



Cabinet Office

Carbon Reduction Plan

CMS Cameron McKenna Nabarro Olswang LLP

March 2026

Commitment to achieving Net Zero

CMS Cameron McKenna Nabarro Olswang LLP is committed to achieving Net Zero emissions the latest by 2050, in line with the Government’s Net Zero strategy. Emissions figures and the initiatives discussed in this Carbon Reduction Plan cover our UK offices only, in line with the bidding entity.

Baseline Emissions Footprint

Baseline Year: 2019	
Additional Details relating to the Baseline Emissions calculations.	
<p>In 2019, we measured our scope 1, 2 and 3 greenhouse gas emissions across global jurisdictions for the first time, including in Central & Eastern Europe, Asia and the Middle East. This was done to allow the firm to set science-based targets to reduce our emissions in line with the Paris Climate Agreement – to limit global warming to well-below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C. The baseline given here is for our UK offices only – this was published in our financial statements and SECR report 2019. The firm will establish a new baseline when it sets an additional long-term target in line with the SBTi Net-zero standard.</p>	
Baseline year emissions:	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	251
Scope 2	2,037 (location-based) 267 (market-based)

Scope 3 (Included Sources)	30,840 Emissions are calculated for the following emissions sources that are material at each site: Purchased goods and services, capital goods, fuel and energy-related activities (FERA), upstream transportation and distribution, waste generated in operations, water use and treatment, business travel, employee commuting (including home working).	
	Upstream transportation and distribution	409
	Waste generated in operations	75
	Business travel	6,246
	Employee commuting	2,410
	Downstream transportation and distribution	Not Applicable. As a professional services firm, we do not manufacture, sell, or distribute physical products. Therefore, Scope 3 Category 9 emissions—Downstream Transportation and Distribution—are not applicable to our operations.
Total Emissions	31,358 (uses market-based figures)	

Current Emissions Reporting

Reporting Year: 2025 (reporting period is 1 April 2024 – 31 March 2025)	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	128
Scope 2	1,174 (location-based) 408 (marked-based)

Scope 3 (Included Sources)	12,865	Emissions are calculated for the following emissions sources that are material at each site: Purchased goods and services, capital goods, fuel and energy-related activities (FERA), upstream transportation and distribution, waste generated in operations, business travel, employee commuting, homeworking and downstream and upstream leased assets.
	Upstream transportation and distribution	196
	Waste generated in operations	22
	Business travel	3,547
	Employee commuting	1,458
	Downstream transportation and distribution	Not Applicable. As a professional services firm, we do not manufacture, sell, or distribute physical products. Therefore, Scope 3 Category 9 emissions— Downstream Transportation and Distribution—are not applicable to our operations.
Total Emissions	13,401 (uses market-based figures)	

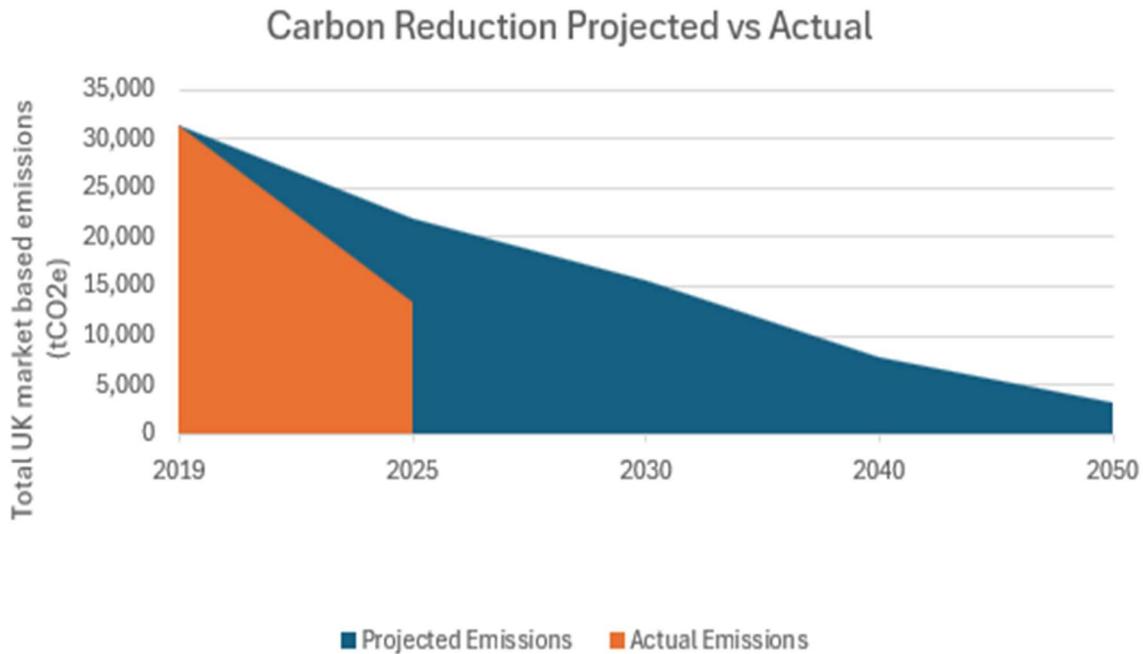
Emissions reduction targets

CMS is committed to taking the necessary steps to addressing our impact on the environment.

