

C L I F F O R D  
C H A N C E

RESPONSIBLE BUSINESS REPORT 2023

**FUTURE  
FOCUS**





# Contents

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## People

6,745  
people

609  
partners

As at 1 May 2023

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## Financials 2022/23

See our [Financial Results FY23](#) for our financial performance. Our accounts are fully audited by external auditors and overseen by our Audit & Risk Committee.

*Under the rules of certain US jurisdictions, this document may constitute attorney advertising. Prior results do not guarantee a similar outcome.*

## Introduction

The financial year 2022/23 was marked by significant disruptions caused by the escalation of the conflict in Ukraine, the energy crisis, market volatility and geopolitical tensions.

Amid this uncertainty, our firm continued to focus on helping our clients navigate a complex legal and regulatory landscape and on advancing our own responsible business strategy. We did this with an eye towards the future, concentrating on areas critical to our sustainability and the challenges and opportunities we know our clients will face in the future.

### Energy transition

Energy transition work is already one of our leading global capabilities, and, whilst we continue to accept instructions relating to fossil fuels when consistent with our Climate Change Policy ([see page 14](#)), we are significantly growing this portfolio of work and helping our clients transition to clean energy sources.

Our advisory and transactional work spanned solar, wind and hydrogen, with significant infrastructure projects and work on sustainable finance. This work is only going to become more important for us, and we continue to build global capabilities through our Energy Transition Initiative to ensure that we can support the future needs of our clients. Our work for the US Department of Energy on scaling up hydrogen production and storage is one of the standout examples, where through our expertise, we can contribute to the decarbonisation of the economy.

### Responsible Tech

Many clients have turned to us for help navigating the rapid development of generative artificial intelligence (AI). With a proven track record of guiding clients through new legal and regulatory landscapes, we have embraced our role in fostering responsible implementations of cutting-edge technologies, including at our firm. Our collaboration with organisations such as Oxford University and the Leverhulme Centre for the Future of Intelligence, has helped us build our expertise and we will continue investing in our capabilities in this field.

### Exceptional talent

We have continued to modernise our approach to talent and to improving employee experience, including by building and rolling out a wellbeing strategy. We have invested in strengthening capabilities across learning and leadership development, to ensure that we are adopting market-leading people practices globally. These interventions are key to attracting and retaining the best talent, and to how we deliver excellence for our clients today and in the future.

### Inclusive culture

Building a truly inclusive culture is an imperative for us, consistent with our values expressed in our values-based [Code of Conduct](#). We will continue to focus on laying the foundations for meeting our inclusion targets set for 2030. While we have made good progress to date, we need to accelerate in some areas such as gender as we acknowledge that there is more work to be done to reach our 2030 target of at least 40% of the partnership being women. We have exceeded our targets on ethnic minority partner promotions: 38.8%, against a target of 15%. At Executive Leadership Group, Executive Director and Director levels of the firm, we have met our gender inclusion targets of at least 40% women and 40% men.

Our inclusion goals are crafted to address and correct any unfair or structural biases that may hinder the recruitment, consideration or advancement of individuals from historically underrepresented population groups – and promote candidates having the broadest possible backgrounds, perspectives and lived

experiences. We aim to provide equal opportunities and deliver the equitable career experiences that all our people deserve.

### Materiality assessment

This year we have engaged with our people, our clients and our civil society partners to understand their perspectives on the issues which are critical to our being a responsible business and what we should be prioritising. The outcomes of the exercise are detailed on [page 6](#). We take this opportunity to personally thank those who participated in this exercise.

While we are proud of our progress, the fast-changing needs and expectations of our clients, talent and other stakeholders mean that we need to continuously challenge ourselves to do better, to anticipate what's next. That focus on the future will continue to guide us.

**Charles Adams, Global Managing Partner**  
**Adrian Cartwright, Senior Partner**

## Our Responsible Business Strategy

Our responsible business strategy concentrates on the material issues that affect Clifford Chance and that Clifford Chance affects and is guided by our values-based global Code of Conduct.

‘Act responsibly’ is one of the five principles of our Code of Conduct which, since its launch in May 2021, has become our primary source of culture, business ethics and values. During FY23, we continued its firm-wide rollout.

The following four pillars represent the key areas of our responsible business strategy:

- Doing Business
- People
- Community & Pro Bono
- Environment

Some of the issues that the responsible business strategy prioritises are also areas in which Clifford Chance delivers high-end legal advice to clients. They include anti-corruption, climate change, cybersecurity, D&I, the energy transition, human rights and risk management.

To improve our understanding of our stakeholders’ expectations, we launched a **materiality assessment** during FY23 – the outcome of the assessment is featured on [page 6](#)

**Objectives and key performance indicators (KPIs)** track the progress of our responsible business strategy. You can find the firm’s performance versus FY23 KPIs and the KPIs we have set for FY24 within this report.

Our responsible business strategy aligns with the **United Nations (UN) Sustainable Development Goals (SDGs)** and the **UN Guiding Principles for Business and Human Rights**. As Clifford Chance is a signatory to the **UN Global Compact (UNGC)**, this report goes towards the firm’s ongoing UNGC Communication on Progress. You can find more details about our alignment with the UN SDGs on [page 8](#).

In accordance with the Limited Liability Partnerships (Accounts and Audit) (Application of Companies Act 2006) Regulations 2008, as amended by the Limited Liability Partnerships (Climate-related Financial Disclosure) Regulations 2022, you can find our **Taskforce on Climate-related Financial Disclosures**, as Annex 4 on [page 58](#).

Clifford Chance reports against the World Economic Forum’s International Business Council **Stakeholder Capitalism Metrics (SCMs)**, which are arranged into People, Planet, Prosperity, and Principles of Governance pillars. You can find our SCMs as Annex 5 on [page 66](#).

### Band 1 for ESG Risk Global-wide

Chambers Crisis & Risk Management Guide 2023

### Band 1 for Business & Human Rights Global-wide

Chambers Global Guide 2023

### UN Global Compact signatory



### World Economic Forum Stakeholder Capitalism Metrics signatory

## Acting Responsibly

### Gold Medal status

Sustainability rating agency EcoVadis has awarded Clifford Chance with a gold medal in FY23 for its sustainability efforts

### #1 law firm for diversity

The 2023 Financial Times and Statista Diversity Leaders List ranked Clifford Chance as the #1 law firm

### 25% reduction

in our aggregated Scope 1, Scope 2 (market-based) and Scope 3 emissions in FY23 compared to our FY20 baseline

### Founding force for sustainability

Became a founding member of the Sustainable Markets Initiative Law Firm Task Force

### Credits

*Our thanks for this reporting go to all our colleagues, our clients and other stakeholders across the world, and the core team who, by working together, have embodied the spirit of collaboration in building the sustainable future celebrated in this year’s report.*



## Our Responsible Business Board

Our Responsible Business Board (RB Board) proposes and has oversight over the responsible business strategy of the firm, as approved by the Executive Leadership Group (ELG)

The RB Board comprises the following members:

- Chair (our former Global Senior Partner)
- Deputy-chair (also chairs the firm's Net Zero Delivery Group)
- Global Clients, Markets and Products Partner (chairs the Clients, Markets and Products sub-committee of the ELG)
- Executive Partner (i.e. our Global General Counsel)
- Chief Risk & Compliance Officer
- General Counsel US
- Chief People Officer
- Chief Operating Officer
- Global Pro Bono & Community Director
- Global Head of Brand, Communications and Marketing
- Partner from APAC
- Partner from Continental Europe (open position at 1 May 2023)
- Secretary to the Responsible Business Board
- Our Global Managing Partner (also leads the ELG) and our Global Senior Partner both have a standing invitation to RB Board meetings and receive the RB Board's internal communications and materials

Our Policy development, implementation and compliance monitoring happen through the General Counsel and Risk functions, overseen by the firm's Executive Partner and the Chief Risk & Compliance Officer.

## Structure at a glance

### Executive Leadership Group

Has ultimate responsibility for the strategy of the firm, including the responsible business strategy

### Responsible Business Board

Proposes and has oversight over the responsible business strategy of the firm, as approved by the ELG

### Net Zero Delivery Group

Recommends and manages the firm's Net Zero Programme and provides analysis on environmental risks for risk management and reporting (including financial) purposes

# Approach to materiality

## Assessing the priorities and expectations of our stakeholders

To strengthen our continued commitment to being a responsible business and to prioritise material issues, we also wish to understand the responsible business topics that our people, our clients, and the NGOs that we partner with expect us to prioritise.

In FY23 we therefore launched our second materiality assessment and will be considering its implications in further detail during FY24.

We adopted a standard methodology and worked alongside a third-party consultancy. The assessment does not equate to the assessments of materiality for statutory reporting purposes.

### Our three-step methodology comprised:



#### Identifying issues unique to our firm and context

We assessed our reporting environment and industry best practices and engaged with internal stakeholders to identify material responsible business issues.



#### Differentiating the issues by impact and importance

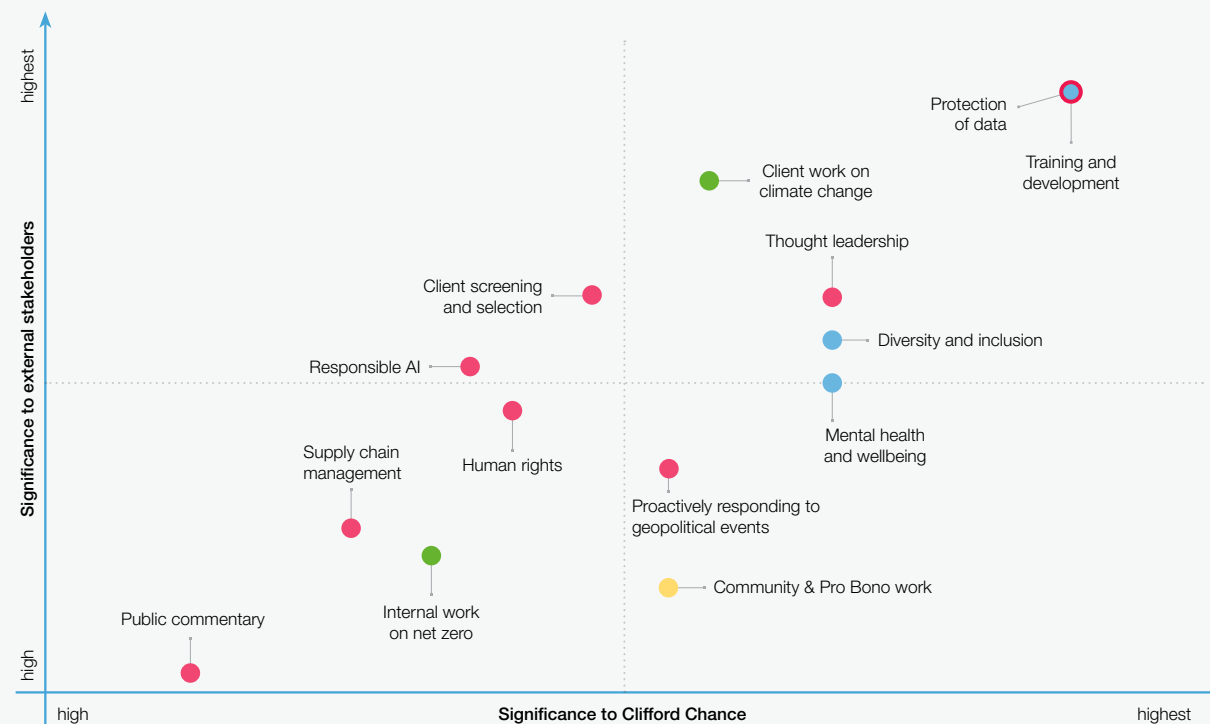
We then assessed and evaluated these issues based on their importance in the context of our responsible business strategy and the significance attributed to them by our external stakeholders. To the latter end, we engaged with a cross-section of our clients and NGOs to understand the levels of importance they placed on various responsible business issues, through interviews with several senior level respondents and through an online survey across our client base.



#### Reporting our most material issues

We shared the outcome of the assessment with senior leaders in our firm, before reporting the output externally as part of this Responsible Business Report. The assessment identified 14 material responsible business issues, ranked by their importance to us as a firm and our responsible business strategy, as well as their significance to our external stakeholders, particularly clients and civil society.

Materiality matrix



### Responsible business strategy

- Doing Business
- Our People
- Community & Pro Bono
- Environment



## Material issues

The material issues, how we describe them, and where they are referenced in our RB Report 2023

### Environmental

- **Internal work on net zero**  
The efforts made to reduce the firm's operational carbon emissions – see *Introduction; Environment section; SCMs – Planet*
- **Client work on climate change**  
The firm being known for advising clients on the energy transition and the effects of climate change – see *Introduction; Climate Change Policy; Clean hydrogen case study; Community & pro bono section*

### Social

- **Diversity and inclusion**  
Steps taken to ensure that the firm's workforce is diverse and inclusive across disability, ethnicity, faith, gender, LGBT+, social mobility and other demographics – see *Introduction; People section; Inclusion section; Boardroom inclusion Case Study; Inclusion Data FY23 and SCMs – People*.

- **Mental health and wellbeing**  
The ability of the firm to support, recognise and appreciate the importance of our people maintaining good mental health and wellbeing – see *Introduction; People section*
- **Training and development**  
The ability of the firm to attract, retain and develop exceptional talent in order to deliver high-quality legal and business advice to clients – see *Introduction; People section; Global Virtual Internships case study; Cornerstone case study, Paladin case study*
- **Community and pro bono work**  
The firm's community and pro bono work to address social and environmental challenges in alignment with the UN SDGs – see *Introduction; SDGs alignment section; Community & pro bono section; Cornerstone case study*

### Governance

- **Responsible AI**  
The use of AI in a way that is ethical, fair, transparent, and quality-controlled – see *Introduction; Responsible techcase study*
- **Proactively responding to geopolitical events**  
Steps taken to mitigate the risks and opportunities that arise from changes in the global political landscape – see *Introduction (and in RB Report 2022 – responding to the war in Ukraine)*
- **Human rights**  
Steps taken to support and respect the protection of human rights in the firm's value chain – see *Doing Business section; Community & pro bono section; SCMs – Governance and People*
- **Public commentary**  
The firm's ability to comment and take a stand on socio-economic and political issues – see *Introduction; Responsible tech case study; Inclusion case study*

- **Thought leadership**  
Being thought leaders on current and emerging legal and regulatory themes and being involved with consultations and similar engagements – see *Introduction; Responsible tech case study; Boardroom diversity case study*
- **Protection of data**  
Steps taken to ensure that the firm appropriately protects client data – see *Doing Business section; SCMs – Governance*
- **Client screening and selection**  
Screening and selection of clients to ensure that they align with the firm's values – see *Doing Business section; Climate Change Policy*
- **Supply chain management**  
Steps taken to maintain oversight and assurance of our suppliers and ensure they have appropriate measures and controls in place – see *Environment section; EcoVadis case study; SCMs – Governance*

# The Sustainable Development Goals

Clifford Chance signed the UN Global Compact in 2009 and in our Responsible Business Report 2023, we provide insight into our efforts to help achieve the UN SDGs. The firm's responsible business strategy most closely aligns with the SDGs in bold below.

	<p><b>1</b> NO POVERTY</p> <p>End poverty in all its forms everywhere</p>		<p><b>2</b> ZERO HUNGER</p> <p>End hunger, achieve food security and improved nutrition and promote sustainable agriculture</p>		<p><b>3</b> GOOD HEALTH AND WELL-BEING</p> <p>Ensure healthy lives and promote well-being for all at all ages</p>		<p><b>4</b> QUALITY EDUCATION</p> <p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p>		<p><b>5</b> GENDER EQUALITY</p> <p>Achieve gender equality and empower all women and girls</p>		<p><b>6</b> CLEAN WATER AND SANITATION</p> <p>Ensure availability and sustainable management of water and sanitation for all</p>
	<p><b>7</b> AFFORDABLE AND CLEAN ENERGY</p> <p>Ensure access to affordable, reliable, sustainable and modern energy for all</p>		<p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p> <p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>		<p><b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> <p>Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation</p>		<p><b>10</b> REDUCED INEQUALITIES</p> <p>Reduce inequality within and among countries</p>		<p><b>11</b> SUSTAINABLE CITIES AND COMMUNITIES</p> <p>Make cities and human settlements inclusive, safe, resilient and sustainable</p>		<p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p> <p>Ensure sustainable consumption and production patterns</p>
	<p><b>13</b> CLIMATE ACTION</p> <p>Take urgent action to combat climate change and its impacts</p>		<p><b>14</b> LIFE BELOW WATER</p> <p>Conserve and sustainably use the oceans, seas and marine resources for sustainable development</p>		<p><b>15</b> LIFE ON LAND</p> <p>Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss</p>		<p><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p> <p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p>		<p><b>17</b> PARTNERSHIPS FOR THE GOALS</p> <p>Strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development</p>		



# DOING BUSINESS





# Doing Business

**The way we do business is driven by our values-based Code of Conduct, and the implementation of our related policies contributes to the firm's leading reputation**

During FY23, we advanced core aspects of our ways of doing business. This included the further rollout of the Code of Conduct, launching the 'Speak Up' programme of our Code of Conduct, and a global review of our standards for Anti-bribery and corruption ([see page 14](#)).

We have a longstanding track record of using technology effectively to deliver client service. Our Enterprise Risk Management Framework (see below), Information Governance and Data Privacy Frameworks alongside our Operational Resilience strategy are embedded globally, and include robust steps and processes to manage technology and data in a secure way.

Our approach to doing business responsibly included continuing to build our expertise in advising clients on legal and regulatory issues in relation to emerging technologies, which also includes questions on use of generative AI.

Our approaches to climate change and human rights also continue to be developed with our RB Board, in consultation with relevant stakeholders in the firm. They include the integration of our Climate Change Policy into our matter acceptance processes and the ongoing further development of our approach to assessing the human rights impacts of the work we do.

## Our values-based Code of Conduct



Act with integrity



Be inclusive



Embrace challenge



Speak up



Act responsibly

Read our [Code of Conduct](#).

## Progress highlights

**163** workshops

run on the firm's values-based global Code of Conduct, led by the Chair of the RB Board, since its introduction in FY22, attended by some 3,000 people in the firm

**82%** completion rate

for the firm's Speak Up training, which aims to encourage and support speaking up appropriately when behaviours and actions aren't right

### Successful integration

of the RB Board into the new management structure of the firm

### Successful integration

of our Climate Change Policy in the firm's systems and processes on client and matter acceptance





## Responsible Tech Advancement for all

In a world driven by rapid technology development, it is critical that adoption of new tools and the way they are developed are guided by clear principles and done in a safe and responsible way. We have a long track record of helping our clients navigate these complex challenges and, through our own community programmes, of making tech more inclusive and diverse.



## At the forefront of developments for our clients

Being at the forefront of supporting clients and regulators around the world in their approach to the responsible, trustworthy use of technology in fields such as AI, robotics, blockchain, big data and cybersecurity means that we not only track developments but also anticipate them.

Our Global Tech Group shared a range of insights on these and other issues during FY23, including [Tech Trends 2023](#), which covered evolving technologies, increased digital connectivity and regulation and legal risk. AI has huge transformative potential, and [Generative AI, The Big Questions](#) (published just after the end of FY23) examined the questions to address when exploring AI opportunities.

Towards the end of 2023, the draft EU regulations on AI are due to be agreed by member states. These are the most comprehensive AI regulations globally to date. They will be implemented over the course of the following two years and will regulate AI technology and its use.

“We’re seeing ethical principles now translate into binding, legal requirements for the uptake of safe, responsible and

trustworthy AI, not least in the EU,” says Dessi Savova, Partner and head of Clifford Chance’s Continental Europe Tech Group.

“What does this mean for businesses in practical terms? Companies should be onboarding and building these principles and high standards into their AI strategy, governance and compliance programmes. Striving for safe, responsible and trustworthy AI should be seen not as a burden but as a must, and a competitive advantage.”

The adoption of the proposed EU regulations is likely to have far-reaching effects, in the EU and around the world, as global regulators monitor implementation and potentially take cues from the European legislation.

“There’s a real variety of approaches to regulation around the world, which makes it difficult for businesses to predict how they will be able to use AI responsibly and lawfully,” says Stella Cramer, Partner and head of our Tech Group in Singapore.

“China is being prescriptive, whereas here in Singapore – as in the UK – regulators are being more circumspect.

“

There’s a real variety of approaches to regulation around the world, which makes it difficult for businesses to predict how they will be able to use AI responsibly and lawfully.

”

**Stella Cramer**  
Partner, Head of Asia Pacific  
Tech Group

“It will be interesting to see what the effects of the EU legislation will be. Elements of the trading bloc’s GDPR regulations were widely adopted here in the Asia Pacific region, so we may see some jurisdictions doing the same when it comes to AI.”

As well as advising our clients on how to deploy AI responsibly and lawfully, we are involved in helping governments formulate their policy and thinking around AI-based on our global experience and what we have seen in various jurisdictions.

“The discussion around the responsible adoption of AI, its implications and what are the sensible legal parameters to put around it is critical,” adds Stella. “The regulatory and advisory work we do is connected and being involved in both puts us in a highly competitive position.”

Devika Kornbacher, Co-Head of Clifford Chance’s Global Tech Group and Houston Managing Partner, adds “As the EU rolls out its AI Act, the US stands at a critical juncture in the development of its own approach to AI governance. The number of AI-relevant laws and legislative proposals globally, and the pace at which this

“

Striving for safe, responsible and trustworthy AI should be seen not as a burden but as a must, and a competitive advantage.

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**Dessislava Savova**  
Partner, Head of Continental  
Europe Tech Group



legal landscape is evolving, can make it challenging for businesses to formulate their AI strategies and policies. For us, a key part of helping clients with that is having a global, cross-practice team of people with expertise in this transformative field.”

Our work, not just with clients and regulators, but also alongside a variety of organisations such as Oxford University and the Leverhulme Centre for the Future of Intelligence, has helped us build on the knowledge we have amassed in this field over the past few years.

