



United Nations
Global Compact

DE BRAUW
BLACKSTONE
WESTBROEK

UNITED NATIONS GLOBAL COMPACT

Communication of
Progress

October 2022

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MESSAGE FROM THE EXECUTIVE PARTNER

De Brauw Blackstone Westbroek (De Brauw) has set itself an ambitious goal of integrating sustainability into our firm's DNA. Far from impinging on how we do business, the Covid-19 pandemic arguably made us more resolute in our commitment to embed a more sustainable approach into our practice. This is the right approach, not only for the firm, our employees and our clients, but also for wider society and the planet.

De Brauw therefore became a signatory of the United Nations Global Compact (UNGC) in 2021 and I am pleased to present our updated Communication of Progress (CoP) Report for 2022.

I naturally reaffirm our support and commitment of the Ten Principles of the UNGC in the areas of Labour, Human Rights, Environment and Anti-Corruption.

In this CoP, we report on the progress that we have made towards our sustainability ambitions in 2021 and continue to create a strong foundation for our Sustainability Strategy, and we set out our future objectives and targets to realise our sustainability ambitions in 2023 and beyond.

All of our efforts are culminative and build on that which has gone before. Of all of the progress in this report specifically, I am especially proud to highlight three examples which reflect our alignment and commitment to three of the Sustainable Development Goals (SDG), specifically:

Gender Equality - SDG 5

Our endeavours to build a sustainable pipeline of diverse talent are beginning to bear fruit. In 2021, our entire employee group was comprised of 63.8% female workers. We aim to increase the number of female partners in the partnership to 30% by 2025, through retaining our best top female talent and supporting all efforts with intention positive initiatives and policies actions such as the Female Leadership Programme and our Family Policy.

Climate Action - SDG 13

We have also set goals to reduce our reliance on sources of non-renewable electricity, and to ensure that we offset residual carbon emissions by investing in forest restoration programmes in the Amazon, to become carbon neutral.

We have reduced by almost half, the carbon footprint from business travel in 2021-2022 (448.4 tCO₂e) compared to 2019-2020 (907 tCO₂e). We will continue to make effort to reduce our overall carbon footprint.

Justice and Strong Institutions - SDG16

In 2021, we have continued our pro bono legal advice programme, to provide support to environmental and human rights organisations.

I trust you will enjoy reading our progress and future vision to align to the United Nations Global Compact.

DOROTHEE VAN VREDENBURCH

EXECUTIVE PARTNER, DE BRAUW





1 — ABOUT DE BRAUW



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DE BRAUW
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1 ABOUT DE BRAUW

De Brauw has standing as the leading international law firm in the Netherlands. 2021 marked a landmark year as we hit our 150 year anniversary: as we look ahead we remain a strong and spirited collective of renowned legal experts committed to deliver for our clients.

This commitment means investing in building relationships of trust with our clients, through profound engagement with their business and a deep understanding of their ambitions.

Our relentless pursuit of excellence is driven by our core values, to be:

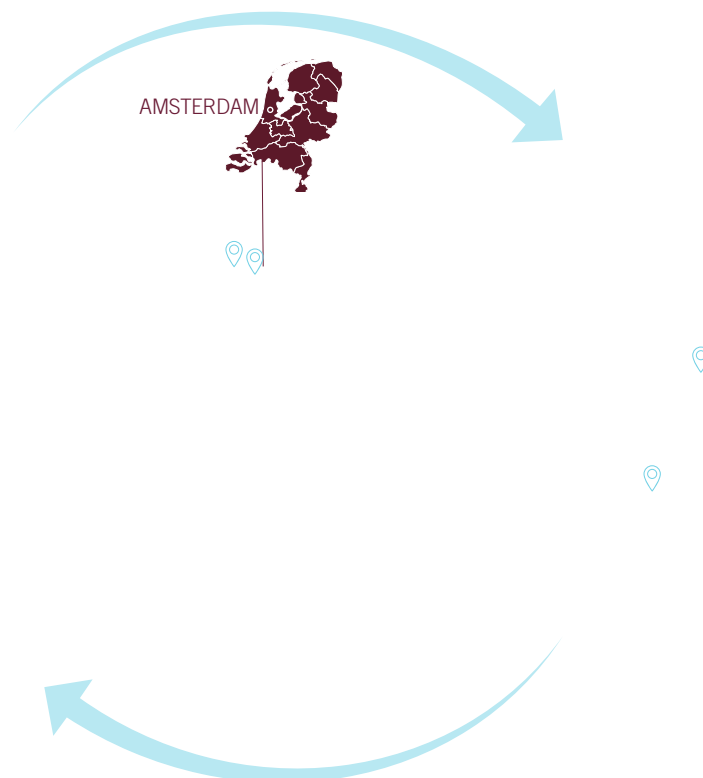
courageous, curious, and collective

both as a firm, and as the individuals and teams that comprise De Brauw.

It therefore follows that we pursue the highest level of quality in every aspect of our business conduct and are committed to hold ourselves accountable to the highest standards of professionalism, ethics and integrity.

As a Dutch firm with rich heritage, we have an international mindset and a global reach: from our head office in Amsterdam we provide our clients with unrivalled expertise in complex, often multidisciplinary and international, corporate transactions, disputes and regulatory enforcement matters.