In 2020, CMS became the first of only two law firms globally to announce and set Science Based Targets, approved by the Science Based Targets initiative (SBTi), to measure and reduce our greenhouse gas (GHG) emissions.

As part of this process, we calculated and modelled our total footprint (including all relevant Scope 1, 2 and 3 emissions categories) across CMS UK and its international offices.

We achieved our 30% reduction of emissions in 2025, and we commit to Net Zero by 2050 for both our own operations as well as for our supply chain. In line with SBTi guidance, we are undertaking our mandatory five-year review to update and revalidate our near-term science-based target, ensuring continued alignment with the latest climate science and our decarbonisation pathway.



Carbon Reduction Projects

Completed Carbon Reduction Initiatives

Our GHG emissions have decreased by 57.26% since 2019 across CMS UK offices.

The following environmental management measures and projects have been undertaken to reduce the firm's environmental footprint.

Reducing Emissions and Energy Use

- All our UK offices run on 100% renewable electricity for our own operations.
- Legacy Infrastructure Decommissioning: In FY25, completed a phasing out of legacy infrastructure achieving an estimated annual reduction of approximately 26,000 kWh.
- Building Management System (BMS): Installed at London headquarters, resulting in approximately 23% cumulative reduction in energy compared to FY23 (from 4,361 MWh to 3,364 MWh) for both electricity and natural gas consumption.
- Aberdeen Office Fit-Out: Incorporated energy efficiency measures including replacement of outdated lighting with LED systems, expanded PIR sensor coverage, and upgrades to energy-efficient electric comfort cooling and heating systems, resulting in a 10.70% decrease in energy consumption over the first three months of occupancy.
- Business Travel Policy: Travel policy allows first-class train travel for journeys over three hours to encourage less domestic flying, alongside a booking system that helps colleagues make more informed, sustainable travel choices. Business travel emissions have reduced by 37% since 2019.
- In line with Government requirements, the firm has completed ESOS Phase 3 to identify additional potential energy savings that could be made across our UK offices.

Waste reduction

- Since 2019, CMS has recorded a 74% reduction in printed paper usage in the UK. Building on the 2024 **"Think Before You Print"** Campaign, in 2025 the firm transitioned to a printing workplace cloud to monitor and report on printing behaviours, with paper and printing reduction being a key theme in the Sustainability in Action newsletter.
- All office paper used is FSC (Forest Stewardship Council) certified, ensuring responsible sourcing.
- Electronic waste: Equipment, which is redundant to us but not end of life and can be reused is, where possible, donated to charities. Other IT waste is scrubbed, and data is wiped and then it is sent for recycling/recovery.
- Single-use plastic: We have pledged to reduce and minimise 'single use plastics' within our business. CMS won the 2023 Plastic Free Award at the Clean City Awards Scheme. In previous years we have received Bronze, Silver and Gold nominations in a number of categories. Additionally, we promote plastic reduction through initiatives like Plastic Free July, which engages and educates staff on minimizing plastic use.

Biodiversity

- The firm expanded its bee programme as part of a commitment to environmental protection, staff engagement and education. CMS now sponsors local beehives or biodiversity initiatives across 14 UK and international offices, with clients and employees able to visit local initiatives or join the network. All money paid for jars of CMS honey is being donated to WWF.
- In partnership with Young Citizens, the firm developed workshops and teacher-led resources on the UN Global Goals including biodiversity, reaching more than 26,000 students.
- Since 2019, the firm has partnered with PrintReleaf to offset paper consumption by supporting global reforestation projects, reforesting over 27,000 trees and offsetting the equivalent of more than 231 million standard printed pages.

Sustainable Procurement

- The supply chain accounts for the majority of our scope 3 emissions; the firm closely engages with key suppliers to share best practice and ideas for collaboration.
- Working specifically with couriers and records storage suppliers to utilise electric and hybrid vehicles as a priority. One such recent initiative was partnering up with a client and a charity for a tailored sustainability programme designed to support SMEs in reducing their environmental impact. This initiative supported SMEs in understanding their carbon footprint, developing practical emissions reduction plans, and preparing to set science-based targets or a path to net-zero. Participants benefited from interactive workshops, expert-led sessions, 1:1 support, and access to a dedicated learning platform and resources, helping them embed sustainability into their operations.

