

**FOLEY'S**

**ESG**

**REPORT**

**ENVIRONMENTAL | SOCIAL | GOVERNANCE**



# Our Inaugural ESG Annual Report



## MESSAGE FROM OUR CEO

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Foley & Lardner LLP operates our law firm based on a set of core values that address how we serve our clients, engage our people, and give back to our communities to make them stronger. While our core values have allowed us to grow our legal practice for 180 years, they also serve as a roadmap to measure our progress through the lens of Environmental, Social, and Governance (ESG) issues.

In 2021, in response to client demand, we formalized our ESG team by bringing together our lawyers who have been advising clients on numerous ESG issues. Today our team comprises over 100 lawyers from a wide range of practice groups. After advising clients with their ESG-related issues, we determined that it was time for us to begin collecting and sharing our progress.

This inaugural ESG Report is the result of our firm's honest self-evaluation that encompasses measuring our current environmental foot-print, documenting our social and employment programs, and specifying our organizational governance structure.

I invite you to review our ESG Report, and I welcome your feedback as always. We are confident that our future ESG performance will change and improve over time. This has been the story of Foley since our founding in 1842 — consistently changing and improving.



**Daljit Doogal**

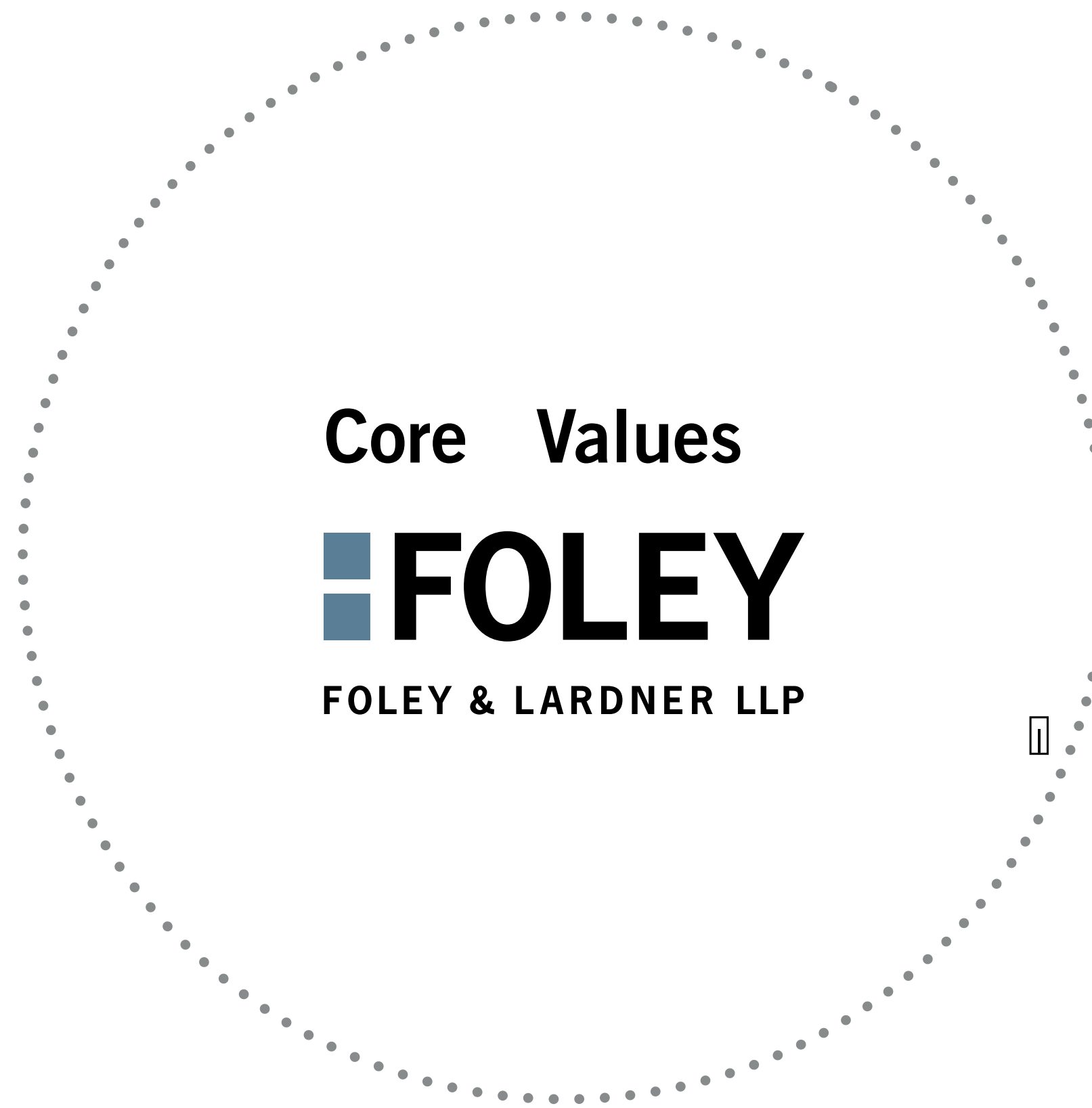
Chairman and CEO  
Foley & Lardner LLP



## OUR CORE VALUES

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Foley has focused on providing exceptional legal services to its clients since its founding in 1842. Our core values have allowed us to sustain our legal practice through the generations – they offer a grounding for this ESG Report, and they say a lot about who we are at Foley.



[CLICK THE TOPIC TO LEARN MORE](#)

# Clients First



## Environmental, Social, and Governance-related Legal Services

**As investors demand increasing company attention to environmental policies, diversity and inclusion programming, corporate governance, and associated operations, Foley helps its clients understand and navigate the cross-currents in the swift flow of ESG-related law.**

While EU- and U.S.-based governmental agencies, as well as organizations like the World Economic Forum, the Value Reporting Foundation (the overseer of SASB standards), the Task Force on Climate-Related Financial Disclosures, and the Greenhouse Gas Protocol are establishing different reporting frameworks and standards, businesses must decide which to follow. We identify the risks and rewards, ferret out the often-hidden pitfalls that embarrass or surprise earnest executives, and guide acquisitive parties through the due diligence process that leads to the successful conclusion of an ESG-compatible transaction.

