# **OUR GRI CONTENT INDEX**

Clifford Chance applies the internationally recognised GRI Standards Sustainability Reporting Guidelines to support our commitment to transparency. This index contains Standard Disclosures from the GRI Sustainability Reporting Guidelines. Our approach to GRI is based on a pragmatic interpretation of the guidelines. We have therefore focused our GRI reporting on the indicators which we believe are the most relevant to our business and of greatest interest to our stakeholders. For more information about our stakeholders and the issues material to them, please see our Responsible Business Report 2020, 'In the face of change' and 'Monitoring our Progress' and our Responsible Business Report 2016, 'Materiality and Stakeholder Engagement.'

The level of disclosure assessments below are self-declared and have not been formally verified by a third-party.

## **GENERAL STANDARD DISCLOSURES**

| Disclosure<br>Number | Description  | Fully/partially<br>reported | Comments  |
|----------------------|--|-----------------------------|---|
| Strategy and A       | nalysis  |                             |   |
| 102-14               | Statement from senior decision makers  | Fully                       | Please see our Responsible Business Report 2020 – <i>Working for a sustainable future in uncertain times</i>  |
| Organizational       | Profile  |                             |   |
| 102-1                | Name of the organisation   | Fully                       | Clifford Chance LLP.  |
| 102-2                | Activities, brands, products and services  | Fully                       | www.cliffordchance.com<br>Clifford Chance Applied Solutions   |
| 102-3                | Location of headquarters   | Fully                       | London, UK.   |
| 102-4                | Location of operations   | Fully                       | The firm has offices in 23 countries and works in a significant number of other markets globally from this network. During 2019/20 we had a Formal Law Alliance (FLA) with Cavenagh Law LLP in Singapore, and a co-operation agreement with Abuhimed Alsheikh Alhagbani Law Firm (AS&H) in Saudi Arabia |
| 102-5                | Ownership and Legal Form   | Fully                       | LLP   |
| 102-6                | Markets served   | Fully                       | www.cliffordchance.com – 'Expertise' & 'Offices'.   |
| 102-7                | Scale of the organisation  | Fully                       | Please see our Responsible Business Report 2020.  |
| 102-8                | Total number of employees by<br>employment contract and<br>gender                  | Partially                   | www.cliffordchance.com – 'Reporting and Resources.'   |
| 102-41               | Percentage of total<br>employees covered by<br>collective bargaining<br>agreements | Partially                   | All employees are free to join collective bargaining<br>agreements but the specifics vary significantly from<br>one office to the next, partly dependent on local<br>employment legislation and general practice.   |

# GENERAL STANDARD DISCLOSURES CONTINUED

| Disclosure     | Description   | Fully/partially | Comments   |  |  |  |
|----------------|---|-----------------|--|--|--|--|
| Number         |   | reported        |  |  |  |  |
| Organizational | Organizational Profile  |                 |  |  |  |  |
| 102-9          | The organization's supply chain   | Partially       | As a global law firm, we work with a large range of<br>suppliers supporting us across multiple<br>categories, including, but not limited to,<br>operations, IT, HR, knowledge and information,<br>professional services, travel, etc. Some of these<br>relationships are managed through centrally<br>managed global relationships, others at a regional<br>or local level.  |  |  |  |
|                |   |                 | We aim to treat all suppliers fairly and we have a<br>Global Procurement Policy that governs how we<br>work with our suppliers, and ensures that<br>appropriate due diligence is undertaken. We also<br>have a supplier code of conduct and standards to<br>outline the minimum standards we expect from<br>our suppliers. We are in the process of launching<br>a new site for our suppliers.   |  |  |  |
|                |   |                 | We have developed our approach to supplier<br>relationship management (SRM), including the<br>deployment of an SRM framework, as well as a<br>focus on supplier diversity and 'sustainability' with<br>the introduction of a new reporting tool to enable<br>the assessment of social, economic and<br>environmental factors and provide greater<br>oversight of the controls our suppliers have in<br>place. We are in the process of launching a pilot<br>for our strategic suppliers.   |  |  |  |
|                |   |                 | We have developed our tiering and risk criteria<br>used to identify the most strategic suppliers to our<br>firm, and are currently automating our third party<br>risk management and due diligence processes to<br>enhance our on-boarding and in-life cycle<br>management approach.   |  |  |  |
| 102-10         | Significant changes during<br>the reporting period<br>regarding the organization's<br>size, structure, ownership or<br>supply chain | Fully           | There have been no relevant changes.   |  |  |  |
| 102-11         | Explanation of whether and how<br>the precautionary approach or<br>principle is addressed by the<br>organization.                   | Fully           | We manage risk proactively. Risk management<br>is the responsibility of the firm's Executive<br>Leadership Group and is managed by a team<br>reporting to the Executive Partner. Our Audit and<br>Risk Committee, which is made up of four<br>internal members and one external member,<br>monitors our approach to risk management. We<br>are committed to protecting natural resources<br>and our Responsible Business activities<br>contribute to mitigating various environmental<br>challenges, including the prevention of global<br>warming and reducing waste to landfill. |  |  |  |

