anti-slavery policy.
- 5.7 Were we to identify any modern slavery we would report to the authorities, support victims, terminate non-compliant suppliers and co-operate with enforcement bodies.

6 Measuring effectiveness

- 6.1 We measure the effectiveness of our anti-slavery programme using the following key performance indicators:
 - 6.1.1 Percentage of new suppliers completing the Lawfront Procurement Data Request Form: 100%;
 - 6.1.2 Percentage of higher-risk existing suppliers assessed or reassessed during the reporting period: 0%;
 - 6.1.3 Number of suppliers identified as requiring enhance due diligence: 0;
 - 6.1.4 Number of suppliers rejected or placed on watch due to unsatisfactory responses: 0;
 - 6.1.5 Number of employees completing modern slavery training during the reporting period: 252;
 - 6.1.6 Number of whistleblowing or other reports related to modern slavery concerns: 0.
- 6.2 During the reporting period, we sent the Lawfront Procurement Data Request Form to 2 suppliers. We received 2 completed responses representing a response rate of 100%. Where responses were unsatisfactory or incomplete, we followed up with the supplier concerned and, in all cases, received adequate assurances.
- 6.3 No incidents of modern slavery or human trafficking were identified within our business or supply chains during the reporting period. No whistleblowing reports were received in relation to modern slavery concerns.

- 6.4 We continue to refine our data collection and reporting processes to enable more detailed analysis in future reporting periods.

7 Training and Awareness

- 7.1 We provide training and awareness for our key employees to ensure they understand what modern slavery is, how to recognise the signs of exploitation, and how to report concerns.
- 7.2 It is a requirement for key employees to understand the benefits of 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 Training is compulsory for all employees responsible for managing third-party relationships and completion rates are monitored. During the reporting period, 100% of targeted employees completed their training.
- 7.4 Our aim is for all employees of Lawfront to understand the importance of stringent measures to tackle modern slavery and human trafficking as well as the consequences of failing to eradicate it from our business and supply chains. We have created a rolling programme to ensure all employees receive training to ensure awareness of the issues. We have completed training for all employees in Lawfront and 3 of our 6 firms and are continuing to roll the training out to employees of the remaining firms.

8 Progress in the reporting period

- 8.1 During the reporting period we made progress against our stated objectives.
- 8.2 Recruitment: We recruited a Head of Talent Development to support our work in this area. We also strengthened our Procurement Team with an additional hire.
- 8.3 Supplier Due Diligence: We deployed the Lawfront Procurement Data Request Form to 2 new suppliers. This form requires suppliers to provide information on the following:
 - 8.3.1 whether the supplier has a formal policy on modern slavery and human trafficking;
 - 8.3.2 how it makes its employees and sub-contractors aware of its policies and procedures;
 - 8.3.3 how compliance with legislation is enforced;

- 8.3.4 what processes are in place to prevent forced labour and human trafficking in their recruitment practices;
 - 8.3.5 if they use recruitment agencies, whether those agencies are vetted to ensure adherence to ethical practices;
 - 8.3.6 how they monitor to identify and mitigate risks of modern slavery and human trafficking;
 - 8.3.7 their supply chain mapping and due diligence processes;
 - 8.3.8 details of training provided to their employees.
- 8.4 Policy development: We reviewed and updated our Modern Slavery Policy, Procurement Policy and Supplier Due Diligence Policy.
- 8.5 Training: We deployed training to key employees and began to develop a tiered training programme on modern slavery awareness (see Sections 7 and 10).

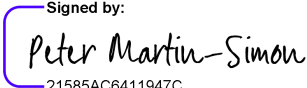
9 Remediation

- 9.1 If we were to identify or suspect an instance of modern slavery or human trafficking in our business or supply chains, we would take the following steps:
- 9.1.1 Immediately report the matter to the relevant law enforcement authorities including the National Crime Agency's Modern Slavery Helpline;
 - 9.1.2 Take steps to protect and support any identified or suspected victims, including referral to appropriate support services;
 - 9.1.3 Investigate the circumstances and take appropriate action against any supplier found to be in breach, which may include suspension or termination of the commercial relationship;
 - 9.1.4 Cooperate fully with any resulting investigation by enforcement bodies;
 - 9.1.5 Review our due diligence procedures to identify how the issue arose and what steps can be taken to prevent recurrence.
- 9.2 We will not knowingly support or do business with any organisation involved in modern slavery or human trafficking. However, we recognise that abruptly terminating a supplier relationship without considering the impact on workers may not always be in the best interests of potential victims. Our approach will therefore be proportionate, informed by expert guidance and focused on achieving the best outcome for those affected.

10 Future commitments

- 10.1 We recognise the importance of our relationships with third party suppliers and of encouraging ongoing, open and honest dialogue about challenges in the field of modern slavery and human trafficking. We will continue to strengthen our policies and processes and take steps to improve them where any weakness is identified.
- 10.2 Our key priorities for the next reporting period are:
- 10.2.1 Assessing existing contracts: We will continue to review existing contracts as they fall due for renewal and will prioritise higher-risk supplier categories for early review;
 - 10.2.2 Supply chain mapping beyond Tier 1: We will take steps to improve our visibility of labour practices in our suppliers' own supply chains, initially focussing on cleaning/facilities management and IT hardware;
 - 10.2.3 Identifying and managing risks in new procurements: We will continue to deploy the Lawfront Procurement Data Request Form and will review and revise our central contract management processes and related documentation;
 - 10.2.4 Supplier Code of Conduct: We will develop a Supplier Code of Conduct which sets out the minimum standards we expect from our suppliers in relation to labour practices, ethical conduct and transparency regarding their own supply chain;
 - 10.2.5 Collaboration: We will engage with industry peers and relevant initiatives to share best practice;
 - 10.2.6 Monitoring and KPIs: We will continue to develop and refine our metrics for measuring effectiveness, with the aim of reporting more granular data in our next statement;
 - 10.2.7 Training: We will ensure all employees responsible for managing third-party relationships complete their modern slavery training and will continue to extend awareness training to all employees across the group;
 - 10.2.8 Integration of acquisitions: As the group continues to grow, we will maintain a robust process for integrating newly acquired businesses into our anti-slavery framework within a defined timeframe.

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

Signed:  Signed by:
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Peter Martin-Simon

Chief Executive Officer

Lawfront Holdings Limited

Date: 28 September 2026