We have approximately 400 lawyers and over 350 Business Support employees working in the Netherlands and in our offices located in key business centres across the world, in London, Brussels, Shanghai and Singapore.





2 — INTRODUCTION TO THE REPORT



2 INTRODUCTION TO THE REPORT

De Brauw is a proud signatory of United Nations Global Compact (UNGC), and is committed to sustainable development and Corporate Social Responsibility (CSR).

The Ten Principles of Human Rights, Labour, Environment and Anti-corruption are foundational within our Code of Business Conduct, and provide us with guidance and certainty as we continue to embed our CSR policies and processes across every facet of the business.

To ensure that our business operations are aligned to these Ten Principles, we have set ambitious objectives, actions and targets which we monitor and continually strive to improve, and are delighted to provide an update on our progress in this Communication of Progress (CoP) which is from 2021 to 2022.

De Brauw supports the United Nations' Sustainable Development Goals (SDGs) and is invested to specifically advance and contribute to:

Gender Equality (SDG 5),
Climate Action (SDG 13) and
Peace, Justice and Strong Institutions (SDG 16).

To address the overarching context of the Ten Principles, each of the three ESG themes are described in their own section:

Social (covering labour and human rights);
Environment; and
Governance (addressing anti-corruption).

For each theme, this report provides an overview of the respective challenges and risks, and the policies and objectives that we have put in place to address these. Our performance in relation to the policies and objectives for 2022 are included as an illustration of our progress and commitment, and to fuel our ambitions and actions for 2023 and beyond.



3 — SUSTAINABLE DEVELOPMENT GOALS

3 SUSTAINABLE DEVELOPMENT GOALS

De Brauw supports the United Nations' Sustainable Development Goals and is invested to specifically advance and contribute to:

SDG 5 - GENDER EQUALITY



We believe in gender equality and we recognise the importance of actively empowering women and empowering men as strong allies and proponents of gender diversity, to achieve this societal balance.

We therefore embedded firmly SDG 5 into our policies and practices. Our Management Board fully endorses and leads on the firm's commitment to gender equality and is supported by a Gender Diversity Working Group which helps ensure that gender equality pervades all relevant policies and processes.

It is the responsibility of all partners and all employees to play their full part in increasing diversity at every level across the firm. Our Director of Culture and Inclusion, (appointed in July 2021), is a further illustration of our commitment to foster a culture of inclusion in which everyone can fulfill their potential.

Our Labour Policy serves to promote a diverse working environment, where indeed all employees can thrive. The Female Leadership Programme provides a platform and pathway for women to become leaders. The Top Parent Programme, along with the Family Policy, seeks to reflect the diversity of family life, and ensure that all our employees are supported to find their own family/work life balance. We were a signatory to the Dutch Diversity Charter, 'Talent naar de (to the) Top' in 2009, and have been actively setting targets, and measuring and reporting on our progress with respect to gender diversity since this date. In 2021, we exceeded our target to have females comprise 50% of our entire group of employees (63.7% in 2021). The target to have 30% of our partnership comprised of female partners by 2025 is on course (19.8% in 2021, 18% in 2020, up from 16% in 2019).

See [page 12 Section 4.1](#) for more information.

SDG 13 - CLIMATE ACTION



The climate emergency is visible to everyone, and to align ourselves to SDG 13 was an inherent and obvious responsibility for us.

At De Brauw, we recognise the imperative necessity to reduce our carbon footprint. We have established a greenhouse gas monitoring programme to identify our carbon sources. Our Environmental Impact Handbook has set in place measures to reduce emissions, for example, through better control of building energy usage and reducing business travel. We have set targets for reducing our energy usage and aim to use only 100% renewable electricity by 2030. Where there are residual carbon emissions, we have committed to offsetting these through a rainforest preservation programme, and we are therefore carbon neutral.

Given the unprecedented impact of the global pandemic, a more helpful comparison of our 2021/22 data is not for the previous period, but back in 2019/20 when business operations and working practices were more comparable. On this premise, the data for 2021/2022 shows the reduction of overall carbon emission in all Scopes (1,2, and 3).

See [page 17 Section 5.1](#) for more information.

SDG 16 - PEACE, JUSTICE AND STRONG INSTITUTIONS



Being a law firm, SDG 16 resonates strongly with our vision and our mission. The goal of SDG 16, to “provide access to justice for all and build effective, accountable and inclusive institutions at all levels” is personified specifically within our pro bono programme.

De Brauw is a member of Pro Bono Connects, which is the Dutch section of the International Commission of Jurists (ICJ) – the network of Advocates for Justice and Human Rights. Each lawyer is expected to conduct 30 hours pro bono work per year, which enables us to provide pro bono support and advice for many matters focused on environmental and human rights.

In 2021, we have spent 9422 hours of Pro Bono work across 99 Pro Bono matters. Recent matters include our partnership with [UNICEF Netherlands](#), and our pro bono support for Afghan Refugees, the Dutch transgender and intersex community, Ocean Cleanup and Plastic Whale.

Refer to [page 23 Section 7](#) for additional information.