| Disclosure<br>Number | Description  | Fully/partially<br>reported | Comments   |
|----------------------|--|-----------------------------|--|
| Organizationa        | l Profile  |                             |  |
| 102-12               | Externally developed<br>economic, environmental<br>and social charters,<br>principles, or other<br>initiatives to which the<br>organization subscribes or<br>which it endorses | Fully                       | Clifford Chance endorses the UN Sustainable<br>Development Goals. We are a participant in the<br>UN Global Compact. We support and respect the<br>UN's Guiding Principles on Business and Human<br>Rights. We are signatories and supporters of the<br>UN's Women's Empowerment Principles, UN Free<br>& Equal and the standards of conduct for tackling<br>LGBTI discrimination. We support the World<br>Economic Form's Partnering Against Corruption<br>Initiative and are signatories of the global Valuable<br>500. In the UK, we have pledged our support to<br>Rare Recruitment's Race Fairness Commitment.<br>We support a wide range of other national and<br>international initiatives designed to foster more<br>inclusive workplaces and societies. Individual<br>offices are also signed up to environmental<br>standards, administered locally at this time. We<br>have been awarded ISO 14001 certification<br>London, and the LEED certification in Washington,<br>DC. Our London office has recently implemented<br>an ISO 50001 certified energy management<br>system. Our Luxembourg office is BREEAM<br>certified. |
| 102-13               | Memberships of<br>associations (such as<br>industry associations) and<br>national or international<br>organizations  | Not reported                | We do not currently have a process in place for<br>collating up to date information in this area from<br>around our global network. Clifford Chance is a<br>member of a wide range of legal sector<br>associations, financial services industry sector<br>associations and trade bodies, and we actively<br>support a number of academic institutions as<br>well as some think tanks, representing a range<br>of perspectives.   |
| Identified Mate      | erial Aspects and Boundaries   |                             |  |
| 102-45               | Entities included in the organization's consolidated financial statements.   | Fully                       | <u>www.cliffordchance.com</u> – 'Who we are and how we work'   |

## GENERAL STANDARD DISCLOSURES CONTINUED

| Disclosure<br>Number | Description  | Fully/partially<br>reported | Comments  |
|----------------------|--|-----------------------------|---|
| 102-46               | Explanation of the process for<br>defining the report content and<br>the Aspect Boundaries, and<br>how the organization has<br>implemented the Reporting<br>Principles for Defining Report<br>Content. | Fully                       | Please see our Responsible Business Report<br>2016, 'Materiality and Stakeholder<br>Engagement', and our 2015 Corporate<br>Responsibility Report, pages 8 – 11, for further<br>information about our 2015-2016 materiality<br>assessment.   |
| Identified Mate      | rial Aspects and Boundaries  |                             |   |
| 102-47               | The material Aspects<br>identified in the process for<br>defining report content.  | Fully                       | <ul> <li>Economic Performance<br/>Market Presence</li> <li>Environmental<br/>Energy<br/>Emissions<br/>Products and Services<br/>Compliance</li> <li>Social<br/>Labor Practices and Decent Work<br/>Employment<br/>Training and Education<br/>Diversity and Equal Opportunity<br/>Equal Remuneration for Women and Men</li> <li>Human Rights<br/>Investment<br/>Freedom of Association and Collective<br/>Bargaining<br/>Supplier Human Rights Assessment</li> <li>Society<br/>Local<br/>Communities<br/>Anti-corruption<br/>Public Policy<br/>Anti-competitive Behaviour<br/>Compliance</li> <li>Product Responsibility<br/>Product and Service Labelling<br/>Marketing Communications<br/>Customer Privacy<br/>Compliance</li> </ul> |

