

Modern Slavery Statement

2023

This statement sets out the steps the Company has taken to prevent 'Modern Slavery, human trafficking, and child labour' in our business and supply chain. This statement has been prepared in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (the "Act"). For the purposes of this statement, Modern Slavery has the meaning given to it in section 4 of the Act.

For the purpose of this policy the Company is principally focused in providing goods and services in Australia.

The nature of the goods and services offered by the Company requires a number of different real estate service offerings, which are discussed in greater detail below, but include the sales, leasing and management of properties including office, industrial, retail, residential, hotel, agribusiness, and healthcare and retirement living assets. We also provide valuation, consultancy, debt advisory, project management, and engineering & design services to institutional, corporate, government and finance clients.

We have a diverse range of clients including private clients, small and medium sized businesses, institutional and corporate clients and government organisations. Our commitment is to ensure that with our business partners we operate with show respect for human rights.

The Company acknowledges the existence of slavery and related activities occurring in Australia across a number of industry sectors and also stemming from the supply chains of goods and services offered across the Australian market. The Company has adopted our Global Code of Ethics and Conduct Policy, an Ethics Hotline Colliers Direct, APAC Recruitment & Transfer Policy and Workplace Health & Safety Policy, which aim to combat direct and indirect risks connected with or arising out of modern slavery, human trafficking, and child labour.

This statement outlines the Company's corporate structure, operations and supply chains, the risks identified in our operations and supply chains, the actions the Company has taken to mitigate, reduce or limit those risks, and the effectiveness of those actions.

Our Mission

Maximise the potential of property and real assets to accelerate the success of our clients, our investors and our people.

Our Values

We empower our people to:

- **Be enterprising** to exceed expectations
- **Collaborate** to drive exceptional results
- **Invest in Relationships** to drive enduring value
- **Do what's right** for our clients, people and communities
- **Be experts** to lead our industry into the future

Key Risk Areas

- | | |
|-------------------------------|---|
| • Operational | • Industrial Relations |
| • Fraud | • Business Continuity & Disaster Recovery |
| • Privacy | • Information & Cyber Security |
| • Anti-Bribery and Corruption | • Environmental Practices |
| • Workplace Health & Safety | • Client Practices & Conduct |
| • Procurement | |

Our Organisation

Service Lines

- Agribusiness
- Capital Markets
- Engineering & Design
- Healthcare & Retirement Living
- Hotels
- Industrial
- Investment Services
- Occupier Services
- Office Leasing
- Project Leaders
- Real Estate Management Services
- Residential
- Retail Leasing
- Retail Investment Services
- Strategic Advisory
- Valuation & Advisory Services
- Workplace Management Services

Policies Relevant to Modern Slavery

APAC Essential Standards Policy

This policy establishes the standards and values with which the Company upholds operating its businesses. We are aware that individuals within the wider community have the right to rely on the advice being provided by our Workers when making personal and business-related investments. As a result, we endeavour to provide the wider community with responsible property advice expected of professional property experts and promote compliance with legislative and educational requirements by way of pre-employment or pre-engagement certification, policies and ongoing training during employment or engagement. This code of conduct demands essential compliance, dealing with personal and professional behaviour, illicit payments, favours, anti-competitive practices, conflicts of interest, tax compliance, exchange controls, personnel issues, personal taxation, treatment of workers, invoicing, fraudulent activity, books and records, share dealing, personal incentives and gifts, misuse of company resources, non-disparagement, afterhours access, office security and third party access, alcohol and drugs and zero tolerance for harassment.

Whistle-blower Policy

This policy is within the APAC Essential Standards policy and is connected with our Ethics Hotline Colliers Direct, which allows for any Worker or associate to report serious violations of policy, fraud or misconduct. To support this commitment, the Company provides a confidential and anonymous reporting process through its shareholder Colliers International Group Inc. to report concerns and complaints regarding serious improper conduct of any policy, accounting and auditing controls, fraud or serious misconduct. We further ensure that each Worker is familiar with this policy and procedure, which is signed by them on commencement of their employment.

Global Code of Ethics and Conduct Policy

Our Global policies provide a framework on the consistent consensus of identity across all jurisdictions the Company operates, which applies stringent controls to ensure a universal brand and reputation that stems with our excellence in meeting the highest of standards worldwide. This outlines the ethical guidelines and business policies for all Workers, including owned affiliates and subsidiaries, consultants, agents and representatives engaged by the Company. It requires compliance with local laws, rules and regulations, professional standards, respectful and professional behaviour, anti-bullying, harassment and workplace violence, personal relationships, appropriate communication systems, avoiding or managing conflicts of interest, anti-competitive behaviour, licensing, dealing with government clients and anti-bribery restrictions, giving and receiving gifts, zero tolerance for any form of money laundering, insider trading, treatment of the Company's brand and non-disparagement and outside communications.