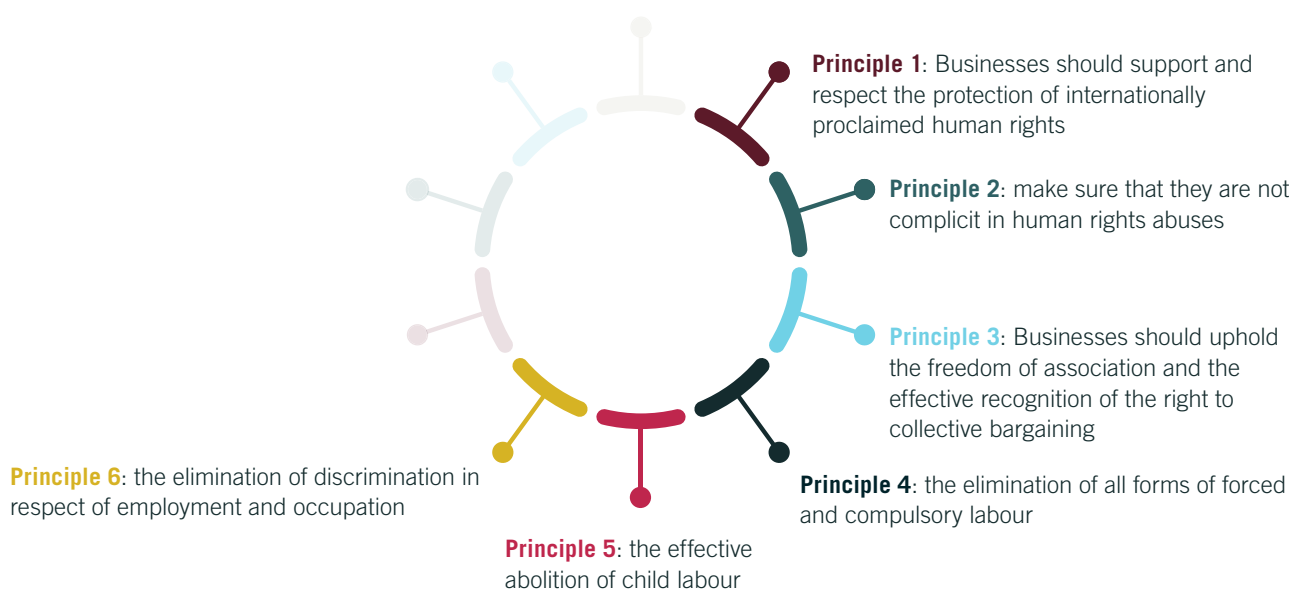
4 — LABOUR AND HUMAN RIGHTS

4 LABOUR AND HUMAN RIGHTS

De Brauw is committed to continuously improve how we facilitate and support a healthy, sustainable and fair working environment for all our employees and our business partners.

We comply with applicable legislation regulating labour conditions and our Labour Policy aligns with the Universal Declaration of Human Rights and the International Labour Organisation's Core Conventions.

De Brauw is committed to the following UNGC Labour and Human Rights Principles:



POLICIES

Our Code of Business Conduct sets out the following Labour and Human Rights principles:

- support for human rights;
- facilitate a safe working environment;
- promote diversity and inclusion;
- a zero tolerance to child labour, forced labour, modern slavery and human trafficking;
- offer employees the possibility of engaging in open and honest conversation and consider their feedback – through our approach to performance reviews and in the bi-annual Employee Engagement surveys; and
- we have a Works Council.

Building on the Code of Business Conduct, our Labour and Human Rights principles are further endorsed in the following specific policies and procedures:

- Labour Policy;
- Family Policy;
- Whistleblowing Policy;
- Working from Home Policy;
- Modern Slavery Statement;
- Recruitment Procedure; and
- Works Council Regulations.

4.1 HUMAN RIGHTS, DIVERSITY & INCLUSION

De Brauw upholds the UN's Declaration of Human Rights as incorporated within our policies pertaining to issues of diversity and inclusion.

We want everyone at De Brauw to bring their authentic selves to work. Guided by our core values of being curious, collective and courageous, we define inclusion as the environment in which diversity thrives and potential is realised. We value diversity in its broadest; all facets of individuality to include age, gender, and cultural diversity to nationality, personality and cognitive diversity, by way of examples only.



In fostering an open environment which facilitates different ways of working, thinking and being able to express ourselves, we must be curious in our approach, with regards to our work, and to each other's perspectives. We value and harness diversity of thinking - key to forging innovative and creative solutions for complex questions. Everyone is invited to join the conversation. Listening and empathy are essential building blocks in fostering an environment in which people feel seen, heard, and are therefore willing to contribute fully, and invest in a team which is the full sum of all talent.

We are collective at our core. Beyond a collegial respect for each other, we work on building relationships of trust with each other and our clients; a willingness to speak up individually and corporately, and to speak out for the benefit of everyone. This can require courage. We endeavour to be courageous in our example: to walk the talk, to share and address our challenges, and translate intentions into actions. In this, our internal culture, values and vision reaches beyond the walls of our own firm as we embrace our role in society and seek to have a positive and broader impact.

Becoming more inclusive and by implication increasingly diverse, is our joint ambition, and a joint responsibility.

