

GIBSON DUNN

MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2023

1. INTRODUCTION

- 1.1 Gibson Dunn is a leading international law firm with more than 1,900 lawyers and 20 offices in major commercial centres across the world, including London. The Firm practises in the United Kingdom through a limited liability partnership (Gibson, Dunn & Crutcher UK LLP) registered in Delaware that is authorised and regulated by the Solicitors Regulation Authority. The Firm practises in the United States and certain other jurisdictions through another limited liability partnership (Gibson, Dunn & Crutcher LLP), also registered in Delaware (collectively, “**Gibson Dunn**” or the “**Firm**”).
- 1.2 The United Kingdom’s Modern Slavery Act 2015 (the “**Modern Slavery Act**”) focuses on the prevention and prosecution of all forms of modern slavery, including human trafficking and forced or compulsory labour. The Modern Slavery Act requires certain businesses to publish a statement regarding the steps that they have taken during the preceding financial year to ensure that modern slavery is not taking place in any part of their business or supply chain.

2. OUR COMMITMENT TO HUMAN RIGHTS

- 2.1 Gibson Dunn is opposed to all forms of human rights abuse, including but not limited to human trafficking, slavery, servitude and forced or compulsory labour. We are committed to taking steps to prevent these acts from occurring within our business and supply chain.
- 2.2 In addition to the Firm’s work within its own business and supply chain, Gibson Dunn attorneys regularly participate in high-profile pro bono causes promoting individual rights (including matters before the United States Supreme Court). Further information on the Firm’s pro bono work, including our annual pro bono report, is available [here](#). In 2023, Gibson Dunn devoted nearly 170,000 hours to numerous pro bono efforts around the world, averaging more than 90 pro bono hours per attorney in the United States and 84 pro bono hours per attorney worldwide. In 2023, we received a number of accolades in recognition of these efforts, including the Lawyers’ Committee for Civil Rights Under Law Robert F. Mullen Pro Bono Award and the Pro-bono Initiative of the Year Award at The Lawyer Awards 2023 for our work as a founding member of the Domestic Abuse Response Alliance. We were also honoured by the Financial Times at the Europe Innovative Lawyer Awards 2023 as the overall winner in the Responsible Business category for our work securing the release of Nazanin Zaghari-Ratcliffe from prolonged, illegal detention in Iran.
- 2.3 We also seek to support our clients with their own human rights commitments. Gibson Dunn’s Environmental, Social and Governance (“**ESG**”) Practice advises clients on implementing and monitoring their own ESG risks and

performance, with attorneys from across the Firm's offices.

- 2.4 The Firm has taken a number of initiatives as part of its commitment to sustainability. It has partnered with trusted professional networks such as Legal Sustainability Network and Legal Sustainability Alliance, a prominent network of the UK's leading law firms working together to improve the environmental sustainability of their business. We have participated in the ALISS (All Legal Industry Sustainability Standard) Assessment twice, in both 2022 and 2023. We currently hold the Bronze Award for our 2023 submission. Over 80% of Gibson Dunn offices have LEED (Leadership in Energy and Environmental Design) certification, the world's most widely used green building rating system.

3. RISK ASSESSMENT

- 3.1 Over the past financial year, leaders of Gibson Dunn's London office and Firm attorneys with relevant expertise have continued to evaluate and monitor the risks of slavery and human trafficking taking place in the Firm's business and supply chain. Given that the Firm is a professional services business and that its supply chains are generally comprised of office space/equipment and technology, facilities, transportation, recruitment and financial services, we believe that those risks are relatively low.
- 3.2 Nonetheless, in recognition of the importance of these issues, and as part of the Firm's own sustainability commitments, work is ongoing to evaluate the Firm's supply chain, taking into account diversity and sustainability metrics. The Firm has engaged a sustainability consulting firm to ensure that sustainability is considered in every aspect of our work. In addition to helping us with our carbon emissions accounting, they assist with and review our CDP and EcoVadis submissions. Further, the Firm has partnered with EcoVadis since 2021 to conduct a detailed, action-oriented review of the Firm's supply chain based on 21 sustainability criteria relating to environment, labour and human rights, ethics and sustainable procurement.

4. POLICIES AND PROCEDURES

- 4.1 The Firm maintains a number of policies and procedures relevant to the prevention of slavery and human trafficking, including policies requiring ethical conduct by Firm attorneys and staff. The Firm also maintains policies covering topics such as equal employment opportunities, prohibiting harassment in employment and compliance with all applicable laws.
- 4.2 Gibson Dunn's Global Procurement Team seeks appropriate assurances (primarily through purchasing or services agreements) from its suppliers that they are complying with all applicable laws. In agreements with certain major suppliers, the Firm has secured the inclusion of rights to conduct on-site inspections and audits of the suppliers' facilities. This includes contracts in jurisdictions where there is a perceived elevated risk of modern slavery.

5. INTERNAL PROGRAMMES & TRAINING

- 5.1 Gibson Dunn offers a multidimensional mental health programme through its Global Wellness Department, providing resources for preventative care, reactive support and crisis management. We are committed to breaking down barriers surrounding mental health, including those related to stigma, accessibility, awareness and cost. Every member at Gibson Dunn, regardless of their location and position, has access to unlimited therapy/counselling/coaching sessions through easily accessible mental health apps. We provide Mental Health First Aid training to all attorneys and supervisors, and offer resiliency training tailored to the legal profession.
- 5.2 In addition to a mature and robust diversity programme, over the past three years we have launched a number of training programmes (Unconscious Bias, Mutual Respect in the Workplace and Transgender 101) designed to cultivate a more inclusive environment and to tackle some of the biases that may be inhibiting the careers of our workforce and to allow our employees to thrive in our workforce free of bias. We are thrilled that our diversity and inclusion efforts have been recognised throughout the legal industry. We were honoured to receive the Minority Corporate Counsel Association's 2023 Thomas L. Sager Award, which is reserved for law firms that champion a more diverse and inclusive workforce and have demonstrated a sustained commitment to improving the hiring, retention and promotion of diverse attorneys. In 2023, we also received Mansfield Rule Certification, which reflects our commitment to ensuring that all our talent has a fair and equal opportunity to advance into leadership. We further received MLT Black Equity at Work Certification in 2023 in recognition of our efforts to make significant strides in advancing Black equity at the Firm. In 2023 we were proud to be a Women in Law Empowerment Forum (WILEF) Gold Standard firm, an honour that we have received for many years. These important recognitions not only fill us with pride but also inspire us to work even harder.

6. CONCLUSION

- 6.1 The Firm's efforts in tackling modern slavery and human trafficking are ongoing, and we will continue to consider our policies and oversight of these important issues in the year ahead.
- 6.2 This statement is made pursuant to the Modern Slavery Act and constitutes Gibson Dunn's slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement has been authorised and approved by Allan Neil, a partner in the Firm's London office, on behalf of the partners of Gibson Dunn's limited liability partnerships.



26 June 2024