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# CMS Cameron McKenna Nabarro Olswang LLP and all affiliates

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## Supplier Code of Conduct

We are a responsible business, committed to creating rewarding futures for our clients, people and communities, through a collective focus on delivering the best outcomes. Our vision is to create an inclusive environment with a strong sense of belonging in which everyone feels valued, wellbeing is supported, and our differences are celebrated. Our culture is underpinned by our core values, which represent our individual and collective commitment to who we are and how we work.

- **Community:** We work together as an inclusive, compassionate and diverse global community to create a collaborative, welcoming and collegiate environment for our people and our clients.
- **Integrity:** We are candid, authentic, fair and straightforward and we take individual ownership for building inclusive, respectful relationships based on trust, transparency and open mindedness.
- **Excellence:** We offer the highest quality of service to our clients, combining technical excellence with pragmatic, commercial advice and client service.
- **Creativity:** We are entrepreneurial in our approach, adopting a growth mindset with passion and curiosity to strive for continuous improvement through adaptability and innovation. Environmental, social, and governance (ESG) considerations are integral to our values and business operations. Our approach is to go beyond compliance, upholding high standards across a number of areas including human rights and labour; ethics; cyber security and data protection; and sustainability. We seek to work with suppliers that align to our own standards. We are committed to collaborating with our supply chain to ensure the best processes, procedures and controls are in place for mutual improvement and for ensuring suppliers' compliance with our Supplier Code of Conduct (hereafter, "the Code").

The areas covered in the Code include:

- Labour and human rights
- Environmental sustainability
- Ethics and anti-corruption
- Information Security and Privacy Protection

# Labour and Human Rights

CMS expects suppliers to be compliant with all applicable employment laws and duties in the countries in which they operate.

## Modern Slavery

CMS is committed to upholding all laws relating to the protection of human rights and is committed to preventing any form of slavery and human trafficking from occurring in our business and in our supply chain.

We seek to partner with suppliers that adopt the same strict standards that we adhere to ourselves. Suppliers can demonstrate their commitment to eradicating modern slavery by ensuring a modern slavery policy and code are in place and have been communicated.

You can read our Modern Slavery statements here: [Anti-Slavery and Human Trafficking Statement - CMS UK.](#)

## Living wage

CMS is an accredited Real Living Wage employer. All our UK employees, including contractors are paid above the Living Wage. We expect, where applicable, our suppliers to adopt and pay the living wage (or local equivalent where applicable) in each of the countries in which they operate and seek the adoption of the local living wage throughout their supply chain.

## Diversity, Equity, Inclusion and Belonging

CMS is committed to fostering a diverse, equitable, and inclusive environment, and preventing all forms of discrimination and harassment, including sexual harassment. We expect all suppliers to take proactive steps to raise awareness of, and prevent, any form of discrimination or harassment, including sexual harassment, in connection with the services they provide. This includes but is not limited to:

- Actively seeking to include individuals from diverse backgrounds at all levels of your organisation, including underrepresented groups such as women, racial and ethnic minorities, LGBTQ+ individuals, and people with disabilities.
- Ensuring fair treatment, opportunities, and advancement for all employees, and actively working to eliminate biases and barriers that may disadvantage certain groups.
- Fostering a culture where every employee feels respected, valued, and able to contribute fully to the organisation.
- Taking appropriate action when reports of discrimination and harassment are made.

## Disability

The Supplier acknowledges that CMNO is a Disability Confident Employer under the UK Government Disability Confident Employer Scheme. The Supplier agrees, where reasonably possible, to commit to promoting equality of opportunity for people with disabilities and to consider becoming a Disability Confident employer.

For audit and regulatory reporting purposes, the Supplier acknowledges and agrees that from time-to-time CMNO may require the Supplier to share reasonable evidence of such its commitment to equality of opportunity for people with disabilities.

## Social Impact

As part of our broader commitment to social purpose, we believe that businesses have a responsibility and an opportunity to make a meaningful difference both locally and globally. We encourage our suppliers to contribute positively to the communities in which they operate through local social impact initiatives.