HUMAN RIGHTS, DIVERSITY AND INCLUSION WORKING GROUPS

We have four working groups focused on gender equity, talent with different cultural backgrounds, LGBT+ emancipation and the full integration of international colleagues. Everyone is welcome to join any one or more of these working groups, and by nature therefore the working groups are comprised of a diverse group of colleagues.

The working groups organise specific events (e.g. Pride celebrations, recruitment activities for bicultural students, webinars and social events) and work on specific policies and initiatives (e.g. extended leave for parents, gender transitioning support) that focus on their respective audiences, but do not exclude other groups (e.g. policies relating to parents also apply to multi-parent families). On the other hand, all committees work together as much as possible, for example when it comes to monitoring progress, onboarding new employees and organising client events.

As these working groups have a specific focus and expertise, representatives come together in one Inclusion Committee to facilitate our intersectional approach, and look at every touch point of the employee experience through an intersectional lens. We facilitate a transparent conversation, viewing issues through with different diversity lenses, to create one 'voice of De Brauw' championing change in advancing and realising our diversity and inclusion ambitions.

In the end, we all pursue a common goal and that is to further improve equality and inclusion for everyone within De Brauw.

OBJECTIVES

De Brauw commits to the following objectives and actions to ensure that our Human Rights, Diversity and Inclusion policies and objectives are achieved:

- treat everyone with courtesy, respect, and consideration;
- reward all employees equally;
- engage employees participating in the working groups to seek to include everyone's opinion and contribution;
- continue to explore and introduce new measures to facilitate people with disabilities' access and work at our office in Amsterdam;
- offer six informative presentations on diversity at the workplace annually by 2023;
- ensure that any report of discrimination or harassment is carefully addressed, protecting the victim and the whistleblower and fully investigated;
- support for SDG 5 – Gender Equality; and
- to have women represent at least 30% of the partner group by 1 January 2025.

PERFORMANCE INDICATORS

TOPIC	TARGET	2019	2020	2021
Percentage composition of females in the firm	50% of total employees	59%	59%	63.7%
Women in top management	30% by 1 Jan 2025	16%	18%	19.8%
Informative lunch presentations on diversity	A minimum of 6 pa	12	12	14

4.2 LABOUR

Providing all our employees with the highest standard of safety and wellbeing is a key priority. The high pace and intensity of work in a modern office setting can lead to stress and other well-being issues. We therefore invest in human resources systems and tools to ensure that our offices, the working conditions and all our employment approaches, meet best practice.



WORKING CONDITIONS AND WORKSPACE HEALTH & SAFETY

We conduct health and safety assessments to identify risks and implement corrective actions to guarantee the safety of our employees and guests. We have implemented an extensive emergency plan and conduct at least one annual emergency exercise to ensure we do all we can to help safeguard the safety of all employees in case of a serious incident or emergency. De Brauw is committed to ensuring the best working conditions for all employees, taking into consideration the challenges posed by the nature of our business activities. We approach the wellbeing of our staff from a holistic perspective. We offer them the tools to handle stress; provide wellbeing webinars and other wellness related activities, such as an in-house physiotherapist, an ergonomist and a wellbeing coach.



To help ensure that employees understand how to best tackle their work, employees can participate in Ethical Dilemma Conversations with an internal and external advisor, which allows for open conversation on challenges they face, which are then reported to management anonymously. Furthermore, employees can reach out to internal confidential advisers as well as an external confidential adviser to discuss any concerns or questions that they may have.

WORKS COUNCIL

The Works Council represents the rights and interests of all employees and facilitates dialogue between the employees and the Management Board. If the Board is contemplating decisions substantially affecting the firm, the Works Council has a right of advice. If these decisions concern substantial changes relating to employment terms and conditions, the Board can only do so with the Works Council's consent.

All employees who have been employed for a period of six months by the date of the election are entitled to put themselves forwards for election to the Works Council. All employees are entitled to vote to elect the members of the Works Council. Elections will be held in July 2023 for the entire Works Council.

CHILD LABOUR, MODERN SLAVERY AND FORCED LABOUR

Forced labour, modern slavery and child labour in all forms are all categorically rejected by De Brauw, as articulated in our Code of Business Conduct and Modern Slavery Statement (in validation). We have undertaken analysis of our business and identified a very low risk of such practices occurring within our firm, given the sector, and the fact that we operate in countries that are generally low-risk, but we are alert and vigilant to it with the necessary policies and procedures in place.

OBJECTIVES

De Brauw commits to the following objectives and actions to ensure our Labour policies, principles and objectives are achieved:

- achieve a record of zero work-related injuries;
- conduct a practice emergency evacuation from our Amsterdam headquarters every twelve months;
- conduct an annual safety assessment and update the information in the Emergency Plan accordingly;
- ensure that at least five employees at our headquarters are emergency response officers (BHV) certified during office hours;
- provide access to a physiotherapist and ergonomist on location;
- offer three wellbeing webinars and/or other wellbeing initiatives per annum to all employees;
- strive for our levels of absenteeism to be below the Dutch national average for organisations with more than 100 employees;
- have 14 members for the Works Council consisting of seven legal employees and seven Business Solutions employees; and
- continue to engage in constructive and effective dialogue with the Works Council on employees' rights and interests.