“A really important part of our work is developing expertise through collaboration,” says Senior Associate Herbert Swaniker. “Our Tech Group, which consists of more than 600 lawyers, has spent a number of years understanding developments, listening to clients and the issues they raise, analysing what we can do to help, publishing thought leadership in this field, and commissioning research. It’s part of our contribution to responsible tech, making sure we have broad knowledge and data-driven insights from which clients can benefit.”

“

As the EU rolls out its AI Act, the US stands at a critical juncture in the development of its own approach to AI governance.

”

**Devika Kornbacher**  
Co-Head of Global Tech Group,  
Houston Managing Partner

## Advancing access to tech skills and knowhow

As our Cornerstone feature on [page 34](#) highlights, the firm is helping to advance core tech skills in Kigali, Rwanda, in collaboration with NGO Women in Africa.

In the UK, Clifford Chance has long supported undergraduate bursaries at Hertford College, University of Oxford, not only helping to nurture the field of Computer Science research, but also emphasising the crucial topic of tech ethics.

By actively supporting those from diverse backgrounds, the programme helps talented individuals from underrepresented groups to enter the technology industry. This commitment to diversity not only enriches the industry with fresh perspectives, but also helps to overcome historical biases and ensure a fair and equitable representation within the field.

“The partnership between Clifford Chance and Hertford College demonstrates a proactive commitment to addressing

the ethical implications of emerging technologies. Alongside their other areas of support, including a code club for young people from the local area, Clifford Chance has demonstrated the importance of considering the broader societal impact of technology and the need for responsible innovation,” says Francis Wheare, Director of Development, Hertford College



**Dessislava Savova**  
Partner, Head of  
Continental Europe  
Tech Group

**Devika Kornbacher**  
Co-Head of Global  
Tech Group, Houston  
Managing Partner

**Herbert Swaniker**  
Senior Associate

**Stella Cramer**  
Partner, Head of Asia  
Pacific Tech Group

## Our Climate Change Policy

In 2021 we adopted a Climate Change Policy, which supports the firm in taking a consistent and integrated approach to taking climate change issues into consideration as part of our existing client and matter acceptance policies.

When evaluating whether to take on new work, in cases where a matter has a potential, material adverse impact on climate change, we will assess whether there are mitigating or compensating grounds. We continually review and update our Climate Change Policy to take account of global developments and also actively engage with our clients, NGOs and the broader public sphere around climate change. In accordance with the Paris Agreement goals on limiting climate change, and the Glasgow Climate Pact, any such assessment needs to consider the level of development and specific needs of vulnerable countries.

The Climate Change Policy acts to identify work which might be high risk from a climate change perspective and draws these climate-related risks to the attention of the relevant partners, to our Executive

Partner and the Chair of our RB Board. The latter two positions have the final, independent, say on whether to take on the new client or new matter where there is potentially a material, adverse climate impact.

While we will continue to work on fossil fuel-related matters, including new fossil fuel projects, these matters are decreasing as a proportion of the work carried out by our energy practice. Indeed, during FY23 we declined to take on various fossil fuel and other instructions as they were not in accordance with the requirements of our Climate Change Policy.

Our energy portfolio relating to renewables and the energy transition has continued to grow quickly, as exemplified by our prominent work on clean hydrogen described on page 43.

The Climate Change Policy is one aspect of a broader responsible business and ethical decision-making framework, which includes our wider compliance and professional standards processes.

## Enterprise Risk Management Framework

We have a robust Enterprise Risk Management Framework, which is designed to identify key risks affecting our business and address the likelihood, impact and velocity of risks materialising.

To add to and improve risk management practices related to climate change, the firm's Net Zero Delivery Group, working with Operations, Risk and Compliance and other relevant stakeholders, will be assessing the risks and opportunities of climate change in more depth in FY24. See the Environment section on [page 41](#) for more detail.

## Measuring and managing risk to combat financial crime

As a business, we need to make sure we have adequate and reasonable procedures in place to prevent bribery, tax evasion and fraud. Conducting risk assessments is a key part of these procedures.

While compliance is vital, of equal if not greater importance for us is our desire as a responsible business to make sure we practise what we preach.

That's why we have embarked on a comprehensive and systematic risk assessment process that looks not only at the risks within our business and supply chain, but also at the areas where we're interacting with clients that could potentially pose a risk.

Over the coming year, we are assessing all our offices and relevant practice areas, looking at the jurisdictions in which they operate, the degree to which they use third parties, touchpoints with government officials, and our broader policies on gifts, hospitality and sponsorship. Paramount is understanding what our risks are, while ensuring that the process is not too onerous.

It's not just our own compliance. The practical experience of having undertaken this work in our own business helps to inform our advice to clients.



# Doing Business Objectives and Key Performance Indicators (KPIs)

## FY23

● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
<b>1.</b>	<b>Equip our people with the training and support to do the right thing, in the right way – and drive cultural change through rollout of the Code of Conduct</b>		
1.1	Progress a comprehensive programme of activities to enhance our ethical culture, including continued rollout of the Code of Conduct with at least 50 workshops in the next 12 months	163 sessions held since the rollout of our Code of Conduct in FY22	●
1.2	Develop and deliver an internal communications programme to ensure that expectations and support available are understood by all our people	Code of Conduct organic communications plan in place – aligned with Clifford Chance Academy statistics on attendance. Testimonials and experiences are recorded periodically to refresh the video content on the intranet, and to inform online reunion sessions and facilitator feedback sessions	●
1.3	Roll out Speak Up e-learning course and guidance across the firm to encourage and support speaking up appropriately when behaviours and actions aren't right	Speak Up e-learning launch and communications completed (82% completion rate)	●
1.4	Launch a new mandatory global Anti Bribery and Corruption training programme with a completion rate of at least 85% of all staff	Launched updated policy and approval portal.	●
<b>2.</b>	<b>Progress comprehensive programme of activities to enhance our ethical culture, including continued rollout of the Code of Conduct</b>		
2.1	Continue to embed Global Crisis Management Guidelines firm-wide, including escalation and governance	Our Business Continuity plans consist of crisis management plans, and department / practice area recovery plans	●
2.2	Ensure that operational risk and resilience strategy is understood and embedded globally	In FY23, the firm has completed a number of external audits from our clients and certification bodies, all of which were successful	●
2.3	Run at least two crisis management exercises	During FY22 and FY23, we ran a number of global and regional crisis management exercises in India, Australia and globally	●

#	Objective / FY23 KPI	Notes on progress	Status
2.4	Continue global engagement and compliance with suite of materials in Operational Resilience Framework	Good global engagement and compliance achieved	●
2.5	Evolve use of Fusion platform for managing Operational Resilience – to include service catalogue of priorities for all critical and essential processes and activities	All locations have a business continuity plan in Fusion, which has allowed us to standardise our plans across the firm	●
2.6	Evolve Business Continuity insights to inform future risk and resilience practices	Continued to evolve our insights on Business Continuity	●
2.7	Continue programme of Business Continuity assessment globally – update and review business impact analysis, testing, including Mimecast testing, and scenario testing	We completed our first end-user testing on our back-up supplier of emails	●
<b>3.</b>	<b>Proper constitution of the Disciplinary Committee</b>		
3.1	Continue to monitor and track use of disciplinary procedures	Developed formal global grievance procedure	●
<b>4.</b>	<b>Implement Intapp Terms</b>		
4.1	Terms implemented and existing client terms migrated / uploaded to the new database	Terms implemented and existing client terms migrated / uploaded to the new database	●
<b>5.</b>	<b>Promoting the work of the Responsible Business Board (RB Board) through raising awareness of its scope and policies</b>		
5.1	Internal awareness, e.g. continued evolution of Climate Change Policy	A Global Town Hall in FY23 promoted the Policy, which has also been successfully integrated into our client and matter acceptance systems and processes.	●
5.2	Integration of RB Board into new management structure of the firm	Completed with Terms of Reference	●

## Objectives and KPIs

### Future Focus for FY24

Objective	KPI
1. Embed the Code of Conduct principles across the firm to ensure alignment with all relevant internal policies and processes guiding professional conduct, compliance framework and risk assessment	1.1 Continue programme of Code of Conduct communications and engagement to embed the principles across our systems and procedures
	1.2 Continue to deliver internal communications programme to ensure that expectations and support available are understood by all our people
	1.3 In line with the Speak Up principle, continue to raise awareness of the Speak Up e-learning course and guidance across the firm to encourage and support speaking up appropriately when behaviours and actions aren't right
	1.4 In line with the Act with Integrity principle, continue to roll out mandatory global Anti-Bribery and Corruption training programme with a completion rate of at least 85% of all staff
2. Progress comprehensive programme of activities to enhance business resilience capabilities and capacity – making sure all relevant policies and frameworks are understood and embedded globally	2.1 Continue global engagement and compliance with suite of materials in Operational Resilience Framework by ensuring that all relevant policies under the framework are reviewed annually
	2.2 Run at least two crisis management exercises; continue to embed Global Crisis Management Guidelines through scenario exercises and real event situations – through training on the escalation and governance for crisis management
	2.3 To ensure that the operational resilience strategy is embedded globally, with all locations to have a current and approved plan in the Fusion risk management system
	2.4 Reactive analysis of events or incidents, internal and external to the firm, to identify areas for improvement and best practices
	2.5 Proactive management and assessment of potential events or incidents to inform future risk and resilience practices

Objective	KPI
3. Review of Whistleblowing Policy and Procedures	3.1 Assess new whistleblowing regulations and implementation requirements and identify the necessary changes required to the firm's Whistleblowing Policy and Procedures
	3.2 Update compliance plan, including timeline and responsible parties
	3.3 Ensure that key stakeholders are aware of and support key changes
	3.4 Design a communications plan and training programme to ensure that partners and employees are aware of the firm's Whistleblowing Policy and Procedures
	3.5 Establish monitoring and reporting mechanisms to evaluate the effectiveness of the Whistleblowing Policy and Procedures
	3.6 Schedule regular reviews of the Whistleblowing Policy and Procedures to ensure alignment with applicable regulations
4. Promoting the work of the RB Board, to ensure that its governance, guidance, scope and reporting are understood across the firm.	4.1 Raise internal awareness and engagement across the firm of the responsible business strategy, highlighting progress and achievements throughout the year



# OUR PEOPLE



Clifford Chance Hong Kong,  
International Women's Day 2023



# Our People

**When people thrive, they are able to deliver their best to our clients, as colleagues and in their communities**

Diversity and inclusion (also see [Inclusion section](#)), wellbeing and taking the time to really listen to our people are intrinsic to being a responsible business. They also underpin the key themes of our long-term people and talent strategy, which focuses on the continued modernisation of our Talent Acquisition; Talent Management; Career Progression; Learning and Leadership Development; and Compensation.

During FY23, we made positive progress with our people and talent strategy, continuing to modernise our approaches to talent globally and providing a better

experience for our people. As announced in last year's report, we have enhanced our capability in wellbeing and completed the first full-year cycle of Three Conversations, our framework to give all colleagues opportunities to discuss their individual performance, development, and career aspirations.

Wellbeing is an enabler for sustainable high performance, actively contributing to the quality of people's working lives while simultaneously delivering enhanced service to our clients. Our global wellbeing strategy has been designed through listening to what matters most to our people and we

are working hard on implementing the constituent parts. Our focus is on creating an environment where wellbeing is part of our everyday vocabulary and building sustainable, healthy practices into our ways of working. Clients are increasingly interested in the progress we're making in this area, and we see collaboration with clients and the market as an opportunity for broader impact.

Looking ahead, our FY24 KPIs include a focus on learning and leadership, highlighting our investment in developing our lawyers and business professionals with the skills and capabilities they need today

and in the future. We recently appointed our first Global Head of Learning and Leadership, Jagdip Panesar, and our first Global Head of Talent Management, Darren Philpott to build our capabilities in these areas.

Inclusion will also remain a key area of focus. Please see the Inclusion section on [page 22](#) for a separate update on our inclusion activities and progress.

## Progress highlights

### Wellbeing strategy enabled

Created the firm's first global wellbeing strategy, focused on creating a thriving workplace through five enablers – visibility; authenticity; good work; capability, and ownership

# 1,610

**legal skills training courses**

delivered by the Global Clifford Chance Academy in FY23

# 135,000

**enrolments from 143 countries**

Since launch in 2020, we have provided far-reaching access to world-class development resources through our global virtual internships

## Global Virtual Internships tap an appetite for learning

In 2020, we launched our Global Virtual Internship programme to enhance access to the legal profession. Since launch, the programme has provided far-reaching access to world-class development resources that clearly tapped an appetite for learning; we have received 135,000 enrolments from students from more than 1,300 universities and 143 countries. The learning was developed alongside our Global Clifford Chance Academy and external learning specialists, and the topics covered include Antitrust, Cybersecurity, Climate Change, Business & Human Rights and Sustainable Finance.

Each internship consists of four to eight hours of bitesize content designed around three to four tasks, each of which has an introductory video, supporting documents and instructions. Upon completion, individuals receive a Global Clifford Chance Academy certification.

One of the internships developed in FY23 is on the topic of 'Risk and Resilience' and involved partnering alongside global insurance and reinsurance business Swiss Re.

The Risk and Resilience internship is designed to help future lawyers develop practical skills in key risk and resilience areas, including building a foundation and understanding of insurance and reinsurance, drafting and written communication skills, identifying and assessing ESG risk issues and exploring the variety of insurance and reinsurance policies available to cover climate-related risk.

“Our teams have produced a novel, practical and enjoyable joint module,” said Hermann Geiger, Group Chief Legal Officer, Swiss Re. “The offering represents a rare

opportunity to see legal work from both in-house and private practice perspectives. The virtual internship is a fantastic global initiative where students get to learn a great deal from these real-world tasks.”

Cheng Li Yow, Partner, Clifford Chance, explains how the initiative came about: “The idea was born when we were sharing ideas about our mutual commitment and excitement around sustainability. The internship focuses on risk and resilience, which was the perfect combination of both those things. We wanted to give as many aspiring lawyers as possible an insight into

working for a client such as Swiss Re and to understand the critical and fascinating role that (re)insurance plays in making our world more resilient to climate change. The platform breaks that down and does so in an interactive and interesting way.”

Our Global Virtual Internships are open access, which means anyone can participate and have access to these programmes from anywhere. They contribute to SDG 4, Quality education and can be found here on our [Careers website](#).

## Fairness and representation

Our determination to modernise our approaches to talent remains unaltered and is more important than ever to realising our firm's responsible business ambitions.

Inclusive hiring plays a vital role in delivering fair and representative access to the law. We use a framework that supports and monitors best practice in areas including job descriptions, advertising, screening,

interviewing and onboarding, against which all our recruitment teams assess their performance.

We are also particularly invested in our own and the industry's evolution to remain an attractive proposition to newer generations entering the profession, while being honest about working life in a dynamic and fast-paced environment.

In FY23 examples included a public feedback campaign, See Yourself at Clifford Chance, in the US and in the UK, the Real Contract to illuminate the commitment lawyers make, balanced against the rewards of a career in law. Meanwhile, our Global Virtual Internships – see case study above – have been accessed by 135,000 people from around the world.

We cannot stand still in the face of the future of work trends, which have been accelerated by the COVID-19 pandemic. Our value proposition needs to keep pace to meet the expectations of future talent, including a strong sense of common purpose, greater flexibility in how and where people work, and an unrelenting focus on wellbeing and inclusion.

# People Objectives and KPIs

## FY23

● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
<b>1.</b>	<b>Review our People Strategy in line with firm strategy and internal / external talent dynamics</b>		
1.1	Twice yearly review of People Strategy progress with firm's ELG	Reviews conducted	●
1.2	Establish phase two priority projects and associated KPIs that align to firm strategy	Priorities identified and aligned	●
<b>2.</b>	<b>Establish Talent Pipeline Reviews</b>		
2.1	Twice-yearly review of sub-set of associate population in each region	First review has been completed	●
2.2	Global pipeline review committee to meet biannually to monitor actions agreed at regional level	First review has been completed	●
2.3	Review capacity to scale to run pipeline reviews to additional associate populations	Review underway	●
<b>3.</b>	<b>Redefine the role of Career Development Partner</b>		
3.1	Complete first full-year cycle of Three Conversations	Complete for all populations in scope	●
3.2	Introduce opportunities for partners to provide peer feedback when collaborating to generate new work for the firm	Annual peer feedback in place	●
3.3	Refine our assessment process to reflect regular manager conversations	Associate, business professional and Partner appraisals adapted to reflect the introduction of our Three Conversations framework	●
<b>4.</b>	<b>Create our Wellbeing Strategy</b>		
4.1	Formalise the global Wellbeing Strategy	We have created the firm's first global wellbeing strategy, focused on creating a thriving workplace	●
4.2	Determine KPIs	Our holistic KPIs for wellbeing have been agreed and are reflected in the firm's modern workplace and people experience risk register	●

#	Objective / FY23 KPI	Notes on progress	Status
4.3	Finalise the programmatic elements for phase one	We have identified the priority actions for wellbeing and phase one of the programme is progressing as planned	●
<b>5.</b>	<b>Increase visibility of wellbeing</b>		
5.1	Publicise wellbeing strategy	We are taking a phased approach to communicating the wellbeing strategy by region and practice area / function	●
5.2	Increase conversations about wellbeing	Wellbeing has increased in prominence across the firm and is now incorporated into several business processes	●
5.3	Establish wellbeing brand and communication channels	Investment in wellbeing communications and branding is in place	●
5.4	Enhance our employee listening capability	We have launched an "anytime" wellbeing survey for open feedback on any issue and purchased technology that will support our employee listening and feedback	●
<b>6.</b>	<b>Engage people in wellbeing</b>		
6.1	Establish representative groups to give input into the firm's wellbeing activities	We have obtained input from a broad spectrum of colleagues. Plans to expand our wellbeing groups are well underway.	●
6.2	Engage more people to shape healthy working practices	Our work to define and articulate healthy working practices is progressing as expected and input has been received from a wide range of colleagues	●
6.3	Build on the existing Mental Health Support Programme	We have made good progress with our Mental Health Support Programme, re-launching the Life, Work and Wellbeing Service, broadening peer support and enhancing medical cover in some regions	●



## Objectives and KPIs


### Future Focus for FY24

Objective	KPI
1. <b>People Strategy</b> Progress our long-term People Strategy	1.1 Conduct twice-yearly review of People Strategy progress with firm's ELG
	1.2 Expand Talent Pipeline Review
	1.3 Continue to embed the culture of objective setting and Three Conversations
2. <b>Learning and leadership</b> Align firm's learning curriculum to the firm's new strategic plan	2.1 Launch partner leadership development series
	2.2 Deliver Clients and Markets module as part of Future Leaders Programme
	2.3 Deliver Clients and Markets Lab as part of New Partner Programme
	2.4 Communicate a modernised curriculum focused on building skills aligned to our strategic plan
	2.5 Launch Senior Associate Induction Programme globally
	2.6 Implement a new learning platform to enhance the learner experience
	2.7 Develop modules focused on manager effectiveness, feedback and objective setting

Objective	KPI
3. <b>Wellbeing</b> Increase the visibility of wellbeing throughout the firm	3.1 Increase conversations about wellbeing through the promotion of our wellbeing strategy and quarterly communications on key topics linked to our strategic objectives
	3.2 Promote the firm's Life, Work and Wellbeing service to achieve a 20% increase in participation levels
	3.3 Establish a global network of at least 150 mental health champions to provide input into the firm's wellbeing activities and facilitate local activity
	3.4 Finalise and communicate our 10-point guidance around healthy working practices as a step towards mitigating avoidable stress in the work environment
Build on our wellbeing capability	3.5 Continue to enhance our approach to listening to our people through implementing globally consistent onboarding and offboarding surveys and launching the 2023 People Survey
	3.6 Publish stress and burnout guidance for all colleagues and managers to increase protective measures and respond appropriately
	3.7 Build on the existing mental health support through additional mental health and wellbeing training programmes



# INCLUSION



Dauwood Malik, Managing Partner, Hong Kong, Charles Adams, Global Managing Partner and Connie Heng, Regional Managing Partner, Asia Pacific attend Clifford Chance Hong Kong Lunar New Year celebrations (Feb 2023)



# Inclusion

**At Clifford Chance we see inclusion to be both a core value and key to our business success. We see our diversity as a key strength to how we work and succeed. We aim to deliver the equitable career opportunities and experiences our people deserve. We believe diverse teams working in an inclusive culture are good for our people, our clients and the success of our firm.**

“We know that for us to deliver on our inclusion goals we need to embed inclusion, diversity and equity into every aspect of our business – the structure of our firm, our practices and policies – and make inclusion central to every decision,” says

Tiernan Brady, Global Director of Inclusion. “Inclusion allows our teams to draw on a diversity of thought and experience to provide the best and most innovative solutions for our clients. Inclusion is therefore intrinsic to how we operate as a firm and is a business imperative.

“Inclusion, Diversity and Equity are also increasingly issues of regulatory and legal importance. As you will see in this section, these changes include regulations on board diversity and legislation on data collection and privacy. Effective inclusion strategies will need to draw on legal and strategic expertise, and we continue to grow our ability to be a resource for our clients to help them develop and deliver their strategies.”

Our Inclusion FY23 KPIs on [page 29](#) highlight our progress, while external

recognition during FY23 included: Gold status on Stonewall’s global workplace equality index and being named by Stonewall as the UK’s top LGBTQ+ employer; being the highest rated professional services firm in Europe in the FT diversity list, and being ranked the number one law firm for diversity by The Vault survey in the US.

“We are delighted with our external accolades. They are a great reflection of the commitment of our people. Nonetheless, the firm also must demonstrate success in our inclusion data,” adds Tiernan.

Our Global Inclusion Reporting Data FY23 ([page 50](#)) shows strong progress in some of our inclusion objectives. At Executive Leadership Group, Executive Director and Director levels of the firm we have met



People in Law Awards 2022 (centre left to right): Emily Hier, Louise Zabbar and Ashika Patel receiving the award for Best Internal Engagement Campaign on behalf of Enable, our firm’s affinity group for disability

our gender inclusion targets of at least 40% women and 40% men, and we have exceeded our targets on ethnic minority partner promotions.

