

CLEARY GOTTLIB

**Climate Financial Disclosure Report –
Prepared in Accordance with
California SB 261**

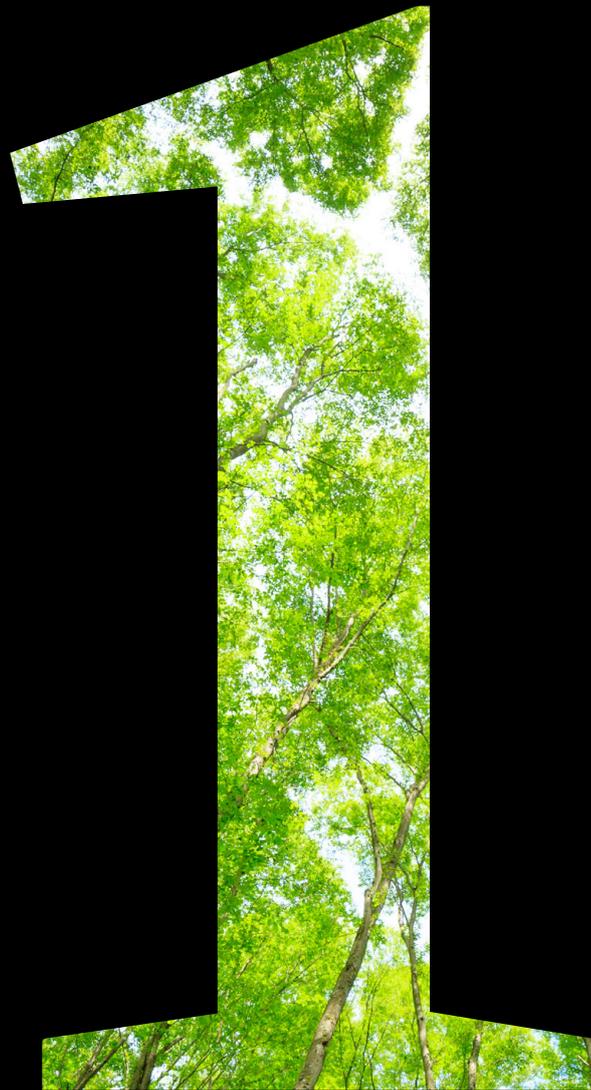
Initial Disclosure, January 1, 2026





Table of Contents

1. Introduction	5
1.1. Why Climate Matters to Cleary Gottlieb	5
1.2. About This Report	5
1.3. California SB 261 Disclosure Alignment	6
1.4. Audience and Intent	6
1.5. Looking Ahead	6
2. Governance	8
2.1. Board Oversight	8
2.2. Management Role	8
2.3. Governance Structure	8
3. Strategy	10
3.1. Identified Climate-Related Risks and Opportunities	10
3.2. Time Horizons	11
3.3. Strategic Impact and Resilience Actions	11
3.4. Scenario Analysis	12
3.5. Science-Based Targets and Climate Strategy Alignment	12
4. Risk Management	15
4.1. Risk Identification and Assessment	15
4.2. Integration into Firmwide Risk Processes	15
4.3. Risk Monitoring and Adaptive Management	15
5. Metrics and Targets	17
5.1. GHG Emissions and Energy Metrics	17
5.2. Internal Carbon Price	17
5.3. Performance to Date	17
5.4. Supply Chain Engagement	18
6. Conclusion	20



1. Introduction

Cleary Gottlieb Steen & Hamilton LLP (“Cleary Gottlieb”, the “Firm”, “we”, “our”) is pleased to share this Task Force on Climate-related Financial Disclosures (“TCFD”) report, reflecting the Firm’s ongoing efforts to understand, manage, and disclose climate-related financial risks and opportunities relevant to its global operations. This disclosure builds on foundational work initiated in 2019 through Cleary Gottlieb’s greenhouse gas (“GHG”) inventory and climate risk analysis and aligns with the latest expectations under California’s Climate-Related Financial Risk Disclosure Law (SB 261).

1.1. Why Climate Matters to Cleary Gottlieb

- As a global law firm with operations across 14 international offices, Cleary Gottlieb recognizes that climate change has both direct and indirect implications for our operations, our people, and our clients. The Firm faces rising physical risks, such as flood exposure in key cities like New York, Paris, and Hong Kong, as well as transition-related challenges stemming from supply chain emissions, evolving energy markets, and growing client expectations.
- Equally, Cleary Gottlieb sees climate change as an opportunity to strengthen our operations, deepen client services in sustainability-related legal areas, and engage meaningfully with stakeholders. These efforts include investments in renewable energy, supplier engagement, and our formal commitment to science-based GHG reduction targets.

