

CBRE UK Modern Slavery and Human Trafficking Statement - 2021

Context

CBRE's multi-billion-dollar global supply chain is critical to our success. We require all our suppliers to provide services in a responsible manner. We have a zero-tolerance approach to modern slavery and are committed to consistently reviewing and strengthening our processes and systems to minimize the risk of human rights infringements anywhere in our supply chain.

This is CBRE Group, Inc.'s fifth annual statement relating to Modern Slavery and covers the reporting period of January 1st, 2020 to December 31st, 2020. This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015 ("The Act"). The Act requires that businesses with a turnover of more than £36 million disclose information regarding their policies and actions over the financial year to eradicate modern slavery and human trafficking from their operations and supply chain. This statement applies to CBRE's UK businesses with a reporting obligation under the Act, but also provides commentary on CBRE Group's global efforts to address the risk of Modern Slavery and Human Trafficking in our supply chain.

This statement provides details on the following:

1. The organisation's structure, its business and its supply chains;
2. Its policies in relation to slavery and human trafficking;
3. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
4. The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
5. Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
6. The training about slavery and human trafficking available to its staff.

The following sections of this statement detail how CBRE is addressing each of the sections listed above.

The organisation's structure, its business and its supply chains;

CBRE Group, Inc. (NYSE:CBRE), a Fortune 500 and S&P 500 company headquartered in Dallas, is the world's largest commercial real estate services and investment firm (based on 2020 revenue). The company has more than 100,000 employees (excluding affiliates) and serves real estate investors and occupiers through more than 530 offices (excluding affiliates) worldwide. CBRE offers a broad range of integrated services, including facilities, transaction and project management; property management; investment management; appraisal and valuation; property leasing; strategic consulting; property sales; mortgage services and development services.

In CBRE's UK business activities the following trading entities are covered by this statement:

1. CBRE Managed Services Limited
2. CBRE GWS Limited
3. CBRE Limited
4. CBRE Investment Management Indirect Limited (CBRE IM Indirect) ¹

The supply chains that CBRE operates are dominated by our large Facilities Management and Property Management operations with high levels of spend in hard and soft services such as maintenance, cleaning, security, utilities and

¹ CBRE Investment Management Indirect Limited (CBRE IM Indirect) is authorised and regulated by the UK's Financial Conduct Authority (FCA) and is also a registered investment adviser with the United States Securities & Exchange Commission (SEC).

catering services. In addition to these main spend areas, CBRE’s supplier spend profile also includes technology and data, marketing services, HR services, professional services and travel.

CBRE IM Indirect’s supply chain also consists of external fund administrators, external secondary trade brokers and other third-party service providers ancillary to real estate investment management.

It also works with investment managers related to the funds and assets in which it invests on behalf of its clients.²

The CBRE UK entities listed in this statement operate within separate divisions and whilst much of the governance and reporting is standardised across the group, separate processes and systems are prevalent in each entity. To this end, CBRE’s statement in relation to points 1 and 2 of the reporting requirements are universally applicable to our reporting entities, whereas the activities and actions listed in CBRE’s response to points 3 through to 6 are not at this stage addressed across all entities. CBRE recognises that more work is required to standardise the approach to points 3 through to 6.

In addition to those entities listed above, the CBRE Group acquired Telford Homes in 2019. The Modern Slavery Statement for Telford Homes has been published separately and can be found [here](#).

Its policies in relation to slavery and human trafficking;

CBRE is actively working to ensure that slavery and human trafficking is not taking place across its business and has policy documents in place to make it clear what standards are expected of our employees and our suppliers. Full details of the policy documents can be found in the embedded links below and a summary of the key points is provided as follows:

