

# Our GRI Content Index

Clifford Chance applies the internationally recognised GRI G3 Sustainability Reporting Framework to ensure our reporting is aligned with best practice, and to support our commitment to transparency. Our approach to GRI is based on a pragmatic interpretation of the guidelines and as such the indicators we report on have been informed through consideration of the materiality principle. We therefore focused our GRI reporting on the indicators which we believe are most relevant to our business and of greatest interest to our stakeholders (see pages 6 and 7, 2012 CR report for a list of our main stakeholders). The level of disclosure assessments below are self declared and have not been formally verified by a third-party.

● Fully reported    ◐ Partially reported    ○ Not reported

## Strategy and analysis

Profile disclosure	Disclosure level	Comments
1.1 Statement from the most senior decision-maker of the organisation.	●	Shared focus, effective collaboration (p4,5 2013 CR report).
1.2 Description of key impacts, risks, and opportunities.	◐	Aligning CR with our business (p6,7 2013 CR report).

## Organisational profile

2.1 Name of the organisation.	●	Clifford Chance LLP.
2.2 Primary brands, products, and/or services.	●	About Clifford Chance (inside front cover, 2013 CR report); more detailed information available on <a href="http://www.cliffordchance.com/expertise">www.cliffordchance.com/expertise</a> .
2.3 Operational structure of the organisation.	●	Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> ) <a href="http://www.cliffordchance.com/governance">www.cliffordchance.com/governance</a> .
2.4 Location of organisation's headquarters.	●	London, UK.
2.5 Number of countries where the organisation operates.	●	The firm has offices in 25 countries and works in a significant number of other markets globally from this network.
2.6 Nature of ownership and legal form.	●	LLP.
2.7 Markets served.	●	<a href="http://www.cliffordchance.com/expertise">www.cliffordchance.com/expertise</a> . <a href="http://www.cliffordchance.com/offices">www.cliffordchance.com/offices</a> .
2.8 Scale of the reporting organisation.	●	Financial performance (2013 Annual Review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> ).
2.9 Significant changes during the reporting period regarding size, structure, or ownership.	●	Clifford Chance entered into a Formal Law Alliance with Cavenagh Law in Singapore. The FLA offers local litigation support in that market ( <a href="http://www.cliffordchance.com/offices/singapore">www.cliffordchance.com/offices/singapore</a> ). Clifford Chance has also announced the intention to form the first mixed international/Saudi lawyer partnership in the Kingdom of Saudi Arabia. This will come into effect early in 2015. ( <a href="http://www.cliffordchance.com/offices/saudi_arabia">www.cliffordchance.com/offices/saudi_arabia</a> ).
2.10 Awards received in the reporting period.	◐	Selection of key awards listed in Firm at a Glance (p29, 2013 CR report). Also see <a href="http://www.cliffordchance.com/news/awards">www.cliffordchance.com/news/awards</a> .

## Report parameters

3.1 Reporting period.	●	Financial year ending 30 April 2013.
3.2 Date of most recent previous report.	●	October 2012.
3.3 Reporting cycle.	●	Annual.

## Our GRI Content Index (continued)

## Report parameters (continued)

Profile disclosure	Disclosure level	Comments
3.4 Contact point for questions regarding the report or its contents.	●	crfeedback@cliffordchance.com.
3.5 Process for defining report content.	●	The content in this report was developed using a process defined for our first corporate responsibility report in 2008. A discussion of this process can be found in our 2008 CR report, p2-5. We have restated our material issues on p6,7 of this year's CR report.
3.6 Boundary of the report.	●	We report on all aspects of our business.
3.7 Limitations on the scope or boundary of the report.	●	We report on all aspects of our business.
3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities.	○	Information for Cavenagh Law, with whom the firm has a Formal Law Alliance in Singapore, is included in this report. Otherwise all information relates to Clifford Chance LLP.
3.9 Data measurement techniques and the bases of calculations.	◐	We try to use international standards and measurement techniques where possible. For example, our greenhouse gas (GHG) emissions reporting is based on the internationally recognised Greenhouse Gas (GHG) Protocol.
3.10 Explanation of the effect of any re-statements of information provided in earlier reports.	●	There were no developments within our business that would require any restatement of information provided in our previous CR reports.
3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods.	●	There are no significant changes from the previous year that would prevent comparability with the previous year's performance indicators.
3.12 Table identifying the location of the Standard Disclosures in the report.	●	This GRI content index.
3.13 Policy and current practice with regard to seeking external assurance for the report.	●	This report has not been assured by external auditors.