As signatories to the UN Global Compact, we are committed to embedding its ten principles into our operations and expect our suppliers to uphold these values. Together, we aim to build a supply chain that not only delivers value but also drives positive change in the communities we serve.

## Health, safety and welfare

At CMS we expect our suppliers to adhere to all Health and Safety Regulations relevant to their operations. In the UK this falls under the Health and Safety at Work Act (HSWA) 1974 and associated regulations but the requirement to comply with comparable laws is the same in all jurisdictions in which we operate. We expect our suppliers to provide workspaces where all individuals are treated with dignity and respect. Suppliers should have robust procedures and processes in place to ensure the health, safety and overall welfare of their employees and anyone affected by the work they carry out.

Suppliers should ensure their employees receive the appropriate safety instruction and training to keep them safe and well in the workplace and provide their employees the following:

- A Health and Safety Policy.
- Documented hazard identification, risk assessments, method statements, and other relevant procedures.
- Safe systems of work and work permits where necessary.
- Fire safety and emergency evacuation procedures.
- First aid and accident reporting procedures and training.
- Clean and safe working conditions.
- Provision of suitable equipment e.g., Personal Protective Equipment (PPE), manual handling aides etc. where necessary.

# Environmental Sustainability

Having successfully met our near-term Science Based Targets initiative (SBTi) goal of reducing carbon emissions by 30% by 2025 from a 2019 baseline, we are committed to reduce our carbon emissions by 50% by 2030 across Scope 1, 2 and 3 emissions and are in progress of validating our targets by the SBTi. CMS is in the process of setting a Net Zero Standard and will reach net zero by 2050 at the latest. Achieving these goals requires close collaboration with our suppliers, as their engagement is crucial to meeting our near-term and long-term targets.

We recognise that businesses are at different stages in their sustainability journey. We take a collaborative approach to support all suppliers, especially small and medium-sized enterprises, in developing and implementing effective sustainability strategies.

Ways in which our suppliers can demonstrate their commitment to carbon reduction:

## Carbon emissions and energy efficiency

- Commit to the SBTi by formally submitting a letter of commitment and develop and submit science-based emissions reduction targets for validation by the SBTi within twenty-four months of the contract's Effective Date.
- Establish greenhouse gas reduction targets to limit global warming to 1.5 degrees C by 2050 – ideally approved by the Science Based Targets Initiative (SBTi). Engage with the CMNO ESG team within six months of the contract Effective Date to discuss progress on SBTi commitments.
- Put in place policies and initiatives to achieve emissions reduction for their own operations and supply chain by 2030.
- Measure, manage and monitor environmental impacts through an external verification process such as EcoVadis or CDP.
- Take all reasonable steps to ensure energy and resource efficiency across premises, reduce gas consumption, and maximise the use of non-fossil-based energy wherever practical.
- Prepare and deliver an annual sustainability report to CMNO by April 30 each year, including at minimum Scope 1 and Scope 2 GHG emissions, and outlining steps taken to achieve the Science-Based Targets.

## Waste and resource use

- Aim to use recycled or sustainably sourced paper only.
- Implement effective waste management, targeting recyclable waste and minimising waste to landfill.
- Reduce single use plastics and disposables.
- Where applicable to the goods provided to CMS, support us with whole lifecycle transparency of products and work to extend product lifecycles.

# Ethics and Anti-Corruption

CMS must uphold the highest ethical standards to operate as a law firm. We expect all our suppliers to conduct business with integrity and incorporate ethical and responsible behaviour throughout their own value chain.

- All suppliers should have in place policies, systems to ensure zero tolerance towards human rights abuses, money laundering, fraud, bribery, tax evasion, conflicts of interest, corruption and other improper payments.
- We expect our suppliers to fully comply with the requirements of all applicable anti-bribery and corruption laws, including but not limited to the UK Bribery Act, as well as where applicable, The Criminal Finances Act 2017 and The Economic Crime and Corporate Transparency Act 2023.
- Suppliers must also not be involved in corruption, which is the misuse of entrusted power or a breach of duty for personal gain.

