

Policy

Modern Slavery Statement

Version 1.1

Purpose

This statement sets out the steps Colliers has taken to prevent 'Modern Slavery' in our business and supply chains during the financial year ending 30 June 2021. It 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.

The purposes of this policy the Company is principally focused in providing goods and services in Australia and New Zealand.

The Company maintains stringent compliance and regulatory frameworks, including ensuring we provide a safe and healthy work environment for all our employees. The Company has established a strong culture underpinned by its core values which ensure we meet our legal, ethical, economic and environmental responsibilities, making us a leading corporate citizen. These are reflected in our comprehensive practices and procedures as outlined in our Code of Conduct and Workplace Policies; Recruitment and Transfers Policies; Health & Safety Policies; Clients & Media Policies; Software & Technology Policies and Financial Arrangements Policies, which are reviewed and audited annually.

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 strategic advisory, debt advisory, commercial leasing and real estate, residential development and real estate, valuation services, property management, industrial leasing, research and development, consulting services, corporate advisory and ancillary services for each service line. This allows the Company to service clients from all industries involved in our business across any number of industry sectors.

We have a diverse range of clients including consumers, small businesses, large enterprises and government organisations. Our commitment is to ensure that with our business partners we operate with respect for human rights.

The Company operates in Australia and New Zealand which maintains some of the most robust and progressive legal systems worldwide enjoying a high quality of life. However, the Company is also aware of the existence of slavery occurring in Australia and New Zealand 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 also adopted our Global Code of Ethics and Conduct Policy, an Ethics Hotline Policy, Recruitment Policy and Workplace Health & Safety Policy, which aim to combat direct and indirect risks connected with or arising out of modern slavery.

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.

Scope

This Policy applies to all Workers.



Definitions

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

“**Policy**” means this Policy as amended from time to time.

“**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.

Our Mission

Maximise the potential of property to accelerate the success of our clients and our people.

Our Values

At Colliers, we empower our people to:

1. Be Enterprising – to exceed expectations.
2. Collaborate – to drive exceptional results.
3. Invest in Relationships – to deliver enduring value.
4. Be experts – to lead our industry into the future.
5. Do what’s right – for our clients, people and communities.

Key risk areas

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

Our organisation

Specialisation	Service Line
Agency Team	- Agribusiness
	- Capital Markets & Investment Services
	- Healthcare and Retirement Living
	- Hotels
	- Industrial
	- Occupier Services (excluding WMS)
	- Office Leasing
	- Residential
	- Retail
	- Healthcare & Retirement Living
	Professional Services
- Valuation & Advisory Services	
- Strategic Advisory	
- Project Leaders	
- Workplace Management Services	

Our policies relevant to modern slavery

1. **Australian Code of Conduct Policy** – this code of conduct 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 employees 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.
2. **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, including Australia and New Zealand, 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 employees, 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 brand and non-disparagement and outside communications.
3. **Whistleblower Policy** – this policy is connected with our Ethics Hotline Colliers Direct, which allows for any employee 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 the Company 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 employee is familiar with this policy and procedure, which is signed by them on commencement of their employment.
4. **Ethics Hotline Colliers Direct** – this is a reporting pathway for employees to anonymously share their concerns about behaviours that may be illegal, unethical or harmful to the Company 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.
5. **Recruitment Policy** – this policy ensures that our proud culture and history of attracting and retaining quality people is maintained. This requires that we find employees 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 employees 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.

6. **Workplace Health & Safety Policy** – we ensure that the highest priority is the health and safety of our employees, with personal obligations to ensure that each person with the Company abide by a safety-first culture workplace. The policy ensures compliance with the work health and safety laws, codes of practice and Australian and New Zealand 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 and New Zealand 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 and modern slavery. 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 employees

The Company prides itself on its workforce and its treatment of its staff, being named an AON Best Employer for

2017, 2018 and 2019. 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 human resources team that addresses the needs, risks and issues within our employee base, and ensures that we comply with our employment conditions for occupational health and safety, minimum wages, hours of work, leave entitlements and employee support. We also offer a number of employee incentives, benefits, goodwill gestures and support for the mental and physical health of our employees. 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 employees, as we recognise that investing in our employees 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 employees 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 or the Chief Financial Officer. 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 the Company staff to attend, in each office across Australia.

Our training is an essential part of ensuring collaboration but also risk management, government and compliance to ensure all our employees 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 employees to undertake a training module on raising awareness on modern slavery and the inherent risks faced by the Company. These training modules include a series of ethics and compliance training 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 employees 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 staff 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

efforts. 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 Policies to ensure continued compliance with its duties as a responsible corporate citizen.

Ethical and whistleblower 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 Whistleblower 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 General Counsel and Company Secretary have carriage with such investigations, unless those complaints involve that person or persons.

The Company's future commitment

The Company both locally and globally continues to review 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.

Over the next year we will continue to review our practices internally and adjust our policies to reflect any risks or better procedures for managing risks as needed. Our commitment to the community to protect the public from risks of modern slavery and human rights violations is a priority for the Company, with our intention to be a leading example of such practices for our peers.

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.

Miscellaneous

Interaction with other policies: Employees must observe and comply with all other policies and guidelines of the Company.

Amendments and revisions: This Policy may be amended or revised from time to time at the discretion of the Company. Employees will be provided with copies of all amendments and revisions.

No additional rights or obligations: This Policy is not intended to, and does not grant, employees any contractual rights and does not impose any contractual or other obligations on the Company.

Contact point: If you have any questions about this Policy, please contact your local HR or Careers representative.

This Statement was approved by the Board of Directors of the Company on 11 December 2020

A handwritten signature in black ink, appearing to read "M. Tyson", with a horizontal line extending to the right.

Malcom Tyson
Chief Executive Officer | Australia