- The firm tracks the percentage of suppliers with commitments and validated SBTs (37.96% in FY2025 compared to 35.31% in FY2024), with the aim of increasing this year-on-year through supplier engagement.

Staff Engagement

- We run a Sustainability in Action newsletter shared with all staff throughout the year. Each month we share information and tips on a different environmental theme, encouraging CMS employees to partake in initiatives such as World Environment Day and Plastic Free July.
- All employees have access to ESG and sustainability training through Sustainability Unlocked, an expert-led, on-demand training platform covering topics around sustainability, climate change and the environment.
- In partnership with Young Citizens, we developed a biodiversity education programme that helps pupils understand nature loss and the actions needed to protect ecosystems. Since its 2024 launch, the programme has reached more than 26,000 students and 126 teachers across 122 schools, reinforcing our long-term commitment to education, social impact and sustainability.
- We have established a network of sustainability champions across our UK and international offices. Over 60 of our Champions are based in UK offices. The network receives training to become subject matter experts and supports awareness campaigns promoting environmental initiatives on topics such as reducing waste, using energy and water efficiently, and sustainable travel.

Governance

Overall responsibility for environmental and corporate responsibility, including management of information on climate change, sits with our Board Chair. The Board is chaired by the Senior Partner. The Chair's responsibility is to both assess and manage climate-related risks and opportunities. The Board considers strategic risk with input from across the business and the Responsible Business Committee. The Responsible Business Committee supports the Board by giving strategic advice on, and monitoring and promoting, the development, adoption, use and impact of Environmental, Social and Governance matters (among others), including our climate change and sustainability commitments. Updates from the Responsible Business Committee to the Board informs the Board's approach on setting performance objectives and risk management of climate-related risks or opportunities.

The Senior Partner chairs the Responsible Business Committee, which consists of senior business leaders, including key Partners across the business, and members of the Responsible Business team who pursue resource and climate change related initiatives. This group is focused on assessing, identifying and managing climate-related risks and opportunities and all have an environmental lens to their roles.

Accreditations and commitments

EcoVadis: In 2025 we were rated with Silver, 90th percentile, 71/100 score by EcoVadis. Currently we hold a Silver rating, 75/100 score and are marked as top 5% of companies rated by EcoVadis in the Legal and accounting activities industry.

The Climate Pledge: In 2022, CMS signed The Climate Pledge. Co-founded by Amazon and Global Optimism, signatories to the pledge commit to reach net zero carbon emissions by latest 2040. The pledge intends to build a cross-sector community of companies,

organisations, individuals and partners working together to address the climate crisis and solve the challenges of decarbonising our economy.

UN Global Compact: CMS is a signatory to the UN Global Compact, reinforcing our commitment to implement universal sustainability principles and to support UN goals. As a signatory of the UN Global Compact, we are part of the world's largest corporate social responsibility initiative and are committed to meeting our business responsibilities in four areas: human rights, labour, environment, and ethics/anti-corruption.

Carbon Disclosure Project (CDP): Every year, CMS submits data on how it is running its business sustainably where we are rated with a B score for Climate Change and A for our Supplier Engagement Assessment.

In the future we hope to implement further measures such as:

Following the verification of our latest GHG emissions data for FY 2025, we have identified priority activities against our top emissions categories to ensure we remain on track to meet our commitments.

1. **Supply chain:** We are expanding our supplier engagement programme to reach over 80% of our supply chain by spend, running workshops to share knowledge on how to decarbonise business operations in line with our commitments. Our Supplier Code of Conduct has been updated and includes details on Environmental Sustainability and encouraging our Supply Chain to implement sustainability strategies.

2. **Offices:** We will continue to identify sustainable premises as the business expands and seek office space with sustainable accreditations. All future office fitouts will be sustainable and avoid landfill.

3. **Commuting and working from home:** CMS will continue to champion a flexible working policy which reduces the need for employees to commute to the office.

4. **Business travel:** Our updated travel policy incentivises train use and strongly discourages domestic flights. We have an internal monthly Sustainability in Action newsletter focused on Travel emission reduction in March.

5. **Courier journeys:** We are working with courier companies to support the transition to 100% hybrid and electric vehicles.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

¹<https://ghgprotocol.org/corporate-standard>

²<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard³.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of the Supplier:

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Barbara Mendler

Chief Operations and Sustainability Officer

12 March 2026

³<https://ghgprotocol.org/standards/scope-3-standard>