## Governance, commitments, and engagement

4.1 Governance structure of the organisation.	●	Clifford Chance operates a clear governance model. The management of the firm is the responsibility of the Management Committee, chaired by the managing partner who is an executive officer of the firm. The Management Committee is responsible for the firm's strategy, finances and profitability, the firm's growth and the development of its competitive position. The performance of the Management Committee is monitored by the Partnership Council. Chaired by the senior partner this body also maintains the firm's values and safeguards the firm's reputation. All members of the Management Committee and Partnership Council are executive members of the firm.  Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> ).
4.2 Indicate whether the Chair of the highest governance body is also an executive officer.	●	
4.3 Number and gender of members of the highest governance body that are independent and/or non-executive members.	●	

## Our GRI Content Index (continued)

## Governance, commitments, and engagement (continued)

Profile disclosure	Disclosure level	Comments
4.4 Mechanisms for partners and employees to provide recommendations or direction to the highest governance body.	●	<p>The firm operates as a partnership. The Partnership Agreement requires that certain issues are subject to a vote of partners, including election of senior management roles, new partners and mergers or acquisitions (see 2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p> <p>There is regular dialogue at all levels within the partnership, with partners, regions and practice areas given the opportunity to articulate their views, including regular partner meetings and a wiki site operated by the Partnership Council.</p> <p>For employees, in addition to standard reporting processes, e.g. through line management, there are also a variety of events put in place that allow staff to ask senior management questions about the firm. This includes quarterly meetings for all staff globally with the firm's managing partner and other members of the global leadership team; similar business updates in many offices with the office managing partner and head of the business services team; and more informal 'Open Door' events where there is no fixed agenda other than the opportunity for staff to talk to management about issues on their mind. A significant number of the firm's leaders participate in this programme, including our Managing Partner and COO.</p> <p>The firm also undertakes staff surveys and internal communications surveys and has also run staff suggestion schemes, for how we can run our business more efficiently and effectively.</p>
4.5 Linkage between compensation for members of the highest governance body, senior managers, and executives.	●	<p>Equity partners' remuneration is based on firm performance over a given financial year. Non-equity partners and senior business services executives receive part of their compensation based on firm performance. The nature of the arrangement varies from office and by seniority.</p> <p>Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p>
4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided.	●	<p>Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p>
4.7 Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees.	●	<p>Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p> <p><a href="http://www.cliffordchance.com/governance">www.cliffordchance.com/governance</a>.</p>
4.8 Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance.	●	<p>Aligning CR with our business (p6,7 2013 CR report).</p> <p>The firm also has a set of eight Principles that underpin our priorities and actions (<a href="http://www.cliffordchance.com/about_us/our_principles">www.cliffordchance.com/about_us/our_principles</a>).</p>
4.9 Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance.	●	<p>Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p> <p>Our CR governance (p7 2013 CR report)</p> <p><a href="http://www.cliffordchance.com/governance">www.cliffordchance.com/governance</a>.</p>
4.10 Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	●	<p>Our approach to governance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a>).</p> <p>Our CR governance (p7 2013 CR report).</p>
4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	●	<p>Clifford Chance's support for the UN Global Compact demonstrates our commitment to the precautionary principle. We are committed to protecting natural resources and our CR activities contribute to mitigating various environmental challenges, including the prevention of global warming and reducing waste to landfill.</p>