1.2. About This Report

- This report is structured around the TCFD framework, which includes four pillars: Governance, Strategy, Risk Management, and Metrics & Targets. It summarizes how climate-related considerations are governed internally, how they influence Cleary Gottlieb’s strategic planning, and how they are integrated into firmwide risk management and environmental performance tracking. It includes third-party verified emissions data for 2024 and outlines the Firm’s science-based trajectory toward net zero by 2040.
- The content reflects several years of consistent environmental data collection, alongside climate risk analysis conducted in 2021 with external advisors. This report also marks Cleary Gottlieb’s commitment to transparency in climate-related financial risk disclosure and will be filed with the California Air Resources Board’s (“CARB”) in accordance with SB 261 requirements.
- Cleary intends to evolve this reporting in the next cycle to align with the IFRS S2 climate disclosure standard issued by the International Sustainability Standards Board (“ISSB”). Future disclosures will include more quantitative scenario analysis and financial materiality assessments to strengthen decision-usefulness and transparency for key stakeholders.



1.3. California SB 261 Disclosure Alignment

- This report has been prepared in alignment with the TCFD framework and reviewed against the CARB Draft Checklist for SB 261 (Health & Safety Code §38533). It meets or exceeds all five minimum reporting elements outlined in the law:

SB 261 Element	Report Section
Governance of climate-related risks	Section 2: Governance
Strategy and time horizon analysis	Section 3: Strategy
Scenario analysis (qualitative)	Section 3.4: Scenario Analysis
Risk management processes and integration	Section 4: Risk Management
Metrics and targets, including GHG data, internal carbon pricing, and science-based target ("SBTi") aligned goals	Section 5: Metrics and Targets

- The report includes enhancements beyond baseline regulatory expectations, such as Cleary Gottlieb’s validated science-based net-zero targets, internal carbon pricing, supply chain engagement through EcoVadis, and references to international frameworks like IFRS S2 and CSRD. These disclosures demonstrate readiness for evolving regulatory and client expectations.

1.4. Audience and Intent

- This disclosure is intended primarily for regulatory stakeholders and select clients. As a privately held firm, Cleary Gottlieb does not publicly disclose financial information or detailed operational data outside of required or strategic contexts. However, in keeping with our CDP reporting practices, this report reflects a growing commitment to transparency, collaboration, and accountability on climate issues, particularly for clients, firm personnel, and external partners.

1.5. Looking Ahead

- Cleary Gottlieb has already achieved ~99% of its 2030 Scope 1 and 2 emissions reduction target and continues to advance its Scope 3 emissions engagement and reduction efforts. As the Firm refines its internal scenario analysis, expands renewable energy contracting, and further integrates climate risk into our business continuity and procurement strategies, we expect future disclosures to reflect increased maturity and depth.
- Cleary Gottlieb welcomes continued dialogue as we advance this work, and appreciates the collaboration of our Sustainability Team, external partners, and client community in shaping the Firm’s long-term climate strategy.





2. Governance

2.1. Board Oversight

- At Cleary Gottlieb, the Executive Committee is the highest governing body overseeing corporate strategy, management compensation, and performance. Our Chief Operating Officer (“COO”) is the sponsor of all climate-related initiatives within the Firm and reports to the Executive Committee. Risk management and sustainability initiatives are housed within the Global Operations Committee, chaired by the COO, who prepares annual goals for the Global Operations Committee including sustainability-related goals.
- Our COO is involved in regular meetings with our Sustainability Team, from which he receives updates about progress on our climate-related initiatives, data, and any other climate-related issues that require approval and decision-making from a senior leader. Our Global Director of Strategic Initiatives reports to the COO and is responsible for informing the Global Operations Committee of any climate-related information that is relevant to the Firm from a global perspective.
- Climate-related matters are reported annually by the Sustainability Team to the Global Operations Committee, particularly in the context of target setting, capital allocation, and review of annual operational performance. Client questionnaires regarding environmental and ESG performance are also reviewed by the Risk Team and referred to the Sustainability Team for response.
- Climate-related metrics and performance are routinely reviewed across global operations, reflecting the Firm’s commitment to both regulatory and voluntary ESG frameworks (CDP, EcoVadis), including alignment with the Net Zero Lawyers Alliance.

2.2. Management Role

- The COO leads Cleary Gottlieb’s internal sustainability initiatives and is ultimately accountable for delivery of the Firm’s climate targets. He receives regular updates from the Sustainability Team led by the Global Director of Strategic Initiatives, and integrates climate considerations into firmwide operations, vendor management, and annual budgeting. The Sustainability Team meets at least bi-weekly on sustainability management items to direct oversight of measurement and implementation of actions that have mitigation or adaptation benefits. Management has not implemented financial incentives tied to climate outcomes but demonstrates commitment through ongoing cross-division engagement, policy development, risk mitigation, and strategic planning.