Foley leverages a deeply experienced, cross-disciplinary team to help clients identify material issues, develop strategies and programs, and ultimately achieve transparency and compliance that satisfies investors and watchdogs alike. We seek to

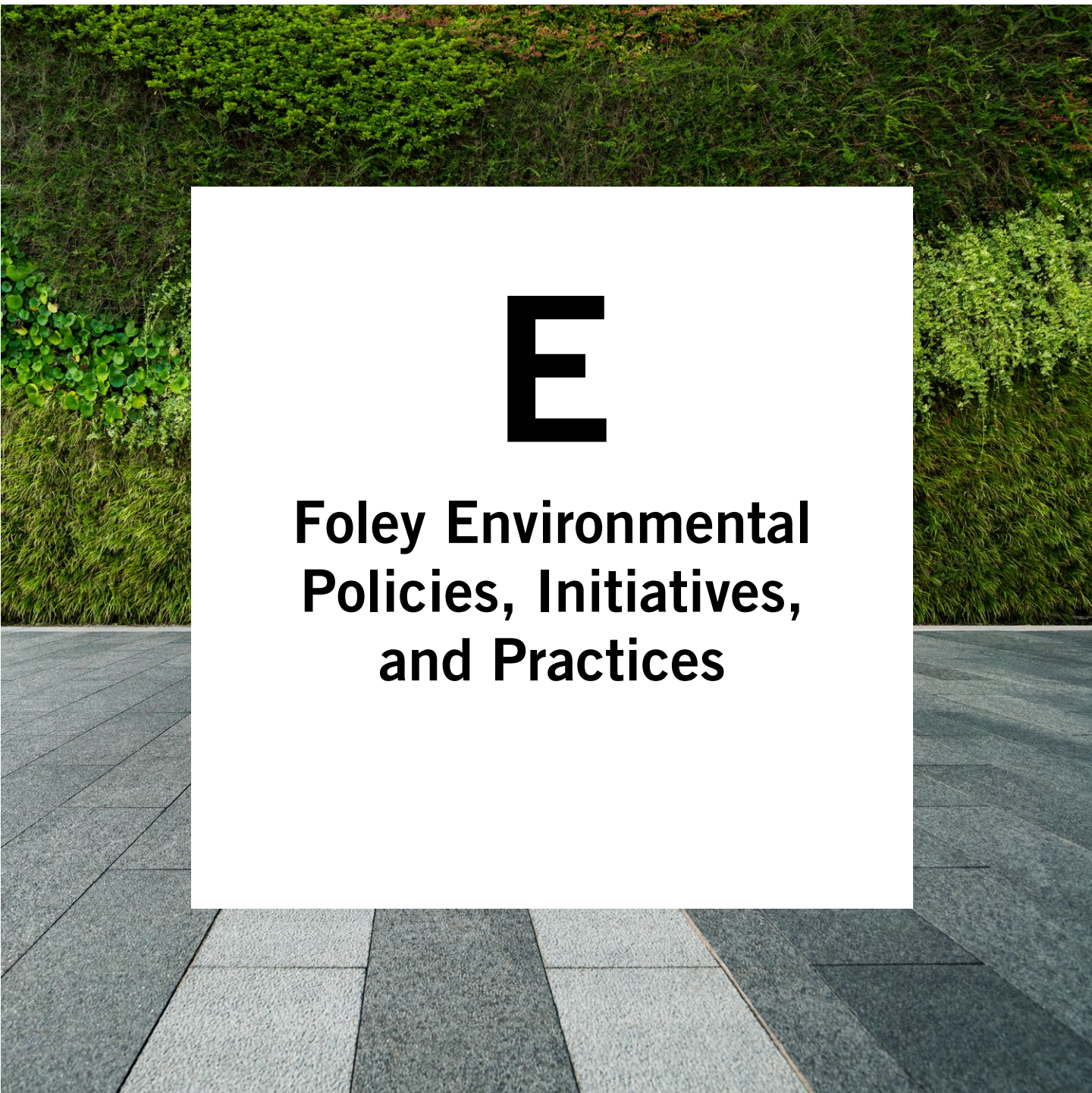
protect clients' long-term value and profitability, and to turn challenges into opportunities. Our services span legislative, regulatory compliance, litigation, and reputational concerns and are grounded in hundreds of years of combined experience, offering both long-term and up-to-the-minute insights and guidance to clients. While we certainly may assist with individual components of ESG, **our greatest value lies in bringing together multidisciplinary legal practitioners who help clients align their end-to-end operations and design a comprehensive approach to full-company ESG compliance that they can defend and highlight.** Our ESG team includes attorneys in more than a dozen practice areas, including:

- Capital Markets and Public Company Advisory
- Labor & Employment
- Environmental and Energy
- Government Enforcement Defense & Investigations and Securities Litigation
- Real Estate
- Cybersecurity & Data Privacy
- Government Solutions




# FOLEY'S ESG REPORT | TABLE OF CONTENTS

This is a living document, subject to ongoing revision as we pursue and achieve continuous improvement. It is our hope that Foley represents an example of a committed, caring organization now and a model for the legal industry going forward.




**E**  
Foley Environmental  
Policies, Initiatives,  
and Practices

GO TO SECTION >



**S**  
Foley Social  
Policies, Initiatives,  
and Practices



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**G**  
Foley Governance  
Policies, Initiatives,  
and Practices



GO TO SECTION >



# E

## Foley Environmental Policies, Initiatives, and Practices





# Stewardship and Accountability



## Foley Environmental Policies, Initiatives, and Practices

Environmental protection and stewardship are now core tenets of business plans. We can improve the sustainability of our systems to reduce pollution and combat global warming, no matter what type of industry we function within. While it is true that our “E” section looks different than that of an energy or manufacturing company, it is nonetheless crucial that we take into account our current policies, impacts, and ways to improve.

Importantly, Foley’s 22 U.S. offices operate somewhat independently, allowing for flexibility within the communities in which we practice. Every office has an office managing partner, who oversees legal operations, and an office administrator, who oversees business operations. With input from leadership and local business professionals, these two roles spearhead activities and operations from location to location. While this flexibility is important to Foley’s success and service to clients, it means sustainability

efforts vary from office to office. **As part of this ESG reporting initiative, we conducted a detailed and comprehensive Environmental and Sustainability Survey (E&S Survey) across our 22 U.S. offices.** Based on the survey results, we have provided below a current snapshot of Foley’s efforts to run a sustainable, environmentally responsible business.

A key goal of our ESG reporting initiative is to identify opportunities to improve energy use and sustainability across offices. Using the results from the initial E&S Survey as a baseline, we aim to improve on metrics related to Energy Usage, Water Usage, Renovations, and Office Administration and Activities by the time we publish the next version of our ESG Report.

