



CARBON REDUCTION PLAN

CMS CAMERON MCKENNA NABARRO OLSWANG LLP

June 2025

Commitment to achieving Net Zero

CMS Cameron McKenna Nabarro Olswang LLP is committed to achieving Net Zero emissions by at least 2050, in line with the Government's Net Zero strategy.

Emissions figures and the initiatives discussed in this Carbon Reduction Plan cover our UK offices only, in line with the bidding entity.

Baseline Emissions Footprint

Baseline Year: 2019	
Additional Details relating to the Baseline Emissions calculations.	
In 2019, we measured our scope 1, 2 and 3 greenhouse gas emissions across global jurisdictions for the first time, including in Central & Eastern Europe, Asia and the Middle East. This was done to allow the firm to set science-based targets to reduce our emissions in line with the Paris Climate Agreement – to limit global warming to well-below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C. The baseline given here is for our UK offices only – this was published in our financial statements and SECR report 2019. The firm will establish a new baseline when it sets an additional long-term target in line with the SBTi Net-zero standard.	
Baseline year emissions:	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	251
Scope 2	2,037 (location-based) 267 (market-based)
Scope 3 (Included Sources)	30,840 Emissions are calculated for the following emissions sources that are material at each site: Purchased goods and services, capital goods, fuel

	and energy-related activities (FERA), upstream transportation and distribution, waste generated in operations, water use and treatment, business travel, employee commuting (including home working)	
	Upstream transportation and distribution	409
	Waste generated in operations	75
	Business travel	6,246
	Employee commuting	2,410
	Downstream transportation and distribution	Not Applicable. As a professional services firm, we do not manufacture, sell, or distribute physical products. Therefore, Scope 3 Category 9 emissions—Downstream Transportation and Distribution—are not applicable to our operations.
Total Emissions	31,358 (uses market-based figures)	

Current Emissions Reporting

Reporting Year: 2024 (reporting period is 1 May 2023 – 30 April 2024)		
EMISSIONS	TOTAL (tCO ₂ e)	
Scope 1	45	
Scope 2	1,212 (location-based) 446 (market-based)	
Scope 3 (Included Sources)	15,645 Emissions are calculated for the following emissions sources that are material at each site: Purchased goods and services, capital goods, fuel and energy-related activities (FERA), upstream transportation and distribution, waste generated in operations, business travel, employee commuting, homeworking and downstream leased assets.	
	Upstream transportation and distribution	303
	Waste generated in operations	33

	Business travel	2,890
	Employee commuting	1,527
	Downstream transportation and distribution	Not Applicable. As a professional services firm, we do not manufacture, sell, or distribute physical products. Therefore, Scope 3 Category 9 emissions—Downstream Transportation and Distribution—are not applicable to our operations.
Total Emissions	16,135 (uses market-based figures)	