2.3. Governance Structure

- The Firm’s climate governance structure operates as follows:
 - Executive Committee:** Ultimate oversight and strategic direction.
 - Global Operations Committee:** Annual review of climate performance, target progress, and material climate risks.
 - Chief Operating Officer:** Executive sponsor for climate target delivery.
 - Sustainability Team:** Bi-weekly operational meetings; led by Global Director of Strategic Initiatives with direct accountability for climate target delivery.
 - Cross-Functional Integration:** Climate considerations embedded in Operations, Procurement, IT, and Risk functions.
- Cleary Gottlieb also has an annual presentation to leadership by the Risk Team about risks identified throughout the year, including environmental and climate-related risk.

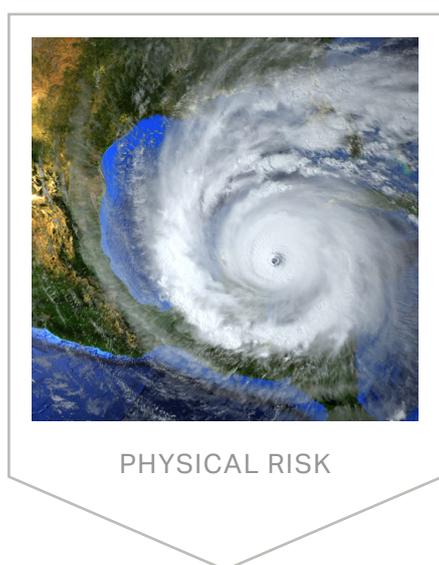


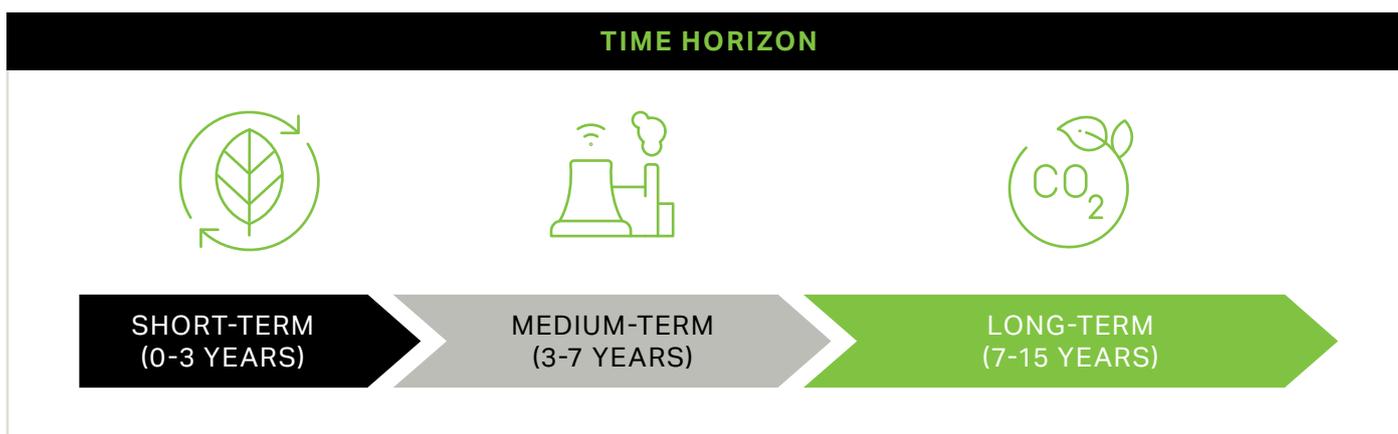


3. Strategy

3.1. Identified Climate-Related Risks and Opportunities

- Climate change impacts have already begun to materialize across many of the cities in which Cleary Gottlieb operates. From 2020 through 2024, global average temperatures continued to break historical records, intensifying both acute and chronic climate-related risks. The Firm has undertaken both a qualitative and quantitative assessment of both physical and transition risks, including:
 - **Physical Risk:** Acute risks driven by the increased frequency and severity of extreme weather (e.g., flooding, extreme heat) and chronic risks driven by shifting baseline conditions (e.g., sea-level rise).
 - **Transition Risk:** Risks driven by social, political, and technological shifts in response to climate.
 - **Opportunities:** Climate-related actions that reduce risk and/or increase the competitiveness of the Firm considering physical, social, policy, and market changes.
- Key Risks Identified:
 - Flooding is the predominant acute physical risk exposure for the Firm’s operations. Seven of the Firm’s office locations are in areas in which the risk of severe flooding is high, which could potentially render the office inaccessible during a flooding event. While legal services would continue off-site if flooding rendered an office space unusable, should an office space be inaccessible or if workers’ remote work locations (personal properties) are flooded, there could potentially be a small business disruption.
- The vast majority of the Firm’s emissions are Scope 3 emissions and thus derived from our value chain. There are essential goods and services we need to procure. While we will continue to work with our value chain to collectively manage emissions, it’s possible that suppliers’ low-carbon transitions don’t keep pace with the Firm’s, resulting in increased expenses to offset the emissions we’re unable to reduce.
 - The Firm’s electricity use in upstream leased assets (data centers) continues to climb with the use of AI, presenting both energy cost and emissions risks.
- Key Opportunities Identified:
 - This year the Firm continued its transition to renewable energy and securing RECs where renewable energy was unavailable. This further reduced the Firm’s market-based Scope 2 emissions and has been a worthwhile investment that we will continue to pursue going forward.
 - The Firm uses a third-party platform to evaluate the environmental risk profile of our suppliers. As part of this engagement, the Firm is working to expand visibility into suppliers’ emissions that are attributable to the Firm. This would allow for a more refined calculation of Firm emissions.





