

# OUR GRI CONTENT INDEX

Clifford Chance applies the internationally recognised GRI G4 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 2019, 'Trust and Confidence' 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 Number	Description	Fully/partially reported	Comments
<b>Strategy and Analysis</b>			
102-14	Statement from senior decision maker	Fully	Please see our Responsible Business Report 2019 – 'Trust and Confidence.'
<b>Organizational Profile</b>			
102-1	Name of the organisation	Fully	Clifford Chance LLP.
102-2	Activities, brands, products and services	Fully	www.cliffordchance.com – 'Applied Solutions'.
102-3	Location of headquarters	Fully	London, UK.
102-4	Location of operations	Fully	The firm has offices in 22 countries and works in a significant number of other markets globally from this network. During 2017/18 we had an association in Saudi Arabia with Abuhimed Alsheikh Alhagbani Law Firm (AS&H) and Ukraine with Redcliffe Partners.
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 2019.
102-8	Total number of employees by employment contract and gender	Partially	www.cliffordchance.com – 'Reporting and Resources.'
102-41	Percentage of total employees covered by collective bargaining agreements	Partially	All employees are free to join collective bargaining agreements but the specifics vary significantly from one office to the next, partly dependent on local employment legislation and general practice.

# GENERAL STANDARD DISCLOSURES CONTINUED

Disclosure Number	Description	Fully/partially reported	Comments
<b>Organizational Profile</b>			
102-9	The organization's supply chain	Partially	<p>As a global law firm, we work with a large range of suppliers supporting us across multiple categories, including, but not limited to, operations, IT, HR, knowledge and information, professional services, travel, etc. Some of these relationships are managed through centrally managed global relationships, others at a regional or local level.</p> <p>We aim to treat all suppliers fairly and we have a Global Procurement Policy that governs how we work with our suppliers, and ensures that appropriate due diligence is undertaken.</p> <p>We recognise the importance and value of our suppliers to our firm, and Clifford Chance has recently appointed a new role to lead its global supplier relationship management programme, which includes the deployment of a new SRM framework and policy, as well as a focus on supplier diversity and 'sustainability'. We are looking to draft a sustainability statement for our suppliers to reflect Clifford Chance's values and inform suppliers of our expectations to encourage sustainable behaviour. This includes, but is not limited to, assessing our carbon footprint, evaluating our suppliers using value alignment indicators such as locality, shipping distance, pollution, and supply chain transparency.</p> <p>As we evolve our supplier programme, we will also be reviewing the tiering and risk criteria used to identify the most strategic suppliers to our firm.</p>
102-10	Significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain	Fully	There have been no relevant changes.
102-11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully	We manage risk proactively. Risk management is the responsibility of the firm's Executive Leadership Group and is managed by a team reporting to the Executive Partner. Our Audit and Risk Committee, which is made up of four internal members and one external member, monitors our approach to risk management. We are committed to protecting natural resources and our Responsible Business activities contribute to mitigating various environmental challenges, including the prevention of global warming and reducing waste to landfill.

Disclosure Number	Description	Fully/partially reported	Comments
<b>Organizational Profile</b>			
102-12	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses	Fully reported	Clifford Chance endorses the UN Sustainable Development Goals. We are a signatory to the UN Global Compact and the UN Women's Empowerment Principles and we support and respect the UN's Guiding Principles on Business and Human Rights and LGBTI standards. We also support the World Economic Forum's Partnering Against Corruption Initiative and are a member of the 30% Club. Individual offices are also signed up to environmental standards, which are administered locally at this time. We have been awarded ISO 14001 certification London, and the LEED certification in Washington, DC. Our London office has recently implemented an ISO 50001 certified energy management system. Our Luxembourg office is BREEAM certified.
102-13	Memberships of associations (such as industry associations) and national or international organizations	Not reported	We do not currently have a process in place for collating up to date information in this area from around our global network. Clifford Chance is a member of a wide range of legal sector associations, financial services industry sector associations and trade bodies, and we actively support a number of academic institutions as well as some think tanks, representing a range of perspectives.
<b>Identified Material Aspects and Boundaries</b>			
102-45	Entities included in the organization's consolidated financial statements.	Fully	<a href="http://www.cliffordchance.com">www.cliffordchance.com</a> – 'Who we are and how we work'

