

IDR Law Limited – Modern Slavery Act Statement

Year ended 31st August 2023

1. Introduction

This statement sets out the measures IDR Law Limited (IDR) takes to identify, manage, monitor, and report on all modern slavery risks, relating to the management of the business and key stakeholders, particularly the suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken to ensure there is no slavery or human trafficking.

IDR has a responsibility to take a robust approach to slavery and human trafficking and is wholly committed to preventing slavery and human trafficking and has a zero-tolerance approach to modern slavery.

2. Scope, structure, and supply chains

This statement covers all of IDR's business activities, which are principally the delivery of legal services support to those with a contentious probate legal need and are only undertaken within the UK. Currently there are no subsidiaries of IDR, although IDR has the benefit of a minority investment from BGF Investments LP and BGF UK Enterprise Fund, who are part of the BGF Group Plc, who have their own Modern Slavery Statement accessible via their website www.bgf.co.uk. IDR is wholly satisfied with the approach BGF have adopted to modern slavery.

The statement also incorporates the approach to the supply chain used to deliver the IDR services and the most appropriate levels of risk assessments in relation to slavery or human trafficking are applied. There is no risk appetite for a breach of The Modern Slavery Act 2015.

3. High Risk Areas

No high-risk areas have been identified within either IDR or its supply chain, however ongoing vigilance of this is maintained should this position ever change.

4. Accountability/Responsibility

Accountability for the anti-slavery initiatives resides with the Board of directors, however every member of the workforce is individually and collectively responsible for ensuring IDR meets the modern slavery obligations. The following controls support our approach:

- Governance – The directors have ultimate oversight and are responsible for regularly reviewing and approving the key performance indicators and internal control framework

- Policies – The Modern Slavery Statement is the responsibility of the directors to approve annually and supported by several other policies, see below for further details
- Contracts – With key suppliers contracts are established which contain provisions relating to the need to have, amongst other things, Modern Slavery Act policies and procedures in place
- Recruitment – Adopting a detailed recruitment and employment vetting and screening process
- Risk assessments – The directors are accountable through a risk management framework for the management of all key risks, including the modern slavery risk
- Investigations/due diligence – The directors are accountable for the compliance of the supply chain with all regulatory and legal requirements
- Training – The workforce receive regular compliance training on all relevant regulatory and legal matters
- ESG – IDR has undergone an external assessment of the approach to ESG in the last year and has an ongoing programme of work to continue to evolve and enhance the commitment to a range of ESG related activities
- Values and conduct – the IDR values and expected standards of conduct ensure an ethical approach is always taken regarding modern slavery responsibilities

5. Relevant policies/codes

IDR operates the following policies that support our approach to the identification, monitoring and management of modern slavery risks and the steps we have taken to prevent slavery and human trafficking:

5.1 Employment vetting and screening Policy

IDR operates a robust recruitment process including employment vetting and screening, which includes checks on the eligibility to work in the UK.

5.2 ESG Policy

The IDR approach to ESG aligns with the values of the business and squarely places ethical conduct at the heart of how IDR is managed, including on matters of sustainability, social responsibility, and good governance.

5.3 Whistleblowing Policy

IDR encourages all members of the workforce, as well as customers, suppliers, business partners and others to report any concerns related to IDR activities or those of the supply chain partners. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

6. Due diligence

IDR undertakes a robust approach to due diligence when considering appointing a new key supplier and managing the performance of existing key suppliers. The due diligence and performance reviews include:

- Assessing the supply chain to assess any product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new key supplier
- Reviewing on a regular basis all aspects of the supply chain

- Consideration if appropriate of supplier audits or assessments where there may a greater degree of focus on slavery and human trafficking where general risks are identified within the supply chain
- Creating an annual risk review of the supply chain
- Taking steps to improve substandard suppliers' practices
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship

7. Performance indicators

The key performance indicators are we:

- Annually reviewing and updating as appropriate the modern slavery statement and supporting policies, processes, and procedures
- Regular induction and ongoing training on modern slavery for all members of the workforce
- Annual modern slavery risk assessment
- Maintaining contractual terms with key suppliers addressing modern slavery expectations
- Regularly assessing the suitability of the supply chain from a modern slavery perspective

8. Training

The modern slavery training covers:

- Supply chain conditions, which should be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues
- What external help is available, for example through the Modern Slavery Helpline, Gang Masters and Labour Abuse Authority and "Stronger together" initiative
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps we should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the supply chain