

## **Slavery and Human Trafficking Statement**

This statement is made on behalf of CMS Cameron McKenna LLP pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**Act**") and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2016. It sets out the steps that we have taken and are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

CMS Cameron McKenna LLP is a limited liability partnership registered in England and Wales with registration number OC310335. It is authorised and regulated by the Solicitors Regulation Authority of England and Wales with SRA number 423370 and by the Law Society of Scotland with registered number 47313. We are part of the CMS international group of law firms but this statement focuses on the operations of our UK business. Further information about the firm can be found at <https://cms.law/en/GBR/>

### **Our Approach**

As a law firm, upholding the highest professional standards and complying with all laws, regulations and rules relevant to our business is an absolute priority. Our corporate social responsibility strategy aims to improve the impact of our business on society and the economies of the regions within which our offices are based.

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We have a clear Whistleblowing Policy which is published on our intranet site: if there are any genuine concerns about any wrongdoing or breaches of law these concerns can be raised in confidence without fear of disciplinary action.

### **Supplier Due Diligence**

Our procurement process includes vetting every new supplier and carrying out a risk analysis based on the nature and value of the product or service.

All our suppliers are expected to comply with all local and national laws and regulations and we ask for information about:

- Monitoring of tier 1 and 2 supply chains for unfair practices;
- Policies on fair sourcing of goods and services;
- Employment practices, such as advertising vacancies;
- Training for staff;
- Diversity data;
- Corporate Social Responsibility; and
- Willingness to share our values.

Supplier responses are taken into consideration when short-listing and we make any concerns known to the supplier. Should suppliers fail to live up to our expectations or be unwilling to make any changes, we may cease to engage with them.

### **Further Steps**

We are currently reviewing our entire procurement process and will be introducing specific measures to ensure that our obligations under the Act are passed through our supply chain. These will include:

- Finalising our Anti-Slavery Policy and rolling this out across our business and our supplier base;
- Requesting contractual assurances that no slavery is used anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case;
- Requiring suppliers to provide information, and allow us to conduct audits, to verify compliance with the Act and our Anti-Slavery Policy;
- Including rights to terminate for breach of our Anti-Slavery Policy, and other appropriate remedies, as standard terms in our contracts with suppliers;
- Extending risk mapping to include location, the length of the relationship and any other existing information to enable us to rate suppliers;
- Ensuring risk areas are documented, monitored and taken into consideration in any future contract renewals.

We will also be rolling out new training which will be available to all staff but made compulsory for those involved in recruiting and sourcing/managing a supply chain so that they are able to identify risk factors, understand the implications and assist us with implementing the Anti-Slavery Policy effectively.

### **Ongoing commitment**

We will act promptly to deal with all compliance breaches that have been identified or flagged to us.

We will also periodically review the effectiveness of the measures we are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business, and will make such changes to those measures and to this statement as may be required from time to time.

### **Board approval**

We have agreed management responsibility for this statement and our Anti-Slavery Policy, and our Board has approved and fully supports these initiatives.

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Penelope Warne  
**Senior Partner**  
**CMS Cameron McKenna LLP**