In 2021, the sickness rate did increase. Our impression is that during the pandemic, due to the fact that employees were working from home, many did not report sick (which they perhaps would have done if they had had to travel to the office and interact with healthy colleagues) but felt able to continue to work. The sickness levels for 2019 and 2020 are therefore a little opaque, and similarly – whilst the figures have increased for 2021, this in part is a healthy pattern in that employees are reporting sick and not continuing to work, but rather focus on their recuperation.

Our Wellbeing and Reintegration Coach actively supports employees, and our sickness policy has been updated this year to clearly stipulate that if an employee is sick and unable to work that they must report sick and indeed not work. Health of course includes both physical and mental wellbeing.

TOPIC	TARGET	2019	2020	2021
Workplace Health & Safety				
Emergency evacuation conducted	Annual	1	0*	1
Employees trained in first aid	Number	27	31	32
Webinars on wellbeing and other health and safety topics	3 per year	n/a**	2	2
Days of sickness	5.3%	5.44%	5.11%	5.98%
Total injury events	0	0	0	0

* the office was closed for the majority of the year

** New initiative in 2020



5 — ENVIRONMENT

5 ENVIRONMENT

As an office-based service company, our environmental impact is relatively modest. Our environmental risk review identified that our most significant environmental impact arises from greenhouse gas emissions from our buildings' energy usage, travel of our employees, and material resources used and disposed of within our offices. Despite the relatively low environmental impact, we still believe that it is our obligation to be as sustainable as possible, and this is reflected in our robust Environmental Impact Handbook.

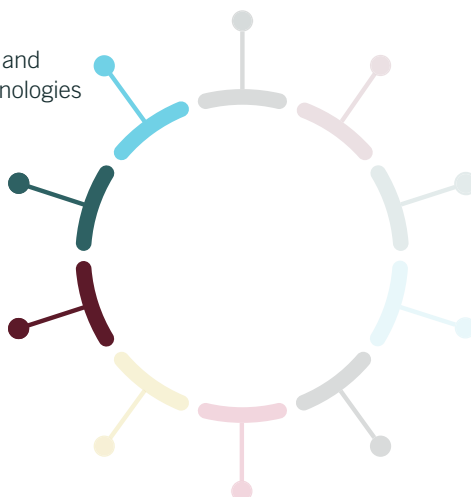
Our Environmental Impact Handbook states that “*Sustainable performance is an inherent aspect of our collective approach, and we strive to embed the embrace of sustainability throughout our choices and practices*”. De Brauw is unequivocally committed to environmental protection.

De Brauw is committed to the following UNGC's Environmental Principles:

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Principle 8: undertake initiatives to promote greater environmental responsibility

Principle 7: Businesses should support a precautionary approach to environmental challenges



ENVIRONMENTAL POLICIES

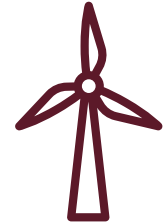
The Code of Business Conduct sets out the following environmental principles:

- support the sustainability transition by actively reducing our environmental footprint;
- monitor and reduce waste generation; and
- reduce energy usage and greenhouse gas emissions.

The Code of Business Conduct is further supported by the following policy documents:

- Environmental Impact Handbook;
- Business Travel Policy;
- Sustainable Procurement Policy; and
- Working from Home Policy.

5.1 THE MANAGEMENT OF ENERGY AND GREENHOUSE GAS EMISSIONS



For the Paris Agreement to achieve its objective of keeping global temperatures well below 2°C, it is up to every person, every organisation and every government to act. At De Brauw, we recognise that our own operations do have a climate impact, and therefore this needs to be addressed. SDG 13 - Climate Action, is therefore a key SDG that our firm can actively contribute towards, and we are putting in place significant programmes and initiatives to mitigate our emissions.

OBJECTIVES

Based on the 2020 baseline, De Brauw has committed to the following:

- Reduce Scope 1 and Scope 2 Emissions by 45% by 2030.
- Reduce Scope 3 emissions by 30% by 2030.
- Reduce emissions per employee by 30% by 2030.
- Source 100% of all electricity from renewable sources by 2030.
- Offset all greenhouse emissions.
- Avoid transport by plane when travelling to locations within 700km from our office in Amsterdam.
- Maintain a policy to support working from home, and a more flexible approach to the time an employee may travel, to help reduce commuting related emissions.
- Provide public transport options for employees (e.g., public transport travel cards).
- Maintain the A-rated energy label of our corporate headquarters building in Amsterdam.

PERFORMANCE INDICATORS

GREENHOUSE GAS EMISSIONS	UNITS	JUNE 2019 - MAY 2020	JUNE 2020 - MAY 2021	JUNE 2021 - MAY 2022
Scope 1	Tonnes CO ₂ eq	18	13	11.4
Scope 2	Tonnes CO ₂ eq	18	8	13.5
Scope 3	Tonnes CO ₂ eq	1,075	220	997.9
Total (Scope 1, 2 & 3)	Tonnes CO ₂ eq	1,110	242	1,022.7
Total Emission per employee	Tonnes CO ₂ /employee	1.42	0.35	1.44

The largest reduction was in Scope 3 emissions, from 1075 tonnes CO₂eq in 2019/2020 to 220 tonnes CO₂eq in 2020/2021. This was predominantly attributed to the cancellation of all business travel during the Covid-19 pandemic. An analysis of the figures best compares the latest results to the data in 2019/2020 since 2020/2021 shows drastic reduction of carbon emission in a large part due to our employees working mostly from home. This consequently decreased the energy consumption of the office building and was bolstered by the cancellation of all business travels.