| Disclosure<br>Number | Description   | Fully/partially reported | Comments   |
|----------------------|---|--------------------------|--|
|                      | Explanation of the material topic and its boundary  | Fully                    | The Aspect boundary for all Aspects includes all internal operations and stakeholders.<br>The Aspect boundary for all Aspects includes all   |
|                      |   |                          | external stakeholders.   |
|                      |   |                          | There were no developments within our business<br>that would require any restatement of information<br>provided in our previous reports.   |
|                      |   |                          | There are no significant changes from the previous year that would prevent comparability with the previous year's performance indicators.  |
| Stakeholder Eng      | agement   |                          |  |
|                      | Stakeholder groups engaged by the organisation  | Partially                | Please see our Responsible Report 2020, 'In<br>the face of change'. Please also see our<br>Responsible Business Report 2019 'Trust and<br>Confidence' and our Responsible Business<br>Report 2018 'Question Challenge Act'.  |
|                      | The basis for identification<br>and selection of<br>stakeholders with whom to<br>engage   | Partially                | Clifford Chance interacts with a broad range of<br>stakeholders. This includes individuals or<br>groups which we consider critical to the success<br>of our firm both in the short and long-term, such<br>as our people, our clients, regulators,<br>government bodies and academic institutions.<br>We also actively engage with those<br>stakeholders where we believe we can add<br>value and create benefit through our expertise<br>and resources, for example, in supporting the<br>work of NGOs and charities in the communities<br>where we operate. Please see our Responsible<br>Business Report 2020 'Scaling Up Our Impact'.<br>Our Responsible Business Report<br>2018 'Make an Impact' and our Responsible<br>Business Report 2016 'Materiality and<br>Stakeholder Engagement' for more information. |
|                      | The organisation's approach<br>to stakeholder engagement  | Fully                    | Please see our Responsible Business Report<br>2020, and our Responsible Business Report<br>2016, 'Materiality and Stakeholder<br>Engagement.' Please see our Corporate<br>Responsibility Report 2012, pages 6-7, for<br>further information.   |
|                      | Explanation of key topics and<br>concerns that have been raised<br>through stakeholder<br>engagement, and how the<br>organization has responded<br>to them. | Partially                | Please see our Responsible Business Report<br>2020 and our Responsible Business Report<br>2018, passim and in particular 'Question<br>Challenge Act', and our Responsible Business<br>Report 2016 'Materiality and Stakeholder<br>Engagement'  |
| Report Profile       |   |                          |  |
| 102-50               | Reporting period  | Fully                    | Financial year ending 30 April 2020.   |

| Disclosure<br>Number | Description   | Fully/partially<br>reported | Comments  |
|----------------------|---|-----------------------------|---|
| 102-51               | Date of most recent report  | Fully                       | September 2020.   |
| 102-52               | Reporting cycle   | Fully                       | Annual.   |
| 102-53               | Contact point for<br>questions regarding the<br>report                        | Fully                       | Claire.Gosnell@cliffordchance.com<br>Colette.Wilkinson@cliffordchance.com   |
| 102-54               | Claims of reporting in<br>accordance with the GRI<br>Standards                | Fully                       | Clifford Chance's approach to GRI is based on a<br>pragmatic interpretation of the guidelines and as<br>such the indicators we report on have been<br>informed through consideration of the materiality<br>principle. This means that we report fully on<br>some, but not all of the core disclosures.  |
| 102-55               | GRI Content Index   | Fully                       | This index contains Standard Disclosures from the GRI Sustainability Reporting Guidelines.  |
| 102-56               | External Assurance  | Fully                       | This report has not been assured by external auditors.  |
| 102-18               | Governance Structure  | Fully                       | Our approach to governance is set out on<br><u>www.cliffordchance.com</u> , 'Risk and Governance'.<br>Our Executive Leadership Group and Executive<br>Operations Group are responsible for making<br>decisions on economic, environmental and social<br>topics. Input is also provided by our Responsible<br>Business Board.The decision-making process<br>and its topics are reviewed by the firm's<br>Partnership Council.  |
| 102-16               | The organisation's values,<br>principles, standards and<br>norms of behaviour | Fully                       | The provision of legal services is a highly<br>regulated industry. Lawyers and law firms are<br>expected to meet strict standards in relation to<br>how the firm is run, how its services are supplied<br>and managed and in the behaviour of its people,<br>particularly but not solely its lawyers. At a<br>minimum, we meet these standards in every<br>market where we operate, and where our global<br>policies and protocols are more stringent those<br>instead provide the standard we expect. We have<br>often played a role in setting new high<br>professional standards in markets that can<br>subsequently be adopted by other firms operating<br>there. As a minimum our guiding principles<br>globally follow those of the Solicitors Regulation<br>Authority of England & Wales, which include that<br>we "uphold the rule of law and the proper<br>administration of justice; act with integrity; act in<br>the best interests of each client". In addition to<br>these expectations, the firm has a set of<br>Principles that are designed to guide behaviour in<br>the firm. |