[CLICK HERE TO LEARN MORE](#)

**[The full results of the E&S Survey are included in the Appendix.](#)**



Environmental



Social



Governance





## STEWARDSHIP AND ACCOUNTABILITY

### Highlights of the Foley E&S Survey of U.S. Offices

**22**  
U.S. Offices

**2,000+**  
Attorneys and business professionals

**10,000+**  
Clients served in 2022 alone



### E&S Priorities with Widespread Adoption



Environmental



Social



Governance





## STEWARDSHIP AND ACCOUNTABILITY

### Highlights of the Foley E&S Survey of U.S. Offices

#### E&S Priorities Targeted for Improvement

ENERGY & WATER USAGE

OFFICE ADMINISTRATION AND ACTIVITIES



Environmental



Social



Governance



# S

## Foley Social Policies, Initiatives, and Practices





# Diversity

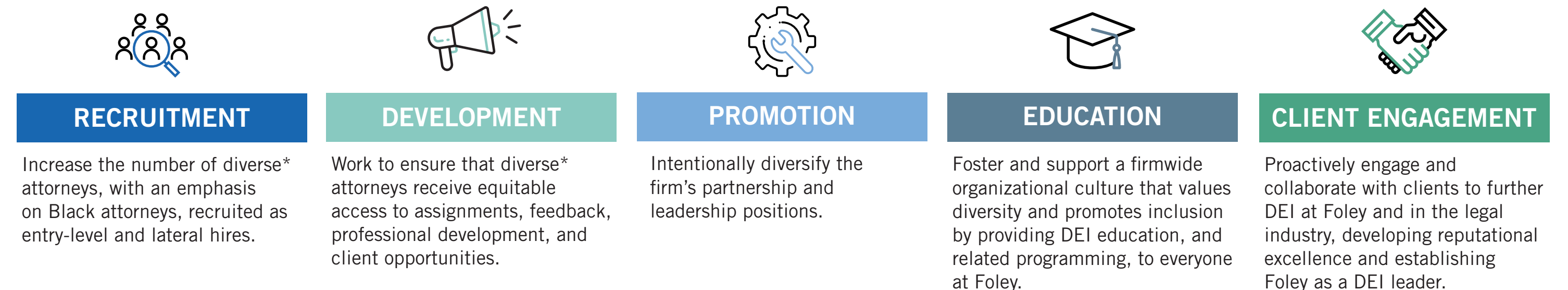


## 2026 Diversity, Equity, & Inclusion Strategic Plan

At Foley, we recognize the importance and value of our workforce reflecting the diversity found in the world, the clients we serve, and the communities in which we live and work. In service of this, we have a holistic approach to ensure diversity, equity, and inclusion (DEI) are woven into every aspect of the firm. We support affinity groups and mentorship programs, and collaborate with a wide array of external organizations committed to promoting diversity, laser focused on elevating the many talent management processes and systems that support

attorneys and business professionals through the arcs of their careers, and in an intentional and equitable way.

Foley's DEI efforts are guided by the firm's 2026 DEI Strategic Plan, which is composed of objectives in five key areas: Recruitment, Development, Promotion, Education, and Client Engagement. These objectives build on our past successes, align with our firmwide strategic plan, and reflect our integrated approach to talent development.



\*Ethnic/racial minorities, LGBTQ, persons with disabilities, women.





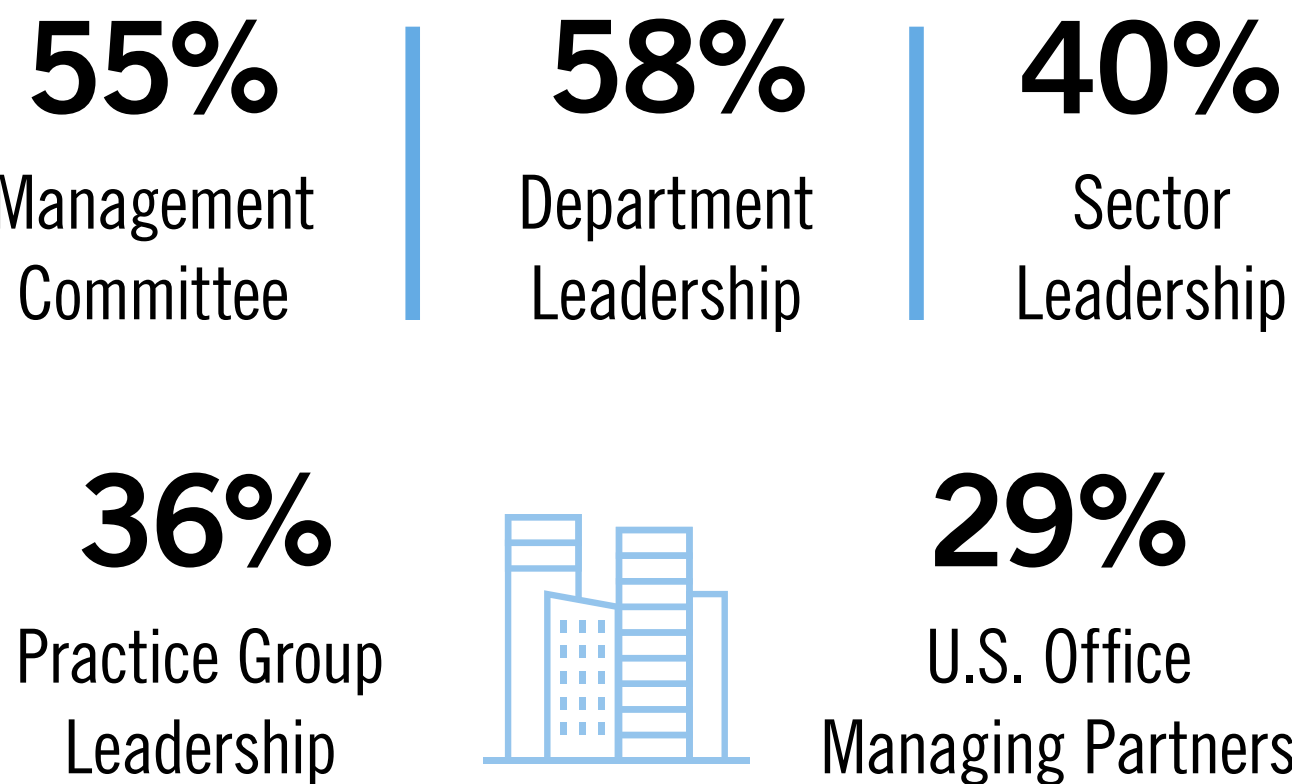


# DIVERSITY

## Diversity Statistics

Our commitment to expanding diversity among our attorneys and business professionals is reflected in our statistics and in the composition of our leadership positions. Doing even better is an ongoing priority at the firm.