The data for 2021/2022 shows the reduction of overall carbon emission in all Scopes (1, 2, and 3), compared to 2019/2020, with there being reduced commuting to work due to the enforced working from home policy, and less business travel during and immediately after the Covid-19 pandemic, utilising instead virtual conferencing facilities.

WE ARE WORKING WITH NATURAL CAPITAL PARTNERS TO OFFSET OUR CARBON EMISSIONS



In 2019 we committed to offset our GHG emissions.

Working with [Natural Capital Partners](#), we selected a project in the Brazilian Amazon Rainforest. We have committed to help finance this project in the Acre State of western Brazil, which aims to prevent deforestation across 105,000 hectares of pristine rainforest in the Amazon basin. The project funds local community programmes, which identify and implement economic opportunities for indigenous peoples to incentivise them to avoid destruction of the rainforest. This includes providing training on growing additional cash crops and financing a boat to increase access to markets for produce. The project meets the REDD+, VCS and CCS-Gold standards.

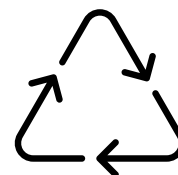
5.2 RESOURCE AND WASTE MANAGEMENT

As a service-based organisation working from an office environment, the predominant source of material usage is office material (for example, printing paper and stationery, food and drink packaging, obsolete IT equipment and other office related services).

OBJECTIVES

Our Environmental Impact Handbook sets out the following environmental actions that we will take, to:

- focus on improving how we reuse materials;
- collect coffee residue so that it can be recycled into 'new-life products';
- reduce the use of materials that cannot be recycled or reused;
- recycle plastic, cans, glass and paper;
- maintain a commitment to recycle all of our ICT waste;
- work towards zero plastic waste in catering by 2022;
- continue developing partnerships with specialist third parties who have a smaller environmental footprint, and investigate new materials which can have a smaller environmental footprint to help us to improve our waste management efforts; and
- provide 80% of selected our full-time employees in Business Support employed within Facilities & Hospitality with an environmental training that covers waste management topics by 2022.



In 2021, we have achieved a drastic reduction in the amount of plastic waste due to our introduction of tap-water machines in the office and the removal of the single-use plastic water bottles from all of our vending machines.



Our level of food waste cannot be helpfully compared to 2019 or 2020 given the impact of the pandemic and not our amount of time that employees were working from home. We are however working with our catering partner to strive to continuously eliminate as much food waste as possible through close monitoring using a real-time dashboard.

TYPE OF WASTE	UNIT	2019	2020	2021
PAPER	Kg	141,66	125,34	22,036
PLASTIC	Kg	16,422	14,623	4,690
GLASS	Kg	6,966	6,168	6,851
FOOD	Kg	49,581	43,869	91,863
GENERAL		n/a	n/a	40,700
BUILDING	Kg	9,168	8,124	n/a
TOTAL AMOUNT OF WASTE	Kg	223,797	198,124	166,14
TOTAL AMOUNT OF RECYCLED WASTE	Kg	n/a	n/a	429,229



6 — ANTI-CORRUPTION

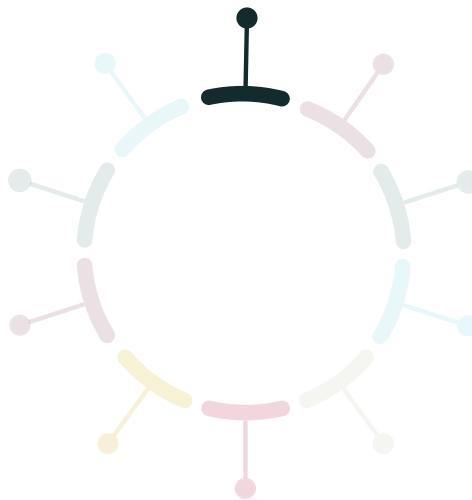
6 ANTI-CORRUPTION

We invest in relationships of trust with our clients through a profound engagement with their business. Our clients place their trust in De Brauw to provide top quality legal services, by means of our courageous, curious, collective approach. Corruption and bribery are given an opportunity to fester if there is a breakdown of trust, and they are a corrosive force of the basics of law and common good. Corruption is fundamentally opposite to and at odds with De Brauw's long-standing tradition of upholding the principle and rule of law and honouring our client's trust and confidence in us.

We recognise that corruption and bribery are destructive to society and that every effort designed to eliminate this, is essential. Starting with our Code of Business Conduct, and reinforced within the Business Ethics Policy, we have made a categorical stance of rejecting all and any form of corruption within our firm, supply chain and business partners. To this effect, De Brauw recognises and supports the anti-corruption measures as established in the UN's Convention Against Corruption (UNCAC).