## Our GRI Content Index (continued)

**Governance, commitments, and engagement** (continued)

Profile disclosure	Disclosure level	Comments
4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	●	Clifford Chance is a signatory to the UN Global Compact. Individual offices are also signed up to principles such as ISO 14001 which are administered locally at this time.
4.13 Memberships in associations (such as industry associations) and/or national/international advocacy organisations.	○	We do not currently have a process in place for collating up to date information in this area from around our global network. Clifford Chance is a member of a wide range of legal sector associations, financial services industry sector associations and trade bodies, and we actively support a number of academic institutions and some think tanks, representing a range of perspectives.
4.14 List of stakeholder groups engaged by the organisation.	●	How we do engage stakeholders? (p6,7 2012 CR report).
4.15 Basis for identification and selection of stakeholders with whom to engage.	○	Clifford Chance interacts with a broad range of stakeholders. This includes individuals or groups which we consider critical to the success of our firm both in the short and long-term, such as our people, our clients, regulators, government bodies and academic institutions.  We also actively engage with those stakeholders where we believe we can add value and create benefit through our expertise and resources, for example, in supporting the work of NGOs and charities in the communities where we operate.
4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	●	How we do engage stakeholders? (p6,7 2012 CR report).
4.17 Key topics and concerns that have been raised through stakeholder engagement.	●	How we do engage stakeholders? (p67 2012 CR report).

**Economic**

GRI indicator wording	Assessment	Comments and reference
EC1 Direct economic value generated and distributed.	●	Financial Performance (2013 Annual review, available at <a href="http://www.cliffordchance.com">www.cliffordchance.com</a> ).
EC2 Financial implications and other risks and opportunities for the organisation's activities due to climate change.	●	Not material, although Clifford Chance addresses climate change primarily through our advisory role to our clients.
EC3 Coverage of the organisation's defined benefit plan obligations.	○	Defined benefit plans do not exist across most of the firm.
EC4 Significant financial assistance received from government.	●	Clifford Chance does not receive any financial assistance from governments.
EC5 Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	○	This information is not available in a consolidated format.
EC6 Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	○	Clifford Chance's procurement process aims to be transparent, objective and non-discriminatory in the selection of its suppliers. We do not have a specific policy on local procurement however we do promote diversity of suppliers in other ways, for instance, through our active support for WEConnect Europe a global supplier diversity initiative spearheading the connection of women-owned business and multinational corporations.

## Our GRI Content Index (continued)

## Economic (continued)

GRI indicator wording	Assessment	Comments and reference
EC7 Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation.	●	<p>We do not have specific procedures on local hiring. However, we are guided by local law. Our employees, partners and management are drawn from a wide range of nationalities and many of our offices are headed by a citizen of the country where they are based.</p> <p>There is a rigorous process for hiring of Partners. This includes: a review process by all relevant business line heads (regionally and by practice area and, as necessary, sector); a full assessment with the firm's Partner Selection Group (which also makes recommendations on all partner promotions); analysis of the business case; agreement by the Management Committee and the Partnership Council and finally a vote of the global partnership.</p>
EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	●	Coming together to make a difference (p17-20 2013 CR report).
EC9 Understanding and describing significant indirect economic impacts, including the extent of impacts.	●	<p>Clifford Chance's primary indirect economic impacts are a result of the legal advice we provide to our clients, whether commercial businesses, government bodies and institutions or non-governmental organisations.</p> <p>The impacts are wide ranging and include supporting our clients in accessing funding for projects; in ensuring a transaction delivers optimised shareholder return; in identifying, managing and mitigating risk; in establishing effective capital markets infrastructures to facilitate business; in establishing effective legal frameworks for geographic expansion.</p> <p>Some illustrative examples of the impacts of our support for NGOs are provided in our CR report.</p>

## Environment

EN1 Materials used by weight or volume.	Not material	<p>Clifford Chance is an office-based business and does not consume significant quantities of raw materials.</p> <p>We do however monitor and target reductions in our use of paper.</p> <p>Additional Environmental Information: Paper use.</p>
EN2 Percentage of materials used that are recycled input materials.	Not material	Clifford Chance is an office-based business and does not consume significant quantities of recycled materials.
EN3 Direct energy consumption by primary energy source.	○	Gas consumption is not available in a consolidated format.
EN4 Indirect energy consumption by primary source.	●	Additional Environmental Information: Electricity consumption (equivalent to: 193,751GJ).
EN5 Energy saved due to conservation and efficiency improvements.	●	Additional Environmental Information: Electricity consumption (equivalent to: 16.09GJ per FTE since 2007/08 baseline).
EN6 Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	●	<p>Clifford Chance advises on energy issues through our advisory role to clients.</p> <p>Groundbreaking client work (p22-25 2013 CR report)</p> <p>Sustained success (p25 2013 CR report).</p>
EN7 Initiatives to reduce indirect energy consumption and reductions achieved.	●	<p>Small footprint, major impact (p25 2012 CR report)</p> <p>Progress and achievements (p26,27 2013 CR report).</p> <p>Additional environmental information.</p>
EN8 Total water withdrawal by source.	Not material	Clifford Chance is an office-based business; its operations do not therefore have a significant impact on water consumption.
EN9 Water sources significantly affected by withdrawal of water.	Not material	
EN10 Percentage and total volume of water recycled and reused.	Not material	