# SPECIFIC STANDARD DISCLOSURES

| Disclosure<br>Number                 | Disclosure Title   | Fully/partially reported | Comments  |  |  |  |
|--------------------------------------|--|--------------------------|---|--|--|--|
| Economic Per                         | formance   | ,<br>                    |   |  |  |  |
| Disclosure on                        | Management approach  | Please see our Re        | sponsible Business Report 2019.   |  |  |  |
| 201-1                                | Direct economic value generated and distributed  | Fully                    | Please see our 2020 Annual Review   |  |  |  |
| 201-4                                | Financial assistance received<br>from government   | Fully                    | Clifford Chance operates globally. In a number<br>of jurisdictions where we have offices,<br>governments have made available certain<br>assistance to all businesses to help them<br>manage their finances during the disruption<br>caused by Covid-19. This includes subsidies for<br>staff retention, tax deferrals, business loans and<br>a range of other schemes. Clifford Chance has<br>not applied for and then taken up any<br>government assistance programs that have<br>been made available to business to support<br>direct employment, including the UK<br>Government Coronavirus Job Retention Scheme<br>(furlough). We have also accepted the offer for<br>the short-term deferral of some limited tax<br>liabilities to support the continued prudent<br>running of the firm's finances.                    |  |  |  |
| Market Presen                        | се   |                          |   |  |  |  |
| 202-2                                | Proportion of senior<br>management hired from the<br>local community                             | Partially                | We do not have specific procedures on local<br>hiring. However, we are guided by local law. Our<br>employees, partners and management are drawn<br>from a wide range of nationalities and many of our<br>offices are headed by a citizen of the country<br>where they are based. There is a rigorous process<br>for hiring of partners. This includes: a review<br>process by all relevant business line heads<br>(regionally and by practice area and, as<br>necessary, by sector); a full assessment with the<br>firm's Partner Selection Group (which also makes<br>recommendations on all partner promotions);<br>analysis of the business case for investment in the<br>relevant practice; agreement by the Executive<br>Leadership Group and the Partnership Council and<br>finally a vote of the global partnership. |  |  |  |
| Environmental                        |  |                          |   |  |  |  |
| Energy                               | Energy   |                          |   |  |  |  |
| 302-4                                | Reduction of energy consumption.   | Partially                | Our energy consumption for FY 2019/20 was 5,439<br>kWh per FTE. This is a reduction of 649 kWh per<br>FTE since FY 2018/19, during which energy<br>consumption was 6,088 kWh per FTE.   |  |  |  |
| <b>302-5</b><br>Clifford Chance Resp | Reduction in energy<br>requirements of products<br>and services.<br>onsible Business Report 2020 | Partially                | Clifford Chance's core business is the delivery of<br>legal advice. We are an office-based business<br>and work internationally. Some of our initiatives<br>to decrease our energy consumption are outlined<br>in our Responsible Business Report 2020. 7   |  |  |  |

