

## **Slavery and Human Trafficking Statement 2023**

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 CMS Cameron McKenna Nabarro Olswang LLP (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 2023. 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.

We expect our suppliers, and, where approved their sub-contractors, to adhere to all relevant legislation and to act responsibly, fairly, ethically, and safely at all times with respect to confidentiality, security, data protection and compliance with regulations, including bribery and modern slavery laws. These principles form an integral part of our sourcing activities and decisions.

We require our suppliers to comply with all laws and regulations applicable to its business in the countries in which they operate and seek commitments in writing from their own supply chain to also meet this requirement. 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;
- Employment conditions
- 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 environment for all 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 training, policies, and procedures in place to promote best practice in recruitment, diversity and inclusion, and deal with discrimination, harassment, and bullying.

## **Key progress in the financial year ending 30 April 2023**

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

- Enhanced coverage of Modern Slavery issues at firmwide induction sessions.
- Provided firmwide training on risk and compliance issues, including a section on Modern Slavery.
- Updated whistleblowing policy and procedure in line with new European legislation.
- Introduced a new whistleblowing reporting platform, allowing for anonymous reports to be made.
- Continued development of our supplier onboarding questionnaire to ensure we can identify higher risk suppliers and whether mitigating actions are needed.
- Our Supplier Code of Conduct sets out the behaviours and high standards we expect from our third-party suppliers and their subcontractors, particularly in the areas of Modern Slavery and Human Trafficking. We, in conjunction with our suppliers, are committed to preventing Modern Slavery and Human Trafficking from taking place in our supply chain.
- 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.

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

- Continue to work to promote awareness of modern slavery issues.
- Further training and awareness raising on whistleblowing.

- Continually review our approach to Modern Slavery to evaluate effectiveness and identify any gaps. We expect our suppliers and their subcontractors to:
  - Prohibit human trafficking and child or forced labour including modern slavery;
  - Comply with all applicable wage and working regulations;
  - Embrace diversity, fairness, and inclusion in their workforce/workplace;
  - Support freedom of association in line with local regulations;
  - Act ethically and with integrity and require their employees to do the same;
  - Have robust policies in place that require their employees to adhere to relevant regulations and treat their own employees fairly and ethically.
- Have the ability to demonstrate that robust procedures are in place to be confident that child labour, slavery or human trafficking is excluded from their supply chain.
- Updated Diversity and Inclusion clause in our contracts with respect to requiring our suppliers to share reasonable evidence of its commitment to equality of opportunity for people with disabilities.
- 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.
- Introduce “bite-size” training modules, including modern slavery, with a view of these being made compulsory for all contract owners and heads of departments.
- Creating and launching Apps to support these bite-size training modules.

### **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  
**The Senior Partner**  
**CMS Cameron McKenna Nabarro Olswang LLP**

## APPENDIX A

Country	Office	Entities
Australia	Brisbane	<b>Cameron McKenna Solicitors (Australia) Pty Ltd</b> Office 7, Level 34 Waterfront Place 1 Eagle Street Brisbane QLD 4000
Belgium	Brussels	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> Avenue des Nerviens 85 1040 Etterbeek Brussels
Brazil	Rio de Janeiro	<b>CMS Cameron McKenna Consultores em Direito Estrangeiro</b> Praia de Botafogo 501, Bloco A - 1º andar, sala 148 – Rio de Janeiro, CEP 22250-040
Bulgaria	Sofia	<b>Sirleshtov and Bangachev Law Office</b> Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 1 1000 Sofia
China	Beijing	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> Room 1909 China Youth Plaza No 19 Dongsanhuan North Road Chaoyang District Beijing 100026
Czech Republic	Prague	<b>CMS Cameron McKenna Nabarro Olswang, advokati, v.o.s.</b> Palladium Na Porici 1079/3a 110 00 Prague 1
England	Bristol	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> 2 College Square Anchor Road Bristol BS1 5UE
	Liverpool	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> Suite 8A1, The Plaza, 100 Old Hall Street, Liverpool L3 9QJ

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		<b>CMS Cameron McKenna Nabarro Olswang LLP</b> The Blade Abbey Square Reading RG1 3BE
		<b>CMS Cameron McKenna Nabarro Olswang LLP</b> 1 – 3 Charter Square Sheffield S1 4HS
<b>Hong Kong</b>	Hong Kong	<b>Lau, Horton &amp; Wise LLP</b> 8th Floor, Nexus Building 41 Connaught Road Central Hong Kong
<b>Hungary</b>	Budapest	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> <b>Magyarországi Fióktelepe &amp; Ormai, Papp &amp; Partners</b> YBL Palace Károlyi utca 12 1053 – Budapest
<b>Israel</b>	Israel	<b>CMS Israel LLP</b> 34th Floor, North Tower Ha'arba'a Towers 28 Ha'arba'a Street Tel Aviv 6473926 Israel
<b>Oman</b>	Muscat	<b>Al Rashdi, Al Juma &amp; Ewing Advocates and Legal Consultants</b> Landmark Building 23rd July Street 6th Floor PO Box 41, 136 Muscat
<b>Poland</b>	Poznan	<b>CMS Cameron McKenna Nabarro Olswang Późniak i Bejm sp.k.</b> Budynek OMEGA J. H. Dąbrowskiego 79a St. 60-529 Poznań
	Warsaw	<b>CMS Cameron McKenna Nabarro Olswang Poźniak i Bejm sp.k</b> Varso Tower Chmielna 69 00-801 Warsaw

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<b>Romania</b>	Bucharest	<b>CMS Tax S.R.L.</b> One Tower 165, Calea Floreasca 12th – 14th floors District 1 014459 Bucharest
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	Iasi	<b>Modular Services SRL</b> Str.Palas nr. 7b-7c UBC3 et 12 Iasi
	Bacau	<b>Modular Services SRL</b> Str. Pictor Theodor Aman nr. 40 Urban Business Center, et 3 Bacau
<b>Singapore</b>	Singapore	<b>CMS Cameron McKenna Nabarro Olswang (Singapore) LLP &amp; Holborn Law LLC</b> 7 Straits View, Marina One East Tower #19-01 Singapore 018936
<b>Slovakia</b>	Bratislava	<b>CMS Cameron McKenna Nabarro Olswang LLP, advokáti, v.o.s</b> Uniq Building, Staromestska 3, 811 03 Bratislava, Slovakia
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