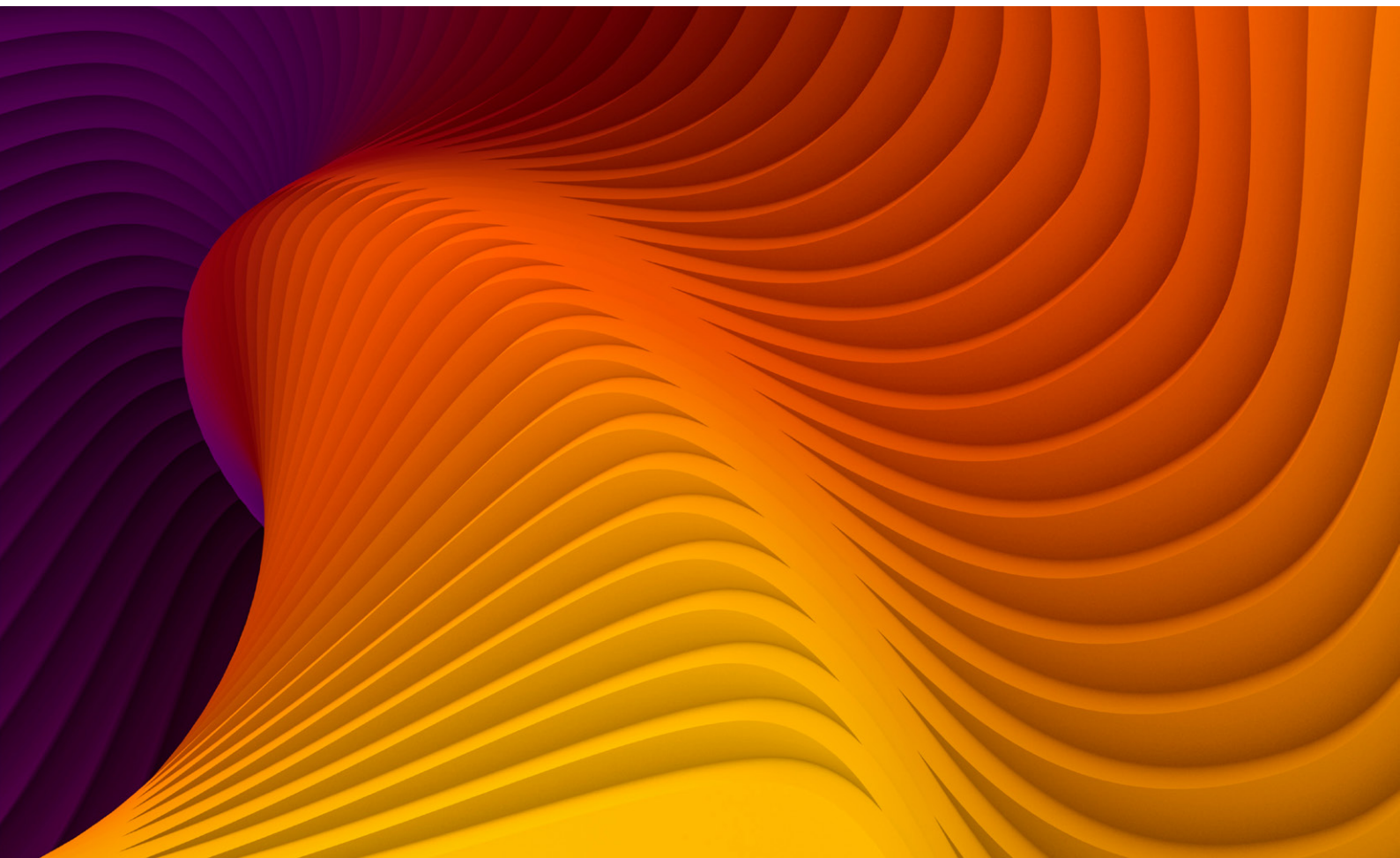


Slavery and Human Trafficking Statement 2025



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 31 March 2025¹. 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.

¹ Following a change in our financial year end date from 30 April.

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 independent 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 Anti-Slavery, 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 whistleblowing policy statement is available on our website, together with our whistleblowing reporting platform which is available to CMS employees and partners, as well as our suppliers and their employees.

Our supply chains and due diligence processes

We are committed to upholding the highest ethical standards across all aspects of our business. We expect our suppliers to conduct business with integrity and incorporate ethical and responsible behaviour throughout their own value chain.

