

Slavery and Human Trafficking Statement 2020

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 2020. 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 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 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;

- 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.

Key progress in the financial year ending 30 April 2020

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.
- Dealt 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:

- Consideration of shorter re-assessment periods for key supply chain partners of at least every two years, or earlier if concerns are raised.
- 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.
- Working with the Risk Team to deliver refresher training on modern slavery to the fee earners.

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.

A handwritten signature in black ink, reading "Penelope Warne". The signature is written in a cursive, flowing style.

Penelope Warne

Senior Partner

CMS Cameron McKenna Nabarro Olswang LLP

APPENDIX A

Country	Office	Entities
Belgium	Brussels	CMS Cameron McKenna Nabarro Olswang LLP Avenue des Nerviens 85 1040 Etterbeek Brussels
Brazil	Rio de Janeiro	CMS Cameron McKenna Consultores em Directo Estrangeiro Travessa do Ouvidor 5, Sala 6.01, Centro, Rio de Janeiro, CEP 20040-040
Bulgaria	Sofia	CMS Cameron McKenna Nabarro Olswang LLP Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 2 1000 Sofia
China	Beijing	CMS Cameron McKenna Nabarro Olswang LLP Room 1909 China Youth Plaza No 19 Dongsanhuan North Road Chaoyang District Beijing 100026
	Hong Kong	Lau Horton & Wise LLP 8 th Floor, Nexxus Building 41 Connaught Road Central Hong Kong
Czech Republic	Prague	CMS Cameron McKenna Nabarro Olswang v.o.s. Palladium Na Porici 1079/3a 110 00 Prague 1
England	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
Germany	Munich	Olswang Germany LLP Promenadeplatz 12 5th Floor Munich
Hungary	Budapest	CMS Cameron McKenna Nabarro Olswang LLP Magyarországi Fioktelepe & Ormai es Tarsai Ybl Palace Károlyi Mihály u. 12 1053 – Budapest
Oman	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

Poland	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
Romania	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
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Turkey	Istanbul	CMS Danışmanlık Hizmetleri Avukatlık Ortaklığı 15th Floor, Suzer Plaza, Elmadag, Askerocagi Cad No 6, 34367 Sisli-Istanbul
UAE	Dubai	CMS (UAE) LLP Level 15 Burj Daman Dubai International Finance Centre Dubai PO BOX 506873
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