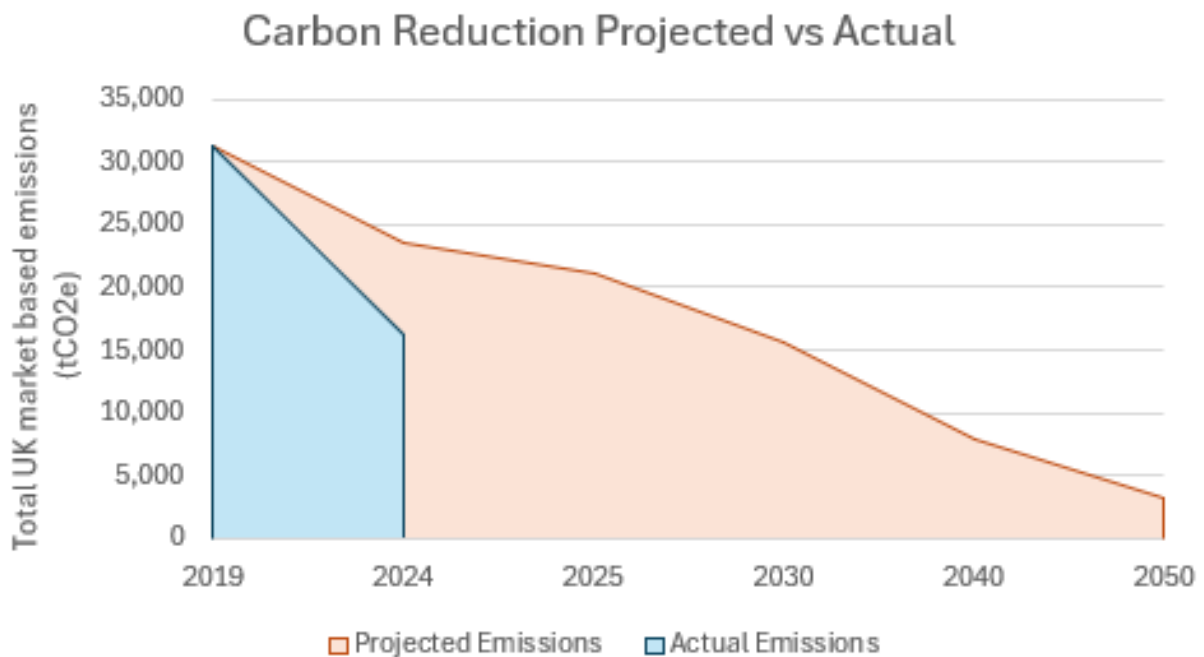
Emissions reduction targets

CMS is committed to taking the necessary steps to addressing our impact on the environment.

In 2020, CMS became the first of only two law firms globally to announce and set Science Based Targets, approved by the Science Based Targets initiative (SBTi), to measure and reduce our greenhouse gas (GHG) emissions.

As part of this process, we calculated and modelled our total footprint (including all relevant Scope 1, 2 and 3 emissions categories) across CMS UK and its international offices.

We are committed to a 30% reduction of emissions by 2025, a 50% reduction by 2030 and to Net Zero by 2050 for both our own operations as well as for our supply chain.



Carbon Reduction Projects

Completed Carbon Reduction Initiatives

As shown in the graph above, GHG emissions have decreased by 48.55% since 2019 across CMS UK offices. This is significantly ahead of our 30% reduction target by 2025.

The following environmental management measures and projects have been undertaken to reduce the firm's environmental footprint.

Reducing emissions and energy use

- In line with Government requirements, the firm has completed ESOS Phase 3 to identify additional potential energy savings that could be made across our UK offices.
- All our UK offices run on 100% renewable electricity for our own operations.
- All leased UK offices, except Bristol have been fitted with LED lights and passive infrared sensors ('PIR'), including during the recent retrofit of our Manchester and Liverpool offices. Carbon savings of 15.97 tCO2e were achieved during these fit outs, as we took steps to retain items for reuse (6.66 tonnes of waste) and divert waste from landfill (13.39 tonnes of waste).
- A Building Management System has been installed at our London headquarters, giving the facilities team increased control over our heating and cooling systems, so far resulting in approximately 946,850 kWh of energy savings and 314 tCO2e of carbon savings. 64% of the total electricity for our UK offices comes from our London office electricity consumption.
- Business travel currently accounts for 18% of our total UK emissions, a 49% reduction since 2019. Our updated travel policy allows for first class train travel for journeys over three hours to encourage less domestic flying. Our new booking system also helps colleagues to make more informed, sustainable travel choices.

- The kitchen in our London office canteen, the only site with a full kitchen, which caters for up to 1,000 staff daily, has moved away from outdated gas equipment to fully electrical equipment.
- We continued with efforts to close some of our office floors on low occupancy days. 1 floor of our Edinburgh office is now closed on Mondays and Fridays, resulting in 186,800 kWh energy savings and 55tCO₂e of carbon savings.

Waste reduction

- Single-use plastic: We have pledged to reduce and minimise 'single use plastics' within our business. CMS won the 2023 Plastic Free Award at the Clean City Awards Scheme. In previous years we have received Bronze, Silver and Gold nominations in a number of categories.
- Since 2019, CMS has recorded a 70% reduction in printed paper usage in the UK. In 2024 we launched the "Think before you print!" campaign to build on this progress, removing 20 printers in underused locations across our UK offices equating to 720kWh energy savings and 0.28 tCO₂e carbon savings so far. The aim is to embed more sustainable printing habits across the firm, reducing paper and ink usage as well as energy consumption.
- Electronic waste: Equipment, which is redundant to us but not end of life and can be reused is, where possible, donated to charities. Other IT waste is scrubbed, and data is wiped and then it is sent for recycling/recovery.

Biodiversity

- As part of the firm's commitment to environmental protection and specifically biodiversity, in 2022 we started introducing beehives to our UK offices as well as investing in bee lines to enhance the natural environment and ensure our ecosystems are well supported by these essential pollinators. Employees are encouraged to sign up and learn about bee keeping as well as essentials of pollinators are to maintaining biodiversity as well as food security, get involved and support the beehives, whether it's tending to the bee gardens, supporting beekeepers or creating a buzz in their team. All money paid for jars of CMS honey is being donated to WWF. We now sponsor local beehives or biodiversity initiatives across 14 of our offices. CMS employees can visit their local initiative or join the network to get involved.