## Our GRI Content Index (continued)

## Environment (continued)

GRI indicator wording	Assessment	Comments and reference
EN11 Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Not material	Clifford Chance is an office-based business; its operations do not therefore have a significant impact on protected areas, habitats or biodiversity.
EN12 Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Not material	
EN13 Habitats protected or restored.	Not material	
EN14 Strategies, current actions, and future plans for managing impacts on biodiversity.	Not material	
EN15 Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	Not material	
EN16 Total direct and indirect greenhouse gas emissions by weight.	●	Progress and achievements (p26,27 2013 CR report). Additional environmental information.
EN17 Other relevant indirect greenhouse gas emissions by weight.	○	
EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved.	●	Managing our footprint (p24 2013 CR report) Leaving ever lighter footprints (p24 2013 CR report).
EN19 Emissions of ozone-depleting substances by weight.	Not material	Clifford Chance is an office-based business; its operations do not emit significant amounts of ozone-depleting substances or other air emissions beyond carbon.
EN20 NO, SO, and other significant air emissions by type and weight.	Not material	
EN21 Total water discharge by quality and destination.	Not material	Clifford Chance is an office-based business; its operations do not result in significant water discharge.
EN22 Total weight of waste by type and disposal method.	Not material	Clifford Chance is an office-based business; its operations do not result in significant amounts of waste.
EN23 Total number and volume of significant spills.	Not material	Clifford Chance is an office-based business; its operations do not result in significant spills.
EN24 Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention.	Not material	Clifford Chance does not transport, import, export or treat any waste, and therefore no waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII.
EN25 Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and run-off.	Not material	Clifford Chance is an office-based business; its operations do not result in significant water discharge.
EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	●	Managing our footprint (p24 2013 CR report) Raising awareness (p24 2013 CR report) Leaving ever lighter footprints (p24 2013 CR report) A day of awareness (p25 2013 CR report) Achievements and progress (p26, 27 2013 CR report).
EN27 Percentage of products sold and their packaging materials that are reclaimed by category.	Not material	Clifford Chance is an office-based business; its operations do not result in significant waste packaging.

## Our GRI Content Index (continued)

## Environment (continued)

GRI indicator wording	Assessment	Comments and reference
EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	●	There have been no fines or non-monetary sanctions for non-compliance with environmental laws and regulations.
EN29 Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	○	Many of our people work on cross-border matters for clients. We are beginning to collect data on business travel related to flights, hotels and rail use but have not yet agreed how this information will be collated or reported.
EN30 Total environmental protection expenditures and investments by type.	○	Clifford Chance does not have a dedicated environmental protection budget. However, business functions such as IT and facilities management have remits to improve environmental efficiency and as such have their own budgets.

## Labour practices

LA1 Total workforce by employment type, employment contract, and region.	●	<a href="http://www.cliffordchance.com/cr">www.cliffordchance.com/cr</a> – Gender statistics.
LA2 Total number and rate of new employee hires and employee turnover by age group, gender, and region.	○	This information varies by country and is not available in a consolidated format.  The gender split across partner, other lawyer and business services teams by geography is available at <a href="http://www.cliffordchance.com/cr">www.cliffordchance.com/cr</a> – Gender statistics.
LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation.	○	This information varies by country and is not available in a consolidated format.
LA4 Percentage of employees covered by collective bargaining agreements.	●	All employees are free to join collective bargaining agreements but the specifics vary significantly from one office to the next, partly dependent on local employment legislation and general practice.
LA5 Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements.	○	This information varies by country and is not available in a consolidated format.
LA6 Percentage of total workforce represented in formal joint management – worker health and safety committees that help monitor and advise on occupational health and safety programmes.	Not material	Clifford Chance is an office-based business; its operations do not give rise to significant health and safety risks. We do however have a clear health and safety policies that apply to all staff.
LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region.	○	This information varies by country and is not available in a consolidated format.  Clifford Chance is an office-based business; its operations do not give rise to significant health and safety risks. We do however have a clear health and safety policies that apply to all staff.
LA8 Education, training, counselling, prevention, and risk-control programmes in place to assist workforce members, their families, or community members regarding serious diseases.	Not material	Availability of these services varies from one office to the next. A significant number of offices have arrangements on-site or on-call for healthcare and a number of others offer confidential employee counselling. Our London office, the largest in our network provides both services.
LA9 Health and safety topics covered in formal agreements with trade unions.	Not material	Clifford Chance does not have any formal health and safety agreements with trade unions.