### FIRM LEADERSHIP DIVERSITY DEMOGRAPHICS



PARTNER DEMOGRAPHICS	SENIOR COUNSEL DEMOGRAPHICS	ASSOCIATE DEMOGRAPHICS
25% Women	40% Women	51% Women
10% Racial/Ethnic Minorities	21% Racial/Ethnic Minorities	26% Racial/Ethnic Minorities
2% LGBTQ	5% LGBTQ	5% LGBTQ
33% *Total Demographically Underrepresented	55% *Total Demographically Underrepresented	66% *Total Demographically Underrepresented
2022 SUMMER ASSOCIATE CLASS	2022 NEW ASSOCIATE CLASS	2022 LATERAL NON-PARTNER RECRUITS
58% Women	60% Women	25% Women
34% Racial/Ethnic Minorities	28% Racial/Ethnic Minorities	28% Racial/Ethnic Minorities
9% LGBTQ	13% LGBTQ	6% LGBTQ
76% *Total Demographically Underrepresented	75% *Total Demographically Underrepresented	53% *Total Demographically Underrepresented

\*Total Demographic Underrepresentation is based on gender, race/ethnicity, LGBTQ, and disability. The above totals do not double count for any of these categories. Updated as of 12/31/2022.







# DIVERSITY



## Diversity, Equity, and Inclusion – Awards & Accolades

We are pleased to share that our DEI efforts have been acknowledged in the form of a number of external certifications and awards. Recent recognition includes:



Achieved **Mansfield 5.0 Certification Plus** Status from Diversity Lab



Named in *Bloomberg Law's* second **Diversity, Equity & Inclusion Framework**



Named 2022 **Compass Award** winner by LCLD



Earned **MCCA Approved 2023 Gold Seal**



Received the **2022 Gold Standard Certification** by the Women in Law Empowerment Forum (WILEF)



Ranked **Top 25 law firm for diversity, equity & inclusion** in the *Chambers Associate 2022* Satisfaction Surveys



Recognized by Diversity Lab as a **2022 Inclusion Champion** for our **Health Care Practice Group**



Recognized as a **Best Place to Work for LGBTQ Equality** by the Human Rights Campaign annually since 2013







## DIVERSITY

### Diversity, Equity, and Inclusion – Additional DEI Efforts



This popular podcast series, hosted by Foley’s Director of Diversity, Equity & Inclusion Alexis Robertson, explores the professional origin stories of our attorneys and highlights the diverse backgrounds,

experiences, and perspectives they bring to the firm and the practice of law.

#### Diversity Fellowship Program

Over the past two decades, Foley has awarded more than \$500,000 in scholarships to more than 100 outstanding first-year law students. Our Diversity Fellowship Program for second-year law students continues our longstanding commitment to fostering diverse legal talent. Each Diversity Fellow receives a weekly salary throughout the 10-week program, plus a \$20,000 fellowship.

#### Leadership Council on Legal Diversity (LCLD)

Foley is proud to be a longstanding member of the LCLD. Each year, we select rising stars from the senior counsel and associate ranks to participate in LCLD’s Fellows and Pathfinder Programs. These programs are aimed at developing the next generation of diverse leaders in the legal profession. [Read insights from our recent Fellows and Pathfinders.](#) We also provide opportunities for first-year law students through LCLD’s 1L Scholars Program.

#### Affinity Groups

Foley’s six affinity groups serve as a resource for members and allies.

**Black Attorneys Affinity Group**

**Asian, Pacific, and Middle Eastern Attorneys Affinity Group**

**Latino Attorneys Affinity Group**

**Lesbian, Gay, Bisexual, Transgender, Queer & Allies Affinity (LGBTQA) Group**

**National Women Attorneys Network**

**Veterans & Allies Affinity Group**

[CLICK HERE TO LEARN MORE](#)

[About our DEI Efforts](#)



Environmental



Social



Governance





## CITIZENSHIP

### Giving Back in Our Communities

Foley considers it a moral imperative to give back to the communities in which we live and work. We are committed to providing meaningful pro bono opportunities for our attorneys and quality legal services to those who most need our help. The firm makes generous donations to hundreds of organizations in our communities each year. And our attorneys and business professionals commit their time and talent to numerous organizations.

#### Pro Bono Legal Services

When it comes to pro bono services, we have done everything from assisting individuals, legal aid societies, and civil rights organizations to representing nonprofit organizations in strategic projects and litigation matters.

Here are a few recent examples:

- Helping financially under-resourced inventors and small businesses protect their ideas, positioning them to more fully realize their dreams. [Read More](#)
- Representing low-income residents in adult guardianship, tax, and other family law matters. [Read More](#)
- Securing asylum for numerous pro bono clients. [Read More](#)

- Offering estate-planning assistance at no charge for eligible first responders and their spouses or domestic partners. [Read More](#)

We automatically provide billable credit for the first 100 hours of pro bono work per year, and Foley’s National Pro Bono Committee has set these goals to improve our pro bono service:

- Significantly increasing the number of attorneys, paralegals, and patent agents performing pro bono service and the hours they contribute.
- Expanding the variety of service opportunities.
- Enhancing partnerships with other law firms, clients, nonprofits, and law school pro bono programs.

### Featured Pro Bono Initiative: No One Left Behind (NOLB)

Foley is committed to advancing NOLB’s mission to resettle every Afghan and Iraqi interpreter in the United States by providing legal services in various areas, including filing humanitarian parole applications to help bring Afghan allies and their families to the United States, reviewing service contracts for emergency evacuation flights from Afghanistan and housing of Afghan allies following their arrival in the United States, and advising on matters such as fundraising, tax, and other nonprofit governance issues. [Read More](#)

[CLICK HERE TO LEARN MORE](#)

[About our Pro Bono Efforts](#)