3.2. Time Horizons

■ Cleary Gottlieb’s assessment of climate-related risks includes three time horizons relevant to corporate strategy.

- **Short-term (0-3 years):** Committee cycles and near-term sustainability targets.
 - **Medium-term (3-7 years):** Interim emissions targets aligned with SBTi.
 - **Long-term (7-15 years):** Strategic positioning for net-zero alignment and physical infrastructure resilience.
- The short-term time horizon aligns with the duration of one cycle of membership on key committees that are responsible for Firm strategy and environmental priority oversight. Our medium-term time horizon aligns with the near-term science-based targets we have set through SBTi. Our long-term time horizon has been set to align with our long-term science-based target to ensure the decisions we make to manage dependencies, impacts, risks and opportunities are in alignment with achievement of the Firm’s long-term and net-zero ambitions that have been set with SBTi.

3.3. Strategic Impact and Resilience Actions

- Climate risks have informed Cleary Gottlieb’s decisions related to real estate, energy procurement, and client service offerings. Notably, building renovations since 2023 have incorporated embodied carbon assessments, and key suppliers (representing ~80% of total supply chain spend) with a medium-high or high risk based on EcoVadis IQ Plus are evaluated. Risk mitigation investments (e.g., battery backups, REC purchases) have influenced capital allocation.
- Cleary Gottlieb has begun translating its understanding of climate-related risks into operational and infrastructure strategies that enhance resilience across its global offices. These efforts are most advanced in regions where acute physical risks, such as flooding, extreme heat, or wildfire-related air quality decline, pose a credible threat to service continuity or employee well-being. Current resilience planning and evaluation include:

- **Extreme Weather and Building Adaptation:** Several offices of Cleary Gottlieb face increasing extreme weather risk. The Firm seeks opportunities for incorporating resilience considerations into facilities planning and examples include:
 - Evaluating backup power systems in high-risk locations to reduce exposure to utility outages and grid disruption during extreme weather events.
 - Using energy and water usage controls to monitor vulnerabilities and improve building-level responsiveness to climate stressors.
- **Occupant Safety and Remote Work Resilience:** Cleary Gottlieb has prioritized employee health and operational continuity across global operations, including regions where wildfire smoke, flooding or other environmental stressors may disrupt normal business functions. Examples include:
 - Establishing robust hybrid work capabilities that allow for flexibility during climate-related emergencies.
 - Reviewing HVAC system performance and indoor air quality standards as part of ongoing lease and renovation projects, with enhanced metering and air handling upgrades installed noted in, for example, Abu Dhabi and Brussels.
- **Data Center and Digital Resilience:** As legal services become increasingly reliant on digital infrastructure, Cleary Gottlieb is reviewing the physical and carbon resilience of its IT operations. Examples include:
 - Assessing data center procurement agreements, particularly in Virginia and New Jersey, to explore renewable electricity integration and operational backup capabilities.
 - Recognizing the growing energy demands of AI-related processing, Cleary Gottlieb is considering carbon performance expectations as part of future vendor agreements.
 - Evaluating opportunities to shift IT services to providers with net-zero commitments or renewable energy procurement, consistent with Cleary Gottlieb’s science-based targets and Scope 3 mitigation strategy.