De Brauw is committed to the following UNGC Anti-Corruption Principle:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery



POLICIES

Our Code of Business Conduct sets the standard for all management and employees to adhere to, and sets out the following Governance Principles:

- act honestly, and with integrity, always;
- reject all forms of bribery and corruption;
- avoid being compromised by gifts and entertainment;
- play a role in combating financial crime;
- not permit any conflict of interest to arise between its employees and the company, by following the Conflict-of-Interest Policy;
- not deal in shares or other securities when in possession of inside information; and
- support fair competition.

We have established a strong set of policies to ensure strong control against corruption which reinforce the Governance principles established in the Code of Business Conduct:

- Business Ethics Policy;
- Hospitality Gifts and Donations Policy;
- Investment Transactions Rules;
- Anti-Money Laundering, Counter Terrorism Financing and Anti-Tax Evasion Policy;
- Sustainable Procurement Policy;
- Conflict of Interest Policy; and
- Whistle-blower Policy.

As part of our ongoing endeavour to continually improve our policies to deliver compliance and to better support our employees, we have created an Act Responsibly Framework. This is currently in the validation / approval process. This framework sets out the behaviour that we expect of our employees, but has policies annexed to it, which set out the procedure to support employees should there be any cause for concern or complaint. The policies annexed to this framework are the:

- Harassment Policy and Complaints procedure (Annex 1) to define and prohibit workplace harassment and outline the procedure for filing a complaint;
- Alcohol and Drugs Policy (Annex 2) to define and prohibit use of alcohol and drugs in the context of work;
- Our Speak Up Policy (Annex 3) to set out the procedure in the event of fraud or compliance issue allegations; and
- Confidential Adviser Protocol (Annex 4) which describes the role and responsibilities of our internal and external confidential advisers.

OBJECTIVES

De Brauw commits to the following anti-corruption objectives:

- maintain a zero-tolerance policy with regards to corruption, bribery and fraud;
- conduct anti-corruption due diligence for every supplier we work with;
- facilitate our employees to report on any unethical business practices that they witness by virtue of the provisions of our whistleblowing policy;
- conduct an AML audit on an annual basis;
- ensure that all partners and relevant employees complete the annual mandatory AML training;
- not permit any conflict of interest to arise between its employees and the company, by following the Conflict of Interest Policy;
- provide training on ethical business practices covering corruption, bribery and anti-money laundering (AML), to 100% of new employees by 2023; and
- to have our Code of Business Conduct easily accessible to all employees and to regularly communicate about and share our, Conflict of Interest policy; our Hospitality, Gift and Donations policy; and the Whistleblowing policy yearly by email to all employees.

PERFORMANCE INDICATORS



TOPIC	TARGET (UNIT)	2019	2020	2021
Whistle-blowing related cases	0	0	0	21
Anti-Money Laundering risk assessment conducted for client side	YES	YES	YES	YES
Business Ethics training (% of Legal employees)	80%	85%	85%	85%

The results of our bi-annual Employee Engagement Survey (completed in September 2021), stressed the need to more openly discuss why and how we can foster a safe and open environment for all employees. The impact of the pandemic has been wide ranging as employees come back to work together again in the office, as we also continue a flexible approach so that for up to 50% of their contracted hours, employees can work from home.

A key focus for the Management Board, and for the partners and managers in the firm has therefore been to encourage teams to come together, to build trust, to speak up and out (in accordance with one of our core values to be courageous). This active and concerted approach also included a specific invitation for employees to reach out to our external advisor to give their input on how we can strengthen our culture and mutual connection and collaboration. This constructive and proactive focus and approach therefore accounts for the increased number of whistleblowing incidents in 2021.



7 — PRO BONO INITIATIVES

7 PRO BONO INITIATIVES

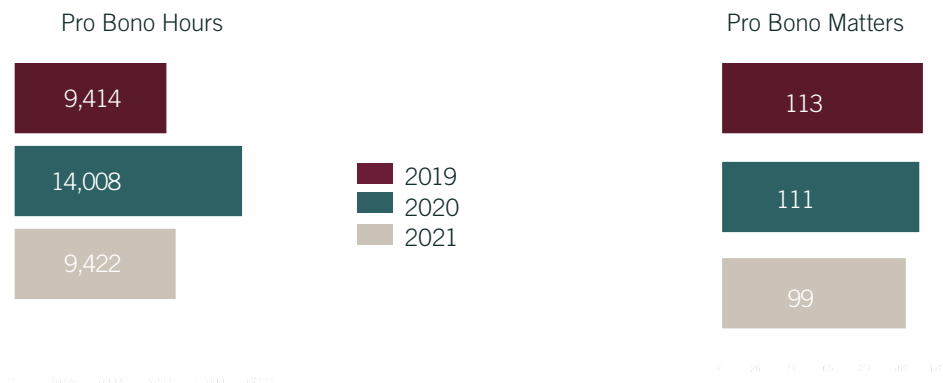
As a leading law firm, we subscribe to the principle of access to the court for all, irrespective of one's financial means. In addition to our for-profit work, we therefore provide legal advice to organisations that have a great positive impact on society and the environment, and to people who have limited access to the justice system. We also support our clients in developing, launching and strengthening their own social responsibility initiatives and projects.

