Modern Slavery Act Transparency Statement

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 2024/2025. This statement was approved by the firm's Senior Management Team on 26 January 2026 and signed by our Managing Partner on behalf of the firm. Our previous Modern Slavery Act Transparency statement can be viewed here.

1. Our Values

1.1. 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.

1.2. 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.

2. Business organisational structure and supply chains

2.1. Capsticks is a law firm, which operates within the UK, we have five 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.

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

2.3. Our supply chains provide us with people, goods and services to support the services we provide to our clients. Our suppliers are generally local although some are part of global businesses.

3. Policies

3.1. Capsticks opposes all forms of slavery and human trafficking, and we are committed to taking steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

3.2. We promote ethical values and behaviour within our business, and our Anti-Slavery Policy reflects these principles with a commitment to conduct all our business relationships with ethical principles.

4. Due diligence and risk assessment processes

4.1. 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. However, we do review this assessment periodically.

4.2. 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 continue to review and refine our risk assessment process in this area.

4.3. We work with our suppliers' using tools such as supplier assessment questionnaires, provisions in our supplier contracts and our supplier code to ensure we communicate our requirements to suppliers.

4.4. Our overall objective is to establish and maintain supplier relationships, which will minimise the risk of slavery and human trafficking within our supply chains.

5. Procurement Process

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

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

5.3. We ask our suppliers to sign up to our Supplier Code of Conduct, which sets out what we require from our suppliers and contractors.

5.4. We are also currently undertaking steps to review our procurement processes to ensure that we have robust supplier management.

5.5. We have deployed a new contract management software system, to help us build in processes which enable us to monitor key supplier dates and terms more effectively.

6. Training and awareness

6.1. 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.

6.2. All new joiners are now required to complete training to make them aware of the risks around modern slavery and human trafficking.

6.3. 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.

7. Measuring effectiveness

With regard to progress made on previous Key Performance Indicators, we have:

7.1. We continue to communicate our objectives in relation to the prevention of slavery both internally and externally.

7.2. We continue to develop our contract management system 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.

7.3. we have begun a dedicated procurement review project which is focusing on our internal contract escalation procedures, to ensure that our supplier contracts follow the correct escalation process depending on the risks associate with them.

8. Planning and priorities

8.1. 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:

8.2. enhancing our training by expanding our annual mandatory training to include tailored 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;

8.3. strengthening our supplier due diligence processes through a renewed questionnaire reflecting current best practices, and by implementing enhanced due diligence for higher risk suppliers; and

8.4. 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.

8.5. These objectives will be managed by our Chief Operating Officer, who has oversight of our modern slavery compliance.

This statement is made by Capsticks Solicitors LLP:



Signed:

Date: 26th January 2026

Martin Hamilton

Managing Partner, Capsticks Solicitors LLP