However, the rate at which we make up women partners needs to significantly accelerate if we are to achieve our gender

inclusion goals. This will require a renewed vigour and focus across every practice area and office on how best to evolve our recruitment and promotion practices to deliver on our inclusion goals. A lot has been done and that must be celebrated, but there is more to do.

## Progress highlights

**Number 1 for diversity in professional services:** Financial Times and Statista Diversity Leaders List 2023

**Number 1 LGBTQ+ employer:** UK Stonewall Workplace Equality Index 2023

**Stonewall Gold Status:** Global Stonewall Diversity Champions Equality Workplace Index

**Faith Initiative of the Year:** Women & Diversity in Law Awards 2023, for our Ramadan 2022 engagement initiative

**Top 10 ranked for D&I, US Vault Survey 2023:** Top 10 Best Law Firm for Racial & Ethnic Diversity; for Disability, and for LGBTQ+

**Triple winner, People in Law Awards 2022:** Enable – our firm’s affinity group for disability – won Best Internal Engagement Campaign, for My Lived Experience, a global campaign about living with, working with and experiencing disability. The firm also won Best Global HR Initiative and Most Innovative People Initiative for our Global Virtual Internships and pioneering LIFT programme





## Embracing Inclusion

### The rule of law and boardroom diversity

Business the world over is placing gender diversity higher up the agenda. It is an increasing demand from all stakeholders, from employees to customers – and is just good business; diverse boards are proven to be more innovative and profitable, and yet female board representation remains stubbornly low.



Across the globe, from Singapore to Washington, DC, and from Brussels to Tokyo, D&I is also increasingly a regulatory and legal issue requiring clear, high-quality advice. This places law firms in the pivotal position of enablers of change and advisers to clients on how best to navigate the regulatory patchwork, as Floris van de Bult, Partner and Co-head of our Global Employment practice area, explains:

“The EU Women on Boards Directive has been in draft for around 10 years, and this is just one piece of legislation that has focused corporate attention on leadership diversity, which is a topic we have been helping clients with for many years. The Directive will give it a further push. The scope of the Directive is all publicly listed entities in the EU, and over time we expect it to have an even wider impact.”

### Global Board Diversity Tracker

One example of the products we have developed to help clients around the world to address board-level diversity and inclusion regulations is the Clifford Chance Global Board Diversity Tracker. The Tracker provides an introduction for clients and snapshots of the legal, compliance and reporting requirements in each jurisdiction. It also details the consequences of non-compliance, be they financial, reputational or both.

We first launched the Tracker in October 2022 – and then announced an upgrade in March 2023, coinciding with our International Women’s Day campaign. Our global employment team maintains and updates the Tracker, which acts as a guide to the core legal requirements for diversity and inclusion ratios in a broad range of jurisdictions.

We are also working with clients on the strategy for implementing, monitoring and ultimately achieving inclusion and diversity-related targets, by combining our legal skills with the experience and capabilities of our in-house inclusion specialists (see also our partnering with the GCD&I initiative story on [page 28](#) for more about the importance of data integrity in tracking D&I metrics).

“

Our global inclusion team has played a valuable role in advising clients on inclusion and diversity strategies.

”

Floris van de Bult  
Co-head of Global Employment





## Networking and knowledge-sharing globally

Across our firm, we bring clients and peers together to highlight gender-focused regulatory changes and issues. Examples include:

**Americas** – running accredited learning sessions for a range of clients in Washington, DC, looking at how to deliver internal sustainable culture change and meet the demands of an ever-changing legal landscape (November 2022)

**Asia Pacific** – a client-facing event with the Singapore Institute of Directors on ‘Demystifying the Path to the Boardroom’ to explore barriers to boardroom representation and the strategies to break them down.

**Europe** – linking up with Airbus, the European Commission and PWN (Professional Women’s Network) Global to raise awareness of the new European Commission proposals on Gender Balance on Corporate Boards and Targets for Equal Representation across Europe (available on our website) as part of our European Perspectives: ESG series (March 2023)

Janice Goh, Partner, Cavenagh Law LLP, Singapore was one of the panellists on the ‘Demystifying the Path to the Boardroom’ event and is a member of Accelerate>>>, Clifford Chance’s gender parity affinity group. (Clifford Chance Asia is a formal law alliance in Singapore between Clifford Chance Pte Ltd and Cavenagh Law LLP.)

“It’s fair to say Singapore is lagging behind some jurisdictions in this area,” says Janice, “but what we’re trying to do is set an example and raise awareness. That said, it’s also an area where many of our clients are setting targets, so we are sharing our experiences with them.

“There was a lot of interest during the event from clients who valued hearing about struggles women have faced, and the biases they have experienced. They also expressed interest in our experience at Clifford Chance, asking about our diversity targets and how ambitious these are.

“In many Asian countries, requirements are currently very much disclosure-based and limited to listed companies,” adds Janice.

“While they need to document inclusion goals and detail their progress towards them in their annual reports, there are no strict legal requirements to have diversity frameworks in place. These are the kind of insights that the Tracker (mentioned above) covers on a jurisdiction-by-jurisdiction basis and to which the team in Singapore contributes.”

## Looking ourselves in the mirror on D&I

“When we advise clients about building diversity into their environments and navigating the changing laws, we draw on our own experience,” says Amy Bird, Senior Associate – Employment and former Co-Chair of our Accelerate>>> in the UK. “We and our clients are on a shared journey towards greater inclusion and matching our clients’ efforts by ‘walking the talk’ is and always has been important to us.”



Janice Goh  
Partner, Cavenagh Law



Amy Bird  
Senior Associate



## Raising awareness through storytelling: our Enable affinity group

Our Enable network seeks to create the right culture and environment for colleagues with a disability (visible or non-visible, including mental health), long-term injury or condition to succeed and ensure they have the equality of opportunity and experience. The network creates opportunities for colleagues to celebrate diversity and discuss inclusion topics, as exemplified by our People in Law 2022 award-winning Enable: My Lived Experience series.

The series features people across Clifford Chance talking about their experiences of visible and non-visible disabilities and what it means for them in their day-to-day role at the firm. Changing perceptions and educating people about how our working needs may vary and raising awareness through storytelling is central to its strategy. Dana Meijler, Senior Best Delivery Advisor and the Enable champion in our Amsterdam office, has been involved from the beginning, and volunteered to share her experience of living with her autistic daughter.

“

My Lived Experience is one of the many things the firm does that shows this is a priority for us and that we are trying to create a more inclusive working environment for people.

”

Dana Meijler  
Senior Best Delivery Advisor  
Amsterdam



“Enable: My Lived Experience is one of the many things the firm does that shows this is a priority for us and that we are trying to create a more inclusive working environment for people” says Dana. “That’s great not only for current colleagues but also for prospective employees, who can see this is a place where they are able to be themselves and can succeed. It’s something clients increasingly want to see from their service providers too.”



Amsterdam Rainbow Dress, 2016, Arnout van Krimpen, Matthijs van Bergen, Oeri van Woezik, Jochem Kaan, which formed of centrepiece of Pride Art 2022 – Amsterdam. The 16<sup>th</sup> Clifford Chance Pride Art, under the theme of community, provided an opportunity to come together and harness the power of inclusion in support of our LGBT+ and allies communities around the world.



## Supporting the General Counsel for Diversity & Inclusion (GCD&I)

**GCD&I draws together leading General Counsel to promote inclusion and diversity. With more than 130 signatories from across the business spectrum, GCD&I has developed a series of consistent metrics designed to measure and report on diversity. The next steps include driving their adoption, thereby enabling in-house and law firm legal teams to be more representative.**

“We recognised in-house teams have a role to play in driving D&I in the legal profession, whether that’s through how they address it within their own teams or how they instruct and engage law firms,” says GCD&I consultant Mary Mullally. “When we looked into how we could do this on a practical level, what also became clear was we needed a more uniform way of requesting D&I data from law firms.”

GCD&I has helped to establish common ground with our clients and peers on which are the right metrics to track, representing efficiencies versus bespoke approaches

and data-gathering exercises that can and do vary from one client and one context to the next. As a responsible business and client-centric firm, we have embraced how GCD&I has helped improve internal awareness of why inclusion is so vital to our clients and the specific data points around diversity that clients value.

Provided it’s used in an informed way, data is a vital enabler of comparison, as Donny Ching (now former) Chair of GCD&I and (now former) Legal Director, Royal Dutch Shell, explains: “We use many law firms, so a consistent set of data we can use to compare them gives us a transparent view of how they are making progress. But the data is only one part of the equation. What we really want to achieve is that firms use the data to drive the right conversations and engagements and to drive improvements. Our approach is about assessing where things are now, what needs to be improved, what actions need to be taken and how we can help.”

Tiernan Brady, the firm’s Global Director of Inclusion and a member of the working group that designed the metrics, adds: “The GCD&I forum is a brilliant initiative that brings together law firms and our clients to advance diversity and inclusion across the profession. We have been active supporters of the group from its inception. The metrics allow us to work together to decide what questions we should be asking each other if we are to really drive change and to develop truly collaborative bilateral relationships with clients. It has also allowed us to develop more efficient practices and stronger principles around sharing data whilst respecting the privacy of our people.”

The GCD&I initiative is not just about measuring the data; it involves discussion, review and analysis of the data to assess whether progress is being made and, if not, trying to understand why. Ultimately, it’s about helping the entire profession become more diverse and inclusive.



Jeroen Ouwehand, Chair (and former Global Senior Partner), Responsible Business Board, Mary Mullally, Consultant, GCD&I, and Tiernan Brady, Global Director of Inclusion

# Inclusion Objectives and KPIs

## FY23

● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
<b>1.</b>	<b>Engaging and activating the global firm population as advocates for inclusion</b>		
1.1	Develop global and regional inclusion campaigns that allow all people to engage in the inclusion project and raise awareness	A campaign calendar has been developed and implemented for all offices including global campaigns. The calendar reflects global, regional and local perspectives.	●
1.2	Continue the roll out of Code of Conduct training globally and design and deliver follow up campaigns to further embed the Code	Continue to embed the Code. Developed and launched global Speak Up e-learning and in-person training. Developed office, practice areas and business professional inclusion plans to help areas of the firm meet our global goals	●
1.3	Work with relevant internal stakeholders to embed inclusive practices and deliver inclusive facilities in all building upgrades and new buildings	Inclusion incorporated in the firm's Global Workspace Guidelines. Design and delivery of targeted and tailored e-learning	●
<b>2.</b>	<b>Work with external stakeholders to deliver inclusion</b>		
2.1	Develop and roll out new inclusion metrics with our clients to ensure that data requests are targeted, strategic and enshrine our colleagues' right to anonymity	Clifford Chance is part of the General Counsel Diversity and Inclusion Forum task force which created the metrics pack and supported its launch	●
2.2	Develop effective inclusion guidelines and support with our suppliers	We developed our supplier diversity programme approach and strategy	●

#	Objective / FY23 KPI	Notes on progress	Status
2.3	Collaborate with clients on raising awareness of and support for inclusion in the workplace	Developed an extensive inclusive development and advice programme combining legal and strategic change perspectives for our clients. These include Continuous Learning Education programmes, leadership capacity sessions, thematic advice sessions on LGBT+, pronouns, and affinity network development	●
2.4	Develop and sustain strategic collaborative arrangements with inclusion NGOs	Continued work with the community Outreach and Pro Bono teams to support a wide range of NGOs globally covering the various aspects of inclusion	●
<b>3.</b>	<b>Improve the gender balance in our partnership</b>		
3.1	Implement gender targets strategy and publicly report on progress towards the global and regional gender targets	Progress being made but the pace of progress needs to accelerate	●
3.2	Establish more Accelerate>>> affinity groups across our offices, increase regional connectivity and build regional Accelerate>>> structures	Accelerate>>> continues to grow in number of groups, level of activity, and breadth of engagement within the firm and with external stakeholders	●
<b>4.</b>	<b>Improve LGBT+ inclusion in our firm</b>		



● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
4.1	Implement LGBT+ inclusion targets strategy and publicly report on progress towards the global and regional inclusion targets	Global reporting process being explored	●
4.2	Establish more Arcus affinity groups across our offices, increase regional connectivity and build regional and intra regional Arcus structures	Arcus continues to grow in number of groups, level of activity engagement within the firm and external stakeholders – including global and regional external recognition (Stonewall etc.)	●
4.3	Develop LGBT+ roadmap for all offices to deliver LGBT+ inclusive workplaces and practices	Roadmaps developed and implementation to be rolled out	●
<b>5. Improve the ethnic diversity of our firm</b>			
5.1	Implement ethnicity inclusion targets strategy and publicly report on progress of the regional targets	Ethnicity targets have been met and exceeded for this year	●
5.2	Establish more REACH affinity groups across our offices, increase regional connectivity and build regional REACH structures	REACH continues to grow in number of groups, level of activity, and breadth of engagement within the firm and with external stakeholders	●
<b>6. Improve inclusion of disability within our firm</b>			
6.1	Establish more disability affinity groups around our global firm to better understand our colleagues' experiences and to progress towards the commitments we have made as part of Valuable 500	Enable continues to grow in number of groups, level of activity, and breadth of engagement within the firm and with external stakeholders	●

#	Objective / FY23 KPI	Notes on progress	Status
<b>7. Develop programmes that improve inclusion for all in the firm and wider dimensions of diversity</b>			
7.1	Continue to develop and support our faith networks, family networks, veterans networks and others	Networks and groups continue to develop platforms for internal and external engagement – and celebrate days of importance regionally and globally	●
7.2	Develop range of interventions and potential study groups / affinity networks on social mobility	The first Social Mobility group launched in London	●
<b>8. Increase the alignment of our learning and development programmes with our inclusion strategy</b>			
8.1	Develop and deliver a suite of inclusion sessions and training that align with regions, career stages, and teams	Extensive programme delivering inclusion capacity-building sessions targeted and tailored to the needs of the specific group including trainees, appraisal teams, new partners, partner assessors, and practice areas  Thematic sessions including on ethnicity, gender, LGBT+, disability, pronouns and others	●

## Objectives and KPIs

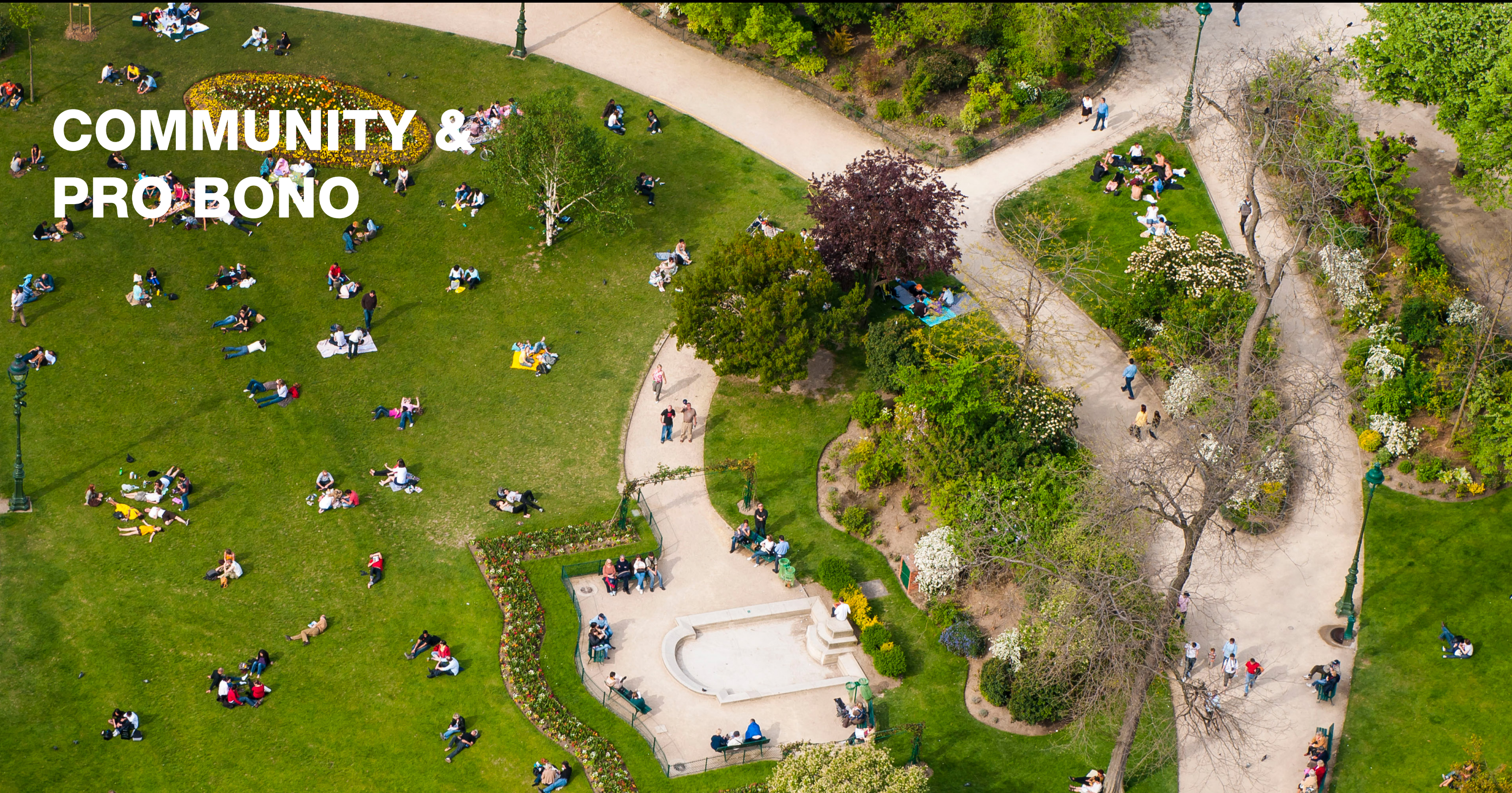
### Future Focus for FY24

Objective	KPI
1. Engaging and activating the global firm population as advocates for inclusion	1.1 Develop global and regional inclusion campaigns that raise awareness of the firm's inclusion strategy initiatives – and how people can be actively involved to deliver the strategy objectives
	1.2 Align inclusion training and campaigns with the Code of Conduct principle “Be Inclusive”, as part of the continuing embedding of the Code and the ongoing Code workshops
	1.3 Expand our reverse mentoring programmes across the office networks and expand the areas of focus of reverse mentoring including gender, ethnicity, LGBT+, and disability
	1.4 Expand our Bubbles network-building programme for underrepresented population groups
	1.5 Work with internal stakeholders to embed inclusive practices and deliver inclusive facilities in all building upgrades and new buildings
2. Work with external stakeholders to deliver inclusion	2.1 Develop and roll out new inclusion metrics with our clients to ensure that data requests are targeted, strategic and enshrine our colleagues' right to anonymity (consistent with the FY23 objective and KPI 8.1)
	2.2 Develop effective inclusion guidelines and support with our suppliers
	2.3 Collaborate with clients on raising awareness of and support for inclusion in the workplace, and develop and deliver inclusion products and programmes for clients
	2.4 Develop and sustain strategic collaborative arrangements with inclusion NGOs

Objective	KPI
3. Improve the gender balance in our partnership	3.1 Continue to implement gender targets strategy and publicly report on progress towards the global and regional gender targets
	3.2 Establish more Accelerate>>> affinity groups across our offices, increase regional connectivity and build regional Accelerate>>> structures
4. Improve LGBT+ inclusion in our firm	4.1 Continue to implement LGBT+ inclusion targets strategy and publicly report on progress towards the global and regional inclusion targets
	4.2 Establish more Arcus affinity groups across our offices, increase regional connectivity and build regional and intra regional Arcus structures
	4.3 Develop LGBT+ roadmap for all offices to deliver LGBT+ inclusive workplaces and practices
5. Improve the ethnic diversity of our firm	5.1 Continue to implement ethnicity inclusion targets strategy and publicly report on progress of the regional targets
	5.2 Establish more REACH affinity groups across our offices, increase regional connectivity and build regional REACH structures
6. Improve inclusion of disability within our firm	6.1 Establish more disability affinity groups around our global firm to understand better our colleagues' experiences and to progress towards the commitments we have made as part of Valuable 500
	6.2 Increase self-declaration levels on disability
7. Develop programmes that improve inclusion for all in the firm and wider dimensions of diversity	7.1 Continue to develop and support our faith networks, family networks, veterans networks and others
	7.2 Develop range of interventions and study groups/affinity networks on social mobility
8. Increase the alignment of our learning and development programmes with our inclusion strategy	8.1 Develop and deliver a suite of inclusion sessions and training that align with regions, career stages, and teams



# COMMUNITY & PRO BONO





# Community & Pro Bono

**Our global community & pro bono strategy continues to be focused on contributing towards the achievement of the UN Sustainable Development Goals. Guided by our theory of change, and in the spirit of SDG 17 – Partnership for the Goals – we work in long-term partnerships with some of the world’s leading NGOs and civil society organisations in order to maximise our impact.**

We harness the skills and expertise of our people, often delivered alongside grant funding from the Clifford Chance Foundation, to deliver positive and sustainable contributions in the communities around the world where we do business. Increasingly, we work on pro bono collaborations with our clients.

An important part of our recent work has been in connection with the environment-related SDGs and in FY23 those efforts included:

- 80 of our lawyers delivering a significant cross-border mandate for Terre des Hommes, supporting their work for the United Nations Committee on the Rights of the Child in relation to the obligations faced by states in the context of global climate change.
- Grant funding and pro bono support to a four-year project of The Lifescape Project, which is developing comprehensive legal briefings across six European jurisdictions on the legal issues that need to be addressed when rewilding land.

Beyond Environment-aligned work, our focus on SDG 16 – Access to justice has included advising those seeking asylum (see page 36) and protection of human rights. Cases we worked on during FY23 included assisting pro bono partner International Center for Advocates Against Discrimination (ICAAD) and Barbados NGO Operation Safe Space (OSS) on two important human rights cases in Barbados. Both cases resulted in successful judgments that strengthen human rights protections in Barbados.