We expect our suppliers and their subcontractors to:



Have in place policies, systems and/or procedures to ensure zero tolerance towards human rights abuses, money laundering, fraud, bribery, tax evasion, conflicts of interest, corruption and other improper payments



Fully comply with the requirements of all applicable antibribery and corruption laws, including but not limited to the UK Bribery Act 2010



Not be involved in corruption, which is the misuse of entrusted power or a breach of duty for personal gain

Suppliers must not directly or indirectly offer improper payments or inducements to CMS employees and partners 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 practice 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 confirmation, 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



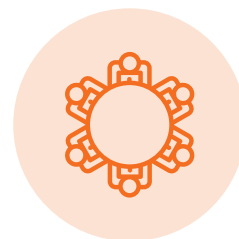
Environmental sustainability commitments and practices



Ethical sourcing and behaviour



Responsible Business and Social Impact



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 everyone that works at the firm. 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 31 March 2025

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 to existing CMS employees and partners (including to our overseas offices, and in particular our Central Eastern Europe offices) on risk and compliance issues, with sections on modern slavery and whistleblowing. We monitor attendance at these training sessions. Launched a Speak Up Supporter scheme with trained Speak Up Supporters within the firm to provide a safe and confidential space to discuss concerns, seek information and raise issues related to discrimination, bullying, harassment, or any behaviour that goes against our firm's culture and values. The scheme encourages our staff to utilise the firm's whistleblowing reporting channels and raise legitimate concerns. Enhanced our gifts and hospitality records by transitioning to an online platform. This platform better enables us to monitor, track and report on this data.
- Considering that we form part of our clients' supply chain, we have standardised our responses to requests for information we receive from our clients regarding the firm's approach to modern slavery. The team members who respond to such queries have received additional training on modern slavery.
- Maintained the firm's ISO 30425 Diversity & Inclusion certification.
- Provided mandatory e-learning training for all employees, partners and embedded suppliers on Shaping an Inclusive Culture. This training focused on increasing awareness around non-inclusive behaviours and the expectations of the Solicitors Regulation Authority towards firms and individuals regarding workplace culture. This approach has been endorsed by our Board and completion is monitored. Failure to complete this training results in follow-up action.

- Provided in-person Inclusive Culture training to all partners and business services leaders.
- Continued development of our supplier onboarding questionnaire to ensure we can identify higher risk suppliers and whether mitigating actions are needed.
- Published an updated version of our [Supplier Code of Conduct](#) on our website. 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.
- Updated the Diversity and Inclusion clause in our contracts with respect to requiring our suppliers to share reasonable evidence of their commitment to equality of opportunity for people with disabilities.
- Implemented follow-up audits for key suppliers identified as having a higher risk of exposure to modern slavery, including annual on-site visits.
- Implemented annual 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:

- Publish a Global Code of Conduct promoting our culture, values and standards expected from our colleagues and across our offices.
- 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.
- Further training and awareness raising on whistleblowing.
- Continually review our approach to modern slavery to evaluate effectiveness and identify any gaps.
- Roll out in-person Inclusive Culture training to everyone working at the firm.
- 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.
- Look to introduce “bite-size” training modules, including modern slavery, with a view of these being made compulsory for all contract owners and heads of departments.
- We intend to introduce a new internal process for responding to client due diligence exercises on our firm (i.e. in the form of client questionnaires), which often include confirmations as to the firm’s approach to modern slavery. We have recruited additional resource to focus on moving this process online, standardising our responses and ensuring they align with the firm’s current position. This will provide an additional layer of review of our processes and procedures.

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

This statement has been approved by our Board. The Board fully supports the initiatives described in this statement.



Charles Currier
Senior Partner
CMS Cameron McKenna Nabarro Olswang LLP

Appendix A

Country	Office	Entities
Australia	Brisbane	Cameron McKenna Solicitors (Australia) Pty Ltd Office 12.02, Level 12, Quay Central 95 North Quay Brisbane, QLD 4000 Australia
Belgium	Brussels	CMS Cameron McKenna Nabarro Olswang LLP Avenue des Nerviens 85 1040 Etterbeek Brussels
Bulgaria	Sofia	Sirleshtov and Bangachev Law Office, trading as CMS Sofia Lawyers Partnership Landmark Centre 14 Tsar Osvoboditel Blvd, Floor 1, 2 1000 Sofia Bulgaria
China	Beijing	CMS Cameron McKenna Nabarro Olswang LLP 1405, World Financial Centre No. A6, Hujialou North Street West Tower Middle East Third Ring Road Chaoyang District, Beijing 100020 China
Czechia	Prague	CMS Cameron McKenna Nabarro Olswang, advokati, v.o.s. Palác Dunaj, Národní 138/10 Na Porici 1079/3a 110 00 Prague 1
England	Bristol	CMS Cameron McKenna Nabarro Olswang LLP College Square 2 Anchor Road Bristol BS1 5UE

