

Modern Slavery Statement 2020

AUSTRALIA

This is a joint statement given by CBRE Pty Limited (ACN 057 373 574) (CBRE) on behalf of CBRE, CBRE (GCS) Pty Ltd and CBRE (FM) Pty Ltd (each of which are reporting entities for the purposes of the *Modern Slavery Act 2018* (Cth)) and covers the activities of their owned and controlled entities set out in Appendix 1, during the year ended 31 December 2020 (CBRE Australia).

This is CBRE Australia's first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of CBRE Pty Limited on 10 June 2021.

References in this statement to 'CBRE', 'we', 'our' and 'us' are references to CBRE Australia.

A MESSAGE FROM THE CEO



As part of the world's largest commercial real estate services and investment firm, we recognise the impact we have on our communities, clients, employees and stakeholders – and why our pillars of corporate responsibility are key to providing industry leadership that grows our business in socially responsible ways. This includes accepting we have a responsibility to respect and create opportunities to advance, human rights as a purchaser of goods and services, as an employer and as a supporter of the communities in which we live and work.

Despite the global challenges associated with COVID-19, we have continued to work on developing a Modern Slavery Framework into our supply chain to assess and address modern slavery risks and build awareness across the business in Australia. Our parent company, CBRE Group Inc, has published five modern slavery statements in the UK and this is the first for our Australian business.

We will continue to develop our Modern Slavery Framework and processes and take further steps to collaborate with our clients, suppliers and employees to protect human rights in our business, industry and the community.

A handwritten signature in black ink, appearing to read 'Phil Rowland', written in a cursive style.

PHIL ROWLAND

Chief Executive Officer, Advisory
Australia and New Zealand

ABOUT US

At CBRE, we recognise that respecting the human rights of those affected by our business activities is important. As a global company with operations in more than 100 countries on six continents, we have an opportunity to make a positive contribution in every location in which we do business. CBRE supports the ideal that all people should be valued and respected and have the right to choose their own destiny. Our global Human Rights Policy, which applies to all employees, reminds us that we have a responsibility to always respect human rights in our operations, to promote an appropriate example and to make a positive global impact. The policy covers topics such as child labour; human trafficking, slavery and the right to voluntary labour; freedom against prejudice and discrimination; safe and secure workplace; work hours and wages; and freedom of association. Our policy states that CBRE endorses the United Nations Guiding Principles on Business and Human Rights and will work to raise awareness within our employee population of our responsibility to protect human rights.

OUR STRUCTURE AND GOVERNANCE

CBRE is a company incorporated in Australia and our registered office is located at Level 21, 363 George Street, Sydney, NSW 2000.

CBRE is a subsidiary of CBRE Group Inc, headquartered in Dallas, Texas, United States of America. CBRE Group Inc is the world's largest commercial real estate services and investment firm (based on 2020 revenue). The company has more than 100,000 employees globally. CBRE Group Inc has in 2021 been recognised for the eighth year in a row as one of the World's Most Ethical Companies® by Ethisphere, a global leader in

defining and advancing the standards of ethical business practices.

Each of CBRE Australia's owned and controlled entities including reporting entities, CBRE Pty Limited, CBRE (GCS) Pty Ltd and CBRE (FM) Pty Ltd, is a company incorporated in Australia and governed by a Board of Directors. CBRE also has an Executive Committee that is comprised of a number of senior representatives from each business line including Chief Executive Officer, Chief Financial Officer, Chief Operating Officer and Senior Managing Directors. The details of the companies within the CBRE group are set out in Appendix 1.

OUR OPERATIONS

CBRE undertakes 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 Australia engages approximately 2800 employees and 96 contractors. CBRE's employees are located primarily in Australia and CBRE carries out its

employment practices in accordance with federal and state employment laws. CBRE has and complies with internal policies and procedures to protect its workforce.

Our operations are split over a number of business lines, with core operations in NSW, VIC, SA, ACT, QLD and WA. We also operate in Tasmania. A summary of the operations of CBRE is contained in Appendix 2.

OUR SUPPLY CHAIN

CBRE globally engages many types of suppliers and recognises the opportunity to influence vendors on a large scale, while also mitigating supply chain risks. We work with direct and indirect vendors throughout the world and expect them to conduct their operations in an environmentally sustainable and socially responsible manner. At the same time, we have the opportunity to use our multi-billion-dollar global supply chain to promote sustainable business practices and support local businesses around the world.

CBRE's supply chain in Australia is predominantly represented by our Global Workplace Solutions (GWS) and Property Management lines of business, with high procurement activity in hard and soft services such as building operations, maintenance, construction projects, cleaning, security, landscaping

and general contractors, utilities and catering services. In addition to these main spend areas, CBRE's vendor spend profile also includes technology, data, marketing services, human resources services, professional services and travel.