Environmental



Social



Governance

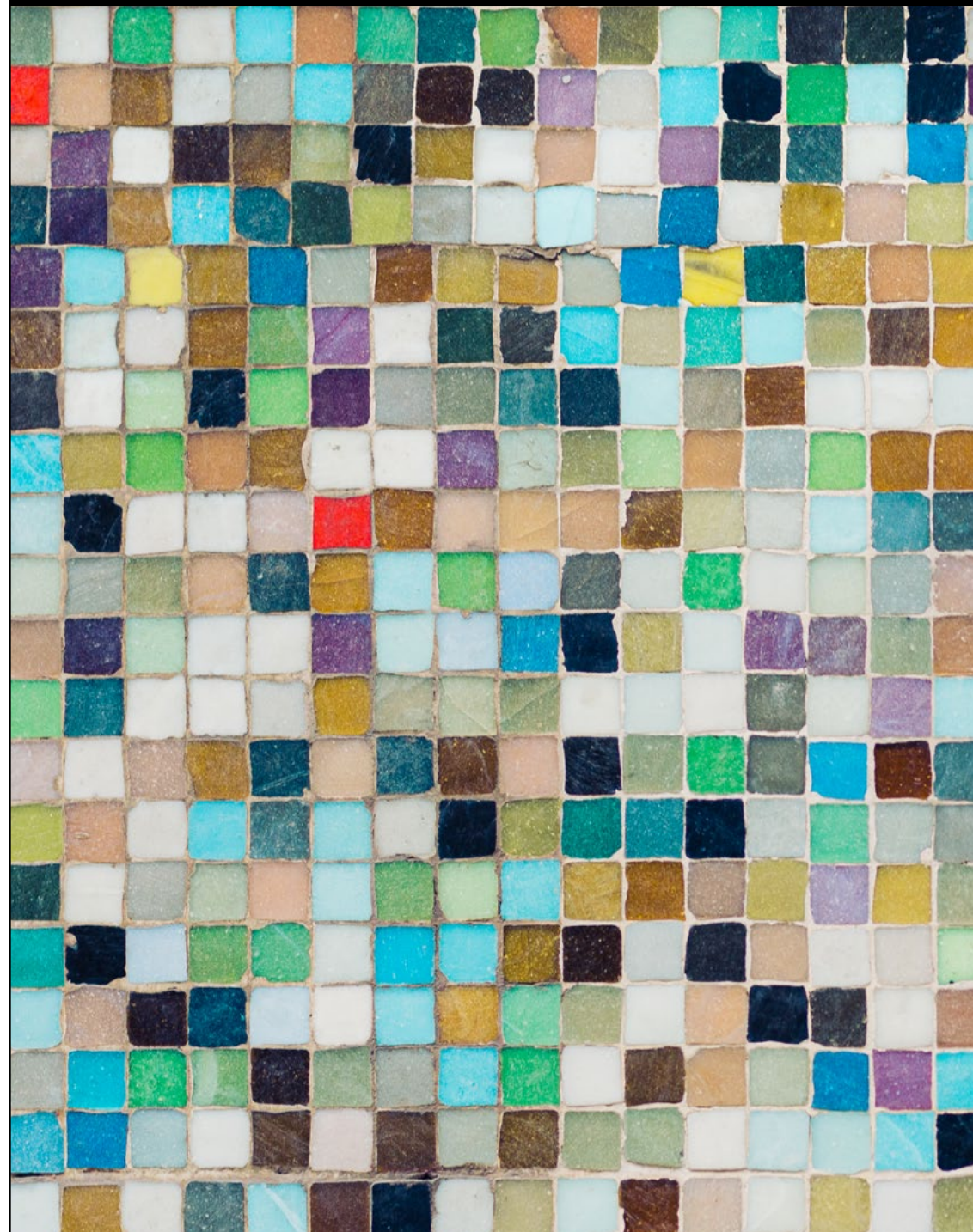




# CITIZENSHIP

## Giving Back in Our Communities – Marquee Initiatives

### RACIAL JUSTICE & EQUITY PRACTICE



Foley is committed to furthering equity and combating prejudice. Our [Racial Justice & Equity Practice Group](#) spans a range of legal disciplines to provide a multifaceted approach to addressing unfair and unequal treatment based on race or ethnicity.

#### Areas of Focus

- Community Partnerships
- Election Protection Activities
- Legal Aid Clinics
- Litigation
- Minority-Owned Business Legal Services
- Police Reform
- Prisoner Rights
- Protest Protection
- Public Affairs and Government Outreach

#### High-Profile Case

We secured a victory on behalf the [Los Angeles County Board of Supervisors](#) to return a popular Black-owned resort to the legal heirs of the property.

### BOYS & GIRLS CLUBS OF AMERICA NATIONAL PARTNERSHIP



On July 7, 2021, Foley [announced a national partnership](#) with Boys & Girls Clubs of America to support its Diversity, Equity, and Inclusion efforts. Since then, all of the firm’s 22 U.S. offices have engaged with local Clubs on programs and initiatives that are responsive to the Clubs’ needs in that community. Foley’s Mexico City office also began a partnership last year with Pro Niños de la Calle, a local charitable foundation working with children living in challenging conditions. In celebration of the one-year anniversary, [Foley Chairman and CEO Daljit Doogal](#) and [Foley-BGCA program leader Linda Benfield](#) reflected on the [first 12 months](#) and what is next for the partnership.







## CITIZENSHIP

### Giving Back in Our Communities – Marquee Initiatives

#### STREET LAW LEGAL DIVERSITY PIPELINE PROGRAM



Foley’s unique Street Law Legal Diversity Pipeline Program provides high school students from diverse backgrounds with an engaging, highly interactive experience featuring a variety of legal topics and mock trials and negotiations. It also has led to internships at Foley and at firm clients and has fostered lifelong mentoring relationships. In 2022, our [Milwaukee office hosted a semester-long, in-person Street Law program](#) for 27 teens from 13 area high schools who were members of the Boys & Girls Club (BGCA) of Greater Milwaukee. Foley’s Los Angeles office held its first-ever Street Law program in 2022, hosting 18 students from Metro LA BGCA’s college bound program.

#### DR. MARTIN LUTHER KING JR. ANNUAL ORATORY COMPETITION



Each Martin Luther King Jr. Day, Foley hosts an oratory competition to encourage students to learn more about Dr. King and to help cultivate the writing and speaking skills of elementary school students and pay tribute to the late civil rights leader’s legacy. First initiated 30 years ago by the Gardere Wynne Sewell law firm, with which Foley combined in 2018, the program now takes place in Dallas, Houston, and Chicago. In our January 2023 competition, fourth- and fifth-graders delivered original speeches addressing the topic: *“What would Dr. King say to us today about hope for tomorrow?”* The final rounds were held [live in Chicago, Dallas, and Houston on January 13, 2023.](#)

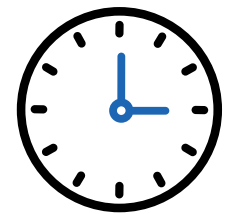




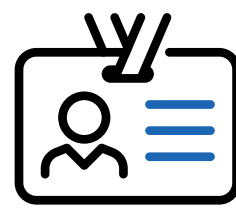


# CITIZENSHIP

## 2022 Community Impact – By the Numbers



**42,361**  
pro bono hours  
in FY23



**85.8%**  
attorney pro bono  
participation rate  
in FY23



**39.7**  
average pro bono  
hours per attorney  
in FY23



**3,400+**  
hours in FY2022  
spent on racial justice  
and equity issues

Foley has volunteered, either as an office or as individuals within offices, at more than

