

## **Slavery and Human Trafficking Statement 2019**

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 2019. 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 2019**

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.
- We are developing a Supplier Code of Conduct and a firm-wide supplier assessment questionnaire to ensure consistency of approach throughout our offices in relation to a number of issues, including modern slavery. We are in the process of ensuring that all of our suppliers sign up to these documents.
- We aim to carry out an assessment of offices identified as having a higher risk of exposure to modern slavery, to establish whether tighter due diligence controls are required.


### **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.



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Penelope Warne

**Senior Partner**

**CMS Cameron McKenna Nabarro Olswang LLP**

## **APPENDIX A**

<b>Country</b>	<b>Office</b>	<b>Entities</b>
<b>Belgium</b>	Brussels	CMS Cameron McKenna Nabarro Olswang LLP Avenue des Nerviens 85 1040 Etterbeek Brussels
<b>Brazil</b>	Rio de Janeiro	CMS Cameron McKenna Consultores em Directo Estrangeiro Travessa do Ouvidor 5, Sala 6.01, Centro, Rio de Janeiro, CEP 20040-040
<b>Bulgaria</b>	Sofia	CMS Cameron McKenna Nabarro Olswang LLP Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 2 1000 Sofia
<b>China</b>	Beijing	CMS Cameron McKenna Nabarro Olswang LLP Room 1909 China Youth Plaza No 19 Dongsanhuan North Road Chaoyang District Beijing 100026
<b>Czech Republic</b>	Prague	CMS Cameron McKenna Nabarro Olswang v.o.s. Palladium Na Porici 1079/3a 110 00 Prague 1
<b>England</b>	Mayfair	CMS Cameron McKenna Nabarro Olswang LLP 24 Upper Brook Street London W1K 7QB
	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
<b>Germany</b>	Munich	Olswang Germany LLP Promenadeplatz 12 5th Floor Munich
<b>Hong Kong</b>	Hong Kong	Lau Horton & Wise LLP 8 <sup>th</sup> Floor, Nexxus Building 41 Connaught Road Central Hong Kong

<b>Hungary</b>	Budapest	CMS Cameron McKenna Nabarro Olswang LLP Magyarországi Fioktelepe & Ormai es Tarsai Ybl Palace Károlyi Mihály u. 12 1053 – Budapest
<b>Oman</b>	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
<b>Poland</b>	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
<b>Romania</b>	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
<b>Singapore</b>	Singapore	CMS Cameron McKenna Nabarro Olswang (Singapore) LLP & Holborn Law LLC 7 Straits View, Marina One East Tower #19-01 Singapore 018936

<b>Slovakia</b>	Bratislava	CMS Cameron McKenna Nabarro Olswang LLP, advokáti, v.o.s Uniq Building, Staromestska 3, Bratislava, Slovakia
<b>Scotland</b>	Aberdeen	CMS Cameron McKenna Nabarro Olswang LLP 6 Queens Road Aberdeen AB15 4ZT
	Edinburgh	CMS Cameron McKenna Nabarro Olswang LLP Saltire Court, 20 Castle Terrace Edinburgh EH1 2EN
	Glasgow	CMS Cameron McKenna Nabarro Olswang LLP 1 West Regent Street Glasgow G2 2LD
<b>Turkey</b>	Istanbul	CMS Danışmanlık Hizmetleri Avukatlık Ortaklığı 15th Floor, Suzer Plaza, Elmadag, Askerocagi Cad No 6, 34367 Sisli-Istanbul
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