
Modern Slavery Policy

1. Introduction

Capital Law is committed to acting responsibly, ethically and with integrity in everything we do. We recognise that modern slavery and human trafficking are serious global issues, and we are committed to preventing them within our business and across our supply chains.

While the nature of our work means that the risk of modern slavery is low, we do not take this for granted. We take a proportionate, risk-based approach to identifying, assessing and managing potential risks, and we are committed to continuous improvement in our practices. Where risks or concerns are identified, we will act promptly and appropriately.

2. Business Structure

The Capital Group is a corporate structure comprising multiple entities with distinct functions across legal services, consultancy, administrative support, and litigation funding. The Group includes **Capital Law Limited (SRA 644688)**, an SRA-authorized commercial law firm providing legal services, and **Capital Law and People Limited**, a non-regulated associated company offering administrative services. The Group's holding company, **Capital Holdings Limited**, is not regulated, alongside **Capital People Consultants Limited**, which provides consultancy and training services, and **New North Litigation Capital Investment Advisers Limited**, a wholly owned subsidiary operating independently within the litigation funding sector. This policy applies to all entities within the Group. While the scope of individual activities varies, the Group remains committed to maintaining a consistent approach to preventing modern slavery.

3. Legal and Regulatory Framework

This policy reflects our commitment to the principles of the Modern Slavery Act 2015 and the UK Government's Modern Slavery Guidance. It also supports our wider professional and ethical obligations under the SRA Principles and Codes of Conduct.

These standards require all our people to act with integrity, uphold the rule of law and maintain public trust and confidence in the legal profession, including taking appropriate steps to protect vulnerable individuals from exploitation.

4. Risk Profile

Given the nature of our business and our UK-focused operations, we consider the inherent risk of modern slavery to be low. Our activities do not typically involve high-risk jurisdictions, complex labour arrangements or unverified suppliers.

That said, we remain alert to potential risks. We regularly review our practices and supplier relationships, taking proportionate steps to identify, assess and manage any concerns. This approach reflects our commitment to transparency, accountability and responsible business conduct.

As part of our wider commitment to ethical and sustainable business practices, we are a member of the Legal Sustainability Alliance (LSA). Participation in the LSA supports broader Environmental, Social and Governance (ESG) objectives, including addressing modern slavery risks within supply chains.

5. Supply Chain Management

Capital Law is committed to responsible procurement and supply chain management. When engaging suppliers, we consider ethical standards, alignment with our values and compliance with legal obligations, alongside commercial considerations.

Our supply chain is relatively straightforward, reflecting our UK-based operations and focus on legal services. Our primary value chain is the delivery of legal services by our partners and staff. Our secondary value chain includes:

- Recruitment and HR
- IT services
- Facilities management
- Cleaning and catering
- Other professional and operational services

Where appropriate, we request information from suppliers about their modern slavery policies and due diligence arrangements and retain relevant records within our quality management system. Suppliers are expected to comply with applicable labour, employment and human rights laws and to demonstrate ethical working practices.

We do not knowingly engage with organisations involved in modern slavery or human trafficking. Any reasonable suspicions will be reported to the appropriate authorities. Where a supplier does not meet our expectations, we will assess the circumstances and take appropriate action, which may include terminating the relationship.

6. Firm Policies, Standards and Due Diligence

Our approach to preventing modern slavery is supported by robust internal policies and procedures that promote ethical behaviour, fairness and accountability. These include policies covering recruitment and selection, whistleblowing, equality, diversity and inclusion, and risk management.

Our Recruitment Policy includes appropriate pre-employment checks, such as confirming the right to work in the UK, obtaining employment references and carrying out other relevant screening. These measures help reduce the risk of exploitation, forced labour or human trafficking within our workforce.

We comply with all applicable employment laws, including those relating to contracts, working hours and pay, and we carry out regular pay reviews and benchmarking exercises.

The firm reviews its key policies annually, including:

- Anti-Bribery, Corruption and Fraud
- Equality, Diversity, and Inclusion
- Employment and Recruitment
- Whistleblowing
- Risk Assessment

Together, these policies reinforce our expectations of fair treatment, transparency and responsible conduct across our business and supply chains.

7. Reporting and Whistleblowing

We encourage an open and supportive culture in which concerns can be raised without fear of retaliation. All staff have a personal responsibility to speak up if they suspect modern slavery, human trafficking or any other form of unethical or unlawful conduct.

Our Whistleblowing Policy provides a confidential mechanism for raising concerns. All reports are taken seriously and investigated appropriately.

8. Training and Awareness

We provide proportionate training and guidance to help our people understand what modern slavery is, recognise potential indicators and know how to raise concerns.

All staff are expected to maintain a working knowledge of relevant policies, including our Anti-Bribery and Corruption Policy, Whistleblowing Policy and other policies that support ethical and lawful behaviour.

9. Governance and Responsibility

Overall responsibility for this policy rests with senior management, who are accountable for ensuring appropriate measures are in place to prevent modern slavery.

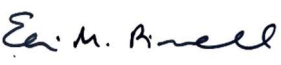
Day-to-day responsibility for implementation is shared across Compliance, HR, IT and Facilities, with clear ownership for risk assessment, supplier engagement and training. This reflects our view that preventing modern slavery is a collective responsibility.

10. Review

This policy is reviewed annually to ensure it remains appropriate to our risk profile, effective in practice and aligned with legal and regulatory developments, including guidance issued under the Modern Slavery Act 2015.

11. Signature

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the firm's slavery and human trafficking statement. It has been approved by the Board of Directors.

Signed: 

Name: Elin Pinnell
Title: Managing Partner
Date: 09/03/2026