3.4. Scenario Analysis

- While formal in-depth scenario analysis is being planned for the next risk disclosure, Cleary Gottlieb began considering climate scenario frameworks in climate risk assessment starting in 2021. These efforts aim to anticipate and prepare for the range of physical and transition risks that may impact the Firm’s operations, supply chain, and client services under a warming climate.
- The Firm’s current reference scenarios are derived from the IPCC’s Representative Concentration Pathways (RCPs), which reflect varying levels of global greenhouse gas emissions and warming trajectories:
 - **RCP 2.6:** An orderly transition scenario in which strong mitigation efforts limit global warming to below 2°C by 2100, closely aligned with the Paris Agreement and Cleary Gottlieb’s internal science-based targets.
 - **RCP 4.5:** An intermediate scenario where emissions peak around 2040 and decline thereafter. This scenario projects a global temperature increase of approximately 1.7-3.2°C by 2100 and is currently the most relevant for near- to mid-term operational planning.
 - **RCP 8.5:** A high emissions or “hot house world” scenario in which little to no mitigation action is taken, leading to temperature increases of 3.2-4.0°C by 2100 and heightened risk of severe physical climate impacts.
- The following table summarizes the Firm’s preliminary qualitative scenario analysis considerations:

Scenario	Temperature Pathway	Key Physical Risks	Key Transition Risks	Strategic Implications
RCP 2.6 (Orderly Transition)	<2°C by 2100	Moderate increase in flood frequency; manageable heat stress	Accelerated carbon pricing; stringent disclosure requirements	Alignment with SBT trajectory; competitive advantage in client services
RCP 4.5 (Intermediate)	1.7–3.2°C by 2100	Increased coastal flooding in NYC, Paris, Hong Kong; more frequent heatwaves	Moderate carbon pricing; evolving regulatory landscape	Enhanced resilience investments in high-risk offices; supplier engagement critical
RCP 8.5 (High Emissions)	3.2–4.0°C by 2100	Severe coastal flooding; extreme heat events; infrastructure strain	Delayed but severe policy responses; reputational risks	Significant capital expenditure for adaptation; potential office relocation considerations

- Early insights from baseline climate risk assessments undertaken in 2021 and 2023 have already influenced internal planning discussions. For example, exposure assessments under RCP 4.5 informing internal planning discussions in reference to office resiliency and energy efficiency investments, business continuity planning, and procurement decisions.
- Looking ahead, Cleary Gottlieb intends to formalize its scenario analysis capabilities by establishing a set of analytical assumptions, selecting sector-relevant stressors, and identifying quantitative thresholds that could trigger additional risk mitigation measures. These next steps will

support alignment with IFRS S2, improve the robustness of future SB 261 compliance filings, and enhance internal decision-usefulness of climate risk assessments.

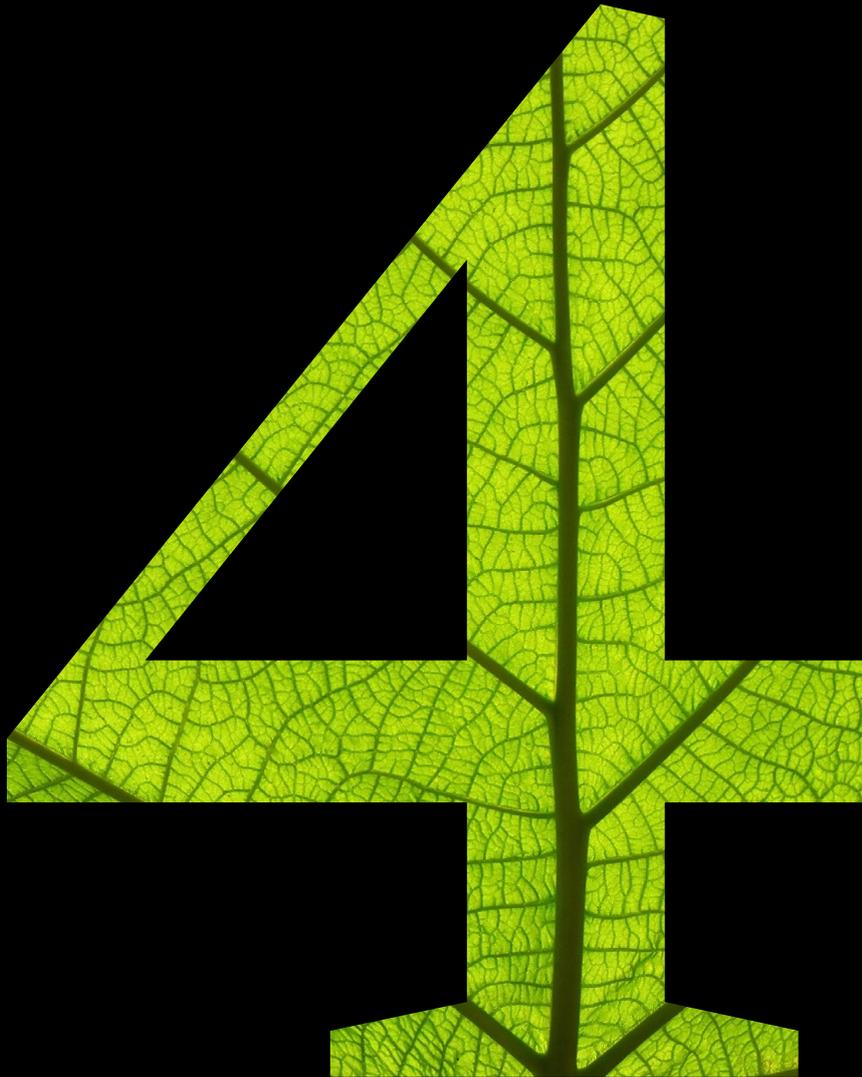
3.5. Science-Based Targets and Climate Strategy Alignment