There was an uptick in FY23 pro bono and volunteering hours versus FY23. However, in FY24 we would like to see a higher proportion of the firm volunteering for the opportunities available. As part of our responsible business strategy, we expect all lawyers to do 50 pro bono hours a year and business professionals 10 volunteering hours a year. The continued successful rollout of our Paladin platform ([see page 37](#)) has been well-received by colleagues.

## Progress highlights

# 124,067

people

helped by the NGOs we work with as a result of our support working in long-term partnerships with 88 NGOs around the world

# 76,719

pro bono and in-kind  
volunteering hours

– up 2% on FY22

# 162

partners and employees

sitting on the boards of 191  
not-for-profit organisations

# 37

Pro Bono relationships

exemplify our theory of change





## Cornerstone

### Building capacity in Rwanda

In FY23 we delivered the equivalent of £38 million in value from our lawyers and business professionals and the Clifford Chance Foundation pledged an additional £2.2 million – in support of a range of SDG-related projects around the world. Cornerstone is the firm's flagship outreach initiative.



**Launched in 2019, our five-year Cornerstone initiative is committed to strengthening the wellbeing of thousands of people in the poorest communities in the Rwandan capital Kigali, through the funding and delivery of a series of co-designed projects tackling the widespread barriers people face when trying to improve their lives.**

**The programme has seen us commit our legal and technical expertise – as well as £1 million per year for five years from the Clifford Chance Foundation (and**

**constituting therefore nearly 50% of the £2.2 million pledged by the Foundation in FY23) – to a series of projects in partnership with several NGOs. Since launch, through Cornerstone we have delivered 11 distinct projects with nine NGOs.**

The programme also offers our people the chance to get involved and help deliver the kind of high-impact change that motivates our volunteers. More than 140 Clifford Chance volunteers from 31 offices have taken part in the initiative so far, and we estimate that more than 68,000 people have been directly impacted by Cornerstone projects.

We also aim to leave a legacy of lasting sustainable change in Kigali long after Cornerstone has finished, by developing the capacity and efficiency of the NGO partners we are working with on the initiative.

At the outset we ran a three-month consultation process with the communities we wanted to support, which identified housing, education, health, livelihoods, family relationships and food insecurity as the areas of life in which wellbeing is being held back. Therefore, we have concentrated our efforts on these areas, monitoring and evaluating the impact of each project to ensure the overall effectiveness of the programme.

“

Helping communities overcome the barriers to improving wellbeing and developing the skills and capacity of the partners we are working with in Kigali is enabling us to achieve our overall objective of positive change that endures.

”

**Tom Dunn**  
Global Pro Bono and  
Community Director





## Coding and computer skills with NGO Women in Africa

One project truly inspired our volunteers – the coding and computer skills training programme run in partnership with NGO Women in Africa. Nearly 100 colleagues from our offices around the world signed up to be mentors to teenage girls from Groupe Scolaire of Kimisange in Kigali on the project. The aim of the project was to equip the girls with the digital tools, skills and resources they need to become solutions providers to entrepreneurs, close the digital gender gap, improve gender equality and provide opportunities for girls from low-income communities in Information and Communications Technology (ICT).

“Like many of my colleagues, I was keen to get involved in the mentoring side of this project,” says Gail Orton, Head of EU Public Policy, from our Paris office. “Many years ago, I spent some time in Uganda. I’ve also mentored girls before when I was in London, and I’m passionate about helping young women, so this project ticked lots of boxes for me.

“I had expected it to be like the mentoring I’d done in London, but it was a completely different world. The technology was patchy, which made communication quite challenging, and this was compounded by the language barrier. As a result, the greatest gift I felt I could share was English skills.”

Gail and her mentor partner Tosin Murana, an associate in the firm’s Dubai office, spent months mentoring Ignacia, helping to improve her language skills and finalise the website she produced as part of the programme.

“I volunteered in part because I wanted to demonstrate what’s possible for someone with an African background who’s had the opportunities education can bring,” Tosin says. “I think we helped Ignacia make great progress with her language skills, which, as Gail says, was an area where we could bring the most value.

“What I didn’t realise at the outset was what I would get out of this. Getting to know Gail has been amazing. She’s introduced me to her contacts at the firm and helped me establish connections with colleagues in Dubai, so this pro bono opportunity has made a big difference to me too.”

Through this and its other projects, our Cornerstone initiative has the potential to establish a new model for how businesses can achieve sustainable impact through community investment programmes.

“I think this is why lawyers and business professionals from across our firm are getting involved and using their skills to help deliver our ambitious projects,” says Global Pro Bono and Community Director Tom Dunn. “Helping communities overcome the barriers to improving wellbeing and developing the skills and capacity of the partners we are working with in Kigali is enabling us to achieve our overall objective of positive change that endures.”



Tosin Murana  
Associate

Gail Orton  
Head of EU Public Policy

“

The girls did not have any basic skills with computers to start with, but they can now create their own websites. They have also gained a number of soft skills such as presentation and public speaking. I believe this project has had a positive impact on their education as most of the girls would not have studied computer sciences. Now they are considering it, because they are seeing it as a reliable career path.

”

Oda Ishimwe  
Professor at Groupe Scolaire of Kimisange,  
Kigali, Rwanda

## Portal boosts pro bono uptake

After its successful launch in the US, we have rolled out Paladin, the online portal for pro bono and volunteering opportunities, to our people in the UK, continental Europe and the Middle East.

Paladin is an efficient, accessible and transparent way for people to access and select opportunities best suited to them and, to date, more than 2,500 lawyers and business professionals have signed up.

To date, more than 620 projects have been posted on the platform. Feedback has been overwhelmingly positive, with most saying Paladin has reduced the amount of time it takes to identify interesting pro bono and volunteering opportunities by 75%.

One lawyer who has taken advantage of Paladin's rollout to Europe is Octavio Canseco from our Madrid office, who is now helping a Spanish shark conservation NGO in a case regarding a public subsidy.

"It's really intuitive to use," Octavio says. "You can specify which areas you're interested in, whether you wish to

volunteer as a lawyer or in the community, and the field in which you feel you can help the most.

"Previously, we'd only hear about opportunities by email, and you would have to navigate your way through them all if you wanted to find something. Now it's much easier, which makes it more likely people will want to get involved."

As well as improving the volunteering experience, Paladin is also helping us to deliver on our key strategic objective of contributing towards the achievement of the UN SDGs. At the same time, it strengthens our ability to help our volunteers to develop skills through pro bono work.

"Working with the conservation NGO enabled me to refresh my knowledge of public subsidy legislation here in Spain," adds Octavio. "And it's opened my eyes to the difference between working for an NGO and a corporation, which I know will be useful in my career and to the firm."

“

You can specify which areas you're interested in, whether you wish to volunteer as a lawyer or in the community, and the field in which you feel you can help the most.

”

Octavio Canseco  
Abogado



## Protecting the legal rights of asylum seekers

One key area of SDG alignment has arisen from the work we have done to support refugees globally, which has contributed in particular to SDGs 4, 10 and, in protecting the legal rights of asylum seekers, to 16. This has included:

- Working alongside the United Nations High Commissioner for Refugees, helping refugees in Hong Kong to prepare the documents that they need for the Canadian government to process their application for the "golden ticket" (i.e., the chance to resettle in Canada with training and support to begin a new life as a Canadian citizen, not as a refugee).
- In the UK, continuing to develop our long-term relationship with Refugee Action which supported 128 asylum claims, and the University of London's Refugee Law Clinic, through which we supported 14 refugee claims.
- Working with ICAAD, our global strategic pro bono client, as part of their multidisciplinary team of scientists, activists, lawyers and researchers working to develop a legal standard for the 'right to life with dignity' in the context of climate migration.



# Community & Pro Bono Objectives and KPIs

## FY23

● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
1.	<b>Continue to develop pro bono and community outreach opportunities that are aligned with business-critical areas</b>		
1.1	Number of pro bono mandates in Africa, Europe and the US that help to develop the firm's position in these regions	Africa: 29 open mandates, 12 were new in FY23 Europe: 157 open mandates, 60 new in FY23 US: 194 open mandates, 78 new in FY23	●
1.2	Number of pro bono mandates that help develop the firm's financial investor client base	25 collaborations with five clients	●
2.	<b>Continue to undertake pro bono and community outreach work that strengthens the capabilities of our people and our relationships, and maximises the value we add to our pro bono clients' capacity to achieve their mission</b>		
2.1	Pro bono involvement in innovative services and products	37 mandates where the firm is advising on a product that is innovative; or an innovative NGO structure, or (as with Terre des Hommes mentioned above), innovative use of and developments in the law	●
2.2	Number of strategic pro bono relationships that exemplify our theory of change	37 relationships	●
2.3	The number of our people who are serving on the boards of not-for-profit organisations	162 employees, in 21 offices, on the board of 191 organisations	●
3.	<b>To contribute to the achievement of the SDGs by continuing to develop long-term strategic pro bono and community outreach relationships with the world's best NGOs</b>		
3.1	The number of long-term global and local office strategic pro bono and community outreach relationships and the number of projects within these relationships. By strategic, we intend enduring and ongoing activity with the NGO.	We have long-term global and local relationships with 88 pro bono and community partners. There are 233 projects within these relationships	●

#	Objective / FY23 KPI	Notes on progress	Status
3.2	The proportion of our pro bono work that is carried out within these relationships	44%	●
3.3	The number of such relationships with a focus on sustainable economic opportunity and the number of projects carried out within these relationships	We have 18 relationships and have worked on 19 projects	
3.4	The strength of the feedback that we receive from our partner NGOs about the value and impact of our contribution to the achievement of the SDGs they have been able to deliver	Strong feedback from A4ID, Hope and Homes for Children, War Child, Fair Trials, Save the Children, Survivors Fund, ICAAD, Médecins Sans Frontières, ISLP, the Vance Center, FINCA, Srdce na dlani, Refugee Action, JINC, IMC Weekendschool, NC Cares, Netherlands Red Cross, BlaQ Aboriginal Corporation and Teen's Key	●
4.	<b>Deliver our pro bono and community outreach services through partner-led, client-focused and properly resourced teams, effectively supported by the pro bono team. Our pro bono and community outreach practice will provide all our people, at all levels, with the opportunities to practise and enhance the skills that are key to their development, making them more effective and well-rounded</b>		
4.1	The number of pro bono client teams	58 pro bono client teams	●
4.2	The proportion of lawyers who report skills enhancement as one of the benefits of doing pro bono work	96.5% of lawyers reported skills enhancement as one of the benefits of doing pro bono. The average number of skills gained was 6.	●
4.3	The number of pro bono and community mandates allocated through the Paladin platform	Paladin has now been successfully rolled out across the firm. Mandates: 145	●

● Good progress / Complete   ● In progress   ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
<b>5.</b>	<b>Support the execution of the firm's Talent and Retention strategy</b>		
5.1	The number of graduate recruitment events and publications with pro bono and community content	<p>Events included</p> <ul style="list-style-type: none"> <li>• Spark with PBCO content for first-year lawyers and penultimate year non-lawyers</li> <li>• ACCEPT with PBCO mentioned for first-year lawyers and penultimate year non-lawyers</li> <li>• ACCESS graduate recruitment run the ACCESS project for students where we do a career carousel session</li> <li>• We also ran 48 RA days with a graduate recruitment aspect</li> </ul>	●
<b>6.</b>	<b>Support the firm's affinity groups</b>		
6.1	The number of diversity and inclusion-related pro bono mandates and joint pro bono and diversity and inclusion events	53 mandates and 12 events	●
<b>7.</b>	<b>Support the delivery of the firm's environmental policy</b>		
7.1	The number of environment-related pro bono mandates	19 environment-related pro bono mandates	●
<b>8.</b>	<b>Continue to develop and refine our capability and that of our clients, to support effectively the widest range of civil society organisations, from small community-based organisations to international NGOs</b>		
8.1	The number of offices with a relationship with a local school or educational institution	13 offices have relationships with in total 60 schools / educational institutions	●
8.2	In-kind (hours) and direct financial investment in our pro bono and community outreach work	<p>Pro bono hours: 74,379</p> <p>Charge-out value: £36,654,199</p> <p>Community outreach hours: 2,340</p>	●
8.3	The number of people helped by the NGOs we work with, as a result of our support for them	124,067 people helped	●

#	Objective / FY23 KPI	Notes on progress	Status
8.4	The number of pro bono and community collaborations with our GSC and other clients (including the number of clients who request that we work with them)	<p>89 collaborations with 28 clients</p> <p>Separately, eight of our people sit on not-for-profit boards together with client representatives; the boards on which they sit feature 15 representatives from 13 of our clients</p>	●
8.5	The number of pitches in which we provide details of our pro bono and community offering	A significant number of pitches included details of our pro bono and community work and we have taken steps to be able to capture the precise number in future	●
8.6	Internal and external communications articulating how our responsible business strategy, ESG practice and SDG alignment differentiate us	<p>Extensive communications include:</p> <ul style="list-style-type: none"> <li>• Responsible business: seven external blog articles with strong engagement and two internal Community and Pro Bono newsletters shared firm-wide</li> <li>• ESG: multiple events, briefings and insights</li> <li>• SDG-alignment: three pages on website – SDG awards page, Clifford Chance Foundation page and RB landing page, and three joint events with the NGOs with which we work – showcasing human rights work</li> </ul>	●
8.7	External validation of our pro bono work, including recognition of our standing as significant actors within sectors that our pro bono practice supports	<p>Awards: seven</p> <p>External recognition: 70</p> <p>Client feedback: 48 engagements</p>	●
<b>9.</b>	<b>To develop contingency planning that enables the firm to deploy its internal resources in response to external events, e.g., health and natural disasters and social unrest, efficiently and impactfully</b>		
9.1	Effective coordination by the Clifford Chance Foundation of the firm's disaster relief grant making at local office, regional and global levels	The Clifford Chance Foundation effectively coordinated urgent responses to the Pakistan flood. There was also continuing implementation of the programmes funded by the US\$1 million to support responses to the Russian invasion of Ukraine and the distribution of grants following the earthquakes in Turkey and Syria	●



## Objectives and KPIs

### Future Focus for FY24

Objective	KPI
1. Continue to develop pro bono and community outreach opportunities that are aligned with business-critical areas and raise the profile of our pro bono and SDG alignment	1.1 Number of new pro bono mandates in Africa, Europe, and the US
	1.2 Internal and external communications articulating how our responsible business strategy and SDG alignment differentiate us
2. Continue to collaborate with our fee-paying clients on pro bono and community projects	2.1 The number of pitches in which we provide details of our pro bono and community offering
	2.2 The number of pro bono and community collaborations with our GSC and other clients (including the number of clients who request that we work with them)
3. Continue to undertake pro bono and community outreach work that: <ul style="list-style-type: none"> <li>• strengthens the capabilities of our people;</li> <li>• provides them with opportunities to have a positive impact on the wider community in accordance with the firm's Code of Conduct; and</li> <li>• maximises the value we add to our pro bono clients' capacity to achieve their missions and contributes towards the achievement of the SDGs, including by working within our four-pillar framework (widening access to justice, education, a healthy environment and sustainable economic opportunity)</li> </ul>	3.1 Pro bono involvement in innovative services and products
	3.2 The proportion of lawyers who report skills enhancement as one of the benefits of doing pro bono work
	3.3 The number of long-term community relationships
	3.4 The number of our people who are serving on the boards of not-for-profit organisations
	3.5 The number of global and local office strategic pro bono and community relationships that exemplify our theory of change and the number of projects within these relationships
	3.6 The number of such relationships with a focus on widening access to sustainable economic opportunity and the number of projects carried out within these relationships
	3.7 The strength of the feedback that we receive from the NGOs with which we partner about the value of our contribution to the impact on the achievement of the SDGs that they have been able to deliver

Objective	KPI
4. Deliver our pro bono and community outreach services through partner-led, client-focused and properly resourced teams, effectively supported by the pro bono team	4.1 The number of pro bono client teams
5. Support the firm's affinity groups	5.1 The number of diversity and inclusion-related pro bono mandates and joint pro bono and diversity and inclusion events
6. Support the delivery of the firm's environmental policy	6.1 The number of environment-related pro bono mandates
7. Continue to develop and refine our capability to support effectively the widest range of civil society organisations, from small community-based organisations to international NGOs	7.1 The number of offices with a relationship with a local school or educational institution
	7.2 External validation of our pro bono work, including recognition of our standing as significant actors within sectors that our pro bono practice supports
	7.3 In-kind (hours) and direct financial investment in our pro bono and community outreach work
	7.4 The number of people directly and indirectly helped by the NGOs we work with, as a result of our support for them
8. Support the execution of the firm's Talent and Retention Strategy	8.1 The number of graduate recruitment events and publications with pro bono and community content



# ENVIRONMENT





# Environment

## Climate Change

**The firm targets net zero ambitions at the same time as seeking to help our clients with theirs**

The Net Zero Delivery Group (NZDG), which reports to our RB Board, is responsible for the development and implementation of the firm's emissions reduction plan, with current focus areas including business emissions, travel emissions, supplier emissions and lawyer engagement. The NZDG is going forward also tasked with assessing climate change-related risks and opportunities and risks to the firm.

Our near-term target, validated by the Science-based Targets initiative, is to reduce absolute Scope 1 and 2 greenhouse gas (GHG) emissions 80% by 2030 from a FY20 base year, and to reduce absolute Scope 3 GHG emissions by 47% within the same time frame. For the financial year ending 30 April 2023, we can report that our aggregated Scope 1, Scope 2 (market based) and Scope 3 emissions are 25% lower in FY23 versus our FY20 baseline.

To add to and improve risk management practices and opportunities identified related to climate change, during FY24, key areas of focus of the firm's NZDG, working with Operations, Risk and Compliance and other relevant stakeholders, will be to review:

- our methodology for assessing climate change-related risks and opportunities

and their integration into the firm's Enterprise Risk Management Framework

- whether to employ any additional metrics tracking the financial impact of climate change-related risks and opportunities
- the resilience of the business model; while our qualitative assessment is that the firm's business model is resilient to climate change, we will complete a more detailed analysis in FY24.

## Community & Pro Bono activities

We have KPIs that track the volume of, more broadly, environment-related community and pro bono work, and, in FY23, we advised on 19 environment-focused pro bono mandates, some of which are highlighted in the Community and Pro Bono section above.

In addition, in FY23 the Clifford Chance Foundation pledged grant funding of £300,000 to support Save the Children's engagement with the UN Green Climate Fund. Specifically, the grant is supporting the development of the NGO's application for funding of over US\$20 million to build the resilience, in particular of women and children in the face of climate change across five coastal districts of Sierra Leone.

## Office Portfolio

FY23 was also a pivotal year in our ongoing efforts to enhance the sustainability of our global office portfolio. We have gathered data from trusted third-party specialists, enabling us to take more focused action towards sustainability. Alongside this, we have remained vigilant in taking opportunities that align with our sustainability

goals. In our Responsible Business Report 2022, we showcased the success of Project Nest in the Asia Pacific region, where we shared best practices in refurbishments and fit-outs in Singapore, Sydney and Perth. In FY23, we have continued to build upon this progress, ensuring the sustainability momentum remains strong.

"While our firm-wide programme is still in development, we have notable examples of placing sustainability at the forefront of our decision-making process during FY23," explains Nicole Brocklebank-Fowler, Global Head of Property Portfolio. "These examples include London, Düsseldorf, New York, Brussels, and, most recently, Houston, where our new office is situated in the city's most sustainable building."

## Progress highlights

↓ **25%**

reduction in our aggregated Scope 1, Scope 2 (market-based) and Scope 3 emissions in FY23 versus our FY20 baseline in the firm

**19**

environment-related pro bono mandates opened in FY23

**83%**

of our key suppliers are taking action on energy consumption and GHGs – read more about our Sustainable Procurement Programme and reporting on [our Supplier Management website](#)

**Founding member of the Sustainability Markets Initiative Task Force**

Became a founding member of the Sustainable Markets Initiative Legal Task Force, committed to accelerating action on climate change and nature recovery



## Powering the Future

### Clean hydrogen boosts the energy transition

New technology and government incentives are boosting clean energy and driving a greater demand for high-end legal capabilities steeped in the sector. These capabilities become increasingly important when production scales in ways never achieved before. A case in point is our advice to the US Department of Energy on a landmark clean hydrogen project in Utah, US



**In June 2022, Clifford Chance advised the US Department of Energy’s Loan Programs Office (DOE LPO) on a US\$504.4 million loan guarantee for the Advanced Clean Energy Storage Project (ACES), an innovative end-to-end solution to produce, store and use renewable hydrogen for carbon-free, year-round power in the western part of the US.**

Consisting of the largest clean hydrogen storage facility in the world, the Utah-based project will combine 220 megawatts of alkaline electrolysis with two massive 4.5-million-barrel salt storage caverns. The clean hydrogen stores will be used by a new gas turbine power plant (replacing an existing coal-fired power plant) that aims to be fully fuelled by clean hydrogen by 2045. ACES is one of the first hydrogen projects of this scale in the world to receive project financing.

“This ground-breaking transaction demonstrates you can have a bankable hydrogen production and storage project and establish confidence in the market,” says David Evans, co-head of the Americas Energy & Projects Group.

The ACES project involved the massive scaling up of existing hydrogen production

technology and new interface risks, considerations that can make investors nervous – partly due to the unprecedented challenges around mitigating the risks of financing such first-of-a-kind projects. It took the Department of Energy’s involvement to absorb that risk as a way of building confidence, promoting the technology and developing the market.

“These kinds of projects raise issues the market hasn’t dealt with before,” says Counsel Peter Hughes of our Energy, Infrastructure & Projects Group. “Our long-standing commitment to advise clients on the development of all aspects of the clean hydrogen ecosystem enables us to deploy the creative and collaborative problem-solving our clients require to help move the ball forward when the technology or scale of a project is different.”

