

Anti-Slavery and Human Trafficking Statement

Introduction

This statement covers the financial year of 2023 to 2024 and is made on behalf of Axiom Ince Limited trading as both Axiom DWFM and Ince & Co (hereinafter “the Firm”), in accordance with Section 54 of the Modern Slavery Act 2015 (hereinafter “the Act”).

Any reference herein to “we”, “us” and “our” should be interpreted to mean the Firm.

Overview of the Firm

The Firm is a dynamic and fast-growing law practice with a strong presence in the United Kingdom. The Firm operates as a private limited liability company with Company Number 0960177 and is registered in England and Wales, with its registered office at 101 Wigmore Street, London, W1U 1FA.

We have a broad range of legal expertise and offer legal solutions and advice to a wide client base. More information about our organisation and our staff can be found on our website.

Our Values and View on Modern Slavery

As part of the Legal Sector, we recognise that we have a responsibility to take a robust approach to slavery, servitude, forced or bonded labour and human trafficking (collectively referred to hereinafter as “modern slavery”).

We have a zero-tolerance approach towards modern slavery, and we will not knowingly support any transaction or relationship that is involved in modern slavery. We are committed to acting ethically and with the utmost integrity in our relationships, associations, and operations.

It is our view that we are at a low risk of modern slavery occurring within the Firm, as we are a professional services firm and are strictly regulated by professional regulatory bodies in the jurisdiction within which we operate. This assessment is based on several factors, including that the Firm is primarily comprised of permanently employed skilled staff in a client-focused service sector that is regulated within strict ethical frameworks. Furthermore, the Firm has a rigorous due diligence process in respect of recruiting and appointing staff and engages in continuous training.

Our Approach to Combating Modern Slavery

As a dynamic and fast-growing law firm servicing multiple high-profile clients, we strive for excellence in all areas and our culture is derived from our strong core values of diversity, inclusivity, equality, and respect for all individuals.

We have various practices in place to combat modern slavery. These are set out below.

Recruitment and Appointment

We have detailed recruitment, screening and onboarding processes in place and our dedicated in-house human resources and compliance team apply the highest level of due diligence in this regard.

Once formally employed by us, our staff are provided with training and induction, which includes training on the Firm's values and reiteration that all staff are expected to comply with any and all relevant legislation, professional codes of conduct, and the Firm's internal policies and procedures, which include, but are not limited to, Whistleblowing Policy, Grievance Procedure, Anti-Bribery and Fraud Policy and a Modern Slavery Policy.

We further offer support to our staff in respect of their health and wellbeing.

As part of our culture, we prioritise our staff's health and wellbeing, and offer in-house support in relation to the mental wellbeing of our staff. Our offices have trained mental health aiders who are equipped to address various mental health concerns and who often reach out to our staff, encouraging them to reach out if they are in need of assistance.

Our Firm has an in-house Human Resources and Operations Department dedicated to ensuring adherence to the Firm's policies and procedures and relevant legislation, in particular employment and labour legislation.

Our Suppliers

Majority of our suppliers are based in the United Kingdom, and we are of the view that the services provided to us by our suppliers, also being entities in professional services, are low risk for modern slavery. We only rely on our suppliers for professional services, and we do not make any requests of our suppliers that could result in our suppliers violating any laws.

Planned Approach for Combatting Modern Slavery in the 2023 – 2024 Financial Year

- We will roll out specific training on modern slavery and raise awareness of modern slavery.
- We will develop a Supplier Code of Conduct and roll this out to our supplier base, obtaining their undertaking that their conduct is in line with our values, as set out therein.
- We will expand our Human Resources and Operations Department to keep up with the growth of the Firm and ensure that the Firm's integrity is upheld as we grow, by ensuring that the 'employee voice' is still heard at higher management levels.
- Conduct anonymous online surveys amongst our employees to establish their overall experience and satisfaction in relation to their working conditions and obtain their input on areas they feel the Firm can improve on.

Approval

This statement has been approved for and on behalf of the Firm and the Partners of the Firm.



Signed by Pragnesh Modhwadia

Managing Partner and Authorised Representative of the Firm