- Cleary Gottlieb has adopted a science-based target (“SBT”) approach as a foundational element of its long-term climate strategy. These targets are aligned with the Science Based Targets initiative (“SBTi”) Net-Zero Standard and are structured to drive emissions reductions in line with limiting global temperature rise to 1.5°C. The Firm’s near- and long-term climate targets were established following an in-depth GHG inventory and operational analysis, and are structured to address emissions across all three scopes:
 - Near-Term Targets by 2030
 - Reduce absolute Scope 1 and 2 GHG emissions by 75% from a 2022 base year.
 - Reduce absolute Scope 3 GHG emissions by 42% within the same timeframe.
 - Long-Term Targets by 2040
 - Reduce absolute Scope 1 and 2 GHG emissions by 95% from a 2022 base year.
 - Reduce absolute Scope 3 GHG emissions by 90% within the same time frame.

- Achieve full net-zero status across Firm operations and value chain.
- These targets reflect both the Firm’s internal decarbonization commitments and its growing engagement with clients, suppliers, and peers. To support progress toward these goals, Cleary Gottlieb has taken a phased implementation approach that includes:
 - Integrating climate considerations into facilities planning, renewable energy procurement, and supplier evaluation.
 - Using an internal carbon price to inform voluntary procurement and budget planning.

- Continuing to refine Scope 3 emissions estimates and supplier engagement strategies, including the use of EcoVadis for ESG screening of key suppliers.
- The Firm’s SBTs are increasingly informing strategic and operational decision-making and are expected to play a central role in shaping future real estate investments, IT infrastructure decisions, and procurement criteria. In the next disclosure cycle due January 1, 2028, Cleary Gottlieb plans to align further with ISSB IFRS S2 and CSRD, incorporating quantitative scenario analysis and financial materiality assessments to complement its target-driven approach.





4. Risk Management

4.1. Risk Identification and Assessment

- Cleary Gottlieb identifies and assesses climate-related risks using a structured, multi-layered approach, integrating both internal knowledge and third-party expertise. The Firm conducted its first enterprise-level climate risk screening in 2021 with support from external consultants. This work is expected to be revisited periodically to reflect new data, operational shifts, and evolving disclosure standards.
- Risks are assessed across two principal categories:
 - **Physical risks:** For example, flooding, heatwaves, landslides, wildfire smoke, and water stress; evaluated with consideration for location-specific exposure, infrastructure vulnerability, and business continuity implications.
 - **Transition risks:** Including supplier emissions intensity, energy cost volatility, evolving climate disclosure expectations, and reputational exposure, particularly relevant in the legal services sector.
- These risks are evaluated based on likelihood and potential severity using qualitative and quantitative metrics, incorporating factors such as geographic location, impact on client service delivery, and capacity for adaptation.
- Thresholds for materiality are still evolving. However, qualitative triggers such as impact on client deliverability, regulatory compliance risk, or material procurement disruption are currently prioritized over strict financial thresholds. This materiality lens is expected to be refined in future cycles in alignment with ISSB and CSRD standards.

4.2. Integration into Firmwide Risk Processes

- Climate-related risks are embedded into the Firm's operational and governance systems in a manner consistent with emerging best practices. The COO and Global Director of Strategic Initiatives, supported by the Sustainability Team, oversee identification and response efforts, with key risks elevated to the Global Operations Committee for review and prioritization. Environmental and climate risks inform decisions across multiple business functions including:
 - **Facilities and real estate:** Climate risk informs lease negotiations, renovation investments, and energy system upgrades.
 - **Procurement:** Supplier climate performance is integrated into scorecards, with key vendors assessed through EcoVadis.
 - **IT and infrastructure:** Data center selection and business continuity planning increasingly account for exposure to climate extremes (e.g., temperature, power reliability, and flood risk).

- Outputs from the climate risk assessment process, such as office-level vulnerability and supplier emissions data, are also shared with the Global Operations Committee, which conducts an annual review of sustainability-related risk exposures as part of its broader oversight mandate.
- In the past year, the Firm has introduced a platform to evaluate the environmental risks of its suppliers. The results are monitored on a regular basis and a process is in place for supplier engagement and remediation should concerning results be surfaced.