- CBRE’s **Standards of Business Conduct** set out the ethical standards which must be upheld by all staff across our wide-ranging business activities. The document acknowledges that CBRE exists and succeeds due to the trust that has been earned for integrity and fair dealing. CBRE’s RISE value of Integrity requires that the business always “takes the high road” and deals fairly and honestly with all employees, business partners, communities and society at large.
- As such, no one representing CBRE will take unfair advantage of anyone through manipulation, fraudulent inducements or concealment, abuse of confidential or privileged information, interference with a known contractual relationship or any other unfair dealing.
- No monetary benefit is worth conducting business in this manner. Any profit or gain based on disregarding our values is temporary and causes more harm in the long run. We respect the contracts and commitments we have made and strive to go beyond minimum compliance with the rules governing our business and to operate with the utmost reliability and transparency. CBRE’s **Human Rights Policy** commits the business to respect human rights in its operations, to promote an appropriate example and make a positive global impact. The policy includes four key elements with respect to modern slavery and human trafficking.
 1. CBRE respects the free choice of all persons and strictly prohibits forced or compulsory labour.
 2. CBRE will not do business with, tolerate, or associate with organizations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.
 3. CBRE endorses the UN Guiding Principles on Business and Human Rights and will work to raise awareness within our employee population of our responsibility to protect Human Rights.
 4. CBRE commits to cooperate with law enforcement authorities to address any such instances that come to the attention of the Company.
- CBRE’s **Supplier Code of Conduct** sets out CBRE’s fundamental ethical and business conduct requirements for its suppliers. It is available in 32 languages and makes clear that a CBRE supplier is responsible for ensuring their

² CBRE IM Indirect invests in primary funds, secondaries, joint ventures, club deals and co-investments with underlying managers and operating partners (collectively “specialist managers”) across the world.

directors, officers, employees, agents, representatives, suppliers, subcontractors, and other business partners understand, and comply with, the requirements set forth in the Code. The requirements include CBRE's position on [Anti-Bribery and Corruption](#), Unfair Business Practices and a specific section pertaining to Labour standards, including:

1. Child Labour
 2. Human Trafficking, Slavery and the Right to Voluntary Labour
 3. Freedom Against Prejudice and Discrimination
 4. Safe and Secure Workplace
 5. Working Hours and Wages
 6. Freedom of Association
- In 2020 CBRE updated our Supplier Code of Conduct to state that supplier employees must be free to raise concerns without fear of retaliation in any form. We also strengthened the language regarding CBRE's rights to respond to identified non-compliance with the Code.

Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

CBRE has different supplier onboarding tools in place in our separate UK businesses. Our largest supplier onboarding tool by volume in the UK is called mySupplier and supports our risk management and compliance processes in our Facilities Management Business. The tool was further enhanced during 2020 and our plan is to continue the roll out into other CBRE businesses in 2021 and beyond to include our own corporate spend across all entities. Suppliers are onboarded only by invitation, with all suppliers expected to agree to CBRE's Supplier Code of Conduct and answer specific questions on Modern Slavery such as their policy positions and audit controls. CBRE IM Indirect's suppliers are required to comply with the CBRE Supplier Code of Conduct, and the specialist managers it engages with are required to affirm they have policies in place to deal with modern slavery and human rights abuses.

CBRE carries out systematic screening of our supply chain for adverse media and broader compliance risks. We utilize a globally recognised compliance screening platform to screen all new suppliers as part of the onboarding process. We also re-screen all suppliers in our Europe, Middle-East and Africa operations at least annually. Screening results are reviewed by a centralized team and any items of concern are escalated for action. In 2020 this included 67,993 individual checks, none of which resulted in investigations of modern slavery or other human rights violations.

CBRE also partners with third-party screening and vetting solutions, such as Ecovadis, that support the assessment and on-going review of the social and ethical performance of our key Suppliers, through supply chain risk screening, scorecards with actionable ratings, audit and improvement management. CBRE aims to further embed this and other risk management solutions for our higher risk category suppliers (see below) throughout 2021.

The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

Our Property Management and Facilities Management services engage various hard and soft services such as maintenance, cleaning, security, utilities and catering services across a wide range of countries. We believe that services reliant on relatively low-paid labour are our greatest risk areas for abusive and exploitative practices in the supply chain. Examples of the risks we are aware of are:

- **Cleaning** - Subcontracting of old or inappropriate vendors, compliance with minimum wage requirements, excessive hours, poor documentation and no proof of back pay / holidays, risks of non-compliance with social security commitments.
- **Catering** - Undisclosed subcontractors, workers working under student visas, workers deprived of normal employment benefits, excessive working hours, vulnerable to visa conditions, poor command of local language.
- **Security** - Underpayment, overtime rates not in line with contract, preventing staff from taking sick leave or annual leave.