### **Global team supporting the energy transition**

The award-winning ACES project – winner of the 2023 IFLR Net Zero Transition Award (Americas) – is just one example of Clifford Chance advising at the forefront of the energy transition market. As many of our major clients are investing in the energy transition, we are ramping up our capabilities to assist.

Our Energy Transition Initiative already provides training for our lawyers and for clients across sectors and technologies. In May 2023, we established a new office in Houston, Texas, the world’s leading energy hub with our goals including further building our energy transition offering.



**David Evans**  
Senior Counsel

**Peter Hughes**  
Counsel

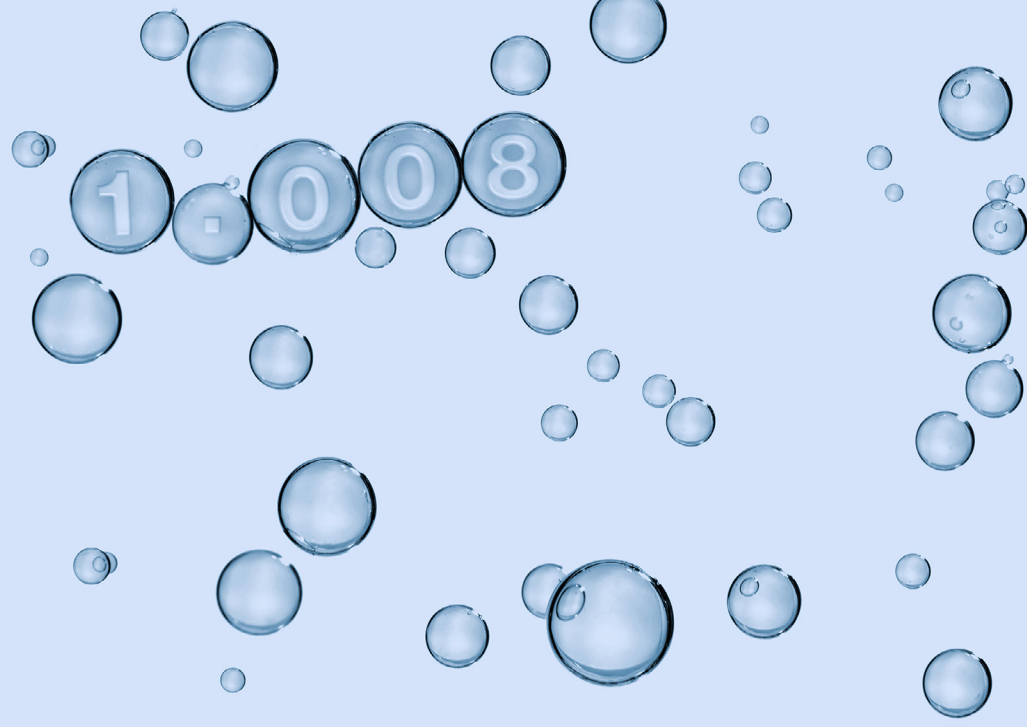
## What's the deal with renewable hydrogen?

Renewable hydrogen, or clean hydrogen, has the potential to power global efforts to transition from fossil fuels to cleaner energy. However, there are numerous technological, logistical, regulatory and other complexities that relate to renewable hydrogen production, storage and usage. If current challenges, including those in relation to price, scale and transport, are overcome, clean hydrogen will change the way businesses generate, store, transport and consume energy, as well as replace fossil fuel-based feedstocks in certain industrial processes. In doing so, it will help the world decarbonise sections of the economy that green electric power cannot reach.

“The use and deployment of clean hydrogen is moving much faster than we anticipated,” says David. “The initial phase has involved government support to underpin projects, but I believe we’re now seeing the technologies being scaled up and investors willing to deploy

capital, and it will not be too long before such projects are able to stack up on their own economically.”

“Two years ago, we had a presentation deck on hydrogen that few wanted to hear. Now everyone is talking about it, which clearly shows the direction in which we’re travelling,” says Peter.



## Debt conversion to protect the Galápagos

Sustainable finance is a key pillar of the firm’s sustainability work. A landmark instruction in FY23 saw our team advising Credit Suisse on a US\$656 million Galápagos marine conservation-linked bond (Galápagos Marine Bond),

The Galápagos Marine Bond was used to finance a debt conversion for Ecuador, exchanging \$1.628 billion of Ecuador’s international bonds for a \$656 million loan. The debt conversion will generate an estimated \$323 million for marine conservation in the Galápagos Islands over the next 18.5 years,

The marine conservation objectives include enhancing the management and conservation of the recently created marine reserve in the exclusive economic zone of Ecuador surrounding the Galápagos known as “Hermandad Marine Reserve” (Reserva Marina Hermandad) and the growth of the natural capital of the Galápagos Islands and their marine ecosystems.

Deborah Zandstra, partner and the transaction lead, said “This innovative use of debt conversion and blended finance techniques will generate considerable fiscal savings for the Republic of Ecuador and substantial funds for marine conservation in the Galápagos Islands and the Hermandad Marine Reserve, and builds on our long-standing partnerships with both Credit Suisse and the Republic of Ecuador on transactions of this type.”

The deal was structured by Credit Suisse also involving the Republic of Ecuador, US International Development Finance Corporation, the Inter-American Development Bank, Oceans Finance Company and the Pew Bertarelli Ocean Legacy.



## Gold medal-standard sustainability performance

In 2020, we officially partnered with sustainability rating agency EcoVadis to help monitor our own and our suppliers' sustainability performance and to formalise our approach. In doing so, we became the first law firm globally to roll out a sustainable procurement programme using the EcoVadis platform.

The EcoVadis sustainability assessment methodology comprises Environment, Labour & Human Rights, Ethics and Sustainable Procurement pillars. Under the Environment pillar, the assessment tracks areas including Energy Consumption and GHGs, Water, Biodiversity, Local & Accidental Pollution, Materials, Chemicals & Waste, Product Use & End-of-Life, and Environmental Services & Advocacy.

Sustainability rating agency EcoVadis awarded Clifford Chance with a gold medal in FY23 for its sustainability efforts, highlighting the sustainability strides we made in 2022. These, but are not limited

to, include setting near-term science-based targets for 2030 as part of our longer term commitment to reach net-zero global emissions, creating highly sustainable workplaces, being founder members of the Net Zero Lawyers Alliance, and winning the Net Zero Transition award from IFLR Europe Awards 2023.

Critical to our achieving this status has been our focus on the “corrective action plan”, one of the outputs of the sustainability assessment, which prioritises what companies completing the assessment can do to improve their sustainability performance. There were some quick wins detailed in the outputs, alongside some longer term considerations.

One of the quick wins identified across all pillars of the assessment was transparency of reporting, so we focused on how we could make this more easily accessible and signpost our external stakeholders to it. This has included more detailed updates on our [supplier management website](#) to provide greater transparency

around the steps we're taking to support oversight and assurance of our suppliers. As part of our [sustainable procurement programme](#), we have used the feedback from the sustainability assessments completed by our suppliers to inform discussions with them and help drive continuous improvement.

We will use the insights from the action plan to inform our strategy for the coming year as we continue making improvements and advancing our progress.

### Gold medal status

Sustainability rating agency EcoVadis awarded Clifford Chance with a gold medal in FY23 for its sustainability efforts. This places Clifford Chance in the top five per cent of all businesses assessed by EcoVadis, and the top two per cent of firms assessed within the legal and accounting services sector.

# Environment Objectives and KPIs

## FY23

● Good progress / Complete    ● In progress    ● Not progressed

#	Objective / FY23 KPI	Notes on progress	Status
1.	To reduce our absolute GHG emissions from our FY20 baseline in order to achieve our near-term targets (80% reduction for Scope 1 and 2 and 47% reduction for Scope 3) by 2030: <ul style="list-style-type: none"> <li>Scope 1 &amp; 2 emissions reduced by 7.3% (year-on-year average)</li> <li>Scope 3 emissions reduced by 4.2% (year-on-year average)</li> </ul>	<ul style="list-style-type: none"> <li>Near-term 2030 science-based target implementation plan created</li> <li>Science-based targets reviewed for the reporting period and external party engaged to support review and analysis of Scope 1, 2 and 3 emissions to help track progress towards near-term targets</li> <li>Please see our Scope 1, Scope 2 (market-based) and Scope 3 emissions on <a href="#">page 63</a></li> <li>We have seen a 25% reduction in our overall emissions (Scope 1, Scope 2 (market-based) and Scope 3) in FY23 against our FY20 baseline</li> </ul>	●
2.	To support the work of environmental NGOs through pro bono assistance and grants from the Clifford Chance Foundation	<ul style="list-style-type: none"> <li>Opened 19 environment-related pro bono mandates</li> <li>We have long-term relationships with 12 pro bono and community partners. There are 17 projects within these relationships with an environmental focus</li> <li>28% of the grants of the Clifford Chance Foundation had an environmental focus</li> </ul>	●
3.	To improve the collation and usefulness of data about the contribution to the environment-related UN SDGs made by our pro bono and fee-paying work; and the benefits accruing personally to our colleagues from their involvement	We have made good progress in relation to our pro bono work but so far are reliant on anecdotal information in relation to our fee paying work. In FY24 we will focus on improving the robustness of data for our fee earning work	●
4.	To reduce our waste by ten per cent per FTE year-on-year from a FY20 base year	Waste emissions have reduced by 2% per FTE from FY20 baseline, an estimation method was used for some sites	●
5.	To reduce our water consumption by five per cent per FTE year-on-year from a FY20 base year	The progress from the baseline shows a reduction of water emissions by 56% per FTE. The water consumption was estimated completely for all sites using an intensity figure (million litres per FTE) from 2020	●

#	Objective / FY23 KPI	Notes on progress	Status
6.	To participate in recognised external forums to inform and support our near-term 2030 science-based target commitment	Seven forums (Net Zero Lawyers Alliance, Sustainable Markets Initiative, CIPS Procurement Futures, Legal Foresight Summit, Moving Beyond, EcoVadis Sustain and Legal Sustainability Alliance)	●
7.	To raise internal and external awareness and involvement in our environmental and energy policies to support the delivery of our near-term 2030 science-based target commitment	We have progressed training for our <a href="#">sustainable procurement programme</a> and have a plan in place to support training / upskilling for our Sourcing team and Contract Managers / Owners	●
	<ul style="list-style-type: none"> <li>Percentage of colleagues engaged and/or trained</li> <li>Number of campaigns</li> <li>Interaction (external)</li> </ul>	<p>Five cohorts (50 participants in total) have participated in our <a href="#">SRM Learning Programme</a>, which includes sustainability</p> <p>Two (World Environment Day and Earth Hour)</p> <p>Good interaction, for instance EcoVadis Gold Rating received good external engagement online</p>	●
8.	To leverage our Sustainable Procurement Programme to understand our suppliers' indirect and direct GHG emissions and to use the outputs from independent verification and analysis to report and reduce our Scope 3 emissions and, in collaboration with our supply chain, fulfil our near-term 2030 science-based target commitment	See the emissions data above plus: <ul style="list-style-type: none"> <li>66 of our key suppliers have been rated through EcoVadis so far, with 27 assessments in progress</li> <li>83% of our key suppliers are taking action on energy consumption &amp; GHGs</li> <li>83% of our key suppliers have waste management procedures in place</li> <li>67% of our key suppliers are reporting on energy consumption &amp; GHGs</li> <li>45% of our key suppliers have signed up to the Science-Based Targets initiative</li> <li>100% of our key suppliers have acknowledged our Supplier Code</li> <li>Please refer to our <a href="#">Supplier Management Website - Reporting</a></li> </ul>	●



## Objectives and KPIs

### Future Focus for FY24

Objective	KPI
<b>1. To continue to take action to reduce our environmental impact</b>	
1.1 To reduce our absolute GHG emissions from our FY20 baseline in order to achieve our near-term targets (80% reduction for Scope 1 and 2 and 47% reduction for Scope 3) by 2030:  <ul style="list-style-type: none"> <li>• Scope 1 &amp; 2 emissions reduced by 7.3% (year on year average)</li> <li>• Scope 3 emissions reduced by 4.2% (year-on-year average)</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental Roadmap &amp; Action Plan created for 2030</li> <li>• Science-Based Targets reviewed to ensure all relevant emission sources are being measured and required levels of reduction being achieved</li> <li>• Total emissions generated in tCO2e: <ul style="list-style-type: none"> <li>- Scope 1 – tCO2e</li> <li>- Scope 2 – tCO2e</li> <li>- Scope 3 – tCO2e</li> </ul> </li> </ul>
1.2 To design and deliver a 'Responsible Travel' campaign to support emissions reduction and achievement of our near-term targets	<ul style="list-style-type: none"> <li>• Percentage of colleagues engaged through campaign</li> <li>• Business travel emissions intensity (tCO2e/FTE)</li> <li>• Distance travelled (million Km)</li> </ul>
1.3 To reduce our waste by ten per cent per FTE year-on-year from an FY20 base year	<ul style="list-style-type: none"> <li>• Percentage of plastic waste generated per FTE and per region</li> <li>• Percentage of paper waste generated per FTE and per region</li> <li>• Percentage of waste recycled or reused</li> </ul>
1.4 To reduce our water consumption by five per cent per FTE year-on-year from an FY20 base year	<ul style="list-style-type: none"> <li>• Percentage of water consumed per FTE and per region</li> </ul>
1.5 To reduce our energy consumption	<ul style="list-style-type: none"> <li>• Energy Consumption – Million kWh</li> <li>• Percentage of electricity from renewable sources</li> <li>• Percentage of energy from renewable sources (including electricity purchased under renewable tariffs)</li> </ul>

Objective	KPI
1.6 To raise awareness of our environmental and energy policies, encouraging active engagement and participation from colleagues to support the protection of the environment	<ul style="list-style-type: none"> <li>• Percentage of colleagues engaged and/or trained</li> <li>• No. of Campaigns</li> <li>• Interaction (internal / external) e.g.: <ul style="list-style-type: none"> <li>- # global news stories</li> <li>- Total number of views</li> <li>- # likes</li> <li>- # comments</li> <li>- Highest click rate (%)</li> </ul> </li> </ul>
1.7 To leverage our Sustainable Procurement Programme to enable us to fulfil our environmental commitments, including, but not limited to, understanding our suppliers' indirect and direct GHG emissions, and to use the outputs from independent verification and analysis to report and help reduce our Scope 3 emissions  Top 50 suppliers will set a 1.5 degree-aligned SBT and will all achieve a 50% reduction by 2030	<ul style="list-style-type: none"> <li>• Percentage of key suppliers taking action on energy consumption &amp; GHGs</li> <li>• Percentage of key suppliers that have waste management procedures in place</li> <li>• Percentage of key suppliers reporting on energy consumption &amp; GHGs</li> <li>• Percentage of key suppliers signed up to Science-Based Targets Initiative</li> <li>• Percentage of key suppliers that have acknowledged our Supplier Code</li> <li>• Number of suppliers engaged (global)</li> <li>• Total emissions generated in tCO2e</li> </ul>

Objective	KPI
<b>2. To create a sustainable client services model</b>	
2.1 To continue to develop our environmental and climate change / energy transition services	Percentage of firm revenue earned from relevant services
2.2 To work collaboratively with clients to reduce our direct and indirect impact on the environment	Percentage and number of client events or roundtables
<b>3. To support the work of environmental NGOs through pro bono assistance and grants from the Clifford Chance Foundation</b>	
3.1 See also the Community Pillar KPIs for Environment.	<ul style="list-style-type: none"> <li>Percentage and number of our pro bono and community outreach mandates, and Clifford Chance Foundation grants, that contribute to the achievement of the SDGs relating to the environment</li> </ul>
3.2 To improve the collation and usefulness of data about the contribution to the environment-related SDGs made by our pro bono work; and the benefits accruing personally to our colleagues from their involvement.	<ul style="list-style-type: none"> <li>Successful generation of report analysing benefits to colleagues of involvement in environmental pro bono work</li> </ul>
3.3 To participate in recognised external forums to inform and support our near-term 2030 science-based target commitment and drive progress in the legal sector to reduce our impact on the environment	<ul style="list-style-type: none"> <li>No. of forums</li> </ul>

Objective	KPI
<b>4. To add to and improve risk and opportunity management practices related to climate change</b>	
4.1 To review our methodology for assessing climate change-related risks and opportunities and their integration into the firm's Enterprise Risk Management Framework	<ul style="list-style-type: none"> <li>Review completed</li> <li>Percentage implementation of any changes agreed</li> </ul>
4.2 To review whether to employ any additional metrics tracking the financial impact of climate change-related risks and opportunities	<ul style="list-style-type: none"> <li>Review completed</li> <li>Percentage implementation of processes to produce any additional metrics</li> </ul>
4.3 To review the resilience of the business model; while our qualitative assessment is that the firm's business model is resilient to climate change, we will complete a more detailed analysis in FY24.	<ul style="list-style-type: none"> <li>Review completed</li> <li>Percentage implementation of any steps agreed to be taken to improve resilience</li> </ul>



## Annex 1: Global Inclusion Reporting Data FY23

**At Clifford Chance, we see inclusion to be both a core value and key to our business success. We see our diversity as a key strength to how we work and succeed. We aim to deliver the equitable career opportunities and experiences our people deserve. We believe diverse teams working in an inclusive culture are good for our people, our clients and the success of our firm.**

We have developed a strategy of Change the Rules, Change the Culture, Change the Lived Experience in recognition of the three key areas of focus that we believe are required if we are to deliver on greater inclusion. Inclusion is more than a set of rules; it is a major social change in how we approach our lives and work. In addition, we have developed a framework called The Permanent Campaign.

In 2020 we launched our ambitious regional and global inclusion targets with targets focussed on gender, ethnicity and LGBT+ status. They include partner and senior associate promotions, executive leadership and business professional management diversity.

The targets were created to deliver the equitable career opportunities and experiences that our people deserve, and will help deliver more successful outcomes for our firm. We aim to identify and remove the artificial barriers that interfere with our desire to make meritocratic decisions across the firm.

We are committed to reporting on our progress towards our inclusion targets as we believe transparency is a critical part of delivering focus and progress.

This year we have seen strong progress in some of our inclusion objectives. At Executive Leadership Group, Executive Director and Director levels of the firm we have met our gender inclusion targets of at least 40% women and 40% men, and we have exceeded our targets on ethnic minority partner promotions.

However, the rate at which we make up women partners needs to significantly accelerate if we are to achieve our gender inclusion goals. This will require a renewed vigour and focus across every practice area and office on how best to evolve our recruitment and promotion practices to deliver on our inclusion goals. A lot has been done and that must be celebrated, but there is more to do.



### Our Inclusion Strategy



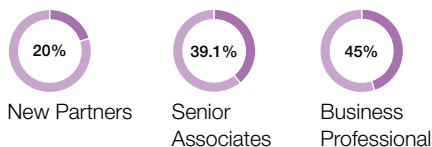
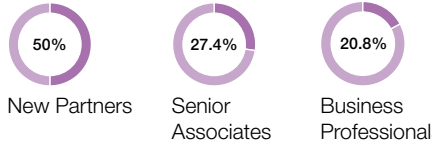
To help deliver on our inclusion strategy, **Change the Rules, Change the Culture, Change the Lived Experience**, the firm has developed a wide range of **tailored and targeted initiatives supported and informed by data**. In this document we set out key data points, in addition to our historic gender and ethnicity reporting.



### Our Inclusion Targets

In July 2020 we launched **ambitious regional and global inclusion targets** focused on gender, ethnicity and LGBT+. We are making progress in the right direction, but to achieve our goals, we will need **to accelerate the rate of change**.

Target	Progress FY23	Commentary
<b>SENIOR LEADERSHIP</b>		
<b>Global Management target</b> Global Leadership committees to be at least 40% women and 40% men	<b>46.2%</b> of the members of the Executive Leadership Group are women <b>53.8%</b> of the members of the Executive Leadership Group are men	There has been significant progress in the gender balance of our Executive Leadership Group and as a result we have reached our target
<b>Senior Business Advisory Group to the ELG</b> Global Leadership to be at least 40% women and 40% men	<b>42.9%</b> female membership <b>57.1%</b> male membership (a new committee)	On target
<b>Executive Directors</b> Target to be at least 40% women and 40% men	<b>45.4%</b> female executive directors <b>54.6%</b> male executive directors	On target
<b>Directors</b> Target to be at least 40% women and 40% men	<b>53.8%</b> female directors <b>46.2%</b> male directors	On target
<b>GENDER</b>		
<b>Global target</b> At least 40% female and at least 40% male global partners in the firm by 2030	<b>23.9%</b> female partners, up by 0.5% <b>76.1%</b> male partners, down by 0.5%	There has been an increase in the overall number and percentage of women partners but the rate of change needs to accelerate to meet our inclusion goals
<b>APAC target</b> Increase the proportion of female partners by 25% by 2025 (achieving 35.1% female partners) and by 60% by 2030 (achieving 45% female partners)	<b>33%</b> female partners, up 2.6% from 30.4%	Good rate of increase which if sustained will see the region meet its targets
<b>Middle East target</b> attain 12.5% female partners by 2025 and 25% by 2030	<b>7.1%</b> , up by 1.8 from 5.3%	There is no numerical change in women partners this year in the Middle East
<b>Americas target</b> Increase the proportion of female partners by 35% by 2025 (achieving 23.8% female partners) and 100% by 2030 (achieving 35.2% female partners)	<b>22.6%</b> , remains same as before	After several years of increasing at a rate that will meet our inclusion targets this year has seen no movement. This is related to lateral hiring which has removed the positive impact of our internal promotions.

