

GIBSON DUNN

MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2021

1. INTRODUCTION

- 1.1 Gibson Dunn is a leading international law firm with more than 1,400 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 authorized 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 U.S. Supreme Court). Further information on the Firm’s *pro bono* work, including our annual *pro bono* report, is available [here](#). In 2021, Gibson Dunn devoted more than 140,000 hours to numerous *pro bono* efforts around the world, averaging more than 90 *pro bono* hours per attorney in the United States and more than 83 *pro bono* hours per attorney worldwide.
- 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. Gibson Dunn’s ESG Practice comprises attorneys from across the Firm’s offices. In 2021, the Firm was proud to become a member of the Law Firm Sustainability Network and we are working towards

the American Legal Industry Sustainability Standards certification, having also recently joined the Legal Sustainability Alliance in the UK.

3. RISK ASSESSMENT

- 3.1 Over the past financial year, leaders of Gibson Dunn’s London office and Firm attorneys with relevant expertise in the field of supply chain transparency 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 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. In 2021, the Firm also engaged a third party sustainability ratings business to conduct a review of the Firm’s supply chain.

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 operates a Global Wellness initiative for all personnel that is dedicated to the physical, emotional and psychological wellbeing of our attorneys and staff. The programme ran throughout the financial year, notwithstanding the challenges of COVID-19. Services such as counselling, access to a mental health first aider in each office and yoga and meditation classes were offered to all personnel within the Firm.
- 5.2 In addition to a mature and robust diversity programme, Gibson Dunn provides mandatory “Unconscious Bias” and “Respect in the Workplace” training. The Firm has been ranked

as one of Vault, Inc.'s Best Law Firms for Diversity. The Firm's diversity report and information on the Firm's diversity efforts can be found [here](#).

5.3 The Firm also provides compulsory training to all attorneys and staff on key compliance matters, depending on their position and seniority. This includes training on anti-harassment; non-discrimination; financial crime and corruption; and other key compliance and regulatory matters.

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 UK Modern Slavery Act and constitutes Gibson Dunn's slavery and human trafficking statement for the financial year ending 31 December 2021.

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.

Allan R. W. Neil

22 June 2022