| Disclosure                        | Disclosure Title  | Fully/partially   | Comments  |  |  |  |
|-----------------------------------|---|---|---|--|--|--|
| Number                            |   | reported  |   |  |  |  |
| Emissions                         | Emissions   |   |   |  |  |  |
| Disclosure on I                   | Management Approach   |   | Please see our Responsible Business Report 2020, 'Environment'<br>and 'Monitoring our Progress.'  |  |  |  |
| 305-1                             | Direct greenhouse gas<br>emissions (scope 1)  | Partially   | Scope 1 & 2 emissions are reported collectively in<br>line with our global targets. The global CO2<br>emissions per FTE in 2019/20 is 1.99 for electricity<br>and fuel emission sources compared to 4.50 in FY<br>2012/13, 4.62 in FY 2013/14, 4.55 in 2014/15, 4.06<br>in FY 2015/16, 2.98 in FY 2016/17, 2.78 in FY<br>2017/18 and 2.41 in 2018/19. |  |  |  |
| 305-2                             | Energy indirect greenhouse<br>gas emissions (scope 2)   | Partially   | Scope 1 & 2 emissions are reported collectively in<br>line with our global targets. The global CO2<br>emissions per FTE in 2019/20 is 1.99 for electricity<br>and fuel emission sources compared to 4.50 in FY<br>2012/13, 4.62 in FY 2013/14, 4.55 in 2014/15, 4.06<br>in FY 2015/16, 2.98 in FY 2016/17, 2.78 in FY<br>2017/18 and 2.41 in 2018/19. |  |  |  |
| 305-5                             | Reduction of greenhouse<br>gas emissions  | Partially   | As of FY 2019/20 scope 1 & 2 CO2 emissions per FTE have decreased by 28.42% from the latest baseline of 2017/18.  |  |  |  |
| Compliance                        |   |   |   |  |  |  |
| Disclosure on I                   | Management Approach   | Please see our Responsible Business Report 2020, 'Environment' and 'Monitoring our Progress.' |   |  |  |  |
| 307-1                             | Monetary value of significant<br>fines and total number of<br>non- monetary sanctions for<br>non- compliance with<br>environmental laws and<br>regulations. | Fully   | There have been no incidents of noncompliance with environmental laws and regulations.  |  |  |  |
| Social                            |   |   |   |  |  |  |
| Labour practices and decent work  |   |   |   |  |  |  |
| Employment                        |   |   |   |  |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'People' and 'Monitoring our Progress.'      |   |  |  |  |
| 401-1                             | New employee hires<br>and employee turnover   | Not reported  | We collate and report internally on the number of joiners and leavers by gender and region.   |  |  |  |

| Disclosure                        | Disclosure Title  | Fully/partially  | Comments   |
|-----------------------------------|---|--|--|
| Number                            |   | reported   |  |
| Training and E                    | ducation  |  |  |
| Disclosure on I                   | Management Approach   | Please see our Res<br>and 'Monitoring our  | ponsible Business Report 2019, 'People'<br>Progress.'  |
| 404-1                             | Average hours of training per<br>year per employee by gender<br>and by employee category  | Fully  | www.cliffordchance.com – 'Academy Statistics'.   |
| 404-2                             | Programs for upgrading<br>employee skills and<br>transition assistance<br>programs  | Partially  | Lifelong learning is highly valued at Clifford Chance<br>and is enshrined in our culture, with an emphasis<br>on 'soft skills' – including managing wellbeing and<br>resilience – as well as the development of technical<br>capabilities. Please see our Responsible Business<br>Report 2020 <u>'People'</u> , <u>www.cliffordchance.com</u> –<br>'Academy Statistics' and 'The Clifford Chance<br>Academy.'  |
| 404-3                             | Percentage of employees<br>receiving regular performance<br>and career development<br>reviews, by gender and by<br>employee category. | Partially  | Clifford Chance has a global appraisal system;<br>we expect everyone in the firm to receive an annual<br>appraisal which sets objectives and considers<br>development for the coming year. We track<br>completed appraisal rates, as well as data from the<br>appraisals and the overall results and trends are<br>reported to the firm's senior leadership bodies. In the<br>past year, nearly all partners, lawyers and business<br>services staff had a completed appraisal. We do not<br>currently report any further detail externally. |
| Diversity and E                   | qual Opportunity  |  |  |
| Disclosure on I                   | Management Approach   | Please see our Responsible Business Report 2020, 'People' and 'Monitoring our Progress.' |  |
| 405-1                             | Composition of governance<br>bodies and breakdown of<br>employees   | Partially  | www.cliffordchance.com – 'Gender Statistics',<br>'Ethnicity Statistics'. Our Executive Leadership<br>Group is made up of 2 women and 11 men. Our<br>Wider Leadership Group is made up of 4 women<br>and 15 men. Our Partnership Council is made up<br>of 2 women and 7 men. Our Executive<br>Operations Group is made up of 9 women and 11<br>men.   |
| Equal Remune                      | ration for Women and Men  |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'People' and 'Monitoring our Progress.' |  |
| 405-2                             | Ratio of basic salary and<br>remuneration of women to<br>men by employee category,<br>by significant locations<br>of operation.       | Partially  | Clifford Chance operates a lockstep compensation<br>system for partners whereby remuneration is<br>largely determined by seniority. The arrangements<br>for our other lawyers and business services staff<br>varies by location. In line with local regulations, our<br>UK information is available at<br><u>www.cliffordchance.com</u> – 'UK Pay Gap Report<br>2019'  |