England	Liverpool	CMS Cameron McKenna Nabarro Olswang LLP Suite 8A1, The Plaza, 100 Old Hall Street, Liverpool L3 9QJ
England	London	CMS Cameron McKenna Nabarro Olswang LLP Cannon Place 78 Cannon Street London EC4N 6AF
England	Manchester	CMS Cameron McKenna Nabarro Olswang LLP 1, The Avenue Manchester M3 3AP
England	Reading	CMS Cameron McKenna Nabarro Olswang LLP The Blade Abbey Square Reading RG1 3BE
England	Sheffield	CMS Cameron McKenna Nabarro Olswang LLP 1 – 3 Charter Square Sheffield S1 4HS
Hong Kong	Hong Kong	CMS Hong Kong LLP 8th Floor, Nexxus Building 41 Connaught Road Central Hong Kong
Hungary	Budapest	CMS Cameron McKenna Nabarro Olswang LLP Magyarországi Fioktelepe YBL Palace Károlyi utca 12 1053 – Budapest Ormai, Papp, Czike & Partners YBL Palace Károlyi utca 12 1053 – Budapest
Israel	Israel	CMS Israel LLP 1st Floor, North Tower Ha'arba'a Towers 28 Ha'arba'a Street Tel Aviv 6473926 Israel
Ireland	Dublin	CMS Cameron McKenna Nabarro Olswang Ireland LLP Suite 202, Grafton Centre 41 Leeson Street Lower, Dublin 2, D02 R968

Oman	Muscat	Al Rashdi, Al Juma & Ewing Advocates and Legal Consultants Landmark Building, 6th Floor 23rd July Street 6th Floor PO Box 41, 136 Muscat Oman
Poland	Poznan	CMS Cameron McKenna Nabarro Olswang Póśniak i Bejm sp.k. Budynek OMEGA J. H. Dąbrowskiego 79a St. 60-529 Poznań 8 pietro/ 8th floor Poland
Poland	Warsaw	CMS Cameron McKenna Nabarro Olswang Pośniak i Bejm sp.k Varso Tower Chmielna 69 00-801 Warsaw
Romania	Bucharest	CMS Cameron McKenna Nabarro Olswang LLP S.C.P. One Tower 165, Calea Floreasca 12th – 14th floors District 1 014459 Bucharest CMS Tax S.R.L. One Tower 165, Calea Floreasca 12th – 14th floors District 1 014459 Bucharest Modular Services S.R.L One Tower 165, Calea Floreasca 12th – 14th floors District 1 014459 Bucharest
Romania	Iasi	Modular Services SRL Str.Palas nr. 7b-7c UBC3 et 12 Iasi
Romania	Bacau	Modular Services SRL Str. Pictor Theodor Aman nr. 40 Urban Business Center, et 3 Bacau
Saudi Arabia	Riyadh	CMS Cameron McKenna Nabarro Olswang Lawyers and Consultants Laysen Valley Building No. 13 Intersection King Khalid with Oruba Road Riyadh 12329 Saudi Arabia

Singapore	Singapore	CMS Cameron McKenna Nabarro Olswang (Singapore) LLP & Holborn Law LLC 7 Straits View, #19-01 Marina One East Tower Singapore 018936
Slovakia	Bratislava	CMS Cameron McKenna Nabarro Olswang LLP, advokáti, s.r.o. Staromestská 3, 811 03 Bratislava, Slovakia
Scotland	Aberdeen	CMS Cameron McKenna Nabarro Olswang LLP 6 Queens Road Aberdeen AB15 4ZT
Scotland	Edinburgh	CMS Cameron McKenna Nabarro Olswang LLP Saltire Court, 20 Castle Terrace Edinburgh EH1 2EN
Scotland	Glasgow	CMS Cameron McKenna Nabarro Olswang LLP 1 West Regent Street Glasgow G2 1AP
Türkiye	Istanbul	CMS Danışmanlık Hizmetleri Avukatlık Ortaklığı Süzer Plaza Askerocağı cad. No:6 Kat:15 D: 1501 34367 Şişli – Istanbul
UAE	Dubai	CMS (UAE) LLP Level 15 Burj Daman Dubai International Finance Centre Dubai PO BOX 506873
UAE	Abu Dhabi	CMS (UAE) LLP Unit No. 20 Al Sila Tower ADGM Square Al Maryah Island Abu Dhabi United Arab Emirates
Ukraine	Kyiv	CMS Cameron McKenna LLC 6th Floor 38 Volodymyrska Street Kyiv, 01054