4.3. Risk Monitoring and Adaptive Management

- Cleary Gottlieb monitors climate risks across short-, medium-, and long-term horizons, informed by scenario data and regional exposure analysis. For example:
 - Flood risk and extreme weather events are monitored at the city level (e.g., New York, Brussels, Paris) based on IPCC-aligned RCP pathways.
 - Transition risks tied to vendor Scope 3 emissions and technology-related energy use are monitored through the Firm's GHG inventory management systems, sustainable procurement policy, vendor code of conduct and renewable procurement performance.
- Future reporting cycles will incorporate updates to the risk register based on:
 - Scenario planning aligned with RCP 4.5 and 8.5.
 - More granular data from suppliers and facilities.
 - Evolving regulatory standards such as California SB 261, IFRS S2, and CSRD.





5. Metrics and Targets

Cleary Gottlieb tracks and reports a range of climate-related performance indicators to inform operational decision-making, meet its science-based targets, and improve transparency across its value chain. The Firm’s current metrics cover emissions performance, energy consumption, renewable sourcing, and supplier engagement, with third-party assurance obtained for 2024 GHG data.

5.1. GHG Emissions and Energy Metrics

Cleary Gottlieb monitors Scope 1, 2, and select Scope 3 emissions categories (which align with our SBT target setting) across its global footprint, using a combination of internal data collection, consultant-led analysis, and procurement-based estimates. Reporting follows the GHG Protocol and aligns with CDP disclosure standards.

2024 GHG Emissions (Third-Party Assured):

Scope	Emissions (MT CO ₂ e)
Scope 1 (direct)	472
Scope 2 (market-based)	268
Scope 2 (location-based)	2,733
Scope 3 (selected categories)	31,348

Scope 3 (select categories)	Emissions (MT CO ₂ e)
Category 1: Purchased goods and services	14,959
Category 2: Capital goods	6,344
Category 3: Fuel- and energy-related activities	114
Category 5: Waste generated in operations	44
Category 6: Business travel	8,260
Category 7: Employee commuting	1,277
Category 8: Upstream leased assets	350

- In addition to emissions, the Firm tracks:
 - Electricity consumption, broken down by renewable vs. non-renewable sources. As of 2024, the Firm sources renewable energy via Renewable Energy Certificates (RECs) and Energy Attribute Certificates (EACs) covering substantially all electricity consumption.
 - Fuel consumption by office and from corporate vehicles.
 - Firm personnel commute modes and characteristics.

- Detailed information on business flights and ground transportation.
- Waste generated in operations and refrigerant system service data, where available.
- Energy intensity and emissions trends by office are monitored internally but not publicly reported.

The Firm purchased RECs and EACs covering over 8,400 MWh of electricity consumption in 2024, avoiding over 2,250 MT CO₂e in Scope 2 emissions on a location-based accounting basis.

5.2. Internal Carbon Price

Cleary Gottlieb applies an internal carbon price of \$22–\$37 per metric ton of CO₂e, based on the prevailing market rates for RECs and certified offsets. In addition to REC purchases for Scope 2 energy, we purchase carbon allowances via Climate Vault. These purchases hold allowances on regulated markets and then funding is directed to carbon dioxide removal and sequestration projects, providing a tangible cost of carbon for our footprint.

- This price serves several purposes:
 - Guides budget planning for environmental initiatives.
 - Supports vendor selection and offset strategy.
 - Frames internal discussions on capital expenditures with potential climate impacts.
 - The internal carbon price is not yet used in financial modeling or investment decisions. Cleary Gottlieb is exploring the formal integration of this carbon price into travel, IT procurement, and vendor contracting frameworks in future cycles.
- Aside from these efforts, we are prioritizing investments and ensuring that we are getting the best data to integrate actions. For instance, we are getting more granular emissions factors from our architect partners for emissions tracking and integration of building level and material choices that can reduce emissions impacts.

5.3. Performance to Date

- Progress against science-based targets:
 - Cleary Gottlieb has already achieved ~99% of its 2030 Scope 1 and 2 target, primarily through market-based renewable procurement and HVAC efficiency projects.
 - Scope 3 emissions increased in 2024, largely due to improved methodology and expanded data coverage across travel, commuting, and vendor categories. The Firm is evaluating whether to re-baseline its Scope 3 targets to reflect these methodological updates while preserving alignment with SBTi requirements.

5.4. Supply Chain Engagement

- To advance its Scope 3 strategy, Cleary Gottlieb is:
 - Using EcoVadis to evaluate the climate performance of key suppliers representing ~80% of total supply chain spend.
 - Integrating climate scoring into vendor selection and renewal discussions.
 - Exploring pathways to encourage suppliers to adopt science-based targets or improved emissions transparency.
- Cleary Gottlieb uses EcoVadis and its IQ Plus platform to map the Firm’s value chain. Through this screening tool, the Firm is able to understand the risk profiles of its key vendors from environmental, human rights, ethics and sustainable procurement perspectives.
- These practices are intended to enhance the credibility of Cleary Gottlieb’s value chain disclosures and support forward-looking procurement strategies.