| Disclosure<br>Number | Disclosure Title   | Fully/partially<br>reported   | Comments   |
|----------------------|--|---|--|
| Human Rights         |  |   |  |
| Investment           |  |   |  |
| Disclosure on        | Management Approach  | Please see our Responsible Business Report 2020, 'People'<br>and 'Monitoring our Progress.' |  |
| 412-2                | Total hours of employee<br>training on human rights<br>policies or procedures<br>concerning aspects of human<br>rights that are relevant to<br>operations, including the<br>percentage of employees<br>trained | Partially   | Many of our lawyers are conversant with human<br>rights policies or rights standards and/or locally<br>applicable human rights procedures concerning<br>aspects of rights legislation. A number of our<br>lawyers are leading advisers on these issues<br><u>www.cliffordchance.com</u> , 'Business and Human<br>Rights') and a number of our lawyers<br>internationally work pro bono in this arena<br>(please see our Responsible Business Report<br>2020, 'Doing Business'). Clifford Chance<br>operates to strict professional standards which<br>all of our staff are expected and, where<br>appropriate, trained to meet. The training<br>provided to our employees includes training<br>specifically on Human Rights and The Modern<br>Slavery Act. |

| Disclosure<br>Number | Disclosure Title  | Fully/partially<br>reported | Comments   |
|----------------------|---|-----------------------------|--|
| 412-3                | Total number and percentage of<br>significant investment<br>agreements and contracts that<br>include human rights clauses or<br>that underwent human<br>rights screening. | Partially                   | Following the launch of our enhanced Global<br>Procurement Policy in November 2019, we have<br>introduced procedures that will enable us to<br>track whether our 'required clauses', inclusive of<br>Clifford Chance's Supplier Code of Conduct and<br>United Nations Guiding Principles on Business<br>and Human Rights, have been included in our<br>supplier contracts and where identified gaps<br>need to be addressed.   |
|                      |   |                             | We issue a 'Supplier Assessment Questionnaire'<br>(SAQ) as part of our supplier due diligence and<br>onboarding, which gathers information on a<br>supplier(s) response and policies against different<br>criteria, including modern slavery and human<br>rights, bribery and corruption, health and safety,<br>financials, diversity, the environment, information<br>security, data protection and business continuity.<br>This is to ensure that we are working with<br>suppliers who are aligned to our procurement and<br>firm practices regarding ethical and sustainable<br>procurement.  |
|                      |   |                             | Integral to our ethical business principles is our<br>commitment to uphold human rights wherever we<br>are in the world. To support this commitment, we<br>have a Modern Slavery statement, and we also<br>have, as noted above, a 'Supplier Code of<br>Conduct.' Our Suppliers are expected to meet (and<br>take steps to procure that their subcontractors and<br>subsidiaries meet) the expectations in our Supplier<br>Code of Conduct and Supplier Standards and/or<br>demonstrate that they have comparable standards<br>in place that are reasonable to their size or industry<br>sector. |