# GENERAL STANDARD DISCLOSURES CONTINUED

Disclosure Number	Description	Fully/partially reported	Comments
102-46	Explanation of the process for defining the report content and the Aspect Boundaries, and how the organization has implemented the Reporting Principles for Defining Report Content.	Fully	Please see our Responsible Business Report 2016, 'Materiality and Stakeholder Engagement', and our 2015 Corporate Responsibility Report, pages 8 – 11, for further information about our 2015-2016 materiality assessment.
<b>Identified Material Aspects and Boundaries</b>			
102-47	The material Aspects identified in the process for defining report content.	Fully	<ul style="list-style-type: none"> <li>• <b>Economic</b> <ul style="list-style-type: none"> <li>Economic Performance</li> <li>Market Presence</li> </ul> </li> <li>• <b>Environmental</b> <ul style="list-style-type: none"> <li>Energy</li> <li>Emissions</li> <li>Products and Services</li> <li>Compliance</li> </ul> </li> <li>• <b>Social</b> <ul style="list-style-type: none"> <li><i>Labor Practices and Decent Work</i></li> <li>Employment</li> <li>Training and Education</li> <li>Diversity and Equal Opportunity</li> <li>Equal Remuneration for Women and Men</li> <li><i>Human Rights</i></li> <li>Investment</li> <li>Freedom of Association and Collective Bargaining</li> <li>Supplier Human Rights Assessment</li> <li><i>Society</i></li> <li>Local Communities</li> <li>Anti-corruption</li> <li>Public Policy</li> <li>Anti-competitive Behaviour</li> <li>Compliance</li> <li><i>Product Responsibility</i></li> <li>Product and Service Labelling</li> <li>Marketing Communications</li> <li>Customer Privacy</li> <li>Compliance</li> </ul> </li> </ul>

Disclosure Number	Description	Fully/partially reported	Comments
103-1	Explanation of the material topic and its boundary	Fully	<p>The Aspect boundary for all Aspects includes all internal operations and stakeholders.</p> <p>The Aspect boundary for all Aspects includes all external stakeholders.</p> <p>There were no developments within our business that would require any restatement of information provided in our previous reports.</p> <p>There are no significant changes from the previous year that would prevent comparability with the previous year's performance indicators.</p>
<b>Stakeholder Engagement</b>			
102-40	Stakeholder groups engaged by the organisation	Partially	Please see our Responsible Report 2019, 'Trust and Confidence'. Please also see our Responsible Business Report 2018 'Question Challenge Act'.
102-42	The basis for identification and selection of stakeholders with whom to engage	Partially	Clifford Chance interacts with a broad range of stakeholders. This includes individuals or groups which we consider critical to the success of our firm both in the short and long-term, such as our people, our clients, regulators, government bodies and academic institutions. We also actively engage with those stakeholders where we believe we can add value and create benefit through our expertise and resources, for example, in supporting the work of NGOs and charities in the communities where we operate. Please see our Responsible Business Report 2019 'Move the Dial', our Responsible Business Report 2018 'Make an Impact' and 'Materiality and Stakeholder Engagement' for more information.
102-43	The organisation's approach to stakeholder engagement		Please see our Responsible Business Report 2019, and our Responsible Business Report 2016, 'Materiality and Stakeholder Engagement.' Please see our Corporate Responsibility Report 2012, pages 6-7, for further information.
102-44	Explanation of key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to them.		Please see our Responsible Business Report 2019 and our Responsible Business Report 2018, passim and in particular 'Question Challenge Act', and our Responsible Business Report 2017 'Materiality and Stakeholder Engagement'
<b>Report Profile</b>			
102-50	Reporting period	Fully	Financial year ending April 2019.

Disclosure Number	Description	Fully/partially reported	Comments
102-51	Date of most recent report	Fully	September 2019.
102-52	Reporting cycle	Fully	Annual.
102-53	Contact point for questions regarding the report	Fully	crfeedback@cliffordchance.com
102-54	Claims of reporting in accordance with the GRI Standards	Fully	Clifford Chance's approach to GRI is based on a pragmatic interpretation of the guidelines and as such the indicators we report on have been informed through consideration of the materiality principle. This means that we report fully on 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 <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> , 'How we manage our firm'. Our Executive Leadership Group and Executive Operations Group are responsible for making decisions on economic, environmental and social topics. Input is also provided by our Responsible Business Committee. The decision-making process and its topics are reviewed by the firm's Partnership Council.
102-16	The organisation's values, principles, standards and norms of behaviour	Fully	The provision of legal services is a highly regulated industry. Lawyers and law firms are expected to meet strict standards in relation to how the firm is run, how its services are supplied and managed and in the behaviour of its people, particularly but not solely its lawyers. At a minimum, we meet these standards in every market where we operate, and where our global policies and protocols are more stringent those instead provide the standard we expect. We have often played a role in setting new high professional standards in markets that can subsequently be adopted by other firms operating there. As a minimum our guiding principles globally follow those of the Solicitors Regulation Authority of England & Wales, which include that we "uphold the rule of law and the proper administration of justice; act with integrity; act in the best interests of each client". In addition to these expectations, the firm has a set of Principles that are designed to guide behaviour in the firm.

