

Transparency Statement 2022

This statement is made on behalf of The Ince Group plc and its subsidiaries (together “Ince” or “we”) pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”) and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022. This is the fourth statement that The Ince Group plc has been required to publish.

Our business

The Ince Group plc (“Ince” or “we”) is a public limited company formed under the laws of England & Wales with company registration number 03744673.

The Ince Group plc is an international, full service corporate and commercial law firm specialising in the shipping, insurance, aviation, energy, construction/real estate, and ultra-high-net-worth sectors. The Group has offices across Asia, EMEA and the UK and provides corporate, commercial, and ultra-high-net-worth clients with comprehensive legal and advisory solutions for their complex legal and strategic needs.

We operate under a number of different entities and brands in the United Kingdom, including Ince Gordon Dadds LLP (which trades as Ince, Michael Kelly & Co and Alen-Buckley Solicitors). We are also affiliated with a number of different entities internationally who are expected to adhere to our standards on preventing modern slavery. A full list of our subsidiaries is set out in our Annual Financial Statements which are available on our website. Our network includes offices in the United Kingdom, Greece, Gibraltar, Cyprus, Monaco, UAE, Hong Kong and China.

The Ince Group has a zero-tolerance approach towards any form of modern slavery as defined in Article 4 of the Human Rights Convention. We are committed to ensuring that modern slavery does not take place within our business or supply chain and that we, and our suppliers, act with integrity and professionalism.

Policy & procedures

We believe that, as a professional services firm, the risk of modern slavery or human trafficking occurring in our business or supply chain is low. Our supplies include suppliers of IT software and hardware, office cleaning and other facilities management providers, catering, transport, office and stationary equipment and professional services such as legal counsel, banks, insurers and recruitment agencies. We have taken a risk-based approach to monitor our business and suppliers which allows us to allocate resources appropriately and efficiently. Our Anti-Slavery Policy forms part of the Employee Handbook and the Firm’s Senior Management Team has overall responsibility for ensuring that our Policy complies with our legal and ethical obligations. Day-to-day implementation is managed by the Group People Director who has responsibility for implementing our Policy in this area as well as monitoring its use and effectiveness.

As part of the on boarding of new suppliers we may request further information on the Modern Slavery procedures in place at the company. This will vary depending on the level of risk presented. Employees are also encouraged to report any concerns.

Training

We believe the most effective way for us to prevent modern slavery from occurring in any part of our business is through the training and education of our employees. We will continue to provide training and awareness to those employees who are most likely to be involved in the procurement of services or products to the Group. This training will increase awareness of the implications of modern slavery, our obligations as imposed by the Act and our commitment to fair employment practices.

Looking ahead

We will continue to review and monitor the impact of our procedures, policy and training to ensure that modern slavery or human trafficking does not take place within Group Companies and that all suppliers abide by our ethical standards.

This statement has been approved by the Board of Directors of The Ince Group plc.

Donald C Brown

Donald Brown

Chief Executive Officer