| Disclosure<br>Number | Disclosure Title   | Fully/partially<br>reported  | Comments   |
|----------------------|--|--|--|
| Freedom of As        | sociation and Collective Bargaining  | g  |  |
| Disclosure on        | Management Approach  | Please see our Responsible Business Report 2020, 'People' and 'Monitoring our Progress.' |  |
| 407-1                | Operations and suppliers<br>identified in which the right to<br>exercise freedom of<br>association and collective<br>bargaining may be violated or<br>at significant risk, and<br>measures taken to support<br>these rights. | Partially  | We have a Supplier Code of Conduct, which<br>outlines our expectations of our suppliers and<br>contractors, and we expect all suppliers to comply<br>with the applicable laws in the countries within<br>which they operate, noting that the specifics<br>regarding local employment legislation and<br>general practice may vary. We undertake<br>appropriate due diligence of our suppliers as part<br>of onboarding and we have introduced procedures<br>that will enable us to track whether our 'required<br>clauses', inclusive of Clifford Chance's Supplier<br>Code of Conduct and United Nations Guiding<br>Principles on Business and Human Rights, have<br>been included in our supplier contracts and where<br>identified gaps need to be addressed. |

| Disclosure<br>Number              | Disclosure Title  | Fully/partially<br>reported  | Comments  |
|-----------------------------------|---|--|---|
| Supplier Human                    | Rights Assessment   |  |   |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |
| 414-1                             | Percentage of new suppliers<br>that were screened using<br>human rights criteria. | Partially  | Following the launch of our enhanced Global<br>Procurement Policy in November 2019, we have<br>introduced procedures that will enable us to<br>track whether our 'required clauses', inclusive of<br>Clifford Chance's Supplier Code of Conduct and<br>United Nations Guiding Principles on Business<br>and Human Rights, have been included in our<br>supplier contracts and where identified gaps<br>need to be addressed.<br>Our Suppliers are expected to meet (and take<br>steps to procure that their subcontractors and<br>subsidiaries meet) the expectations in our<br>Supplier Code of Conduct and Supplier<br>Standards and/or demonstrate that they have<br>comparable standards in place that are<br>reasonable to their size or industry sector. This<br>includes conducting their business consistently<br>with the United Nations Guiding Principles on<br>Business and Human Rights, and rejecting any<br>form of forced, bonded or compulsory labour<br>and/or other forms of slavery or human<br>trafficking. As part of Clifford Chance's<br>onboarding processes, and where Procurement<br>is engaged, we would ask for evidence from the<br>supplier as part of our due diligence, including<br>any supporting documents or policies.<br>We expect all suppliers to comply with the<br>applicable laws in the countries within which they<br>operate, and this forms part of our standard terms<br>and conditions. We have developed our tiering<br>and risk criteria used to identify the most strategic<br>suppliers to our firm, and are currently automating<br>our third party risk management and due |

| Disclosure                        | Disclosure Title  | Fully/partially  | Comments   |  |  |  |
|-----------------------------------|---|--|--|--|--|--|
| Number                            |   | reported   |  |  |  |  |
| Society                           |   |  |  |  |  |  |
| Local Commun                      | Local Communities   |  |  |  |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Community' and 'Monitoring our Progress.'      |  |  |  |  |
| 413-1                             | Percentage of<br>operations with<br>implemented local<br>community<br>engagement, impact<br>assessments, and<br>development programs. |  | In FY 2019/20, all of our offices contributed to<br>their local communities by undertaking<br>volunteering work and making charitable<br>donations. For the past seven years we have<br>monitored our firm-wide contribution by setting a<br>goal of helping 100,000 people p.a. In FY<br>2019/20 we helped 85,746 people.   |  |  |  |
| Anti-Corruption                   | 1   |  |  |  |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |  |  |  |  |
| 205-1                             | Total number and percentage<br>of operations assessed for<br>risks related to corruption and<br>the significant risks identified.     | Partially  | The firm seeks to ensure it does not unwittingly<br>facilitate corruption in the legal services it<br>provides by managing client acceptance<br>(including AML checking) through a dedicated<br>expert team. The performance of the team itself<br>is the subject of review by the firm's internal<br>audit function and, last year, by external<br>assessment. Clifford Chance operates to strict<br>professional standards which all of our staff are<br>expected and trained to meet. This includes<br>polices in relation to, inter alia, anti-corruption,<br>money-laundering, legal ethics. The firm has a<br>dedicated Risk team which works with<br>management to identify any possible risk to the<br>firm and to put in place appropriate measures to<br>mitigate those risks. The Risk team undertakes<br>a regular review of risk across every part of the<br>business, including in relation to corruption<br>matters which includes reviews of individual<br>offices. All offices are under an obligation to<br>report to the central Risk team any concerns or<br>possible issues relating to corruption. |  |  |  |
| 205-2                             | Communication and<br>training on anti-corruption<br>policies and procedures   | Partially  | The firm has a global training programme in relation to anti-corruption which is compulsory for every member of staff (with a very small number of exceptions) and for every partner in the firm.  |  |  |  |
| 205-3                             | Confirmed incidents of corruption and actions taken.  | Fully  | No incidents of corruption have been recorded.   |  |  |  |
|                                   |   |  |  |  |  |  |

