

# Whistleblowing Policy Statement

## Introduction

CMS Cameron McKenna Nabarro Olswang LLP and its affiliated international offices (CMS) takes compliance seriously and always strive to do the right thing, but if our staff see wrongdoing, illegal or unethical activities we encourage them to speak up. Our whistleblowing process is designed to be a safe way for CMS staff to speak up and report their legitimate concerns, while knowing that their identity will be safeguarded, their report treated confidentially and that they will be protected from detrimental treatment.

## Our policy



This policy applies to the following:

- all individuals working at all levels of the firm, including partners, contractors, employees (part time and full time), casual and agency staff and volunteers, members, shareholders and persons belonging to the administrative, management or supervisory body of the firm, or its related entities, including non-executive members, as well as volunteers and paid or unpaid trainees, any persons working under the supervision and direction of contractors, subcontractors and suppliers (collectively referred to as “Staff” in this policy).
- all individuals whose work-based relationship has ended but they wish to report information on breaches acquired during their time at the firm and those whose work-based relationship is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations (referred to as a “Reporting Person” in this policy).
- to anyone who assists a member of staff or a reporting person in the reporting process (‘a Facilitator’), third persons who are connected with staff or reporting persons who could suffer retaliation in a work related context, or any companies that the member of staff or reporting person owns, works for, or is otherwise connected with, in a work-related context.



A whistleblowing report can be about any of the following:

- danger to health and safety
- protection of the environment
- failure to comply with any legal or professional obligations or regulatory requirements, including professional ethical standards in the workplace, failure to treat colleagues fairly and with respect, bullying, harassment or unfair discrimination
- financial services, products and markets, and prevention of money laundering and terrorist financing, bribery, financial fraud or mismanagement
- breaches of competition rules
- breaches of corporate tax rules or arrangements to obtain tax advantage
- negligence
- conduct likely to damage our reputation
- breaches of DFSA legislation
- breaches of EU law on:
  - public health
  - product safety and compliance
  - food and food safety
  - animal health and welfare
  - radiation protection and nuclear safety
  - transport safety
  - public procurement
  - consumer protection
  - protection of privacy and personal data
  - security of network and information systems, unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters.



A whistleblowing report can be made in the following way:

- Staff can raise their Whistleblowing concerns with their line manager, the firm's General Counsel or via our confidential online reporting tool: <https://speak-up.cms-cmno.com>.
- Reporting Persons and Facilitators, as well as Contractors, Suppliers can raise concerns with the firm's General Counsel or via our confidential online reporting tool: <https://speak-up.cms-cmno.com>.



We encourage whistleblowers to raise their concerns openly and provide contact details for further communication and feedback, however whistleblowers can raise their concerns anonymously if they wish to do so.



We aim to acknowledge the receipt of the whistleblowing report within 7 days, keep the whistleblower informed of the progress of the investigation, its likely timescale and will provide feedback within 3 months.



We will ensure that confidentiality of the whistleblower is safeguarded and any internal or external disclosures made with the whistleblower's consent.



We are committed to protect the whistleblower from detrimental treatment from the moment any whistleblowing report has been made.