Target	Progress FY23	Commentary
<b>Continental Europe target</b> Increase the proportion of female partners by 35% by 2025 (achieving 20.8% female partners) and 100% by 2030 (achieving 30.8% female partners)	<b>18.8%</b> female partners, up by 0.9% from 17.9%	Continental Europe has increased the overall number and percentage of women partners, but the rate of change needs to accelerate to meet our inclusion targets
<b>UK target</b> Increase the proportion of female partners by 25% by 2025 (achieving 30% female partners) and by 60% by 2030 (achieving 41% female partners)	<b>28.9%</b> female partners, up 0.4% from 28.5%	An increase in the rate of women promotions to partner is required to meet our goals.
<b>LGBT+</b>		
<b>UK partner target of 5% by 2025</b>	 3.8%	3.82% partners identified as LGBT+ in the UK, falling slightly from 5.1%
<b>Global partner target of 3% by 2025</b>	 96.2% non-LGBT+	The UK has fallen back on its LGBT+ target. At a global level, the firm is exploring how best to capture LGBT+ data across all regions where there are legal and cultural barriers
<b>ETHNICITY</b>		
<b>Americas &amp; UK Targets*</b> 15% of new partners by 2025	Percentage of identified represented by ethnic minority	For the third year in a row, the firm remains on track to meet our targets for partners from an ethnic minority population group in both the Americas and the UK regions
30% senior associates and business professionals (manager and above) by 2025	<p>US:</p>  <p>New Partners: 20% Senior Associates: 39.1% Business Professionals: 45%</p> <p>UK:</p>  <p>New Partners: 50% Senior Associates: 27.4% Business Professionals: 20.8%</p>	Overall, we have significantly exceeded the targets of 15% of all new partners with a figure of 38.8%
		The Americas continues to meet all its other targets and the UK continues to increase its Senior Associates figure towards the 30% goal
		The UK Business Professionals figure needs to accelerate its rate of change



## Gender

All Regions							
	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>All Partners</b>							
Females	151	140	125	123	116	104	105
Males	480	459	455	473	470	472	472
% Female	23.9%	23.4%	21.6%	20.6%	19.8%	18.1%	18.2%
% Male	76.1%	76.6%	78.4%	79.4%	80.2%	81.9%	81.8%
<b>Equity Partners</b>							
% Female	20.6%	19.4%	18.2%	17.1%	17.0%	15.9%	14.9%
% Male	79.4%	80.6%	81.8%	82.9%	83.0%	84.1%	85.1%
<b>Non-Equity Partners</b>							
% Female	31.3%	32.1%	28.8%	28.5%	26.1%	23.1%	25.7%
% Male	68.7%	67.9%	71.2%	71.5%	73.9%	76.9%	74.3%
<b>Lawyers</b>							
Females	1305	1399	1308	1294	1254	1119	1177
Males	1196	1241	1196	1265	1294	1231	1250
% Female	52.2%	53.0%	52.2%	50.6%	49.2%	47.6%	48.5%
% Male	47.8%	47.0%	47.8%	49.4%	50.8%	52.4%	51.5%
<b>Business Professionals</b>							
Females	2248	2352	2381	2468	2638	2241	2115
Males	1222	1217	1189	1188	1606	1097	1027
% Female	64.8%	65.9%	66.7%	67.5%	62.2%	67.1%	67.3%
% Male	35.2%	34.1%	33.3%	32.5%	37.8%	32.9%	32.7%

Americas							
	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Females	21	19	18	15	12	9	9
Males	72	65	64	69	63	63	65
% Female	22.6%	22.6%	22.0%	17.9%	16.0%	12.5%	12.2%
<b>Lawyers</b>							
Females	140	131	111	106	96	80	87
Males	115	110	103	121	116	116	108
% Female	54.9%	54.4%	51.9%	46.7%	45.3%	40.8%	44.6%
<b>Business Professionals</b>							
Females	147	149	151	163	210	154	148
Males	84	83	77	84	154	93	90
% Female	63.6%	64.2%	66.2%	66.0%	57.7%	62.3%	62.2%
<b>India</b>							
	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Business Professionals</b>							
Females	295	304	264	208	176	147	128
Males	480	462	401	366	354	294	281
% Female	38.1%	39.7%	39.7%	36.2%	33.2%	33.3%	31.3%

## Asia Pacific

	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Females	31	28	25	27	29	26	30
Males	63	64	60	69	68	67	66
% Female	33%	30.4%	29.4%	28.1%	29.9%	28.0%	31.3%
<b>Lawyers</b>							
Females	232	236	222	219	233	221	234
Males	207	194	188	200	203	207	209
% Female	52.8%	54.9%	54.1%	52.3%	53.4%	51.6%	52.8%
<b>Business Professionals</b>							
Females	353	372	362	386	437	397	374
Males	85	83	93	85	130	87	80
% Female	80.6%	81.8%	79.6%	82.0%	77.1%	82.0%	82.4%

## Continental Europe

	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Females	43	39	36	33	31	30	29
Males	186	179	175	181	187	184	181
% Female	18.8%	17.9%	17.1%	15.4%	14.2%	14.0%	13.8%
<b>Lawyers</b>							
Females	561	526	515	522	487	435	442
Males	527	531	509	539	558	520	535
% Female	51.6%	49.8%	50.3%	49.2%	46.6%	45.5%	45.2%
<b>Business Professionals</b>							
Females	786	778	844	902	897	806	811
Males	243	249	266	276	296	242	252
% Female	76.4%	75.8%	76.0%	76.6%	75.2%	76.9%	76.3%

## Middle East

	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Females	2	1	1	1	1	1	1
Males	26	18	16	17	18	18	17
% Female	7.1%	5.3%	5.9%	5.6%	5.3%	5.3%	5.6%
<b>Lawyers</b>							
Females	50	38	25	27	28	25	26
Males	72	43	40	38	48	48	45
% Female	41%	46.9%	38.5%	41.5%	36.8%	34.2%	36.6%
<b>Business Professionals</b>							
Females	39	33	35	35	32	33	33
Males	39	14	14	15	20	14	15
% Female	50%	70.2%	71.4%	70.0%	61.5%	70.2%	68.8%

## London &amp; Newcastle

	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Females	54	53	45	47	43	38	36
Males	133	133	140	137	134	140	143
% Female	28.9%	28.5%	24.3%	25.5%	24.3%	21.3%	20.1%
<b>Lawyers</b>							
Females	480	468	435	420	410	358	388
Males	382	363	356	367	369	340	353
% Female	55.7%	56.3%	55.0%	53.4%	52.6%	51.3%	52.4%
<b>Business Professionals</b>							
Females	736	716	725	774	886	666	621
Males	331	326	338	362	652	351	309
% Female	69%	68.7%	68.2%	68.1%	57.6%	65.5%	66.8%



# Ethnicity

New York & Washington, DC							
	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Ethnic Minority	10	7	8	7	3	5	5
Non-Ethnic Minority	73	65	64	66	50	61	61
Not Identified	7	9	9	10	22	5	7
<b>Total</b>	<b>90</b>	<b>81</b>	<b>81</b>	<b>83</b>	<b>75</b>	<b>71</b>	<b>73</b>
% identified represented by ethnic minority	12.0%	9.7%	11.1%	9.6%	5.7%	7.0%	7.6%
<b>Lawyers</b>							
Ethnic Minority	96	81	75	76	17	65	59
Non-Ethnic Minority	130	118	110	126	38	120	120
Not Identified	21	36	20	15	154	5	7
<b>Total</b>	<b>247</b>	<b>235</b>	<b>205</b>	<b>217</b>	<b>209</b>	<b>190</b>	<b>186</b>
% identified represented by ethnic minority	57.5%	40.7%	40.5%	37.6%	30.9%	34%	33.0%
<b>Business Professionals</b>							
Ethnic Minority	114	102	113	113	78	117	103
Non-Ethnic Minority	94	92	89	102	66	102	90
Not Identified	15	29	26	24	213	20	22
<b>Total</b>	<b>223</b>	<b>223</b>	<b>228</b>	<b>239</b>	<b>357</b>	<b>239</b>	<b>215</b>
% identified represented by ethnic minority	54.8%	52.6%	55.9%	52.6%	54.2%	49.0%	53.4%

## Data as of May 2023

\*Ethnic minority means: American Indian/Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian / Pacific Islander, Two or more races, Other [definitions influenced by US-specific legislative diversity definitions].

\*\*Lawyers are made up of Counsel, Senior Associates, Associates and Trainees. Excludes partners.

The figures are based on headcount numbers. 2023, 2022, 2021, 2020 and 2019 figures show On and Off headcount data. Excluded are Outsourced, Freelancers, Agency Temps, Work Experience, Consultants, Retired Partner Consultants.

Our reporting must comply with local legislation (for example, data protection), custom and practice, and accordingly we report only those regions where ethnicity is capable of this compilation and aggregation.

Business Professionals' includes a range of roles and seniority within our business service functions across our Coordinator/Assistant; Manager; Executive Manager; Director and Executive Director career bands

For more information on our offices and locations, [visit our website](#).

London & Newcastle							
	FY23	FY22	FY21	FY20	FY19	FY18	FY17
<b>Partners</b>							
Ethnic Minority	22	17	18	13	12	13	8
Non-Ethnic Minority	151	153	158	158	150	148	148
Not Identified	14	16	9	13	15	17	23
<b>Total</b>	<b>187</b>	<b>186</b>	<b>185</b>	<b>184</b>	<b>177</b>	<b>178</b>	<b>179</b>
% of identified represented by ethnic minority	12.7%	10.0%	10.2%	7.6%	7.4%	7.3%	5.1%
<b>Lawyers</b>							
Ethnic Minority	234	225	211	199	161	171	178
Non-Ethnic Minority	453	455	481	452	422	391	426
Not Identified	175	151	99	136	196	136	137
<b>Total</b>	<b>862</b>	<b>831</b>	<b>791</b>	<b>787</b>	<b>779</b>	<b>698</b>	<b>741</b>
% of identified represented by ethnic minority	34.1%	33.1%	30.5%	30.6%	27.6%	24.5%	29.5%
<b>Business Professionals</b>							
Ethnic Minority	181	173	170	179	149	126	121
Non-Ethnic Minority	745	719	741	790	706	646	607
Not Identified	141	150	152	167	683	245	202
<b>Total</b>	<b>1067</b>	<b>1042</b>	<b>1063</b>	<b>1136</b>	<b>1538</b>	<b>1017</b>	<b>930</b>
% of identified represented by ethnic minority	19.5%	19.4%	18.7%	18.5%	17.4%	12.4%	16.6%

## Data as of May 2023

Ethnic minority in UK reporting means: Black or Black British, Asian or British Asian, Chinese, Other ethnic group, Mixed (definitions influenced by UK-specific legislative diversity definitions).

\*Lawyers are made up Counsel, Senior Associates, Associates and Trainees. Excludes Partners.

The figures are based on headcount numbers. 2023, 2022, 2021, 2020 and 2019 figures show On and Off headcount data. Excluded are Outsourced, Freelancers, Agency Temps, Work Experience, Consultants, Retired Partner Consultants.

Our reporting must comply with local legislation (for example, data protection), custom and practice, and accordingly we report only those regions where ethnicity is capable of this compilation and aggregation.

Business Professionals' includes a range of roles and seniority within our business service functions across our Coordinator/Assistant; Manager; Executive Manager; Director and Executive Director career bands

For more information on our offices and locations, [visit our website](#).

# LGBT+

UK		
	FY23	FY22
<b>Partners</b>		
LGBT+	3.8%	5.2%
Non LGBT+	96.2%	94.8%
<b>Lawyers</b>		
LGBT+	13.2%	11.6%
Non LGBT+	86.8%	88.4%
<b>Business Professionals</b>		
LGBT+	7.0%	6.4%
Non LGBT+	93%	91.6%

## Data as of May 2023

The figures are based on headcount numbers: 2023, 2022, 2021, 2020 and 2019 figures show combined On and Off headcount data. Excluded are Outsourced, Freelancers, Agency Temps, Work Experience, Consultants, Retired Partner Consultants

For more information on our offices and locations, visit our website.

We have included an Equity/Non-Equity partner split for All Regions. Due to policy, we do not disclose this data on local or regional level.

\*Lawyers are made up of Counsel, Senior Associates, Associates and Trainees. Excludes Partners.

\*Business Professionals\* includes a range of roles and seniority within our business service functions across our Coordinator/Assistant; Manager; Executive Manager; Director and Executive Director career bands



## Annex 2: Global Clifford Chance Academy Data FY23

Number of business skills training courses*					
REGIONS	FY23	FY22	FY21	FY20	FY19
Americas	2	0	0	41	64
Asia Pacific	4	1	4	51	52
MEA	-	0	4	13	21
CE	129	79	100	138	148
UK	102	82	117	230	208
India	28	165	277	49	74
Virtual Classroom	440	796	635	75	18
<b>Total</b>	<b>705</b>	<b>1,123</b>	<b>1,137</b>	<b>597</b>	<b>585</b>
Number of participants in global academy courses					
	FY23	FY22	FY21	FY20	FY19
Lawyers/ fee earners	5,175	4,382	4,392	2,928	3,166
Business professionals / non fee earners	3,490	2,696	2,795	1,664	1,192
<b>Total</b>	<b>8,665</b>	<b>7,078</b>	<b>7,187</b>	<b>4,592</b>	<b>4,358</b>
Elearning**	12,568	13,846	11,381	10,383	13,109
Training videos***	3,550	4,421	4,451	6,300	4,880
<b>Total</b>	<b>16,118</b>	<b>18,267</b>	<b>15,832</b>	<b>16,683</b>	<b>17,989</b>
FTE Per FY					
	FY23	FY22	FY21	FY20	FY19
<b>Total</b>	<b>6,077</b>	<b>5,898</b>	<b>5,920</b>	<b>5,994</b>	<b>5,875</b>
Elearning**	2.07	2.35	1.92	1.73	2.23
Training videos	0.58	0.72	0.75	1.05	0.83
<b>Total</b>	<b>2.65</b>	<b>3.07</b>	<b>2.67</b>	<b>2.78</b>	<b>3.06</b>

\* Academy + Local (classroom + remote)

\*\* Academy elearning courses + 'Talking Heads' knowledge sharing videos (number of hrs viewed) + external web-based licences (hrs spent online)

Total number of legal skills training courses*					
	FY23	FY22	FY21	FY20	FY19
<b>Total number of courses</b>	<b>1,610</b>	<b>1,216</b>	<b>1,190</b>	<b>1,426</b>	<b>1,306</b>
Number of new business skills courses					
	FY23	FY22	FY21	FY20	FY19
<b>Total number of courses</b>	<b>4</b>	<b>18</b>	<b>38</b>	<b>28</b>	<b>16</b>
Average hours of training by gender (Fee Earner)					
	FY23	FY22	FY21	FY20	FY19
Male	6.03	4.82	4.38	6.99	7.18
Female	7.65	6.45	5.83	5.26	8.4
Average hours of training by gender (Business Professionals)					
	FY23	FY22	FY21	FY20	FY19
Male	2.45	1.48	1.60	2.01	1.83
Female	2.64	1.75	2.00	1.05	2.05
Average hours of training by job type					
	FY23	FY22	FY21	FY20	FY19
Lawyers/fee earners	6.80	5.61	5.04	6.08	7.72
Business professionals / non fee earners	2.57	1.64	1.86	1.81	1.97
Number of classroom courses					
	FY23	FY22	FY21	FY20	FY19
<b>Total number of courses</b>	<b>2,394</b>	<b>2,339</b>	<b>2,327</b>	<b>2,023</b>	<b>1,891</b>

## Annex 3: Community and Pro Bono Data FY23

Pro bono and community hours per lawyer* FY22 and FY23**			
REGIONS		FY23	FY22
Americas		44.56	50.92
Asia Pacific		7.56	6.05
Europe		10.57	7.10
UK and Middle East		28.5	38.55
<b>Total</b>		<b>19.87</b>	<b>21.01</b>

Pro bono and community hours per lawyer* FY18 to FY21*				
REGIONS	FY21	FY20	FY19	FY18
Asia Pacific	10.13	9.90	9.00	12.07
Americas	49.71	27.69	34.52	40.33
CEER	11.89	10.84	9.76	6.36
Western Europe	6.06	5.83	7.47	9.98
UK and Middle East	32.88	30.47	28.11	28.21
<b>Total</b>	<b>20.0</b>	<b>16.93</b>	<b>16.84</b>	<b>20.48</b>

\*Figures based on average pro bono and community hours per lawyer based on average headcount

\*\*For FY22 and FY23, aligned with the firm's strategy, CEER and Western Europe figures are combined as Europe



## Annex 4: Taskforce on Climate-related Financial Disclosures

### **In compliance with the Limited Liability Partnerships (Accounts and Audit) (Application of Companies Act 2006) Regulations 2008, as amended by the Limited Liability Partnerships (Climate-related Financial Disclosure) Regulations 2022.**

*Clifford Chance is the collective name for an international legal practice comprising Clifford Chance LLP and its subsidiary entities. These entities may be branches, partnerships or separate corporate entities (“the Group”).*

### **1. Introduction**

As described in more detail in the Strategy section, the Group does not consider climate change to be a material financial risk to the business. As a law firm our emissions are relatively small, and our infrastructure relatively secure. The Group’s business is well hedged and whilst climate change and the transition to a low carbon economy will affect our clients, we do not envisage this reducing demand for our advice and services, provided the firm maintains and builds its relevant expertise. Rather, the Group considers climate change related advice and services as an area for potential growth.

The Group’s commitment to reducing emissions and to transparency on progress is oriented to our values, and what our stakeholders can expect of us, despite our operational emissions not having any material impact on global GHG emissions. The Group tracks its climate change-related commitments through specific targets and objectives detailed in this disclosure. We also have policies and controls in place

in respect of our business operation and supply chain that specifically address climate change and support our focus to decarbonise our business.

The Group has a plan to reduce absolute Scope 1 and 2 GHG emissions 80% by 2030 from a base year of the year ended 30 April 2020 (“FY20”), and to reduce absolute Scope 3 GHG emissions by 47% within the same timeframe. In March 2022 the Group’s near-term science-based targets for 2030 were independently assessed and validated as a key element to our longer term aim of being net zero.

The Group targets net zero ambitions while at the same time seeking to help our clients with theirs.

The client work the Group undertakes in relation to climate change is integrated into the Group’s regions and practice areas and is often an element of a wider scope of work. Therefore, it is not practical to quantify separately the value of work undertaken by the Group in relation to climate change.

This disclosure describes the Group’s coordinated approach to its own environmental footprint, including decarbonising our operations and supply chain, and advising clients on climate change and the energy transition. Key management groups with responsibility for this include:

- the Responsible Business Board (“RB Board”) that proposes and has oversight of the Group’s responsible business strategy, as approved by the Executive Leadership Group (“ELG”)
- the Global ESG Board that steers and coordinates the activities of the teams and lawyers advising clients on ESG matters including climate change.

Commonality of people on these Boards – including the same individual as Chair – helps to connect the approach of the Group to the risks and opportunities that climate change presents.

The Group uses a robust Enterprise Risk Management Framework (“the Framework”), which is designed to address the likelihood and impact of risks materialising. The Framework tracks climate change-related risks.

During the year ended 30 April 2024 (“FY24”), the Group plans to conduct a deeper dive in relation to the financial impact of climate-related issues on its business and assess the Group’s financial exposure to climate change (both risks and opportunities). These risks are already on the risk radar of the Group (see below) yet we recognise the value of taking the opportunity to deepen the Group’s understanding of its potential financial exposure to climate change (both risks and opportunities).

The Group is a founding member of the Net Zero Lawyers Alliance committed to accelerating the transition to Net Zero by 2050.

## 2. Governance

In this section we define the governance structures for the assessment, management and escalation of climate related matters and describe the key executive responsibilities in relation to climate management and how key decisions and actions are taken.

The development, implementation and compliance monitoring of our policies are managed through the General Counsel and Compliance office, led by the General Counsel and Chief Risk & Compliance Officer, who provide regular updates to the Audit & Risk Committee and both sit on the Responsible Business Board representing the Doing Business pillar of the Group's responsible business strategy, alongside the Environment pillar lead of the Responsible Business Board who chairs the Group's Net Zero Delivery Group.

These roles and relationships are explained in more detail below, but at a high level this shows the interconnectedness between the different arms of the Group which address climate change.

The Group has policies and controls in place in respect of our business operation and supply chain that specifically address climate change and support our focus to decarbonise our business. These include but are not limited to our Environment & Energy Policy, our Climate Change Policy, our Global Procurement Policy, inclusive of our Supplier Relationship Management Framework and our Supplier Code of Conduct and Standards and our Global Travel Policy.

**Table 1: Bodies of the Group involved in / having responsibility for climate change-related risks and opportunities**

Group	Oversight	Description	Governance / Reporting
ELG	The Group's opportunities and risks	Has ultimate responsibility for the strategy of the Group including the Group's responsible business strategy.	Oversight from the Partnership Council
Partnership Council	ELG	Reviews the performance of the ELG and any other issues of concern to the partnership	
Audit & Risk Committee	The Group's financial reporting and risks	Reviews both the reports of Internal Audit and the Group's accounts and monitors the Group's risk management processes	A sub-committee of the Partnership Council
General Counsel's Office and Risk & Compliance	The Group's risks	Develops, implements and monitors compliance with Group Policy and manages the Group's Enterprise wide Risk Management Framework	Part of the ELG
Global ESG Board	ESG-related opportunities for client work	Steering and convening the Group's ESG-related experience and capabilities to provide ESG related support to our clients.	
RB Board	The Group's Responsible Business strategy	Proposes and has oversight over the responsible business strategy of the Group, as approved by the ELG.	Reports to the ELG
Net Zero Delivery Group	The Group's Net Zero Implementation Plan	Recommends and manages the Group's Road to Net Zero Implementation plan	Reports to the Group's RB Board



### Global ESG Board

In 2019 the Group created a cross-disciplinary Global ESG Board, drawn from partners and senior colleagues across our Group who are experts in and working on ESG-related topics. The role of the Global ESG Board is steering and convening our experience and capabilities in relation to our ESG client work, which includes aspects of climate change such as strategic advice and planning, carbon trading and project investment, regulation and compliance, investment, financing and due diligence, international obligations, and trade and litigation. The Global ESG Board therefore has an important role in identifying and considering climate related opportunities arising from climate related workstreams.