6. Conclusion

This Climate-Related Financial Disclosure Report demonstrates Cleary Gottlieb’s commitment to transparency, accountability, and proactive climate risk management. Through robust governance structures, strategic resilience planning, comprehensive risk assessment, and ambitious science-based targets, the Firm is positioning itself to navigate the challenges and opportunities presented by climate change whilst continuing to deliver exceptional legal services to our clients.

We recognize that climate disclosure is an evolving practice, and we are committed to continuous improvement in our reporting, data quality, and strategic integration of climate considerations across all aspects of our operations. We look forward to engaging with stakeholders as we advance this important work.

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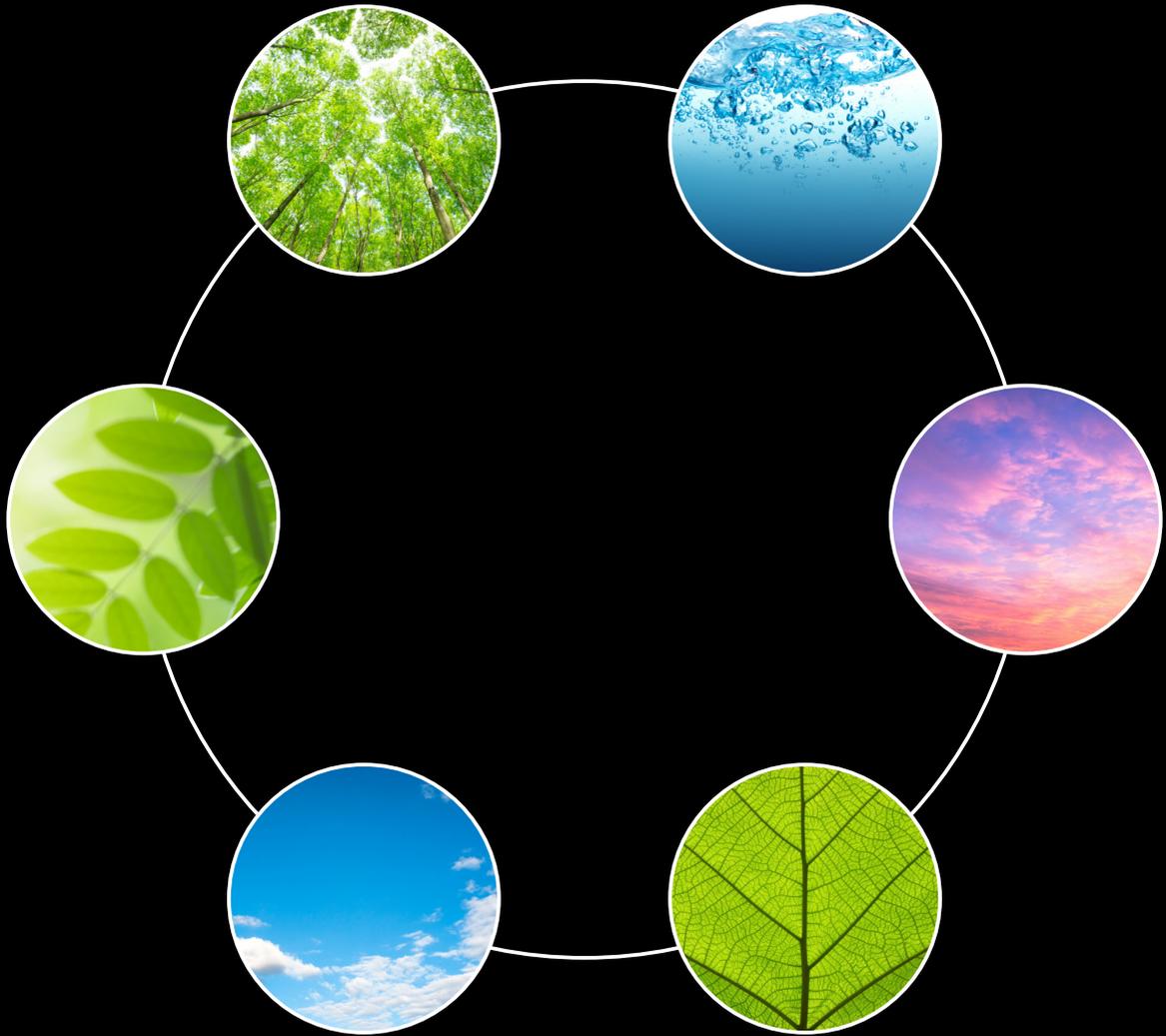
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Report Date: December 2025

Reporting Period for GHG Data: Calendar Year 2024

Third-Party Assurance: Limited assurance obtained for Scopes 1, 2, and 3 GHG emissions data.





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