**100**  
organizations

over the last

**18**  
months.

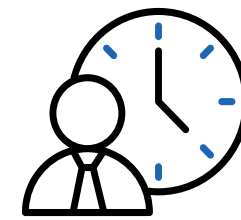


BOYS & GIRLS CLUBS  
OF AMERICA

**FOLEY**  
FOLEY & LARDNER LLP



**120+**  
activities hosted  
with local Clubs



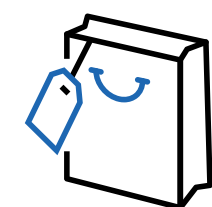
**2,500+**  
hours contributed  
to BGCA activities



**16+**  
scholarships  
provided to Club kids



**2,500**  
Club kids received  
backpacks with  
school supplies



**5,000**  
Club kids benefitted  
from holiday giving



Environmental



Social



Governance



# Our People



## Employee Health and Well-Being

It's no secret that the legal industry can be one of the most challenging and rewarding in which to serve. We are committed to cultivating a healthy work environment and investing in the long-term personal and professional growth and well-being of our people.

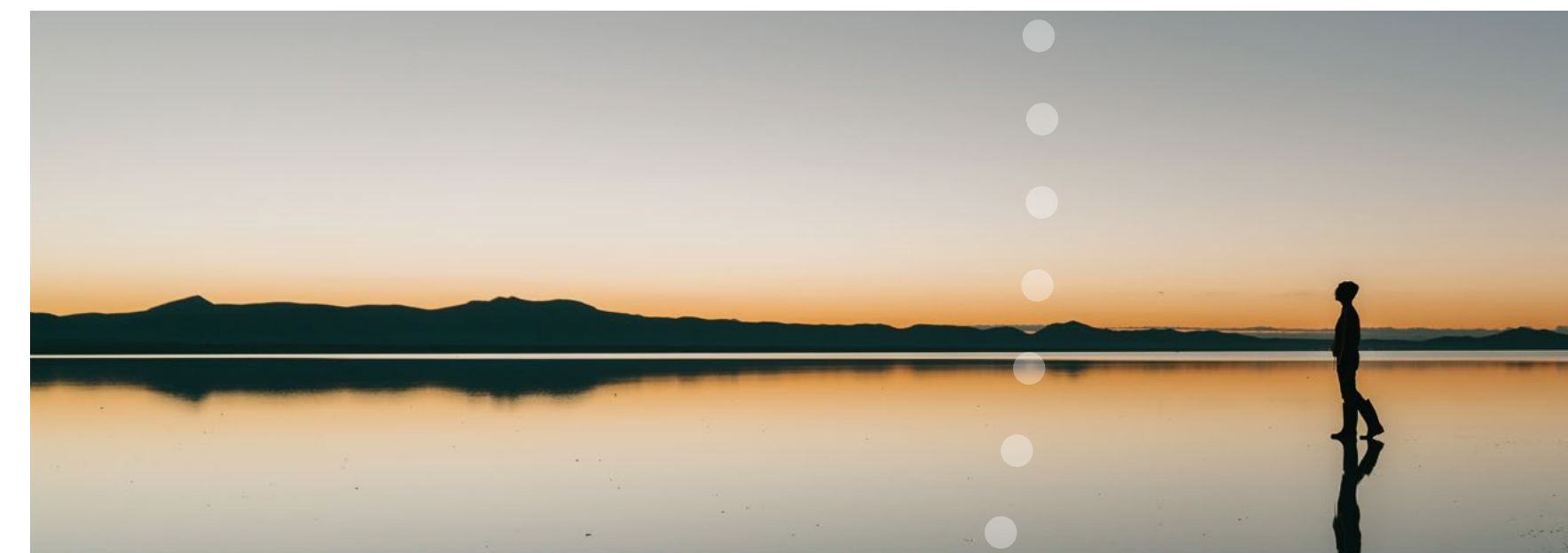
In 2019, we launched our **Foley Best Self** wellness initiative with the ambitious goal of making each person's "humanity" a topic of open conversation and built around the four pillars of:

- Healthy Body
- Healthy Mind
- Meaningful Connections
- Fulfilling Careers

Foley is committed to continuing an open and honest dialogue to ensure our people not only are aware of the resources available but also feel comfortable seeking help when they need it.

As with most large law firms, Foley provides all legal and business professionals with:

- Foley Medical Plan (flexibility to choose from multiple available options to meet individual requirements, including medical, dental, vision, 401(k) retirement, disability, life, long-term care, adoption assistance, and backup care for dependents)
- Employee Assistance Program / Lawyer Assistance Program
- Leave of Absence & Short-Term Disability Benefits
- Local Office Wellness Programming
- Complimentary Calm premium subscription







## OUR PEOPLE

# Employee Health and Well-Being

We also have initiated some unique internal programs to deepen relationships among colleagues and expanded our family-friendly benefits to provide the support Foley legal and business professionals need to do great work every day.

BEST SELF PERSPECTIVES BLOG	CONFIDANT CONNECTIONS	MENTAL HEALTH AWARENESS MONTH PROGRAMMING	FAMILY-FRIENDLY BENEFITS
<p>Housed on our intranet, the blog invites all Foley legal and business professionals to post perspectives on those topics that so often challenge people in our stressful profession...from mental illness to addiction and beyond. Our investment is to support a constructive interdependence, and to guide our people to see that they need not be alone with their struggles.</p>	<p>A mental wellness program that allows Foley personnel to seek confidential support from colleagues who have been trained to serve as informal trusted advisors. Like peer mentoring, Confidant Connections gives our people who are struggling with certain life events the opportunity to speak with colleagues who have had similar experiences.</p>	<p>In May 2022, we presented <a href="#">A Candid Conversation on Mental Health in the Legal Profession</a> featuring a panel of Foley attorneys and an authentic dialogue about how we are (really) doing and what else can be done to ease our own stress and support others who are struggling.</p>	<p><b>Our people are Foley’s most valued asset, and their health and well-being is important to our success.</b></p> <p>Our comprehensive and competitive benefit program includes a number of family-friendly policies, including:</p> <ul style="list-style-type: none"> <li>■ Domestic partner benefits</li> <li>■ Paid parental leave for all new parents</li> <li>■ Surrogacy and adoption reimbursement for eligible expenses</li> <li>■ Infertility treatment coverage</li> <li>■ Gender-neutral flexible schedule policy for attorneys to accommodate child care, elder care, or personal health needs</li> </ul>





# Professional Satisfaction



## Professional Development – Overview

The Foley approach to talent development welcomes the best attorneys and business professionals to join a community that respects their expertise and welcomes them to bring their best selves to clients, to their teams, and to the challenges of our rapidly evolving marketplace.