### Climate Change Policy

The Group has a Climate Change Policy that takes climate change issues into consideration in our matter acceptance policies. In accordance with the goals of the Paris Agreement on limiting climate change and the Glasgow Climate Pact, the Group acknowledges that any such

assessment needs to consider the level of development and specific needs of vulnerable countries. In most cases where a new matter potentially has a material and adverse impact on climate change issues, we will assess whether there are sufficient mitigating/compensating grounds to take on the matter. In this way, the Climate Change Policy acts to identify work which might be high risk from a climate change perspective and draws these climate-related risks to the attention of partners when considering whether to take on a new matter. As well as according with the Group's values, this process assists in managing the potential risks to the Group's business in terms of reputation, staff retention and impact on winning other business.

### Environment & Energy Policy

The Group has an Environment & Energy Policy that takes into consideration the decarbonisation of our business operations and provides visibility of the actions we need to take as an organisation to minimise our environmental impact and fulfil the science-based targets commitments we have made.

### Responsible business strategy

The Group's responsible business strategy, which comprises four pillars: Doing Business, People, Community & Pro Bono and – of most relevance in this context – the Environment, is overseen by the RB Board. The RB Board, comprising partners and senior directors who include permanent and co-opted members of the ELG, meets at least quarterly to review progress and discuss strategic initiatives. This included the development of the Group's Net Zero strategy and monitoring progress.

The Net Zero Delivery Group, which reports directly into the RB Board, is responsible for the delivery of our Net Zero Programme, inclusive of our near-term science-based targets and will report on climate change risk and opportunity. The Net Zero Delivery Group takes a global approach and comprises pillar leads and representatives from across our Group. The chair of Net Zero Delivery Group is the Deputy Co-Chair of the Responsible Business Board and leads the Environment pillar of the Group's responsible business strategy. The the

Co-Lead of the Global Markets, Clients and Products Committee of the ELG and the Group's Executive Partner & General Counsel also sit on the RB Board and are the bridge between the RB Board and the ELG.

The focus areas for the Net Zero Programme include business emissions, travel emissions, supplier emissions and lawyer engagement to support delivery of our environmental commitments. Amongst other things, we believe that our focus on emissions reduction pre-empts regulation and global events which will increase or even prevent use of fossil fuels.

To add to and improve risk management practices related to climate change, during FY24 the key areas of focus of the Group's Net Zero Delivery Group, working with Operations, Risk and Compliance and other relevant stakeholders, will be:

- **Metrics assessing the financial impact of climate change:** consider the appropriateness of tracking specific financial metrics

- **Integrating climate risk into the Framework:** While we have had a dedicated risk register on climate risks as part of the Framework for some time, we intend to further enhance and expand the register, with more stakeholder engagement and a greater focus on ownership and accountability
- **Analysing the resilience of the business model:** as explained above and below, our qualitative assessment is that the Group's business model is resilient to climate change. We will complete a more detailed Group wide analysis in anticipation of FY24 annual report

We recognise that by implementing these recommendations, the Group will strengthen its risk management practices related to climate change. This will enhance understanding, accountability, and decision-making processes, while demonstrating a proactive approach towards addressing climate-related risks.

### **EcoVadis offers third-party support and validation of the Group's transition efforts**

The Group has partnered with EcoVadis to help monitor the sustainability performance of the Group and its suppliers against a globally recognised methodology aligned to the UN Global Compact, International Labour Organisation, Global Reporting Initiative and ISO26000. The monitoring through EcoVadis, which requires the Group and its suppliers to provide evidence to support review and assessment, validates the progress that the Group is making year-on-year. The output of the sustainability assessment includes a 'corrective action plan', which enabled the prioritisation of actions during the year ending 30 April 2023 to support continuous improvement efforts.

The Group has used the outputs of the reviews to inform discussions with suppliers, as well as provide transparency around steps that include but are not limited to more detailed reporting on the Group's Responsible Business website.

Supply chain engagement is crucial to the Group achieving its Environmental, Social and Governance commitments, acknowledging that 66% of our scope 3 emissions reside with our purchased goods and services category.

The partnership with EcoVadis allows the Group to work alongside suppliers to help supplier to reduce their negative environmental and social impacts, whilst allowing us to fulfil our long-term ambition of becoming net zero.

Some core initiatives include:

- Setting near-term science-based targets for 2030 as a key element to our longer term commitment to reach net-zero global emissions by 2050 at the latest
- Creating highly sustainable workplaces, with recent examples including our Perth, Sydney, Singapore, and Dubai offices.

- Co-Founding the Net Zero Lawyers Alliance, in a venture that brings together the legal industry to make collaborative efforts towards, and share best practice on, the transition
- Driving sustainable change through our Cornerstone Initiative, which aims to improve wellbeing in the poorest communities in Kigali, Rwanda

In 2022, EcoVadis recognised Clifford Chance with a Gold Medal status, placing Clifford Chance in the top 5% of all businesses assessed by EcoVadis and the top 2% of those Groups assessed within the legal and accounting services sector.

## **3. Strategy**

### **Climate change-related risks**

As described in section 4 below, the Group's risk identification process identified climate change as an emerging business risk in 2021. Emerging risks are tracked and reviewed regularly by the central risk team and discussed with the ELG and the Audit & Risk Committee. Until now, on review, it has not been considered a material financial risk to the business. As such, it will continue to be monitored and reviewed as described in this disclosure both as part of the emerging risks and separately in its own right as part of the regular review of the Climate risk register. In any event, there are reputational risks that might arise from a failure to achieve the Group's own emissions reduction targets or non-compliance with our policies, which the Group is focussed on avoiding through the mechanisms that this disclosure explains.

### **Climate change-related opportunities** *Advisory services related to climate change and the energy transition*

As described above, the Group has a Global ESG Board and has also launched an Energy Transition Initiative that focuses on legal advice for areas including renewable energy; carbon capture and storage; clean hydrogen; energy storage, EV charging, transmission and interconnection; carbon trading and investment, and new nuclear. The Group regularly advises clients on climate change regulation, the Just Transition and Transition Planning, and sustainable finance. These initiatives form part of the Group's strategy to ensure the Group is well positioned to serve clients in relation to climate change. The Group does not, however, treat climate change as a separate profit centre, and does not separately monitor revenue from climate related work.



### **Partnering**

We believe that it is important that Clifford Chance, as a leading law firm, shows leadership in relation to climate change, but that such leadership is also important for our credibility with clients in relation to climate-related work. The two climate change-related initiatives below are key examples of this:

- Clifford Chance is a founder member of the Net Zero Lawyers Alliance (NZLA) and the Legal Sector Task Force within the Sustainable Markets Initiative (SMI).
- The NZLA commits to support the goal of Net Zero greenhouse gas (GHG) emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C (Net Zero).
- The SMI was launched by King Charles III in his former role as His Royal Highness The Prince of Wales at The World Economic Forum in January 2020 to mobilise business and finance leaders

to accelerate the transition to a net-zero world. The SMI has formed industry-specific, CEO-level Task Forces to drive positive change to protect people and planet from the threats of climate change, including supporting nature's biodiversity. The Group agreed to be a founding member of the Sustainable Markets Initiative Legal Task Force (LTF). The Group's Senior Partner represents the Group as a member of the LTF.

Also relevant to the Group's reputation is the Group's community and pro bono work, which include and target climate change-focused initiatives. For instance, the Clifford Chance Foundation has provided grant funding of £300,000 to support Save the Children's engagement with the United Nations Green Climate Fund and, specifically, the development of its application for funding of over US\$ 20 million to build the resilience in particular of women and children in the face of climate change across five coastal districts of Sierra Leone.

### **Climate change-related training and trends**

We invest significant time in research, internal training, client training, seminars and written briefings focussed on the energy transition and associated areas such as carbon trading. The process of running events and drafting and publishing reports and briefings on climate change issues, trends and regulatory developments supports and enhances the Group's knowhow and awareness of these topics, and so our ability to win and execute client mandates.

## **4. Risk management**

As part of the firm's ERM process the central team carries out a formal horizon scanning exercise where internal stakeholders, subject matter experts and the Group's leadership are engaged to identify key risks relevant to our business. This includes use of internal surveys, workshops and research conducted by the risk team based on external publications and reliable sources. Climate change was identified as an emerging risk as part of this process and a risk register dedicated to Climate-related risks was developed in 2021 which identified physical and transition risks in broad terms, together with controls and mitigations.

As part of the Group's reporting structure, all emerging risks are reported to the Audit and Risk Committee and the Executive Leadership Group periodically. Climate change was discussed as an emerging risk with the Audit Risk Committee in September 2021, the conclusion of which was that the risks identified were not financially material to the Group's business as a law firm.

Some climate related risks are identified and assessed through our business continuity management processes. Operational resilience and business continuity is a standing item on the agenda of the Group's Operations and Business Transformation Committee, co-led by members of the ELG

Climate change risk will continue to be monitored as part of the Group's ERM process

Whilst the Group's ability to meet and progress towards its climate change commitments does not currently represent a material financial risk, it represents a risk to our reputation and therefore our progress requires to be monitored. Our progress towards the Group's near-term science-based targets for 2030 as a key element to our longer term commitment to reach net-zero global emissions by 2050 at the latest are detailed in the objectives and metrics below.

## 5. Metrics and targets

### Climate change-related risks

The Group does not currently have detailed financial-related metrics for climate change risks and, as described above will consider whether such metrics could be developed and what they would measure during FY24.

### Climate change-related opportunities

We consider trends and themes that we anticipate seeing in the medium term and ensure that our teams are developing skillsets in the high-end areas of climate change-related legal expertise that our clients require and that we expect to continue to grow. We do not currently track what percentage of the Group's revenue stems from climate change-related services. We are however increasingly offering climate change-related legal services (see above). The Group will explore whether it can track and report the revenue generated by this work in the Group's annual report for the year ended 30 April 2024.

### GHG emissions and other environment-related targets

**Table 1: Bodies of the Group involved in / having responsibility for climate change-related risks and opportunities**

Category	Emissions (TCO2E) FY23	Emissions (TCO2E) FY20 (validated by SBTi in FY22)	% Change (+/-) FY20 to FY23
1 Direct Emissions	739.00	1,304.00	-43%
2 Indirect Emissions (Location-Based)	7,541.39	8,602.00	-12%
2 Indirect Emissions (Market-Based)	3,154.07	3,869.00	-18%
1 + 2 (Location-Based)	8,280.39	9,906.00	-16%
1 + 2 (Market-Based)	3,893.07	5,173.00	-25%
3 Other Indirect Emissions	94,958.04	126,521.36	-25%
1 + 2 (Location-Based) + 3	103,238.43	136,427.36	-24%
1 + 2 (Market-Based) + 3	98,851.11	131,694.36	-25%

### Supply Chain (Scope 3)

Our sustainable procurement programme for the reporting period has focused on measuring the sustainability and carbon performance of our key suppliers, which has seen a 16% reduction in our purchased goods and services category emissions against an FY20 baseline. For the year ending 30 April 2023 we have been able

to use supplier specific emissions factors to help reduce our reported emissions, however, we have also noted a heavy reliance on spend data still where supplier emissions have not been provided.

To support effective decarbonisation of our supply chain, we are seeking to expand our engagement with our suppliers as part of our programme to support suppliers

to take positive steps towards measuring their carbon reduction and setting science-based targets, including providing metrics through EcoVadis. The monitoring through EcoVadis provides, through validation, the practical steps that our suppliers are taking to minimise their environmental impact. It also provides visibility of low environment scores and supports corrective action planning and consultation with suppliers to support direct and indirect GHG emissions reduction.

The percentage make-up of our purchased goods and services category within scope 3 has increased in the year ending 30 April 2023 from 59.5% to 66% even though we've been able to reduce our overall supply chain emissions for the reporting period by 16%. This has demonstrated a greater reliance on third parties by the Group. Whilst there are benefits of use of third parties, we know that reliance on them can expose the Group to the risk of our suppliers' management and infrastructure. It increases the complexity of risk management, as it is inherently difficult to understand the processes, procedures

and inner workings of our suppliers and can introduce the types of risk to which the Group may not have previously been exposed. This includes, but is not limited to, concentration risk, location risk, legal and / or jurisdiction risk, noting that the supplier may be operating in high-risk countries. Through our sustainable procurement and supplier management programmes, we're focused on enhancing our supplier risk management approach. In FY24, as part of the procurement of new tools, focused on country, industry and country risk assessment, we're hoping to review global or regional economic disruption arising from the impact on sectors with supply chains that are heavily concentrated in areas of high physical risk.

As part of our commitment we have set a goal that our top 50 purchased goods and services suppliers (by emissions) set 1.5 degree aligned science-based targets to reduce their own climate impact and will achieve a 50% reduction by 2030. We acknowledge that this requires regular engagement with our suppliers through our sustainable procurement programme



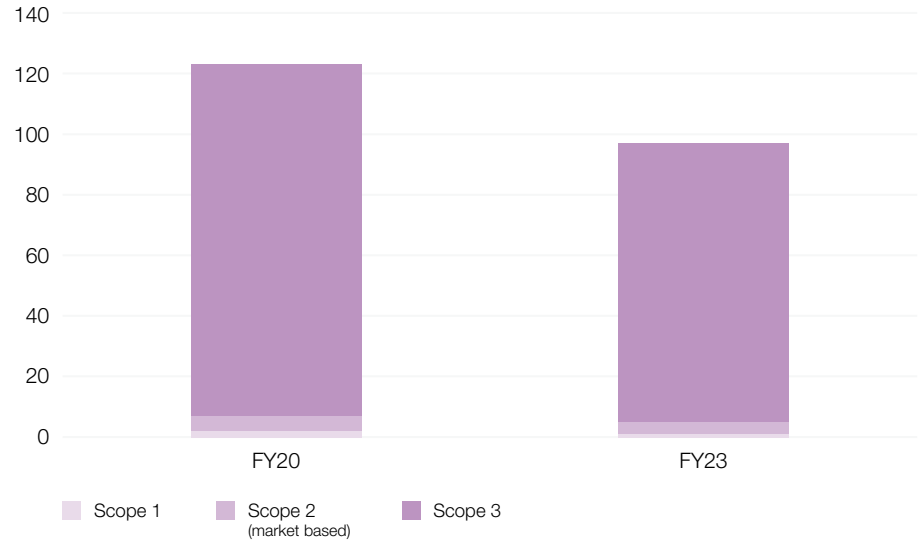
and have prioritised targeted action to support data capture in EcoVadis. Moving away from data capture using spend data to actual emissions data will also help to support more accurate data capture and minimise any reputational damage through us not achieving our targets.

Lower travel as a result of the Pandemic, has led to a 79% reduction in Business Travel against the FY20 baseline. This is not sustainable in the longer term, and we will plan to implement a “Responsible Travel” campaign to ensure compliance with travel policies and communicate the impact of our environmental targets.

**Table 3. Our business travel and supplier management targets**

Overall Target	Business Travel Goals	Supplier Management Goals	Impact
Our annual commitment for Scope 3 from FY20 reduces by 47% by 2030	<ul style="list-style-type: none"> <li>40% reduction in international flights and long-haul flights by 2030</li> <li>Flight emission factors to be reduced by 8% by 2030</li> <li>Reduce emissions from taxis by 25% by 2030</li> </ul>	<ul style="list-style-type: none"> <li>Top 50 suppliers with set a 1.5 degree aligned SBT and will achieve a 50% reduction by 2030</li> <li>Next level down – next 50 suppliers with high submissions will be invited to Sustainable Procurement Programme with a 30% reduction by 2030</li> </ul>	<ul style="list-style-type: none"> <li>Aligned to 1.5C (which is key for a Net Zero pathway)</li> <li>Remaining emissions in 2030: 74,771 tCO2e</li> </ul>

**Chart 1. FY20 to FY23 – change in total emissions (market based)**



Based on IEA data from the IEA (2022) Emissions factors. All rights reserved; as modified by Clifford Chance LLP.

**Table 4. Progress versus 30 April 2023 climate change-related targets set by the RB Board and approved by the ELG**

Target	Key Performance Indicator	Performance
<p>To reduce the Group's absolute GHG emissions from our FY20 baseline to achieve our near-term targets (80% reduction for scope 1 and 2 and 47% reduction for scope 3) by 2030: Scope 1 &amp; 2 emissions reduced by 7.3% (year on year average) / Scope 3 emissions reduced by 4.2% (year on year average)</p>	<p>Near-term 2030 science-based target implementation plan created and communicated across the Group</p> <ul style="list-style-type: none"> <li>• Science based targets reviewed to ensure all relevant emission sources are being measured</li> <li>• Total emissions generated in tCO<sub>2</sub>e: <ul style="list-style-type: none"> <li>- Scope 1 – tCO<sub>2</sub>e</li> <li>- Scope 2 – tCO<sub>2</sub>e</li> <li>- Scope 3 – tCO<sub>2</sub>e</li> </ul> </li> </ul>	<p>See separate table above</p>
<p>To support the work of environmental NGOs through pro bono assistance and grants from the Clifford Chance Foundation</p>	<p>Percentage, number and amount of our pro bono and community outreach mandates, and Clifford Chance Foundation grants, that contribute to the achievement of the SDGs relating to the environment</p>	<p>Opened 19 environment-related pro bono mandates</p> <p>We have long-term relationships with 12 pro bono and community partners. There are 17 projects within these relationships with an environmental focus</p>
<p>To participate in recognised external forums to inform and support our near-term 2030 science-based target commitment.</p>	<ul style="list-style-type: none"> <li>• Number of external forums attended</li> </ul>	<p>7 x forums (Net Zero Lawyers Alliance, Sustainable Markets Initiative, CIPS Procurement Futures, Legal Foresight Summit, Moving Beyond, EcoVadis Sustain, Legal Sustainability Alliance)</p>
<p>To raise internal and external awareness and involvement in our environmental and energy policies to support the delivery of our near-term 2030 science-based target commitment.</p>	<p>Percentage of employed engaged and/or trained</p> <ul style="list-style-type: none"> <li>• No. of Campaigns</li> </ul>	<p>We have progressed training for our sustainable procurement programme and have a plan in place to support training / upskill for our Sourcing team and Contract Managers / Owners. 5 x cohorts (50 participants) have been run for our SRM Learning Programme, which includes, but is not limited to, sustainability</p> <p>2 (World Environment Day and Earth Hour)</p>
<p>To leverage our Sustainable Procurement Programme to understand our suppliers' indirect and direct GHG emissions and to use the outputs from independent verification and analysis to report and reduce our scope 3 emissions and, in collaboration with our supply chain, fulfil our near-term 2030 science-based target commitment</p>	<ul style="list-style-type: none"> <li>• % Key suppliers taking action on energy consumption &amp; GHGs</li> <li>• % Key suppliers that have waste management procedures in place</li> <li>• % Key suppliers reporting on energy consumption &amp; GHGs</li> <li>• % Key suppliers signed up to Science Based Targets Initiative</li> <li>• % Key suppliers that have acknowledged our Supplier Code</li> <li>• No. of Suppliers Engaged (Global)</li> <li>• Total emissions generated in tCO<sub>2</sub>e: <ul style="list-style-type: none"> <li>- Scope 1 – tCO<sub>2</sub>e</li> <li>- Scope 2 – tCO<sub>2</sub>e</li> <li>- Scope 3 – tCO<sub>2</sub>e</li> </ul> </li> </ul>	<p>83% of our key suppliers are taking action on energy consumption &amp; GHGs.</p> <p>83% of our key suppliers have waste management procedures in place.</p> <p>67% of our key suppliers are reporting on energy consumption &amp; GHGs.</p> <p>45% of our key suppliers have signed up to Science Based Targets Initiative.</p> <p>100 % of our key suppliers have acknowledged our Supplier Code</p> <p>66 of our key suppliers have been rated through EcoVadis so far, with 27 assessments in progress.</p> <p>See separate table above</p>



## Annex 5: Stakeholder Capitalism Metrics

Since FY21, we have moved from reporting using the GRI framework to using the World Economic Forum's Stakeholder Capitalism Metrics.

These Stakeholder Capitalism disclosures provide information and references on the firm's commitment and progress across a range of areas that are relevant to our journey, as a professional services firm, to integrate sustainability into our core strategy and operations.

