GIBSON DUNN

MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2024

1. INTRODUCTION

- 1.1 Gibson Dunn is a leading international law firm with more than 2,000 lawyers and 21 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 The Firm has taken a number of initiatives as part of its commitment to sustainability. It has partnered with trusted professional networks such as the Legal Sustainability Network and the 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 since 2022. We currently hold the Bronze Award for our 2023 submission, and are in the process of preparing our 2024 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.
- 2.3 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 2024, Gibson Dunn devoted more than 206,000 hours to numerous pro bono efforts around the world, averaging more than 106 pro bono hours per attorney in the United States and 96 pro bono hours per attorney worldwide. In 2024, we received a number of accolades in recognition

of these efforts, including the NLADA Beacon of Justice Award and ALDF Advancement in Animal Law Pro Bono Achievement Award. In addition, Human Rights First awarded Gibson Dunn Partner and Pro Bono Chair Katie Marquart its Marvin E. Frankel Award for Pro Bono Service in recognition of her leadership in advocating for Afghan refugees in the United States. We were also honoured by the Legal Benchmarking Group as the winner of the 2024 Social Impact Pro Bono Firm of the Year award, which recognises "strides made by trailblazing firms in fostering diverse, equitable, and inclusive environments".

2.4 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 ESG risks, litigation and reporting, with attorneys from across the Firm's offices.

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 preparing our carbon emissions accounting, they manage our CDP submission and conduct our climate risk analysis. 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. In 2024 the Firm's procurement team also undertook EcoVadis training on identifying and remediating modern slavery.

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

- 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 location and position, has access their to 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, the Firm believes that diversity and inclusion are essential to our continued success as one of the leading law firms in the world. For more than two decades, the Firm has been focused on building an inclusive culture that enables all to thrive. Our diversity vision is aimed at "deliver[ing] the highest quality legal services by fostering a culturally fluent, inclusive, and open environment that welcomes individuals from diverse backgrounds and perspectives to achieve Gibson Dunn's core values of excellence, fairness, and individuality". Please see our website Dunn for more information.

6. CONCLUSION

Allan R. W. Neil.

- 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 2024.

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.

27 June 2025