# SPECIFIC STANDARD DISCLOSURES

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Economic Performance</b>			
<b>Disclosure on Management approach</b>		Please see our Responsible Business Report 2019.	
201-1	Direct economic value generated and distributed		Please see our Responsible Business Report 2019 – ‘Monitoring our Progress.’
201-4	Financial assistance received from government		Clifford Chance does not receive any financial assistance from governments.
<b>Market Presence</b>			
202-2	Proportion of senior management hired from the local community	Partially	We do not have specific procedures on local hiring. However, we are guided by local law. Our employees, partners and management are drawn from a wide range of nationalities and many of our offices are headed by a citizen of the country where they are based. There is a rigorous process for hiring of partners. This includes: a review process by all relevant business line heads (regionally and by practice area and, as necessary, by sector); a full assessment with the firm’s Partner Selection Group (which also makes recommendations on all partner promotions); analysis of the business case for investment in the relevant practice; agreement by the Executive Leadership Group and the Partnership Council and finally a vote of the global partnership.
<b>Environmental</b>			
<b>Energy</b>			
302-4	Reduction of energy consumption.	Partially	Our energy consumption for FY 2018/19 was 6,088 kWh per FTE. This is a reduction of 0.669 kWh per FTE since FY 2017/18, during which energy consumption was 6,757 kWh per FTE.
302-5	Reduction in energy requirements of products and services.	Partially	Clifford Chance’s core business is the delivery of legal advice. We are an office-based business and work internationally. Some of our initiatives to decrease our energy consumption are outlined in our Responsible Business Report 2019.

# SPECIFIC STANDARD DISCLOSURES CONTINUED

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Emissions</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Environment' and 'Monitoring our Progress.'	
<b>305-1</b>	Direct greenhouse gas emissions (scope 1)	Partially	The global CO2 emissions per FTE in 2018/19 is 2.41 for electricity and fuel emission sources compared to 4.50 in FY 2012/13, 4.62 in FY 2013/14, 4.55 in 2014/15, 4.06 in FY 2015/16, 2.98 in FY 2016/17 and 2.78 in FY 2017/18.
<b>305-2</b>	Energy indirect greenhouse gas emissions (scope 2)	Partially	The global CO2 emissions per FTE for FY 2018/19 is 2.41 for electricity and fuel emission sources compared to 2.78 in FY 2017/18, 2.98 in FY 2016/17, 4.06 in FY 2015/16, 4.55 in FY 2014/15 and 4.62 in FY 2013/14.
<b>305-5</b>	Reduction of greenhouse gas emissions	Partially	As of FY 2018/19 scope 1 & 2 CO2 emissions per FTE have decreased by 13.12% from the latest baseline of 2017/18.
<b>Compliance</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Environment' and 'Monitoring our Progress.'	
<b>307-1</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	There have been no incidents of noncompliance with environmental laws and regulations.
<b>Social</b>			
<i>Labour practices and decent work</i>			
<b>Employment</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
<b>401-1</b>	New employee hires and employee turnover	Not reported	We collate and report internally on the number of joiners and leavers by gender and region.

