

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020/21

INTRODUCTION

This statement is made in accordance with Section 54 of the Modern Slavery Act (2015) (referred to hereafter as 'the Act') and equates to our slavery and human trafficking statement. The firm's financial year concludes on 30 June each year; therefore, this statement covers the period 1 July 2020 - 30 June 2021.

This statement was approved by the Board of Directors on 17 November 2021 and signed by our CEO, Shirley Woolham. A signed copy of this statement can be made available on request.

As a firm of solicitors, we are committed to acting ethically and have a zero tolerance stance in relation to all forms of bonded or forced labour including human trafficking and modern slavery.

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, employment, residential property disputes and consumer matters.

We are a partner of choice for many well-established insurers, brokers and trusted strategic partners, providing their customers with legal services, particularly in respect of road traffic accident claims.

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 a range of other types of experts who support our customers' claims as and where required.

Additionally, we also procure the services of various suppliers whose functions support with the day to day maintenance of our office space.

WITHIN OUR BUSINESS

Remuneration

As in previous years, we have continued to ensure that our colleagues are paid at least the UK National Living Wage. During the period covered by our statement, we have also conducted our annual salary benchmarking review to ensure that our colleagues are appropriately recognised for the work that they do.

Pre-employment checks

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.

We are alive to the increased risks of onboarding new colleagues where the pandemic has led to this needing to be performed remotely. Our processes were considered and some enhancements were made in relation to remote interviews.

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All prospective colleagues continue to undergo an array of pre-employment checks including verifying their identity, right to work in the UK and their professional qualifications where applicable. We have controls in place to highlight scenarios that could be considered potential warning signs of modern slavery to enable welfare checks to be conducted e.g. multiple colleagues living at the same address, colleagues with the same bank information or the presence of auto forwards on colleagues' bank accounts.

Recruitment

Where recruitment agencies are used to source new colleagues, we only use trusted organisations that we have an established relationship with. Prospective colleagues recruited in this way 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 Committee

We continue to recognise that since the occurrence of the Covid-19 pandemic the business and colleagues have had to embrace new ways of working. Our Wellbeing Committee continue to be on hand to support our colleagues with a view to improving and maintaining their mental and physical health. During the course of the pandemic the Committee have issued guidance for those working from home and our Leadership team look to ensure all colleagues are supported whether they are working remotely or in the office.

As part of our commitment to the wellbeing of our colleagues, we have followed applicable Government guidance during the pandemic to ensure their safety.

Additionally, our colleagues also have access to our Employee Assistance Programme as well as our Mental Health First Aiders should they require any additional support in relation to any aspect of their wellbeing.

EDI Committee

We believe that equality, diversity and inclusion is integral to a successful working environment. Our colleagues bring with them an incredible diversity of viewpoints, beliefs and attitudes which enrich our business.

Since our last statement was published we have embarked on a journey to have courageous conversations which has led to the development of our EDI Committee. Our group is passionate about creating an inclusive and supportive workplace and culture where everyone can be true to themselves, feels a sense of belonging and can reach their full potential.

By continuing to invest in our people and their culture it is hoped that we can continue to foster a safe and open environment for colleagues to feel comfortable sharing any concerns that they might have.

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 External Equal Opportunities Policies, 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 available to all colleagues on our internal Learning Hub should they need to access them.

Each of our policies is owned by a key stakeholder who is takes ownership for completing a regular review of the content to take place to ensure the content remains relevant and fit for purpose. As part of the review cycle, each policy is considered by our Executive Risk Committee for sign off. Key policies are also Board reserved to ensure visibility and oversight at this level.

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 two large, trusted partners. As part of this process all involved parties were subject to enhanced due diligence which featured exploring the steps each takes in relation to compliance with the Act. It is expected that this process would offer assurance that we continue to work with organisations whose values and approach to doing business are aligned with our own.

We continue to include contractual provisions relating to legislative compliance within our agreements with suppliers. Over time, more of these have evolved to specifically reference the Modern Slavery Act. In addition, we continue to have a contractual right to audit key suppliers and the process for the same continues to feature questions around compliance with the Act.

Within the period covered by this statement our Risk and Partnerships teams have collaborated to review our supplier audit template to ensure this remains fit for purpose and adequately captures the information required to consider any emerging risks. This questionnaire specifically queries the policies and controls an organisation has in place to ensure compliance with the Modern Slavery Act as well as their requirement to publish a statement.

Our Enhanced Supplier Framework which sets out our risk based approach to supplier due diligence referenced in our previous statement is now successfully embedded.

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 the maintenance of a supplier audit plan.

All risks are owned, managed and monitored by a member of our Executive Team with relevant reporting on the same being a regular agenda item in our monthly Executive Risk Meeting.

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Throughout the last year, we have continually reviewed our Risk Assessment to take into account the evolving risk presented by the pandemic and adjusting our response accordingly.

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 features in our mandatory Equality and Diversity ELearning module.

This is intended to inform colleagues how to identify and report potential instances via our internal reporting process. We require this module to be completed by all colleagues joining the business as well as featuring in our annual ELearning calendar to be completed by existing colleagues.

Our colleagues continue to have access to additional resources via our Learning Hub. This includes webinars on a variety of topics to support our colleagues to continue to develop.

PERFORMANCE INDICATORS

As in previous years, we monitor the effectiveness of the mechanisms we have in place by:

- Monitoring completion of the annual review of our policies;
- Monitoring the delivery and completion of mandatory ELearning modules;
- Monitoring completion of pre-employment checks;
- Monitoring completion of the supplier audit schedule.

Each of the above are reviewed as part of the key control framework for the appropriate business area.

Shirley Woolham
Chief Executive Officer