## Our GRI Content Index (continued)

## Labour practices (continued)

GRI indicator wording	Assessment	Comments and reference
LA10 Average hours of training per year per employee by gender, and by employee category.	●	Lawyers and other fee earners: Average male training hours per FTE: 8.01 Average female training hours per FTE: 8.72 Business services: Average male training hours per FTE: 5.19 Average female training hours per FTE: 2.64 The firm offers a wide range of training programmes for lawyers and business services teams – <a href="http://www.cliffordchance.com/cr">www.cliffordchance.com/cr</a> – Academy Statistics.
LA11 Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	●	Lifelong learning is highly valued at Clifford Chance and is enshrined in our culture, with an emphasis on ‘soft skills’ as well as the development of technical capabilities. Broadening our training delivery (p15 2013 CR report). Academy statistics – <a href="http://www.cliffordchance.com/cr">www.cliffordchance.com/cr</a> .
LA12 Percentage of employees receiving regular performance and career development reviews.	●	Clifford Chance has a global appraisal system; we expect everyone in the firm to receive an annual appraisal and track completed appraisal rates, as well as data from the appraisals. In the past year, nearly all partners, lawyers and business services staff had a completed appraisal. We do not currently report any further detail externally.
LA13 Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	●	<a href="http://www.cliffordchance.com/governance">www.cliffordchance.com/governance</a> .
LA14 Ratio of basic salary and remuneration of women to men by employee category.	○	This information is not available.

## Human rights

HR1 Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	●	We do not currently track investment agreements that include human rights. In considering new contracts, our global procurement function expects prospective suppliers to complete a Supplier Assessment which includes human rights criteria such as:
HR2 Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	●	<ul style="list-style-type: none"> <li>• employment of underage workers or forced labour</li> <li>• safe and healthy work environments for employees</li> <li>• provision of appropriate training and personal protective equipment</li> <li>• rights of freedom of association and collective bargaining</li> </ul> We expect all suppliers to comply with the applicable laws in the countries within which they operate.

## Our GRI Content Index (continued)

## Human rights (continued)

GRI indicator wording	Assessment	Comments and reference
HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	●	<p>Many of our lawyers are conversant with human rights standards and/or locally applicable human rights legislation. A number of our lawyers are leading advisers on these issues and a number of our lawyers internationally work pro bono in this arena (see p18-20 and p28 2013 CR report).</p> <p>Clifford Chance operates to strict professional standards which all of our staff are expected and, where appropriate, trained to meet. For all of our legal staff, this includes policies in relation to anti-corruption, money-laundering, legal ethics inter alia.</p> <p>Our legal staff are required to meet Continual Professional Development standards in most of the markets where we operate which involves training in relevant areas. We don't currently have figures as to the amount of this training that relates to human rights issues.</p>
HR4 Total number of incidents of discrimination and corrective actions taken.	○	<p>This information is not currently available.</p> <p>Clifford Chance has policies in place regarding diversity, dignity and inclusion, equal opportunities, whistle-blowing and anti-bullying and harassment. Clear grievance processes are in place.</p>
HR5 Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	●	<p>All employees are free to join collective bargaining agreements but the specifics vary significantly from one office to the next, partly dependent on local employment legislation and general practice.</p> <p>In considering new contracts, our global procurement function expects prospective suppliers to complete a Supplier Assessment which includes such as rights of freedom of association and collective bargaining.</p> <p>We expect all suppliers to comply with the applicable laws in the countries within which they operate.</p>
HR6 Operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour.	Not material	<p>The nature of our business – providing sophisticated legal advice to leading global organisations – means that child labour, forced or compulsory labour is not a significant risk in any of Clifford's Chance's operations.</p> <p>In considering new contracts, our global procurement function expects prospective suppliers to complete a Supplier Assessment which includes human rights criteria such as the employment of underage workers or forced labour.</p>
HR7 Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour.	Not material	<p>We expect all suppliers to comply with the applicable laws in the countries within which they operate.</p>
HR8 Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations.	Not material	<p>The nature of our business means we only require personnel to provide standard office security processes at our locations. The majority of these personnel are provided and trained by third-party security suppliers.</p>
HR9 Total number of incidents of violations involving rights of indigenous people and actions taken.	Not material	<p>Violation of indigenous rights is not a significant risk in any of Clifford's Chance's operations.</p>
HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	○	<p>The firm has recently adopted a formal human rights policy and work is underway to ensure that we have the knowledge to integrate the policy in a sustainable way across our business and operations globally.</p>
HR11 Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	○	<p>This information varies by country and is not available in a consolidated format.</p> <p>Clifford Chance has policies in place regarding diversity, dignity and inclusion, equal opportunities, whistle-blowing and anti-bullying and harassment. Clear grievance processes are in place.</p>