| Disclosure<br>Number              | Disclosure Title   | Fully/partially<br>reported  | Comments  |  |  |  |
|-----------------------------------|--|--|---|--|--|--|
| Public Policy                     |  |  |   |  |  |  |
| Disclosure on Management Approach |  | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |  |
| 415-1                             | Total value of political<br>contributions by country<br>and recipient/beneficiary  | Fully  | No financial political contributions were made by<br>Clifford Chance. Any political contribution must be<br>agreed in advance with our Global and/ or US<br>General Counsel. The firm does, from time to time,<br>host or sponsor events with mainstream political<br>parties and related institutions representing a<br>spectrum of interests and views. |  |  |  |
| Anti-competitiv                   | ve behaviour   |  |   |  |  |  |
| Disclosure on Management Approach |  | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |  |
| 206-1                             | Total number of legal actions<br>for anti-competitive behaviour,<br>anti- trust, and monopoly<br>practices and their outcomes.           | Fully  | There have been no legal actions for<br>anticompetitive behaviour, anti-trust, and<br>monopoly practices.   |  |  |  |
| Compliance                        |  |  |   |  |  |  |
| Disclosure on Management Approach |  | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |  |
| 419-1                             | Monetary value of significant<br>fines and total number of<br>non-monetary sanctions for<br>non-compliance with laws<br>and regulations. | Fully  | There have been no significant fines or non-<br>monetary sanctions for non compliance with laws<br>and regulations.   |  |  |  |

| Disclosure<br>Number              | Disclosure Title  | Fully/partially<br>reported  | Comments  |  |  |
|-----------------------------------|---|--|---|--|--|
| Product Responsibility            |   |  |   |  |  |
| Product and Service Labelling     |   |  |   |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |
| 417-1                             | Type of product and services<br>information required by the<br>organization's procedures for<br>product and services<br>information and labelling, and<br>percentage of significant<br>product and service categories<br>subject to such information<br>requirements. | Fully  | In many jurisdictions where the firm operates<br>there are strict standards in force relating to<br>service information. The firm's policy is to comply<br>with these regulations in all jurisdictions in which<br>we practise. All of our communications activity<br>meets these standards.                  |  |  |
| 417-2                             | Total number of incidents of<br>non compliance with<br>regulations and voluntary<br>codes concerning product and<br>service information and<br>labelling, by type of outcomes.  | Fully  | There have been no incidents of non-compliance<br>with regulations and voluntary codes concerning<br>product and service information and labelling.   |  |  |
| Marketing Com                     | munications   |  |   |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |
| 102-2                             | Sale of banned or<br>disputed products  | Fully  | The provision of legal services is a highly regulated<br>industry. In some jurisdictions, limitations or<br>constraints are placed on how we operate and/or<br>the services we can provide to clients. The firm's<br>policy is to comply with these regulations in all<br>jurisdictions in which we practice. |  |  |
| 417-3                             | Total number of incidents of<br>non-compliance with<br>regulations and voluntary<br>codes concerning marketing<br>communications, including<br>advertising, promotion, and<br>sponsorship, by type<br>of outcomes.  | Fully  | There have been no incidents of<br>non-compliance with regulations and voluntary<br>codes concerning marketing communications.  |  |  |
| Customer Privacy                  |   |  |   |  |  |
| Disclosure on Management Approach |   | Please see our Responsible Business Report 2020, 'Doing Business' and 'Monitoring our Progress.' |   |  |  |
| 418-1                             | Total number of substantiated<br>complaints regarding breaches<br>of customer privacy and losses<br>of customer data.   | Fully  | There have been no complaints regarding breaches of customer privacy and losses of customer data.   |  |  |