

## **Slavery and Human Trafficking Statement 2024**

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 2024. 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**

Suppliers must conduct their business with integrity, honesty and transparency and avoid engaging in any form of corruption, bribery or unethical behaviour. We expect our suppliers to comply with the Bribery Act 2010 and have policies in place to prevent fraud, bribery and corruption, market abuse, money laundering, tax evasion and any other improper payments or inducements within its business and seek to only work with suppliers that demonstrate similar commitments. Suppliers must comply with modern slavery laws.

Suppliers must not directly or indirectly offer improper payments or inducements to CMS employees that may give rise to actual, potential or perceived conflicts of interest or engage in any other unethical behaviour.

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.

These principles form an integral part of our sourcing activities and decisions.

Suppliers must comply with all applicable national and international laws, regulations and standards related to environmental protection, labour practices, human rights and ethical business conduct. Suppliers must seek, in writing, from their own supply chain to also meet this requirement.

Suppliers should stay informed about changes in relevant laws and regulations and promptly adjust their practices to ensure compliance.

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 and inclusion data;
- Environmental sustainability commitments and practices;
- Ethical sourcing and behaviour;
- 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 2024**

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

- Provided continued coverage of modern slavery issues at firmwide induction sessions.
- Provided further firmwide training including to overseas offices on risk and compliance issues, including a section on modern slavery.
- Added a whistleblowing policy statement onto our website and made our whistleblowing reporting platform available to suppliers and their employees.
- Achieved the ISO 30425 Diversity & Inclusion certification.

- 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, human trafficking and ethical sourcing and behaviour. 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.
- 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 at all levels.
- Provide specific training to teams who have more exposure to modern slavery issues.
- Implementation of a new gifts and hospitality reporting platform.
- 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.
- Work with small and medium sized organisations to assist them through the detailed onboarding 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.

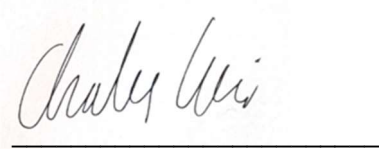
### **Ongoing commitment**

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.

A handwritten signature in dark ink, appearing to read "Charles Currier", is positioned above a solid horizontal line.

Charles Currier

**Senior Partner**

**CMS Cameron McKenna Nabarro Olswang LLP**

**APPENDIX A**

<b>Country</b>	<b>Office</b>	<b>Entities</b>
<b>Australia</b>	Brisbane	<b>Cameron McKenna Solicitors (Australia) Pty Ltd</b> Office 7, Level 34 Waterfront Place 1 Eagle Street Brisbane QLD 4000
<b>Belgium</b>	Brussels	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> Avenue des Nerviens 85 1040 Etterbeek Brussels
<b>Brazil</b>	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
<b>Bulgaria</b>	Sofia	<b>Sirleshtov and Bangachev Law Office</b> Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 1 1000 Sofia
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<b>Czech Republic</b>	Prague	<b>CMS Cameron McKenna Nabarro Olswang, advokati, v.o.s.</b> Palladium Na Porici 1079/3a 110 00 Prague 1
<b>England</b>	Bristol	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> 2 College Square Anchor Road Bristol BS1 5UE
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	Sheffield	<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, Nexxus Building 41 Connaught Road Central Hong Kong
<b>Hungary</b>	Budapest	<b>CMS Cameron McKenna Nabarro Olswang LLP</b> <b>Magyarországi Fioktelepe &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
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<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 Póśniak i Bejm sp.k.</b> Budynek OMEGA J. H. Dąbrowskiego 79a St. 14 Pietro/ 14 <sup>th</sup> floor 60-529 Poznań

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	Bacau	<b>Modular Services SRL</b> Str. Pictor Theodor Aman nr. 40 Urban Business Center, et 3 Bacau
<b>Saudi Arabia</b>	Riyadh	<b>CMS Cameron McKenna Nabarro Olswang Lawyers and Consultants</b> Laysen Valley Building No. 13 Intersection King Khalid with Oruba Road Riyadh 12329 Saudi Arabia
<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
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	Abu Dhabi	<b>CMS (UAE) LLP</b> Floor 12, Al Sila Tower ADGM Square 12 Marina Square Abu Dhabi United Arab Emirates
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