Our Professional Development team creates and implements programs that enhance the workplace experience in order to attract and retain talent at all levels of the organization and support them over the arc of their careers. These include a robust orientation and integration plan for all those who join the firm, targeted training for attorneys and business professionals, leadership development for senior counsel, and executive coaching available to all attorneys.

**#Happy  
atFoley**

We invite our people into a truly inclusive, values-based, performance culture grounded in a ONE TEAM mindset and fueled by active collaboration. And our people are #HappyatFoley. This distinctive feeling — which conveys the factors that shape the satisfaction of our people — officially became Foley’s employer brand in 2022.

## Talent Year in Review

This annual publication highlights the major initiatives of our Attorney Coaching, Benefits & Compensation, Diversity, Equity & Inclusion, Human Resources, Legal Recruiting, and Professional Development to provide an integrated experience for our people.







# PROFESSIONAL SATISFACTION

## Professional Development – Innovative Programs

Here are a few of the innovative professional development programs we offer to support our talent.

### Foley Bound

The firm [launched Foley Bound in 2022](#) in response to the challenges that the worldwide coronavirus pandemic created for travel and togetherness. It empowered our new associates in the 2020 and 2021 classes to plan a thoughtful “Foley Bound” trip to visit another office of their choosing, providing them with a unique chance to meet people they had been working with remotely and build relationships with their colleagues. The program has now been expanded to all new and lateral associates and senior counsel.

### Foley Connect

We invest deeply in helping each of our attorneys build a long, successful career here at Foley. We also know that professional interests and life circumstances can change, so we’re equally dedicated to supporting those who choose to seek opportunities outside of the firm. In early 2022, we launched Foley Connect, a curated internal job board featuring dozens of in-house legal positions. Foley Connect is a key part of our growing career transitions program.

### Career Conversations

Foley recognizes that substantive feedback is an essential development and retention tool for associates. In 2022, the firm replaced its spring associate performance review process with Career Conversations. This new process facilitates meaningful, forward-looking dialogue between our more junior attorneys and their Practice, Office, and Department leadership, with a focus on supporting personal and professional growth and charting a path for their career objectives.

## Chambers Associate 2022 Satisfaction Surveys

In all six surveys, our junior associates rated Foley an “Excellent Performer” among the Top 25 law firms in the U.S.



### Foley Career Perspectives

This blog on [Foley.com](#) offers insight into the many ways we support our people and foster a culture of inclusion and professional satisfaction.

[CLICK HERE TO READ THE BLOG](#)

[Foley Career Perspectives](#)



Environmental



Social



Governance



# G

## Foley Governance Policies, Initiatives, and Practices





# Trust and Respect



## Administrative Structure

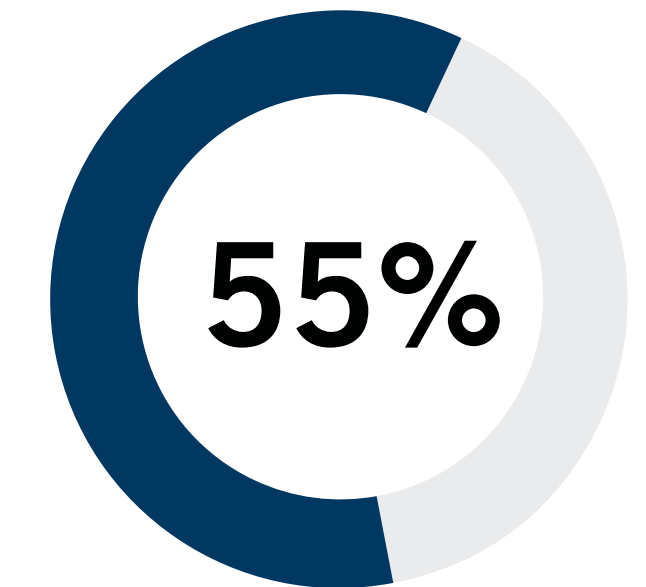
Foley operates as a limited liability partnership. The Management Committee is the firm’s central policy-making body. This committee selects a firm chair, who serves as the chief executive officer and is responsible for guiding and implementing the overall firm strategy. The management team also is composed of the firm managing partner, chief administrative partner, and chief operating officer, all of whom participate in Management Committee meetings in an *ex officio* capacity.

Each timekeeper in the firm is a member of one of three law departments — Corporate, Litigation, and Intellectual Property — that are each overseen by one department chair, with the administrative assistance of a department operating officer. Each department is composed of multiple practice groups, each of which represents a particular area of focus.

In order to institutionalize cross-department and cross-practice group communication and collaboration, the firm’s structure also includes four sectors: Energy, Manufacturing, Health Care & Life Sciences, and Innovative Technology. These multidisciplinary sectors enable the firm to provide experience and services oriented around the client’s perspective.

The administrative operations of the firm are managed by a team of seven chief officers who report to the chief operating officer.

The Management Committee currently comprises **11 partners,**



of whom **identify as diverse\***, including the chairman and CEO.

\*Ethnic/racial minorities, LGBTQ, persons with disabilities, women







## TRUST AND RESPECT

### Committees and Compensation

#### Internal Committees

Foley has established a number of internal committees in order to solicit and encourage involvement by attorneys throughout the firm, receive input on matters of importance to the firm operations and policies, and strengthen firm culture. The chairman and CEO – in collaboration with other partners and key stakeholders and the diversity and inclusion partner – is responsible for the selection of committee members and appointment of committee chairs.

- Associates Committee
- Audit Letter Partners
- Business Practices Committee
- Contingent Fee Committee
- Counseling Partners Committee
- Finance Committee
- Opinion Committee
- Partner Selection Committee
- Pro Bono Committee
- Professional Responsibility Partners Committee
- Recruiting Committee
- Retirement Plans Committee

#### Partner and Associate Compensation

The Management Committee determines partner compensation at the end of each fiscal year, with the ultimate goal of ensuring that partners with similar overall contributions to the firm (both tangible and intangible) are similarly compensated. The Committee expends considerable time reviewing and discussing each partner’s financial, non-billable investment time, and other intangible contributions to the total enterprise value of the firm, in addition to the quantitative metrics attributable to the partner.