Ethics Hotline Colliers Direct

This is a reporting pathway for Workers to anonymously share their concerns about behaviours that may be illegal, unethical or harmful to Colliers International Group, Inc., or in violation of our Code of Ethics and Conduct Policy. This is administered by Network Inc., an independent organisation and is a service offered to the Company.

APAC Recruitment & Transfer Policy

This policy ensures that our proud culture and history of attracting and retaining quality people is maintained. This requires that we find Workers who are an appropriate fit, have high integrity, criminal record checks, background checks, reference checks and compliance & psychological testing. The purpose of this approach is to ensure that the Company continues to be an equal opportunity employer with a zero tolerance to unlawful discrimination, bullying, harassment and victimisation (retaliation). The Company promotes respect to all Workers irrespective of their educational level, position, race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family or carer responsibilities, pregnancy, religion, politic opinion, national extraction and social origin. This policy should be read in line with the Unacceptable Workplace Behaviour Policy.

Workplace Health & Safety Policy

We ensure that the highest priority is the health and safety of our Workers, with personal obligations to ensure that each Worker of the Company abides by a safety-first culture workplace. The policy ensures compliance with the work health and safety laws, codes of practice and Australian standards.

Our Approach And Commitment

The Company orders goods and services from external third parties in its day-to-day operation of its business. These primarily range from food stuffs, furniture and fixtures, electronics, network components and other finished products. Due to the size and scale of the Company our primary suppliers are large multinational companies. The Company does not manufacture any products, but rather provides professional services, which are characterised and described in this document. The goods and services which we procure are to ensure that we can continue to provide our services to a competitive standard within the real estate industry.

Governance Framework

The Company carefully assesses each one of its suppliers and collaborates with its partners to ensure that concerns and risks are identified and determine whether a supplier meets our compliance requirements and practices. In addition to this, clear parameters on resolving non-compliance and addressing any risk, breach or dispute are implemented.

Most of our suppliers have policies and procedures that ensure compliance with Australian standards, including regular auditing practices. The Company has regard to our suppliers' management systems associated with risk and operating standards. If a supplier were to be assessed as not capable of meeting our standards or requirements, including management controls or transparency of their operations, remediation or suspension of a contract are some steps the Company takes to reduce or eliminate such risk.

Risk Management And Due Diligence

The Company's business model is made up from a series of networks across Australia, New Zealand and the Asia Pacific Region. We rely on our extensive network to drive the success of the Company through trusted partners. Consequently, we have a significant number of contractors and workforce that operate locally and internationally.

Being a responsible corporate citizen, we have developed a compliance plan to address the human rights risks, modern slavery, human trafficking, and child labour. This serves as an educational module to raise awareness of human rights and modern slavery with our workforce and contractors. This is undertaken through the Colliers University, which is an interactive platform where we offer online resources and training including mandatory components.

The Company requires that each Service Line identify and assess their operations and supply chain for human rights risks. When this information is submitted to our compliance team, we assess each risk and seek to implement appropriate controls that mitigate and manage those risks. The Company takes a proactive and integrated collaborative approach across the business. This raises awareness to human rights risks and issues including the evolving nature of those risks over time.

The Company has defined controls for human rights which form a part of our compliance requirements and policies, reviewed annually.

Our Workers

The Company prides itself on its workforce and its treatment of its Workers. We have a diverse workforce that come from a multiple disciplined background with a variety of skills, experience, qualifications and values, which ensure the Company's success. This ensures having a strong People & Performance team that addresses the needs, risks and issues within our Worker base, and ensures that we comply with our employment conditions for workplace health and safety, minimum wages, hours of work, leave entitlements and Worker support. We also offer a number of Worker incentives, benefits, goodwill gestures and support for the mental and physical health of our Workers. We have had a focus on supporting women within the industry and within the community, including being a supporter of Women in Property. The Company is also a strong supporter of Aboriginal and Torres Strait Islander initiatives, including supporting and recognising our indigenous heritage.

