

CBRE Group, Inc., a Fortune 500 and S&P 500 company headquartered in Los Angeles, is the world's largest commercial real estate services and investment firm. The company has more than 90,000 employees and serves real estate investors and occupiers through more than 480 offices 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.

CBRE SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019



CBRE's multi-billion-dollar global supply chain is critical to our success. We expect all our suppliers to adhere to our Global Supplier Code of Conduct and to provide services in a responsible manner. We have a zero-tolerance approach to modern slavery and consistently review and strengthen our processes and systems to minimize the risk of human rights infringements anywhere in our supply chain.

Summary

In 2018, we continued to streamline our supply chain processes across our business, and strengthen our supplier onboarding measures. In recognition of our progress, we were delighted to see CBRE's mySUPPLIER engagement and compliance portal win the technology innovation category at the 2018 CIPS Supply Management Awards. We also focused on new measures to promote awareness of modern slavery throughout our GWS Supply Chain, including the communication of modern slavery 'Red Flags' to CBRE and supplier employees and modern slavery recognition in our supplier-training workshops.



What is the UK Modern Slavery Act?

The Modern Slavery Act requires businesses to disclose annual information on policies and action focused on eradicating modern human slavery and trafficking from their operations and supply chain.

Our commitment to addressing modern slavery

CBRE is actively working to ensure that slavery and human trafficking is not taking place across our business. CBRE recognises its responsibility to respect Human Rights in its operations, endeavouring to lead by example and make a positive global impact.

- **We have our own Global Human Rights Policy.** This commits CBRE to respecting human rights and working with businesses or associate organisations that uphold the same ambition and operate in line with standards in this and other legislation.
- **We expect our suppliers to uphold the principles of CBRE’s Standards of Business Conduct (SOBC).** All CBRE employees certify compliance with our SOBC annually, and we also require suppliers to notify us of any breaches if they become aware of an occurrence.
- **We require our suppliers to comply with CBRE’s Global Supplier Code of Conduct.** Based on the Ten Principles of the United Nations Global Compact, this establishes expectations on supplier business conduct relating to how goods and services are provided to us and our clients. Suppliers receive this document during our onboarding process for acknowledgement before any work is undertaken.
- **We operate an independent, confidential and multi-language helpline.** Our **Ethics Helpline** is available to any employee who suspects or is aware of modern slavery in the supply chain. The helpline is also available to employees of our suppliers and clients.

CBRE GWS EMEA wins Supply Management Award

In 2018, CBRE GWS EMEA's supplier engagement and compliance portal, CBRE mySUPPLIER, won the CIPS Supply Management Award for Most Innovative Use of Technology. The portal, designed and operated by CBRE, has been updated to ensure all suppliers confirm their compliance with the Modern Slavery Act, and to declare that neither their organisation nor any supplier engages in activities which would constitute an abuse of human rights.

Driving action

We are committed to continuing to improve our processes and raise awareness to combat the risk of slavery and human trafficking in our business and supply chain. Recent measures include:

- **Modern Slavery Red Flags -**
We have introduced Red Flags to the business, to help CBRE and supplier employees to identify indicators of modern slavery. This has been widely communicated with information displayed across our CBRE offices and occupier client sites.
- **Modern Slavery Awareness Training -**
We have incorporated modern slavery awareness into our supplier-facing training workshops. In 2019, it will become a requirement for all CBRE GWS Preferred Suppliers in the UK to attend one of our workshops every two years.
- **Preferred Supplier Best Practice Group -**
In 2019, we have committed to focusing our efforts and sharing best practice with our preferred suppliers who are at the highest risk of modern slavery. The programme will focus on the supply chain areas that we have identified as holding the highest risk of infractions; cleaning and janitorial services, security and catering.
- **Higher Risk Areas of Business -**
We have identified areas of our supply chain, including within our GWS Growth & Emerging Markets business group, where the risk of modern slavery infractions is higher. CBRE is devising effective action plans for risk management in the supply chain in these areas.

Building awareness

In 2019, CBRE will continue to raise awareness about modern slavery both within our own business and across our supply chain. This will include:

Compliance

Human Rights and Modern Slavery has been included in our 2019 Standards of Business Conduct certification which is compulsory for all CBRE employees. Furthermore, a specific set of questions on Human Rights and Modern Slavery has been included in our annual Regulatory & Compliance Risk Assessment, which will provide an overview of local risk exposure and assess the effectiveness of existing local policies, training and monitoring activity.

General Training

We plan to implement new compulsory training for key CBRE employee groups to promote wider awareness of Modern Slavery. The training will be adapted and made available to our suppliers identified as high-risk, including all cleaning and security service providers.

Compliance Training

Under the planned mandatory Compliance Training programme for 2019, CBRE staff in EMEA will receive eLearning on Human Rights (including Modern Slavery). This will be delivered to circa 30,000 staff in 2019.

Supplier Events

We will include promotional activity and awareness on modern slavery at all CBRE GWS events, the largest of which reaches an audience of 2,000 suppliers, customers and employees.

External recognition

In 2018, CBRE was included in both the FTSE4Good Index and the Dow Jones Sustainability Index (North America) for the fifth year in a row, acknowledging our leadership in environmental, social and governance policies and performance around the world. In February 2019 we were also named, for the sixth year in a row, in Ethisphere Institute's list of 'World's Most Ethical Companies'. Our annual Global Corporate Responsibility report outlines some significant accomplishments over the last year.

Internal accountability

CBRE's RISE values - Respect, Integrity, Service, Excellence - are instrumental to our success, helping to set a culture that enables CBRE to be not only profitable, but to fulfil our wider responsibilities as a corporate citizen. In addition to the policies outlined in this statement, CBRE has strong governance in place to uphold these values:

- The Audit Committee of the Board of CBRE Group, Inc oversees CBRE's Ethics and Compliance function and meets regularly with the Chief Ethics and Compliance Officer (CECO).
- The CECO is responsible for maintaining, developing and reviewing CBRE's policies and procedures for this topic. This approach is mirrored across our regional governance structure, with Regional and Country Compliance Officers managing and supporting their respective geographic responsibilities.
- CBRE maintains an independently overseen reporting process for ethics and compliance issues, including for reporting any slavery and human trafficking concerns. This includes a process for informing senior management about allegations of slavery and human trafficking, periodic internal reports as well as details about key investigations that are in progress or completed.

If you have an ethics or legal concern, please [click here](#) for more information. This statement will be renewed each financial year and is signed on behalf of CBRE.

Signed by



Martin Samworth

Group President & CEO, Advisory Services APAC/EMEA

MEMBER OF
**Dow Jones
Sustainability Indices**
In Collaboration with RobecoSAM

