

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 ‘Environmental Metrics Statement-Basis of Reporting’ (The “Report”).

ENGAGEMENT SUMMARY

Scope of our assurance engagement	Whether the 2023 information and data for the following selected disclosures, are fairly presented in the GHG Emissions section of the Report, in all material respects, in accordance with the reporting criteria.
	<ul style="list-style-type: none"> • Total Scope 1 GHG emissions [metric tons CO₂e] • Total Scope 2 GHG emissions (location-based) [metric tons CO₂e] • Total Scope 2 GHG emissions (market-based) [metric tons CO₂e]
	Our assurance engagement does not extend to information in respect of earlier periods or to any other information included in the Report.
Reporting period	1st January 2023 to 31st December 2023
Reporting criteria	<ul style="list-style-type: none"> • Cleary Gottlieb’s Basis of Reporting as noted in the Report published here - Sustainability at Cleary • 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
Assurance standard and level of assurance	We performed a limited assurance engagement, in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised) ‘Assurance Engagements other than Audits or Reviews of Historical Financial 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 Report 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 scope based on our engagement terms with Cleary Gottlieb, the assurance activities performed and exercising our professional judgment.

OUR CONCLUSION

Based on our activities, as described below, nothing has come to our attention to indicate that the 2023 data and information for the disclosures listed under 'Scope' above are not fairly presented in the Report, in all material respects, in accordance with the reporting criteria.

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 was not restricted to, the following:

- Evaluating the appropriateness of the reporting criteria for the Selected information;
- Interviewing relevant staff to understand and evaluate the management systems and processes (including internal review and control processes) used for collecting and reporting the selected disclosures.
- Reviewing of a sample of qualitative and quantitative evidence supporting the reported information at both site and corporate levels;
- Performing an analytical review of the year-end data submitted by all locations included in the consolidated 2023 group data for the selected disclosures which included testing the completeness and mathematical accuracy of conversions and calculations, and consolidation in line with the stated reporting boundary;
- Evaluating the conversion and emission factors and assumptions used; and
- Reviewing the presentation of information relevant to the scope of our work in the Report to ensure consistency with our findings.

THE LIMITATIONS OF OUR ENGAGEMENT

The reliability of the assured 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 QUALITY 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.

December, 20 2024

Malvern, PA

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