

## Independent Limited Assurance Report

ERM Certification & Verification Services Incorporated ("ERM CVS") was engaged by Cleary Gottlieb Steen & Hamilton LLP ("Cleary Gottlieb") to provide limited assurance in relation to the Selected Information set out below and presented in the Cleary Gottlieb 2024 Environmental Metrics Statement and the 2025 CDP Submission (the "Disclosures").

### **ENGAGEMENT SUMMARY**

### Scope of our assurance engagement

Whether the following Selected Information for 2024 is fairly presented in the Disclosures, in all material respects, in accordance with the reporting criteria.

Our assurance engagement does not extend to information in respect of earlier periods or to any other information included in the Disclosures.

#### Selected Information

- Total Scope 1 GHG emissions [metrics tons CO<sub>2</sub>e]
- Total Scope 2 GHG emissions (location-based) [metrics tons CO<sub>2</sub>e]
- Total Scope 2 GHG emissions (market-based) [metrics tons CO<sub>2</sub>e]
- Tota Scope 3 GHG emissions [metrics tons CO<sub>2</sub>e] consisting of the following categories:
  - Category 1: Purchased goods and services
  - Category 2: Capital goods
  - Category 3: Fuel-and energy-related activities not included in Scope 1 or Scope 2
  - Category 5: Waste generated in operations
  - Category 6: Business travel
  - Category 7: Employee commuting
  - Category 8: Upstream leased assets

#### Reporting period

1 January 2024 to 31 December 2024

### Reporting criteria

- Cleary Gottlieb's Basis of Reporting as noted in the methodology section of the Environmental Metrics Statement and section 7 of the CDP Submission.
- The GHG Protocol Corporate Accounting and Reporting Standard (WBCSD/WRI Revised Edition 2015) for Scope 1 and Scope 2 GHG emissions
- GHG Protocol Scope 2 Guidance (An amendment to the GHG Protocol Corporate Standard (WRI 2015) for Scope 2 GHG emissions
- The Corporate Value Chain (Scope 3) Accounting and Reporting Standard (WBCSD/WRI 2011) for Scope 3 GHG emissions

### Assurance standard and

We performed a limited assurance engagement, in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised) level of 'Assurance Engagements other than Audits or Reviews of Historical Financial assurance Information.'

> The procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement and consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

## Respective responsibilities

Cleary Gottlieb is responsible for preparing the Disclosures and for the collection and presentation of the information within it, and for the designing, implementing and maintaining of internal controls relevant to the preparation and presentation of the Selected Information.

ERM CVS' responsibility is to provide a conclusion to Cleary Gottlieb on the agreed assurance scope based on our engagement terms with Cleary Gottlieb, the assurance activities performed and exercising our professional judgement.

### **OUR CONCLUSION**

Based on our activities, as described on the next page, nothing has come to our attention to indicate that the Selected Information for 2024 is not fairly presented in the Disclosures, in all material respects, in accordance with the reporting criteria.

- Total Scope 1 GHG emissions [metrics tons CO<sub>2</sub>e]: 472
- Total Scope 2 GHG emissions (location-based) [metrics tons CO<sub>2</sub>e]: 2,733
- Total Scope 2 GHG emissions (market-based) [metrics tons CO2e]: 268
- Tota Scope 3 GHG emissions [metrics tons CO2e]: 31,348

### **OUR ASSURANCE ACTIVITIES**

Considering the level of assurance and our assessment of the risk of material misstatement of the Selected Information, a multi-disciplinary team of sustainability and assurance specialists performed a range of procedures that included, but were not restricted to, the following:

- Evaluating the appropriateness of the reporting criteria for the Selected Information;
- Interviewing management representatives responsible for managing the Selected Information;
- Interviewing relevant staff and third-party consultants to understand and evaluate the management systems and processes (including internal review and control processes) used for collecting and reporting the Selected Information;
- Reviewing a sample of qualitative and quantitative evidence supporting the Selected Information at a corporate level;
- Performing an analytical review of the year-end data submitted by all locations included in the consolidated 2024 group data for the Selected Information, which included testing the completeness and mathematical accuracy of conversions and calculations, and consolidation in line with the stated reporting boundary;
- Evaluating the conversion factors, emission factors and assumptions used; and
- Reviewing the presentation of information relevant to the assurance scope in the Disclosures to ensure consistency with our findings.



September, 16 2025 Malvern, PA

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# THE LIMITATIONS OF OUR ENGAGEMENT

The reliability of the Selected Information is subject to inherent uncertainties, given the available methods for determining, calculating or estimating the underlying information. It is important to understand our assurance conclusions in this context.

### OUR INDEPENDENCE, INTEGRITY AND OUALITY CONTROL

ERM CVS is an independent certification and verification body accredited by UKAS to ISO 17021:2015. Accordingly, we maintain a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. Our quality management system is at least as demanding as the relevant sections of ISQM-1 and ISQM-2 (2022).

ERM CVS applies a Code of Conduct and related policies to ensure that its employees maintain integrity, objectivity, professional competence and high ethical standards in their work. Our processes are designed and implemented to ensure that the work we undertake is objective, impartial and free from bias and conflict of interest. Our certified management system covers independence and ethical requirements that are at least as demanding as the relevant sections of the IESBA Code relating to assurance engagements.

ERM CVS has extensive experience in conducting assurance on environmental, social, ethical and health and safety information, systems and processes, and provides no consultancy related services to Cleary Gottlieb in any respect.