Foley compensates associates on a scale competitive with other large law firms, and the same scale is in effect for associates in all of the firm’s U.S. offices. Foley’s salary schedule and bonus program are consistent with our longstanding approach to compensate each associate fairly and competitively based on individual performance, the firm’s core value of recognizing our people as our most valuable asset, and our goal of recruiting, developing, and retaining world-class talent in order to provide excellent client service.







## Firm Policies and Procedures

As a key component of its approach to governance, Foley maintains, reviews, and updates a robust body of policies that govern firm practices.

### Summary of Key Policies

#### Anti-Harassment

All firm personnel are required to review and acknowledge the firm’s anti-harassment policy annually and participate in regular anti-harassment training.

#### Equal Employment Opportunity and Affirmative Action

It is the policy of the firm to promote equal employment opportunities. The firm maintains affirmative action plans covering minorities, women, individuals with disabilities, and veterans.

#### Confidentiality

All firm personnel must maintain the confidentiality of information regarding the firm’s clients, the business, and individuals who work at the firm.

#### Intake and Conflicts of Interest

The firm requires all attorneys to follow specific procedures with respect to the proposed intake of all new engagements that an attorney wishes to become involved in.

#### Insider Trading Policy

This policy restricts the use or disclosure by firm attorneys and other firm personnel of information concerning firm clients and third parties that constitute material, nonpublic information as defined by law.

#### Information Governance and Security Policies

All attorneys and business professionals are expected to understand and comply with the information governance and

technological security policies and procedures, and are required to complete annual security awareness training.

#### Other Firm Policies

Foley maintains robust policies and systems for a number of other important business purposes, including: maintaining and preserving confidentiality, managing data, complying with applicable anti-bribery and anti-kickback laws, complying with obligations under the Sarbanes-Oxley Act and similar rules and standards, approving certain outside business practices and investments by firm attorneys, and practices related to procurement, travel, and third-party agreements.





# APPENDIX





# Appendix: Foley Firmwide Environmental Sustainability Survey Results



ENVIRONMENTAL

ENERGY	Percent Yes
<b>Lighting</b>	
Occupancy detectors/light sensors are used in:	
Common areas	48%
Bathrooms	67%
Storerooms	43%
Conference rooms	48%
Open plan space	43%
Private and shared offices	71%
Office-wide	43%
LED lights installed/in use in office (estimate percentage of office light fixtures with LED)	71%
Lighting fixtures, lamps, and HVAC diffusers are cleaned according to schedule	71%
Oversight in place where manual lighting/HVAC controls exist (floor monitors, cleaning staff, supervisors, etc.)	62%
Outdoor lighting is off during the day	52%





**ENVIRONMENTAL**

<b>HVAC</b>	
HVAC adjusted outside of office hours and seasonally	100%
HVAC and refrigeration systems serviced according to schedule, including filters, and ducts inspected for proper seal	100%
Appliances meet current efficiency standards	76%
Building automation and control system in place to optimize comfort and energy efficiency	81%
Renewable energy purchased via landlord or direct from local utility	14%
<b>Water</b>	
Leak detection alarms installed	57%
Water usage reviewed quarterly	19%
All techniques to reduce water consumption implemented	62%
High-efficiency professional dishwashers in use	71%
Low-flow plumbing fixtures in use	33%
Waterless urinals in use	5%
Hands-free automatic plumbing fixture controls in use	90%
<b>Office Renovations</b>	
Energy audit performed before every major renovation	100%
Demolition and construction of new space meets material recycling and recovery standards	0%
Design of new space meets enhanced energy efficient standards	0%
LEED certification sought for newly renovated space	5%
WELLNESS certification sought for newly renovated space	0%





ENVIRONMENTAL

OFFICE ACTIVITIES AND OPERATIONS	
<b>Paper</b>	
Double-sided printing by default	43%
40 lb (or less) paper in printers unless requirement for heavier paper	100%
Forest Stewardship Council paper is standard	100%
Secure printing control systems implemented	29%
Review stationery items periodically to see if there are better alternatives to most heavily used items	67%
<b>Hospitality</b>	
<b>Single-use plastics are utilized in:</b>	
Pantries	76%
Cafes	86%
Client spaces	76%
<b>Ceramic plates, cutlery, and glasses are utilized (in lieu of paper and plastic) in:</b>	
Pantries	43%
Cafes	43%
Client spaces	90%
<b>Food and Drink:</b>	
Pantries and cafes that have still and sparkling water taps	38%
Sustainable coffee practice in place (e.g., bulk beans, fair trade, recycling programs)	33%
Bulk snacks available in pantries	48%
Emphasis on plant-based catering and local food/materials	29%





**ENVIRONMENTAL**

<b>Operations</b>	
<b>Recycling and Reuse:</b>	
Recycling program participation (municipal or private operator)	95%
Full paper and paper products recycling	100%
Full aluminum and plaster container recycling	57%
Office supports/maintains a separate compost waste stream	10%
Office reuses office supplies	100%
Office reuses packing materials	100%
<b>Bins:</b>	
Liners used for trash in bins used at desk stations	95%
Biodegradable bags used in individual trash cans	38%
Dedicated paper recycling bins at each shared print location	95%
Separate recycling bins at each desk location	90%
Eliminated desk bins in lieu of central bin stations	0%
<b>Cleaning Products:</b>	
Landlord/janitorial service use green cleaning products	38%
<b>Meetings and Events:</b>	
Caterers, décor, and gifts follow same guidelines as office operations	86%
No single-use plastics	29%
Emphasis on plant-based catering and local food/materials	33%
Leftover food from events donated to outside organizations	19%





**ENVIRONMENTAL**

<b>Travel:</b>	
Method in place for applying Global Travel Policy	100%
Travel hierarchy in place with vendors and communicated internally (e.g., prefer train vs. plane)	67%
Vendors used for reservations (include usage rate report)	95%
Participation in eco-travel external programs	29%
Video conference facilities available	100%
Telepresence capability in place	100%
Green taxi preferred vendor program in place (include usage rate report)	0%
Guest services team uses bike couriers vs. car whenever circumstances allow (include usage rate report)	33%
Mass transit programs/incentives available	52%
Secure bike parking provided onsite	76%
Access to showers provided onsite for people who ride/run to work	62%
Electric vehicle charging stations where relevant	62%
<b>Supply Chain:</b>	
Complies with procurement policy and involves Procurement team per policy (e.g., seeks suppliers that hold environmental credentials and support sustainability goals)	95%



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