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Training and Education</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
404-1	Average hours of training per year per employee by gender and by employee category	Fully	www.cliffordchance.com – 'Academy Statistics'.
404-2	Programs for upgrading employee skills and transition assistance programs	Partially	Lifelong learning is highly valued at Clifford Chance and is enshrined in our culture, with an emphasis on 'soft skills' – including managing wellbeing and resilience – as well as the development of technical capabilities. Please see our Responsible Business Report 2019, 'People', www.cliffordchance.com – 'Academy Statistics' and 'The Clifford Chance Academy.'
404-3	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category.	Partially	Clifford Chance has a global appraisal system; we expect everyone in the firm to receive an annual appraisal which sets objectives and considers development for the coming year. We track completed appraisal rates, as well as data from the appraisals and the overall results and trends are reported to the firm's senior leadership bodies. In the past year, nearly all partners, lawyers and business services staff had a completed appraisal. We do not currently report any further detail externally.
<b>Diversity and Equal Opportunity</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
405-1	Composition of governance bodies and breakdown of employees	Partially	www.cliffordchance.com – 'Gender Statistics', 'Ethnicity Statistics'. Our Executive Leadership Group is made up of 2 women and 11 men. Our Partnership Council is made up of 2 women and 7 men. Our Executive Operations Group is made up of 8 women and 9 men.
<b>Equal Remuneration for Women and Men</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
405-2	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Partially	Clifford Chance operates a lockstep compensation system for partners whereby remuneration is largely determined by seniority. The arrangements for our other lawyers and business services staff varies by location. In line with the new regulation this information is available at www.cliffordchance.com – 'Gender Pay Gap Report 2019'

# SPECIFIC STANDARD DISCLOSURES CONTINUED

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<i>Human Rights</i>			
<b>Investment</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
<b>412-2</b>	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	Partially	Many of our lawyers are conversant with human rights policies or rights standards and/or locally applicable human rights procedures concerning aspects of rights legislation. A number of our lawyers are leading advisers on these issues <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> , 'Business and Human Rights') and a number of our lawyers internationally work pro bono in this arena (please see our Responsible Business Report 2019, 'Doing Business'). Clifford Chance operates to strict professional standards which all of our staff are expected and, where appropriate, trained to meet. The training provided to our employees includes a Professional Standards Training Programme, which includes 60 to 90 minutes of new online training introduced every year for all our lawyers, covering different areas of a lawyer's practice. Offerings have included training specifically on Human Rights and The Modern Slavery Act.

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
412-3	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.	Partially	<p>We do not currently monitor supplier agreements that include human rights. We are in the process of introducing procedures that will enable us to track whether our 'required clauses', inclusive of Clifford Chance's Supplier Code of Conduct and United Nations Guiding Principles on Business and Human Rights, have been included in our supplier contracts and where identified gaps need to be addressed.</p> <p>We do, however, issue a 'Supplier Assessment Questionnaire' (SAQ) as part of our supplier due diligence and onboarding, which gathers information on a supplier(s) response and policies against different criteria (i) bribery and corruption (ii) health and safety (iii) financials (iv) diversity (v) the environment (vi) information security (vii) data protection and (viii) business continuity. This is to ensure that we are working with suppliers who are aligned to our procurement and firm practices regarding ethical and sustainable procurement.</p> <p>Integral to our ethical business principles is our commitment to uphold human rights wherever we are in the world. To support this commitment, we have a Modern Slavery statement, and we also have, as noted above, a 'Supplier Code of Conduct', which outlines our expectations of our suppliers and contractors. We ask our suppliers to comply with the code, which includes, but is not limited to (i) compliance with laws (ii) data protection, (iii) compliance with UK Bribery Act 2010 and US Foreign Corrupt Practices Act 1977, and best endeavours to support our commitment to conducting business ethically (iv) anti-tax evasion, ensuring tax laws are complied with (v) conducting their business consistently with the United Nations Guiding Principles on Business and Human Rights (vi) Anti-Modern Slavery, assessing whether the supplier has a modern slavery policy and/or has taken steps in relation to addressing any potential risk of modern slavery in its supply chain.</p>

# SPECIFIC STANDARD DISCLOSURES CONTINUED

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Freedom of Association and Collective Bargaining</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'People' and 'Monitoring our Progress.'	
407-1	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	Partially	We have a Supplier Code of Conduct, which outlines our expectations of our suppliers and contractors, and we expect all suppliers to comply with the applicable laws in the countries within which they operate, noting that the specifics regarding local employment legislation and general practice may vary. We undertake appropriate due diligence of our suppliers as part of onboarding and we are in the process of introducing procedures that will enable us to track whether our 'required clauses', inclusive of Clifford Chance's Supplier Code of Conduct and United Nations Guiding Principles on Business and Human Rights, have been included in our supplier contracts and where identified gaps need to be addressed.

