

Slavery and Human Trafficking Statement 2018

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 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 2018. 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.

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 2018

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

- Finalised our Anti-Slavery Policy and rolled this out across our business and our supplier base;
- Consolidated our supplier assessment questionnaire to include modern slavery questions aimed at identifying higher risk suppliers and whether mitigating actions such as further due diligence or contractual terms, are needed.
- Extended risk mapping to include location, the length of the relationship and any other existing information to enable us to rate suppliers;
- Delivered face to face awareness presentations to staff involved in recruiting and sourcing/managing a supply chain so that they are able to identify high risk factors, understand the implications and assist us with implementing the Anti-Slavery Policy effectively.

Building on steps taken to date, we have identified the following specific enhancements for the forthcoming financial year and beyond:

- Implement follow-up audits for suppliers identified as having higher risks of modern slavery.
- Supplement our policies, processes and training to include more detailed practical guidance on risk factors and indicators, to ensure our people are equipped to respond appropriately to issues identified.
- Training and raising awareness remains a key focus for us and our extended supply chains.

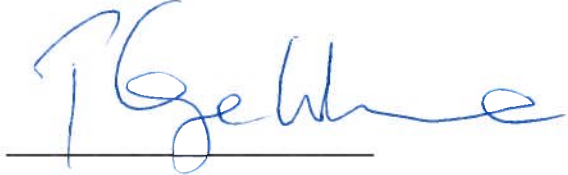
Ongoing commitment

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.



Penelope Warne

Senior Partner

CMS Cameron McKenna Nabarro Olswang LLP