

## **Slavery and Human Trafficking Statement 2021**

CMS Cameron McKenna Nabarro Olswang LLP is committed to ensuring that slavery and human trafficking are not taking place in our business or in our supply chains. This statement is made by CMS Cameron McKenna Nabarro Olswang LLP on behalf of itself and those entities in Appendix A which operate as part of the CMS group (together “the Firm” “we”) 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 2021. 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.

### **Our organisation structure**

CMS Cameron McKenna Nabarro Olswang 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 responsible business and social impact 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 clear Whistleblowing and Grievance Policies which are 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.

### **Our supply chains and due diligence processes**

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. Our policy is to escalate any cases which give us concern from a human rights or modern slavery perspective to senior management for consideration.

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;
- Responsible Business and Social Impact; 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.

## **Recruitment and culture**

We are dedicated to maintaining a fair, ethical and inclusive workplace for all our staff. We comply with all applicable employment legislation relating to recruitment, including right to work evidence. We are an Accredited Living Wage employer. We have policies and procedures in place to promote diversity and inclusion and deal with discrimination, harassment and bullying.

## **Key progress in the financial year ending 30 April 2021**

We keep our procurement processes under constant review and since publication of our last statement have introduced the following measures:

- Continued work on our supplier questionnaire to ensure we can identify higher risk suppliers and whether mitigating actions are needed.
- Continued development of a Supplier Code of Conduct to ensure consistency of approach on a number of issues, including Modern Slavery.
- Implemented follow-up audits for key suppliers identified as having a higher risk of exposure to modern slavery, including annual on-site visits. During the COVID-19 pandemic, onsite visits have been suspended but will resume when it is safe to do so.
- Implementation of shorter re-assessment periods for key supply chain partners.
- Updated aspects of our supplier due diligence document and risk assessment process.
- Continue to deal with novel procurement issues, including modern slavery issues as part of the firm's response to COVID-19.

Building on steps taken to date, we have identified the following specific enhancements for the forthcoming financial year and beyond:

- Continue to review our approach to Modern Slavery to evaluate effectiveness and identify any gaps.
- Continued consideration of shorter re-assessment periods for key supply chain partners of at least every two years, or earlier if concerns are raised.
- Continue to enhance our supplier due diligence document and risk assessment process.
- Review processes and supplier planning, including in relation to modern slavery following the COVID-19 pandemic.
- Introduce “bite-size” training modules, including modern slavery with a view to making these being made compulsory for all contract owners and heads of departments.
- Creating and launching Apps to support these bite-size training modules.
- Work to promote awareness of modern slavery issues.

## **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 Nabarro Olswang LLP**

## **APPENDIX A**

<b>Country</b>	<b>Office</b>	<b>Entities</b>
<b>Belgium</b>	Brussels	CMS Cameron McKenna Nabarro Olswang LLP Avenue des Nerviens 85 1040 Etterbeek Brussels
<b>Brazil</b>	Rio de Janeiro	CMS Cameron McKenna Consultores em Directo Estrangeiro Travessa do Ouvidor 5, Sala 6.01, Centro, Rio de Janeiro, CEP 20040-040
<b>Bulgaria</b>	Sofia	CMS Cameron McKenna Nabarro Olswang LLP Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 2 1000 Sofia
<b>China</b>	Beijing	CMS Cameron McKenna Nabarro Olswang LLP Room 1909 China Youth Plaza No 19 Dongsanhuan North Road Chaoyang District Beijing 100026
<b>Czech Republic</b>	Prague	CMS Cameron McKenna Nabarro Olswang v.o.s. Palladium Na Porici 1079/3a 110 00 Prague 1
<b>England</b>	Bristol	CMS Cameron McKenna Nabarro Olswang LLP 2 College Square Anchor Road Bristol BS1 5UE
	Liverpool	CMS Cameron McKenna Nabarro Olswang LLP Horton House, Rumford Street, Exchange Flags, Liverpool, L2 8SZ

	London	CMS Cameron McKenna Nabarro Olswang LLP Cannon Place 78 Cannon Street London EC4N 6AF
	Manchester	CMS Cameron McKenna Nabarro Olswang LLP 1, The Avenue Spinningfields Manchester M3 3AP
	Reading	CMS Cameron McKenna Nabarro Olswang LLP The Blade Abbey Square Reading RG1 3BE
	Sheffield	CMS Cameron McKenna Nabarro Olswang LLP 1 South Quay Victoria Quays Wharf Street Sheffield S2 5SY
<b>Germany</b>	Munich	Olswang Germany LLP Promenadeplatz 12 5th Floor Munich
<b>Hong Kong</b>	Hong Kong	Lau Horton & Wise LLP 8 <sup>th</sup> Floor, Nexxus Building 41 Connaught Road Central Hong Kong
<b>Hungary</b>	Budapest	CMS Cameron McKenna Nabarro Olswang LLP Magyarországi Fioktelepe & Ormai, Papp & Partners Ybl Palace Károlyi Mihály u. 12 1053 – Budapest
<b>Oman</b>	Muscat	Al Rashdi, Al Juma & Ewing Advocates and Legal Consultants Tilal Complex Muscat Grand Mall 3rd Floor Building No 5, Muscat, PO Box 41 136 Muscat
<b>Poland</b>	Poznan	CMS Cameron McKenna Nabarro Olswang Póśniak i Sawicki sp.k. Budynek OMEGA J. H. Dąbrowskiego 79a St. 60-529 Poznań 14 piętro/ 14th floor

	Warsaw	CMS Cameron McKenna Nabarro Olswang Pośniak i Sawicki sp.k Warsaw Financial Center 26th - 28th floors ul. Emilii Plater 53 00-113 Warsaw
<b>Romania</b>	Bucharest	CMS Cameron McKenna Nabarro Olswang LLP S.C.P. 11-15 Tipografilor Street B3-B4, 4th Floor 013714 Bucharest  CMS Tax S.R.L. 11-15 Tipografilor Street B3-B4, 4th Floor 013714 Bucharest
<b>Singapore</b>	Singapore	CMS Cameron McKenna Nabarro Olswang (Singapore) LLP & Holborn Law LLC 7 Straits View, Marina One East Tower #19-01 Singapore 018936
<b>Slovakia</b>	Bratislava	CMS Cameron McKenna Nabarro Olswang LLP, advokáti, v.o.s Uniq Building, Staromestská 3, Bratislava, Slovakia
<b>Scotland</b>	Aberdeen	CMS Cameron McKenna Nabarro Olswang LLP 6 Queens Road Aberdeen AB15 4ZT
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<b>Turkey</b>	Istanbul	CMS Danışmanlık Hizmetleri Avukatlık Ortaklığı 15th Floor, Suzer Plaza, Elmadag, Askerocagi Cad No 6, 34367 Sisli-Istanbul

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