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
<b>GOVERNANCE</b>			
Governing purpose	<p><b>Setting purpose</b></p> <p>The company's stated purpose, as the expression of the means by which a business proposes solutions to economic, environmental and social issues. Corporate purpose should create value for all stakeholders, including shareholders.</p>	Core	<p>Clifford Chance is a leading global law firm, with clients which include corporates from all the commercial and industrial sectors, the financial investor community, governments, regulators, trade bodies and not-for-profit organisations. We are committed to providing clients with the highest-quality advice and legal insight by combining the firm's global standards with in-depth local expertise. We always strive to exceed the expectations of our clients and act responsibly, creating long-term sustainable value that supports the future success of all our stakeholders.</p> <p>We are guided by our global values-based Code of Conduct.</p> <p>Read our <a href="#">Code of Conduct</a>.</p>

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Quality of governing body	<p><b>Governance body composition</b></p> <p>Composition of the highest governance body and its committees by: competencies relating to economic, environmental and social topics; executive or non-executive; independence; tenure on the governance body; number of each individual's other significant positions and commitments, and the nature of the commitments; gender; membership of under-represented social groups; stakeholder representation.</p>	Core	<p>The firm's top decision-making body, the Executive Leadership Group (ELG), sets the firm's strategy and oversees its implementation. The ELG is chaired by the firm's Global Managing Partner.</p> <p>The ELG comprises 13 members (seven men, and six women). This includes:</p> <ul style="list-style-type: none"> <li>• The Global Managing Partner – a senior partner in the firm who is elected by the partnership who are the owners of the firm</li> <li>• The Executive Partner (i.e. General Counsel) – a senior partner with a broad background of working in the firm internationally</li> <li>• The Global Chief Operating Officer and Chief Financial Officer – who each bring extensive experience from multiple sectors</li> <li>• Senior partners who lead each of the firm's business lines and major regions – they bring deep expertise in their regions and areas of expertise</li> <li>• A specialist Employment lawyer who acts as our Global Partner for People and Talent, and who works closely with the firm's Chief People Officer (who also attends the ELG).</li> </ul> <p>Internally, the development and oversight of our responsible business strategy, including governance, risk management and to support implementation of our 2030 near-term science-based targets, is delegated by the ELG to the firm's RB Board, chaired by a partner, also the chair of the firm's ESG Board – bringing together client-facing ESG experience from across the firm globally.</p> <p>The composition of our Responsible Business Board is on <a href="#">page 5</a></p>
Stakeholder engagement	<p><b>Material issues impacting stakeholders</b></p> <p>A list of the topics that are material to key stakeholders and the company, how the topics were identified and how the stakeholders were engaged.</p>		<p>An updated materiality assessment has been conducted – an overview is provided on <a href="#">page 6</a></p>



Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Ethical behaviour	<p><b>Anti-corruption</b></p> <p>1. Total percentage of governance body members, employees and business partners who have received training on the firm's anti-corruption policies and procedures, broken down by region.</p> <p>(a) Total number and nature of incidents of corruption confirmed during the current year, but related to previous years; and</p> <p>(b) Total number and nature of incidents of corruption confirmed during the current year, related to this year.</p> <p>Discussion of initiatives and stakeholder engagement to improve the broader operating environment and culture, in order to combat corruption.</p>	Core	<p>Clifford Chance has a policy of zero tolerance of bribery and corruption. We expressly prohibit the giving or receiving of any form of bribe and we are committed to fully comply with the anti-corruption laws of all the jurisdictions in which we operate.</p> <p>1(a) All of our partners and employees globally are required to complete training on the firm's anti-corruption policies and procedures. In addition, all partners and employees are required to complete an annual declaration confirming their knowledge of, and compliance with, a number of the firm's policies and procedures, including anti-bribery and corruption.</p> <p>1(b) No incidents of corruption involving the firm or its employees have been confirmed during the reporting period.</p> <p>2. The firm provides guidance and training to our people to help them identify situations of heightened risk with respect to bribery and corruption. Our firm has clear policies and procedures in place to ensure our people understand how to report any concerns with respect to bribery and corruption. We also support external initiatives which promote responsible and ethical business practices. We regularly engage with relevant bodies and organisations, including the Institute of Business Ethics, Professionals Against Corruption and Partnership Against Corruption. We are also actively involved in the WEF Global Futures Council on Transparency and Anti-corruption.</p> <p>We expect our suppliers to comply with anti-bribery and corruption, anti-money laundering, economic sanctions and anti-fraud laws ("<b>Financial Crime Laws</b>") and to have policies and procedures in place which are designed to ensure such compliance. Our Supplier Code of Conduct, available on our website, provides a set of key principles that underpin the minimum standards we expect from the suppliers and contractors, and their subsidiaries and subcontractors, that provide goods or services to us. You can read more in the Financial Crime supplier standard on our website, which provides more detail regarding the technical and organisational measures and controls our suppliers should have in place to support their compliance with all applicable Financial Crime Laws.</p> <p><a href="#">Read our supplier code and standards.</a></p>

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Ethical behaviour	<p><b>Protected ethics advice and reporting mechanisms</b></p> <p>A description of internal and external mechanisms for:</p> <ol style="list-style-type: none"> <li>1. Seeking advice about ethical and lawful behaviour and organisational integrity; and</li> <li>2. Reporting concerns about unethical or unlawful behaviour and lack of organisational integrity.</li> </ol>	Core	<p><b>Internal and external mechanisms for seeking advice about ethical and lawful behaviour and organisational integrity</b></p> <p>The firm has developed and implemented a Code of Conduct that reflects the principles that are important to Clifford Chance and which we expect all colleagues to apply in everything they do. Our Code of Conduct defines our expectations of everyone working in our firm and acts as a guide for our behaviour with each other, our clients, and all our external stakeholders. Information and guidance on ethical and lawful behaviour, organisational integrity and who to contact for advice is published on the firm's intranet which is available to everyone in the firm.</p> <p>We have also published the policies, guidance and the professional standards that we must comply with on the firm's intranet, which is available to everyone in the firm. Our policies, guidance and professional standards requirements are regularly reviewed by our global compliance team and legal professionals to ensure they are kept up to date. We also have a dedicated mailbox monitored by a global team of compliance and legal professionals where everyone in the firm can seek advice on a number of topics, including any concerns around ethical and lawful behaviour as well as professional standards. In addition, we have compliance contacts for each of our offices who can assist with any questions that arise in relation to ethical and lawful behaviour and organisational integrity.</p> <p>Should our clients wish to seek advice on ethical and lawful behaviour and organisational integrity, we have lawyers in many of our offices who can provide this type of advice. For suppliers, our Supplier Management website includes a point of contact should they have any queries and/or concerns. We also conduct an annual voice of supplier survey with our key suppliers, which is confidential, and which provides a mechanism for our suppliers to share feedback and help support and inform continuous service improvement.</p> <p><b>Internal and external mechanisms for reporting concerns about unethical and unlawful behaviour and lack of organisational integrity</b></p> <p>Internally, we have set out requirements to report concerns about unethical and unlawful behaviour and lack of organisational integrity and the appropriate channels for reporting in our Internal Reporting Processes and Requirements Policy. Our global Whistleblowing Policy also includes reporting channels for actual or potential breaches of the firm's rules on professional standards and practice or any other legal or professional obligations. As we recognise there are times when colleagues may feel the need to raise a concern or as a question without coming forward directly to a colleague, the firm has engaged Navex Global, an independent service with trained, impartial staff available 24/7, to provide an additional channel to our people to report concerns confidentially.</p> <p>In terms of external mechanisms for reporting concerns about unethical or unlawful behaviour and lack of organisational integrity, we made our complaints procedure available on our public website. The mechanisms include a centralised mailbox dedicated to complaints. Our public website also includes jurisdiction-specific guidance on regulatory complaints procedures (where available) in countries where we operate.</p> <p>Read our <a href="#">Code of Conduct</a></p> <p>Read our <a href="#">Policies</a></p> <p>Read our <a href="#">Supplier code and Standards</a></p>



Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Risk and opportunity oversight	<p><b>Integrating risk and opportunity into business process</b></p> <p>Company risk factor and opportunity disclosures that clearly identify the principal material risks and opportunities facing the company specifically (as opposed to generic sector risks), the company appetite in respect of these risks, how these risks and opportunities have moved over time and the response to those changes. These opportunities and risks should integrate material economic, environmental and social issues, including climate change and data stewardship.</p>	Core	<p>Clifford Chance deploys an enterprise-wide approach to risk management that looks to aggregate risk across regions and business functions in order to articulate the most prominent risks that may affect delivery of the firm's objectives.</p> <p>This Enterprise Risk Management (ERM) initiative is designed to address the likelihood and consequences of risks materialising, as well as to inform strategic decisions, successful delivery of change and increased operational efficiency. The framework allows the firm to continue to be entrepreneurial in delivering legal services of the highest standard, whilst adopting a prudent approach to risk management.</p> <p>For example, a key risk area we focus on is cybersecurity and information security. Control of client information is particularly important for Clifford Chance, given the nature and type of information often held by the firm.</p> <p>The firm operates multi-layer defences against cyber activity, including a full-service approach to identify and frustrate attempts to access the firm's network. This is supported by a series of global policies governing IT use and access, data loss prevention tools and training and regular awareness activities across the firm.</p> <p>Our security controls are regularly audited by independent specialist third parties against the international standard ISO27001 for information security management. In 2020, Clifford Chance achieved SOC2 Type 2 certification. The firm is also certified, annually, to the NCSC and UK Government's Cyber Essentials Plus security framework. In addition to this external assessment and validation, we conduct regular external penetration tests and have an internal resource that conducts regular internal audits of all information systems utilising several frameworks including SANS-20, NIST800-53 and ISO 27001. <a href="#">Read about our certifications and assurance activities.</a></p> <p>The firm also considers legal and reputational risks when assessing potential new clients and new matters. Where risks are identified, a matter may be subject to specific clearance conditions or we may decline to take the matter on altogether.</p> <p>Our suppliers are expected to have effective processes and procedures in place to reflect and support our risk management approach. More detail regarding <a href="#">our supplier management approach and standards</a> can be found on our website.</p> <p>Read our article on <a href="#">our Compliance Framework</a>.</p> <p>Read about our Climate Change Policy on <a href="#">page 14</a>.</p> <p>Read <a href="#">our global Code of Conduct</a>.</p>

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
<b>PLANET</b>			
Climate change	<p><b>Greenhouse gas (GHG) emissions</b></p> <p>For all relevant greenhouse gases (e.g. carbon dioxide, methane, nitrous oxide, F-gases etc.), report in metric tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e) GHG Protocol Scope 1 and Scope 2 emissions. Estimate and report material upstream and downstream (GHG Protocol Scope 3) emissions where appropriate.</p>	Core	Please see the table on <a href="#">page 63</a>
Climate change	<p><b>TCFD implementation</b></p> <p>Fully implement the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). If necessary, disclose a timeline of at most three years for full implementation. Disclose whether you have set, or have committed to set, GHG emissions targets that are in line with the goals of the Paris Agreement – to limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C – and to achieve net-zero emissions before 2050.</p>	Core	<p>In line with the UK Limited Liability Partnerships (Climate-related Financial Disclosure) Regulations 2022, we confirm that the disclosures included in the Responsible Business Report 2023 are consistent with the Limited Liability Partnerships (Accounts and Audit) (Application of Companies Act 2006) Regulations 2008, as amended by the Limited Liability Partnerships (Climate-related Financial Disclosure) Regulations 2022.</p> <p>Key elements to highlight include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. We aim to reduce absolute Scope 1 and 2 GHG emissions 80% by 2030 from a FY20 base year, and to reduce absolute Scope 3 GHG emissions 47% within the same timeframe. In March 2022 our near-term science-based targets for 2030 were independently assessed and validated as a key element to our longer term aim of being net zero.</li> <li>2. We have had our emissions reviewed and validated by an external consultancy for the reporting period (1 May 2022-30 April 2023) – our progress is outlined in our Environment FY23 KPIs on <a href="#">page 47</a></li> <li>3. Our annual CDP response provides further disclosures on our approach to climate change (<a href="https://www.cdp.net/en">cdp.net/en</a>).</li> </ol>
Nature loss	<p><b>Land use and ecological sensitivity</b></p> <p>Report the number and area (in hectares) of sites owned, leased or managed in or adjacent to protected areas and/or key biodiversity areas (KBAs).</p>	Core	According to the <a href="#">Key Biodiversity Areas</a> database, there are no Clifford Chance offices in the immediate vicinity of Key Biodiversity Areas (KBAs), our Sao Paulo and Milan offices are 1km away from designated KBAs.



Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Freshwater availability	<p><b>Water consumption and withdrawal in water-stressed areas</b></p> <p>Report for operations where material: megalitres of water withdrawn, megalitres of water consumed and the percentage of each in regions with high or extremely high baseline water stress, according to WRI Aqueduct water risk atlas tool.</p> <p>Estimate and report the same information for the full value chain (upstream and downstream) where appropriate.</p>	Core	According to the WRI Aqueduct water risk atlas tool, seven of our office locations are within cities of extremely high baseline water stress and ten are in locations of high baseline water stress.
Climate change	<p><b>Paris-aligned GHG emissions targets</b></p> <p>Define and report progress against time-bound science-based GHG emissions targets that are in line with the goals of the Paris Agreement – to limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C. This should include defining a date before 2050, by which the firm will achieve net-zero greenhouse gas emissions, and interim reduction targets based on the methodologies provided by the Science Based Targets initiative, if applicable.</p> <p>If an alternative approach is taken, disclose the methodology used to calculate the targets and the basis on which they deliver on the goals of the Paris Agreement.</p>	Expanded	<p>We aim to reduce absolute Scope 1 and 2 GHG emissions 80% by 2030 from a FY20 base year, and to reduce absolute Scope 3 GHG emissions 47% within the same timeframe. In March 2022, our near-term science-based targets for 2030 were independently assessed and validated as a key element to our longer term aim of being net zero.</p> <p>We have had our emissions reviewed and validated by an external consultancy for the reporting period (1 May 2022-30 April 2023) - please see <a href="#">page 63</a> and <a href="#">website</a>.</p>
Climate change	<p><b>Impact of GHG emissions</b></p> <p>Report wherever material along the value chain (GHG Protocol Scope 1, 2 &amp; 3) the valued impact of greenhouse gas emissions.</p> <p>Disclose the estimate of the societal cost of carbon used and the source or basis for this estimate.</p>	Expanded	We have had our emissions reviewed and validated by an external consultancy for the reporting period (1 <sup>st</sup> May 2022-30 <sup>th</sup> April 2023) – please see <a href="#">page 63</a> and our <a href="#">website</a> .

## PEOPLE

Dignity and equality	<p><b>Diversity and inclusion (%)</b></p> <p>Percentage of employees per employee category, by age group, gender and other indicators of diversity (e.g. ethnicity).</p>	Core	Please see <a href="#">page 50</a> for our Global Inclusion Reporting Data FY23.
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Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Dignity and equality	<p><b>Pay equality (%)</b></p> <p>Ratio of the basic salary and remuneration for each employee category by significant locations of operation for priority areas of equality: women to men, minor to major ethnic groups, and other relevant equality areas.</p>	Core	<p>Whilst we report on gender-based salary ratios in some geographies, this is not currently reported globally. Clifford Chance is committed to creating an inclusive environment, providing equal employment opportunities for all members of the firm and future employees, including pay equity.</p> <p>Read <a href="#">Our Commitments</a>.</p> <p>Read <a href="#">our published data</a> including UK Pay Gap Report</p>
Dignity and equality	<p><b>Wage level (%)</b></p> <p>Ratios of standard entry-level wage by gender compared to local minimum wage.</p> <p>Ratio of the annual total compensation of the CEO to the median of the annual total compensation of all its employees, except the CEO.</p>	Core	<p>It is the firm's policy to treat all employees and job applicants fairly and equally. Our fair and equitable approach to remuneration applies to all levels, including entry-level roles.</p> <p>We do not currently report entry level wage by gender compared to local minimum wage or on our Global Managing Partner's remuneration.</p>
Dignity and equality	<p><b>Risk for incidents of child, forced or compulsory labour</b></p> <p>An explanation of the operations and suppliers considered to have significant risk for incidents of child labour, forced or compulsory labour. Such risks could emerge in relation to:</p> <p>(a) type of operation (such as manufacturing plant) and type of supplier; and</p> <p>(b) countries or geographic areas with operations and suppliers considered at risk.</p>	Core	<p>We are a professional services firm strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate, and our ongoing assessment is that we are at low risk of child, forced or compulsory labour occurring within our own business, but that there is some risk of child, forced or compulsory labour occurring within our supply chains.</p> <p>Read <a href="#">our 2022 Modern Slavery Act Transparency Statement</a>.</p> <p>Read <a href="#">our Supplier Standards</a>.</p> <p>Read more about <a href="#">our sustainable procurement programme reporting</a>.</p>
Health and wellbeing	<p><b>Health and safety (%)</b></p> <p>The number and rate of fatalities as a result of work-related injury; high- consequence work-related injuries (excluding fatalities); recordable work-related injuries; main types of work-related injury; and the number of hours worked.</p> <p>An explanation of how the organisation facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided for employees and workers.</p>	Core	<p>As a professional services firm the risk of injury or fatality in our offices is incredibly low, therefore we do not report work-related injuries.</p> <p>We recognise the psychosocial risks inherent in a high-performance environment, and address this through our firm's risk and global wellbeing strategies.</p> <p>We provide our people with access to a range of benefits and services to maintain their mental and physical health.</p>

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Skills for the future	<p><b>Training provided (#, \$)</b></p> <p>Average hours of training per person that the organisation's employees have undertaken during the reporting period, by gender and employee category (total number of hours of training provided to employees divided by the number of employees).</p> <p>Average training and development expenditure per full time employee (total cost of training provided to employees divided by the number of employees).</p>	Core	<p>Clifford Chance invests in developing its lawyers and business professional with the world-class skills and capabilities they need today and in the future, and brings together solutions that focus on leadership, legal and business skills to ensure individuals are making an impact in the market and within their teams.</p> <p>Please see <a href="#">page 56</a> for the Global Clifford Chance Academy Data FY23.</p>
Dignity and equality	<p><b>Pay gap (% , #)</b></p> <ol style="list-style-type: none"> <li>1. Mean pay gap of basic salary and remuneration of full-time relevant employees based on gender (women to men) and indicators of diversity (e.g. BAME to non- BAME) at a company level or by significant location of operation.</li> <li>2. Ratio of the annual total compensation for the organisation's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.</li> </ol>	Expanded	<p>Whilst we report on diversity-based salary ratios in some geographies, this is not currently reported globally.</p> <p>Clifford Chance is committed to creating an inclusive environment, providing equal employment opportunities for all members of the firm and future employees, including fair and equitable pay.</p> <p>Read <a href="#">Our Commitments</a>.</p> <p>Read <a href="#">our published data</a> including UK Pay Gap report.</p>
Dignity and equality	<p><b>Freedom of association and collective bargaining at risk (%)</b></p> <ol style="list-style-type: none"> <li>1. Percentage of active workforce covered under collective bargaining agreements.</li> <li>2. An explanation of the assessment performed on suppliers for which the right to freedom of association and collective bargaining is at risk, including measures taken by the organisation to address these risks.</li> </ol>	Expanded	<p>Clifford Chance is committed to ensuring all its employees are afforded all applicable rights under law, including the right to join labour unions, works' councils or other collective bargaining organisations, where applicable. Given the nature of professional services firms, trade unions and collective bargaining agreements are only relevant in some geographies, therefore no global policy commitment has been required.</p> <p>As part of our assessment of the sustainability performance of suppliers, we measure what they're doing to monitor the percentage of their total workforce across all locations who are covered by formal collective agreements concerning working conditions and terms of employment, inclusive of wages, working hours, vacation days, etc. Independent verification of the documents provided by our suppliers is undertaken by EcoVadis ESG specialists. We expect all suppliers to comply with the applicable laws in the countries within which they operate. You can read more about our sustainable procurement programme and progress on our supplier management website, including out latest reports.</p>



Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Dignity and equality	<p><b>Human rights review, grievance impact &amp; modern slavery (#, %)</b></p> <ol style="list-style-type: none"> <li>1. Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.</li> <li>2. Number and type of grievances reported with associated impacts related to a salient human rights issue in the reporting period and an explanation on type of impacts.</li> <li>3. Number and percentage of operations and suppliers considered to have significant risk for incidents of child labour, forced or compulsory labour. Such risks could emerge in relation to:               <ol style="list-style-type: none"> <li>(a) type of operation (such as manufacturing plant) and type of supplier; and countries or geographic areas with operations and suppliers considered at risk.</li> </ol> </li> </ol>	Expanded	<p>We are a professional services firm strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate, and our ongoing assessment is that we are at low risk of human rights violation and modern slavery occurring within our own business, but that there is some risk within our supply chains.</p> <p>A member of the central procurement team is responsible for the development and oversight of third-party risk management processes. Our approach is guided by the UN Guiding Principles on Business and Human Rights.</p> <p>Read our <a href="#">Modern Slavery Statement</a></p> <p>Read our <a href="#">Modern Slavery Policy</a></p> <p>Read our <a href="#">Human Rights Policy</a></p> <p>Read our <a href="#">Supplier Standards</a></p>
<b>PROSPERITY</b>			
Employment and wealth generation	<p><b>Absolute number and rate of employment</b></p> <p>Total number and rate of new employee hires during the reporting period, by age group, gender, other indicators of diversity and region.</p>	Core	In FY23, Clifford Chance hired 1,280 lawyers and business professionals globally. We do not report globally on recruitment data segmented by demographic.

Pillar / Theme	Metrics and disclosures	Core or expanded	Information and references
Employment and wealth generation	<p><b>Economic contribution</b></p> <ol style="list-style-type: none"> <li>1. Direct economic value generated and distributed (EVG&amp;D), on an accruals basis, covering the basic components for the organisation's global operations, ideally split out by:               <ol style="list-style-type: none"> <li>(a) Revenues</li> <li>(b) Operating costs</li> <li>(c) Employee wages and benefits</li> <li>(d) Payments to providers of capital</li> <li>(e) Payments to government</li> <li>(f) Community investment</li> </ol> </li> <li>2. Financial assistance received from the government: total monetary value of financial assistance received by the organisation from any government during the reporting period.</li> </ol>	Core	<p>In FY23, Clifford Chance recorded revenues of GBP £2,062 million.</p> <p>For further information, read our <a href="#">Financial Results FY23</a></p>
Employment and wealth generation	<p><b>Financial investment contribution</b></p> <p>Total capital expenditures (CapEx) minus depreciation, supported by narrative to describe the company's investment strategy.</p> <p>Share buybacks plus dividend payments, supported by narrative to describe the company's strategy for returns of capital to shareholders.</p>	Core	<p>For further information, read our <a href="#">Financial Results FY23</a></p>
Innovation of better products and services	<p><b>Total R&amp;D expenses (\$)</b></p> <p>Total costs related to research and development.</p>	Core	<p>Innovation in the design, development and delivery of legal services is a core pillar of Clifford Chance's strategy. Beyond the development of new products or processes, it is integral to our knowledge and solutions delivery to clients. As such, we cannot accurately calculate the cost of our investment in R&amp;D.</p>
Community and social vitality	<p><b>Total tax paid</b></p> <p>The total global tax borne by the company, including corporate income taxes, property taxes, non-creditable VAT and other sales taxes, employer-paid payroll taxes, and other taxes that constitute costs to the company, by category of taxes.</p>	Core	<p>Total Tax Contribution for FY23 was GBP £769 million.</p>

**C L I F F O R D**  
**C H A N C E**

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We use the word 'partner' to refer to a member of Clifford Chance LLP, or an employee or consultant with equivalent standing and qualifications.

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