CMS has planted over 26,000 trees to offset our paper usage. We work with PrintReleaf to plant indigenous sustainable forest around the world. We also use recycled, and Forest Stewardship Council certified paper and ensure all paper is recyclable. Our paper waste is securely shredded and then recycled, being sent to either a tissue mill which produces household and business products or to paper mills that produce pulp and recycled high-grade paper.

Sustainable procurement

- Like others in our sector, the vast majority (90%) of our emissions come from our supply chain (Scope 3).

- The firm's Procurement team are leading a review of suppliers' carbon reduction commitments and working with them to develop sustainability workshops to share best practice in the supply chain. We have published an updated Supplier Code of Conduct, and we aim to engage with our top 80% of suppliers by spend.
- We have been working specifically with our couriers and our records storage suppliers to utilise electric and hybrid vehicles as a priority for our services. Additionally, we collaborate with SMEs through partnerships with Heart of the City for Net Zero collaboration programme.

Staff engagement

- We have established a network of sustainability champions across our UK and international offices. Over 60 of our Champions are based in UK offices. The network will receive training to become subject matter experts and together will support awareness campaigns promoting environmental initiatives on topics such as reducing waste, using energy and water efficiently, and sustainable travel.
- Firm-wide Sustainability Month launched in September 2022 and runs annually. In 2024, the sustainability team hosted webinars on topics such as: Plastics (Plastic Free Week), Food and Fashion (World Food Day and Textile Recycling), Environmental Volunteering and Sustainable Travel.
- We've partnered with Sustainability Unlocked to provide all our people with access to ESG and sustainability training.

Governance

Overall responsibility for environmental and corporate responsibility, including management of information on climate change, sits with our Board Chair. The Board is chaired by the Senior Partner. The Chair's responsibility is to both assess and manage climate-related risks and opportunities. The Board considers strategic risk with input from across the business and the Sustainability Committee. The Sustainability Committee oversees the implementation of our climate change and sustainability commitments. Updates from the Sustainability Committee to the Board informs the Board's approach on setting performance objectives and risk management of climate-related risks or opportunities. The Senior Partner chairs the Sustainability Committee, which consists of senior business leaders, including key Partners across the business, and members of the Responsible Business team who pursue resource and climate change related initiatives. This group is focused on assessing, identifying and managing climate-related risks and opportunities and all have an environmental lens to their roles.

Accreditations and commitments

EcoVadis: In 2025 we were rated with Silver, 90th percentile, 71/100 score by EcoVadis and were marked as top 5% of companies rated by EcoVadis in the Legal and accounting activities industry, an improvement from our Bronze, top 25%, 64/100 score in 2024.

The Climate Pledge: In 2022, CMS signed The Climate Pledge. Co-founded by Amazon and Global Optimism, signatories to the pledge commit to reach net zero carbon emissions by latest 2040. The pledge intends to build a cross-sector community of companies,

organisations, individuals and partners working together to address the climate crisis and solve the challenges of decarbonising our economy.

UN Global Compact: CMS is a signatory to the UN Global Compact, reinforcing our commitment to implement universal sustainability principles and to support UN goals. As a signatory of the UN Global Compact, we are part of the world's largest corporate social responsibility initiative and are committed to meeting our business responsibilities in four areas: human rights, labour, environment, and ethics/anti-corruption.

British Property Foundation Pledge: In November 2022, CMS signed BPF's net zero pledge. This commits us to becoming net zero by 2050 at the latest. It is focused on encouraging collaboration within the real estate sector to speed the transition to net zero.

In the future we hope to implement further measures such as:

Following the verification of our latest GHG emissions data for FY 2024, we have identified priority activities against our top emissions categories to ensure we remain on track to meet our commitments.

1. **Supply chain:** We are expanding our supplier engagement programme to reach over 80% of our supply chain by spend, running workshops to share knowledge on how to decarbonise business operations in line with our commitments. Our Supplier Code of Conduct has been updated and includes details on Environmental Sustainability and encouraging our Supply Chain to implement sustainability strategies.

2. **Offices:** We will continue to identify sustainable premises as the business expands and seek office space with sustainable accreditations. All future office fitouts will be sustainable and avoid landfill.

3. **Commuting and working from home:** CMS will continue to champion a flexible working policy which reduces the need for employees to commute to the office.

4. **Business travel:** Our updated travel policy incentivises train use and strongly discourage domestic flights. We have an internal monthly Sustainability in Action newsletter focused on Travel emission reduction in March.

5. **Courier journeys:** We are working with courier companies to support the transition to 100% electric vehicles.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in

¹<https://ghgprotocol.org/corporate-standard>

²<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard³.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of the Supplier:

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Barbara Mendler
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Barbara Mendler

Chief Operations & Sustainability Officer

Date 13 June 2025

³<https://ghgprotocol.org/standards/scope-3-standard>