## Information Security and Privacy Protection

All confidential information as defined by CMS must be managed securely and protected with appropriate technical and organisational security measures.

- Suppliers and business partners must have robust security processes and controls in place to protect CMS confidential information.
- Suppliers must adopt and maintain processes to ensure compliance with applicable data protection and privacy laws.
- Supplier will not process or host any CMS information outside the UK or the EEA without CMS' prior written consent.
- Suppliers must have cyber resiliency plans in place to support the delivery of services to CMS.
- Suppliers must be able to assess, track, and document their supply chain where such supporting services are applicable to CMS and must make such information available to CMS upon request.

## Artificial Intelligence

CMS recognises that technology innovation, including the use of Artificial Intelligence (AI), is important in today's business environment and we support the use of innovation that is responsible, ethical, fair, transparent, and subject to rigorous oversight and governance. As a law firm, we are committed to these principles as well as complying with all applicable AI regulations and expect our suppliers to do the same. For clarity, AI Technology means any and all machine learning, deep learning, and other artificial intelligence ("AI") technologies, including statistical learning algorithms, models (including large language models), neural networks, and other AI tools or methodologies, all software implementations of any of the foregoing, and related hardware or equipment capable of generating various types of content (including text, images, video, audio, or computer code) based on user-supplied prompts ("Generative AI Tools").

- Suppliers must adopt principles for the ethical use of AI. This includes ensuring transparency, fairness, and accountability in their use of AI.
- Suppliers must ensure that all developments using AI are subject to applicable laws and regulations, including the EU AI Act.
- Suppliers must not use CMS information: (i) to train or develop any AI model, tool or system without first receiving our explicit consent; or (ii) in any publicly available / consumer AI tools or services; or (iii) in any proprietary / commercial AI tools or services without first receiving our explicit consent to such use.
- Suppliers will not: (i) use or add AI capabilities to the product or service used by CMS; or (ii) use AI in their delivery of services to CMS; or (iii) use any AI system with CMS information without CMS' prior written consent and must be able to demonstrate their responsible use of AI in the delivery of service

to CMS. Suppliers are reminded of their duty to keep all CMS information confidential and as such CMS information must not be used in any consumer or publicly available AI system.

## Compliance and Measurement

Suppliers must be able to demonstrate compliance with the Code in general and are responsible for the compliance of any approved subcontractors.

**And specifically, such compliance includes providing, annually by April 30, documented evidence with regard to the diversity of its organisation, Scope 1, 2 and 3 carbon emissions applicable to CMS, any third party or regulatory sustainability reports (SECR, CSRD, CDP, EcoVadis, etc) and confirmation that the supplier has read the most up to date version of this Code (kept on our website – [link](#)) and is in compliance with it.**

CMS reserve the right to audit suppliers based on the Code.

Where local laws and regulations do not meet the same standards as the Code, the Code takes precedence (except in circumstances where it taking precedence would breach any such local law or regulation).

Supplier adherence and commitment to the Code forms an integral part of CMS' sourcing activity and is used along with all other relevant decision criteria when selecting new suppliers or renewing current contractual relationships.

Non-compliance with the Code may result in corrective actions, including but not limited to:

- Suspension or termination of contracts and business relationships.
- Removal from our list of approved suppliers.
- Legal action, if warranted by the severity of the violation.

Suppliers are expected to cooperate fully with CMS in any investigation or assessment related to compliance with the Code.

By Supplier we mean any Supplier to CMS and any of its relevant Affiliates, Agents, Contractors and Subcontractors.

The Code is reviewed on a regular basis and the most updated version published on our website ([link](#)).

CMS Cameron McKenna Nabarro Olswang LLP is a member firm of CMS, an international organisation of independent law firms.

## Raising a Concern

Should you have any query regarding the Code, please contact:



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