The Company goes beyond what is required at law in supporting and benefiting our Workers, as we recognise that investing in our Workers is key in driving the success of the Company. We have strong policies and procedures around the protection of peoples' personal information and take significant measures of protecting all people who interact with the Company from any form of violence, abuse, harassment, bullying, unfair treatment, discrimination, corruption, fraud and unethical behaviour.

Recruitment

The Company has a recruitment policy to ensure all new Workers align with our culture, values and are the most competent and qualified people to provide the highest level of performance in the relevant role. All our candidates go through an intensive selection process and prior to any position being offered to a candidate, it must be approved by the relevant Managing Director, Chief Executive Officer - Australia or the Chief Financial Officer - Australia. We also complete criminal record checks for all roles, and there may be additional background checks for certain jobs of seniority.

The process adopted by the Company is applied fairly across the company and for each Service Line. We ensure that our recruitment practices ensure diversity and inclusion for all demographics, which enriches our company and involvement within the community.

Training

Induction training is an essential component for any new starter with the Company and the process involves one-on-one mentorship, online training courses that are updated regularly, group training sessions and our enterprise meetings held monthly which is compulsory for all Workers of the Company to attend, in each office across Australia.

Our training is an essential part of ensuring collaboration but also risk management, governance and compliance to ensure all our Workers are aware of their obligations under our policies and procedures locally and internationally. As part of our induction process and periodic training periods, we require all Workers to undertake a training module on raising awareness on modern slavery, human trafficking, and child labour and the inherent risks faced by the Company. The training includes a series of ethics and compliance training modules that address anti- corruption and bribery, code of conduct, acceptable workplace behaviour, privacy and confidentiality, cybersecurity, safety and environment, discrimination and bullying, human rights, and community involvement. We monitor, report and manage the mandatory training completion rates and place restrictions on Workers who fail to complete the training without valid excuse.

A focus area of this training includes education and training practices on raising awareness and assisting our Workers in identifying risk areas and exposures to modern slavery. This includes identifying internal and external risks to the business from goods or services we may regularly use or external services we may provide to our clients.

Supply Chain

The Company being a large organisation with global reach allows us to be selective with who we deal with and the suppliers we source goods and services. Our values set the benchmark of our criteria and mandate for the types of parties we deal with, with a focus on environmental, social and ethical performance which align with our values. It is a priority for our organisation to ensure that each of our suppliers have appropriate measures that address the risks with modern slavery and human rights issues to the Company's standards.

The Company implements its Procurement Policy and Supply Chain and Responsibility Policy to ensure continued compliance with its duties as a responsible corporate citizen.

Ethical And Whistle-blower Mechanisms

The Company as part of its global responsibility to ethical, legal and proper behaviour and conduct has in place robust controls to manage the inherent risks faced by the organisation. We encourage anyone to take action if they have concerns with any behaviour or conduct that may be unethical, illegal or improper through our Ethics Hotline Colliers Direct under our Whistle-blower policy, which is confidential and anonymous to allow any person to report their concerns. Those concerns are then investigated through our senior executives, or if they involve senior executives, controls and measures are put in place to manage those risks. The Company's General Counsel will be responsible for such investigations, unless those complaints involve that person.

The Company's Commitment

The Company reviews its practices and procedures to refine its operations on a continuing basis to deliver unparalleled efficiency in the provision of its services. It does this by ensuring the strictest of compliance with laws, rules and regulations governing the industry as a whole and ensuring it continues to be a pillar within the global and local commercial community, setting the benchmark for ethical and best business practice across environmental, social and sustainable practices.

This statement is made pursuant to section 14 of the Act and constitutes the slavery and human trafficking statement of the Company and has been approved by the Board of Directors of the Company.

Definitions

"Company" means Colliers International Holdings (Australia) Limited and its Related Bodies Corporate as defined in the Corporations Act 2001 (Cth).

"Worker" means a person carrying out work in any capacity for the Company including work as an employee, a contractor or subcontractor, or an employee of a contractor or subcontractor.

Breach of policy

Failure to comply with this policy will be viewed seriously by the Company. Any Worker who is in breach of this policy may be subject to disciplinary action, including termination of employment or engagement. All Workers are therefore expected to read, understand and become familiar with this policy and comply with it at all times.

Contact point

If you have any questions about this policy, please contact a People & Performance representative.

This statement was approved by the Board of Directors of the Company on 6 December 2023.

A handwritten signature in black ink, appearing to read "M. Tyson", followed by a small horizontal line.

Malcom Tyson
Chief Executive Officer | Australia