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Supplier Human Rights Assessment</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
414-1	Percentage of new suppliers that were screened using human rights criteria.	Partially	<p>We do not currently monitor supplier agreements that include human rights. We are in the process of introducing procedures that will enable us to track whether our 'required clauses', inclusive of Clifford Chance's Supplier Code of Conduct and United Nations Guiding Principles on Business and Human Rights, have been included in our supplier contracts and where identified gaps need to be addressed.</p> <p>Integral to our ethical business principles is our commitment to uphold human rights wherever we are in the world. To support this commitment, we have a modern slavery statement, and we also have, as noted above, a 'Supplier Code of Conduct', which outlines our expectations of our suppliers and contractors. We ask our suppliers to comply with the code, which includes conducting their business consistently with the United Nations Guiding Principles on Business and Human Rights, and rejecting any form of forced, bonded or compulsory labour and/or other forms of slavery or human trafficking. As part of Clifford Chance's onboarding processes, and where Procurement is engaged, we would ask for evidence from the supplier as part of our due diligence, including any supporting documents or policies.</p> <p>We expect all suppliers to comply with the applicable laws in the countries within which they operate, and this forms part of our standard terms and conditions. As we evolve our supplier relationship management programme, we will be reviewing the tiering and risk criteria used to identify the most strategic suppliers to our firm, and where greater oversight is required as part of in-life cycle management.</p>

# SPECIFIC STANDARD DISCLOSURES CONTINUED

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<i>Society</i>			
<b>Local Communities</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Community' and 'Monitoring our Progress.'	
<b>413-1</b>	Percentage of operations with implemented local community engagement, impact assessments, and development programs.		In FY 2018/19, all of our offices contributed to their local communities by undertaking volunteering work and making charitable donations. For the past six years we have monitored our firm-wide contribution by setting a goal of helping 100,000 people p.a. In FY 2018/19 we helped 184,998 people.
<b>Anti-Corruption</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
<b>205-1</b>	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified.	Partially	Clifford Chance operates to strict professional standards which all of our staff are expected and trained to meet. This includes policies in relation to, inter alia, anti-corruption, money-laundering, legal ethics. The firm has a dedicated Risk team which works with management to identify any possible risk to the firm and to put in place appropriate measures to mitigate those risks. The Risk team undertakes a regular review of risk across every part of the business, including in relation to corruption matters which includes reviews of individual offices. All offices are under an obligation to report to the central Risk team any concerns or possible issues relating to corruption.
<b>205-2</b>	Communication and training on anti-corruption 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.
<b>205-3</b>	Confirmed incidents of corruption and actions taken.	Fully	No incidents of corruption have been recorded.

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Public Policy</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
<b>415-1</b>	Total value of political contributions by country and recipient/beneficiary	Fully	No financial political contributions were made by Clifford Chance. Any political contribution must be agreed in advance with our Global and/ or US General Counsel. The firm does, from time to time, host or sponsor events with mainstream political parties and related institutions representing a spectrum of interests and views.
<b>Anti-competitive behaviour</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
<b>206-1</b>	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.	Fully	There have been no legal actions for anticompetitive behaviour, anti-trust, and monopoly practices.
<b>Compliance</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
<b>419-1</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	The firm was fined US\$132,000 in August 2018 for having removed from a document review a contract lawyer who held dual citizenship. The firm had understood that only US nationals could work on the relevant matter pursuant to the International Traffic in Arms Regulation ('ITAR'), which prohibits the disclosure of ITAR controlled material to anyone who is not a US Person. The fine followed a finding that an individual with dual nationality was a US Person for these purposes and that the firm had therefore wrongfully discriminated against him.

Disclosure Number	Disclosure Title	Fully/partially reported	Comments
<b>Product Responsibility</b>			
<b>Product and Service Labelling</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
417-1	Type of product and services information required by the organization's procedures for product and services information and labelling, and percentage of significant product and service categories subject to such information requirements.	Fully	In many jurisdictions where the firm operates there are strict standards in force relating to service information. The firm's policy is to comply with these regulations in all jurisdictions in which we practise. All of our communications activity meets these standards.
417-2	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	Fully	There have been no incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling.
<b>Marketing Communications</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
102-2	Sale of banned or disputed products	Fully	The provision of legal services is a highly regulated industry. In some jurisdictions, limitations or constraints are placed on how we operate and/or the services we can provide to clients. The firm's policy is to comply with these regulations in all jurisdictions in which we practice.
417-3	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes.	Fully	There have been no incidents of non-compliance with regulations and voluntary codes concerning marketing communications.
<b>Customer Privacy</b>			
<b>Disclosure on Management Approach</b>		Please see our Responsible Business Report 2019, 'Doing Business' and 'Monitoring our Progress.'	
418-1	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	There have been no complaints regarding breaches of customer privacy and losses of customer data.