## Our GRI Content Index (continued)

## Society

GRI indicator wording	Assessment	Comments and reference
SO1 Percentage of operations with implemented local community engagement, impact assessments, and development programmes.	●	34 out of 35 offices undertake community volunteering and/or pro bono work. Our Seoul office has recently opened and has yet to get a programme up and running but will do so in due course.
SO2 Percentage and total number of business units analysed for risks related to corruption.	●	Clifford Chance operates to strict professional standards which all of our staff are expected and trained to meet. This includes policies in relation to anti-corruption, money-laundering, legal ethics, inter alia.  The firm has a dedicated Risk team which works with management to identify any possible risk to the firm and to put in place appropriate measures to mitigate those risks. The Risk team undertakes a regular review of risk across every part of the business, including in relation to corruption matters which includes ad hoc visits/reviews of individual offices.
SO3 Percentage of employees trained in organisation's anti-corruption policies and procedures.	●	The firm has rolled out a global training programme in relation to anti-corruption which is compulsory for every member of staff (with a very small number of exceptions) and for every partner in the firm. The Risk team is currently monitoring completion status for the training and has a process to chase those who have not completed the training in pursuit of our 100% compliance target.
SO4 Actions taken in response to incidents of corruption.	●	No incidents of corruption have been recorded.
SO5 Public policy positions and participation in public policy development and lobbying.	●	Clifford Chance has an international public policy practice. We are active globally in a number of legislative and regulatory areas. The areas in which we are active are largely in relation to specific client mandates.
SO6 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	●	No financial political contributions were made by Clifford Chance.  Any political contribution must be agreed in advance with our Global and/or US General Counsel.  The firm does, from time to time, host or sponsor events with mainstream political parties and related institutions representing a spectrum of interests and views.
SO7 Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes.	●	There have been no legal actions for anticompetitive behaviour, anti-trust, and monopoly practices.
SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	●	There have been no significant fines or non-monetary sanctions for non-compliance with laws and regulations.

## Product responsibility

PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Not material	Clifford Chance is an office-based business; its operations and services do not give rise to significant health and safety risks.
PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Not material	Clifford Chance is an office-based business; its operations and services do not give rise to significant health and safety risks.
PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	●	In many jurisdictions where the firm operates there are strict standards in force relating to service information. The firm's policy is to comply with these regulations in all jurisdictions in which we practice. All of our communications activity meets these standards.

## Our GRI Content Index (continued)

**Product responsibility** (continued)

GRI indicator wording	Assessment	Comments and reference
PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	●	There have been no incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling.
PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	●	The firm regularly undertakes relationship reviews with its most significant global clients and also undertakes reviews of many individual matters. From time to time this is supplemented with formal client studies conducted by third parties.
PR6 Programmes for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	●	In many jurisdictions where the firm operates there are strict standards in force relating to advertising and marketing communications. The firm's policy is to comply with these regulations in all jurisdictions in which we practice. All of our communications activity meets these standards.
PR7 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	●	There have been no incidents of non-compliance with regulations and voluntary codes concerning marketing communications.
PR8 Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	●	There have been no complaints regarding breaches of customer privacy and losses of customer data.
PR9 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	●	There have been no significant fines for non-compliance with laws and regulations concerning the provision and use Clifford Chance's services.