Our pro bono activity is consequently part of the outworking of our support for an alignment with SDG16 - Peace, Justice and Strong Institutions. Our lawyers offer their services for free to worthy, less able, causes and organisations. This way, we promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

PERFORMANCE INDICATORS

Our Pro Bono practice is among the largest in Europe, with over 9,400 hours spent on 99 matters by 220 of our lawyers throughout the course of 2021. The data for 2020 is arguably an anomaly impacted by the pandemic and our intense focus for our pro bono work to support the cultural sector in the Netherlands, and 2021 should therefore be compared with 2019 where you will see we have invested a similar amount of time, on a slightly smaller number of matter.

We always create opportunities to work for employees to work on pro bono matters during their normal working hours (hours that are treated as part of their billable targets although pro bono for the client) and we strive for our pro bono programme as a whole to provide the equivalent of at least, and on average, 30 pro bono hours, per legal employee, annually.



Examples of pro bono matters that our lawyers have worked on include:

PILP/PRO BONO CONNECT



The Public Interest Litigation Project (PILP) focuses on strategic litigation for human rights. It is a pilot project of the Dutch Section of International Commission of Jurists (NJCM). Several De Brauw lawyers worked on PILP cases via Pro Bono Connect: the first public interest clearinghouse in the Netherlands (another project from NJCM). Pro Bono Connect links civil society to law firms such as De Brauw to provide free legal advice or assistance in legal proceedings.

Defending human rights or pleading for a public interest strikes everybody's imagination; every lawyer wants to be involved to make their contribution to these important topics.

Other recent PILP pro bono matters include:

- the criticised Dutch policy that labelled Afghan refugees with a 1F status presuming that they committed war crimes without any individual investigation being conducted;
- a matter related to human trafficking; and
- reimbursements of cost for maternity care.

THE OCEAN CLEANUP



De Brauw has acted as the first point of contact for The Ocean Cleanup's legal matters since 2015. On 8 June 2018, The Ocean Cleanup entered into a unique agreement with Dutch Minister of Infrastructure and Water Management relating to the deployment of The Ocean Cleanup's systems on the high seas.

This agreement confirms that the Netherlands will support and facilitate The Ocean Cleanup's activities, and (where necessary) represent The Ocean Cleanup's interests in relation to other states and in relevant international forums, such as the International Maritime Organisation.

The Ocean Cleanup's systems represent advanced technology designed to drastically reduce the amount of floating plastic in the world's oceans. Innovative from a legal perspective is that the position of The Ocean Cleanup's systems is largely equated to that of other seagoing vessels. This creates clarity as to the rights and obligations of The Ocean Cleanup when operating its systems on the high seas, towards states as well as other users of the high seas.

UNICEF NEDERLAND



UNICEF is the world's leading organisation for children, no matter who they are or where they live. To protect the rights of every child, UNICEF brings together more than 70 years of field-tested expertise, a network that spans more than 190 countries and territories, a passion for innovation, and a commitment to make every euro count.

The partnership with UNICEF the Netherlands focuses on child rights issues. Therefore, De Brauw is committed to provide ongoing pro bono legal advice and guidance on several projects that contribute to the enhancement of children's rights. De Brauw has participated in several legal matters, from the Dutch government's duties regarding youth care, to the issue of domestic violence and child abuse in the Dutch Caribbean.

Other examples of our previous and ongoing pro bono cases regarding sustainability and the environment:

- WeMove Europe and Oxfam International to file a complaint to the European Commission calling upon the Commission to start proceedings against Greece;
- The transgender and intersex community to obtain acknowledgement, apologies and financial compensation from the Dutch government for the pain and suffering inflicted by the former Transgender Act; and
- The mothers of the victims of the Srebrenica massacre in their proceedings against the Dutch State.



8 — OUTLOOK

OUTLOOK

In 2022 and through to 2023, De Brauw will continue to make a positive impact by enacting our Sustainability Strategy and policies. Our commitment to the UNGC provides further guidance and clarity in our policies and actions.

Our carbon emissions reduced significantly in 2020/2021 as a result of the travel ban necessitated by the Covid-19 pandemic. In order to maintain this positive environmental side-effect, we have updated our Business Travel policy to include the requirement that any travel less than seven hours long should be by train (and not by air). A closer monitoring of all GHG emissions will be required to maintain our lower carbon footprint.

Our stringent carbon reduction policy will be demonstrated in our upcoming office move. Our Amsterdam headquarters will move to a **Tripolis Park** at the end of 2023. We are already working closely with the developers, and our team of architects and designers to ensure that the premises are both BREEAM and WELL-platinum rated, to maximise the benefits for the environment and all our employees as they enjoy working in that space.

We have participated in the EcoVadis assessment for several years. EcoVadis is an independent sustainability ratings organisation. De Brauw obtained a gold medal in 2021 and we are committed to achieve EcoVadis rating of at least 76 points, or a gold medal by 2023. This will be achieved, not least in part by many of the efforts outlined in this document. We certainly aim to maintain this score going forward.

Finally, in 2023, we will be taking a deeper look into our supply chain, to strengthen our Sustainable Procurement approach (to include all procurement for the new office) and to ensure that our suppliers are as committed to sustainability as we are.

Ambitious goals but a promised courageous, curious at collective approach at De Brauw.

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United Nations
Global Compact