We recognise that the highest risk areas are outside the UK and that collaboration throughout the supply chain is needed to prevent such issues from arising. In 2020, we liaised closely with our clients, for whom we are a key supplier, and contributed to various supply chain reviews.

CBRE operates a [Global Ethics Helpline](#) which is available to all members of staff, suppliers and their employees, as well as members of the public. All reports to the Ethics Helpline are independently recorded by an external third party and are vetted and overseen by our corporate Ethics & Compliance team. Whilst we did not receive any 2020 Ethics Helpline reports that led to substantiated violations of human rights or cases of modern slavery in the supply chain, our Compliance teams were engaged in various investigations and projects involving related labour issues. For example:

CBRE was alerted to concerns regarding alleged minimum wage and other labour law violations by cleaning and catering vendors on a client site. CBRE Ethics & Compliance initiated an audit of all cleaning and catering vendors in the local supply chain and confirmed that the named vendors had failed to provide full benefits to their employees. Furthermore, vendors had backdated staff contracts for the purposes of the audit. CBRE terminated the vendor relationships and worked with the client to compensate the affected workers and to transfer their employment to new vendors on the site.

Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;

All Suppliers onboarded via the mySupplier or eLogbooks systems must confirm acceptance to our Supplier Code of Conduct. This is further reinforced through our Standard Purchase Order Terms and Conditions where suppliers are required to comply with applicable laws prohibiting modern slavery and human trafficking, including the UK Modern Slavery Act 2015.

Within our UK GWS business, 98% of Supplier Partners have agreed to our Supplier Code of Conduct. The remaining will form acceptance via either our standard terms and conditions, or through CBRE's analysis and acceptance of the Supplier's own applicable Code. 100% of new GWS Suppliers in 2020 acknowledged the Supplier Code of Conduct. We are actively working towards reporting on this target for our other UK entities.

CBRE is continuing to develop further key performance indicators to measure its effectiveness in addressing modern slavery risks. These will include establishing metrics across our business tracking progress with the following: further roll-out of mySupplier, Supplier responses to enhanced key questions on Human Rights / Modern Slavery, third-party Supplier scorecard results, Supplier adverse media and compliance screening protocols, Supplier Relationship Management specific Modern Slavery reporting across high risk categories, and actions taken as a result of associated risks identified through the above. We will continue to develop and extend our tracking and reporting of these performance metrics.

A critical measure for the effectiveness of our program will be the completion of awareness training for our broader employee population, and/or for targeted groups of professionals in specific service lines, support functions or geographies.

The training about slavery and human trafficking available to its staff;

The annual Standards of Business Conduct certification is the cornerstone of CBRE's commitment to ethical business practices. All CBRE staff are required to certify they understand and will abide by our Standards of Business Conduct and core global policies. In 2020, 93% of employees completed the Standards of Business Conduct certification. Allowing for the timing of new hires and departures, Standards of Business Conduct training approaches 100% employee participation. By completing this certification, CBRE employees acknowledged CBRE's Human Rights Policy and their awareness of CBRE's commitment to Human Rights. The certification process provides the opportunity for staff to disclose any exceptions they were aware of. In 2020 there were no disclosures with respect to the Human Rights Policy that led to substantiated violations of human rights or cases of modern slavery in the supply chain.

In addition to this, our GWS Supply Chain organization has partnered with the Supply Chain Sustainability School to develop and make available Sustainability Training modules that cover subjects such as Diversity, Modern Slavery, Lean procurement, and the Circular Economy. CBRE Supply Chain professionals have completed 802 training modules via the Supply Chain Sustainability School to date.

This statement, dated 30th June 2021, has been reviewed and approved by the Boards of Directors of the following CBRE UK Entities:

CBRE Managed Services Limited:



Name:
Role:

Kevin Lynn
President CBRE | GWS | LOCAL UK



Name:
Role:

Kirsten Bradbury
President | EMEA



Name:
Role:

Ciaran Bird
Divisional President, Advisory Services, CEO UK & Ireland

CBRE Investment Management

Indirect Limited:



Name:
Role:

Gill Roantree
COO Real Estate