We work with more than 12,000 suppliers. The vast majority of our suppliers (approximately 90%) are located in Australia, with the remainder based in other countries including New Zealand, England, China, India, Philippines and Indonesia.

CBRE engages suppliers on several different arrangements depending on client requirements, risk profile and spend. An overview of the types of arrangements is included in the descriptions of our business lines in Appendix 2.

The main types of goods and services that CBRE procures for our general business operations are:



PROPERTY MANAGEMENT SERVICES

To maintain our own offices and facilities, including office maintenance, cleaning and security.



INFORMATION & COMMUNICATIONS TECHNOLOGY

Includes the technology, data computer hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones in our offices.



PROFESSIONAL SERVICES

Professional services we procure externally include financial services, taxation, legal counsel, human resources, insurance, marketing services, consulting and professional and personal development services.



SITE AND OFFICE CONSUMABLES

Site/facility and office consumables, including stationery, amenities and kitchen consumables.



FLIGHTS/ACCOMMODATION

Includes all travel, flights and accommodation and associated costs used by staff to conduct the CBRE Business.

The main types of goods and services that CBRE procures for its clients include:



BUILDING OPERATIONS AND MAINTENANCE

Including cleaning, maintenance, utilities, catering, security, waste management, pest control, HVAC, fire protection, electrical, mechanical, hydraulic, vertical transport, capital works, fire protection and landscaping.



PROJECT MANAGEMENT

Including construction and interior fit out.



MARKETING

Signboards, advertising space.

Our supply chain is managed within each business line and overlaid with a governance structure to ensure centralised supervision and oversight. A summary of the operations and supply chains across CBRE's business lines is contained in Appendix 2.

MODERN SLAVERY RISKS

We recognise that modern slavery may impact our business activities and we have introduced a framework for reducing modern slavery risks in our operations and supply chains.

CBRE has a zero-tolerance approach to modern slavery and is committed to consistently reviewing and strengthening its processes and systems to minimise the risk of human rights infringements anywhere in its operations and supply chain.

RISK ASSESSMENT METHODOLOGY

We developed a risk assessment methodology which considers indicators of modern slavery risks including sector and industry, the type of products and services, geographical location, and specific entity risk. For further information see details of our Modern Slavery Framework below.

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table to the right.

The risk factors we have identified are based on information published by the Walk Free Foundation (Global Slavery Index 2018) and Australian Council of Superannuation Investors (Modern Slavery Risks, Rights & Responsibilities report 2019) (ACSI Report).

RISK PROFILE

RISK	DESCRIPTION OF RISK
SECTOR / INDUSTRY	Property Industry – The ACSI Report notes that the vertical integration of property sector companies across sales, development and management leaves the sector particularly exposed to modern slavery risks in construction, and the procurement of services engaged in property and facilities management. Property faces challenges with complex supply chains where high-risk factors such as vulnerable populations, high-risk geographies, high-risk product and service categories and high-risk business models are present.
PRODUCT / SERVICE	<p>The ACSI Report notes that operational procurement for asset management, and corporate procurement requirements for services such as cleaning, security, catering, landscaping and general contractors present base-skilled labour risks. Bonded labour, delayed wages, human trafficking, poor working and living conditions, withholding of passports and limitations of movement are forms of modern slavery that have been found to be present in Australian operators of cleaning, security and asset and tenant maintenance services.</p> <p>CBRE’s risk assessment has identified three high-risk areas which we believe rely on relatively low-paid labour in the provision of services and which we therefore consider are our greatest risk areas for abusive and exploitative practices in the supply chain, namely:</p> <ul style="list-style-type: none"> • CLEANING – where the risks include undisclosed subcontracting, engagement of subcontractors that do not meet CBRE’s global minimum operating standards, non-compliance with minimum wage requirements, poor documentation and no proof of back pay / holidays or overtime, the engagement of foreign overseas workers, workers working under student visas and for excessive hours. • CATERING – where the risks include undisclosed subcontractors, the engagement of foreign overseas workers, workers working under student visas and for excessive hours, workers deprived of normal employment benefits, excessive working hours, vulnerable to visa conditions, poor command of local language. • SECURITY – where the risks include underpayment of staff, overtime rates not in line with contract or modern awards, subcontractors preventing staff from taking sick leave or annual leave, the engagement of foreign overseas workers.
GEOGRAPHIC	<p>Although CBRE predominately engages and procures goods and services in Australia, we have identified countries from which we procure some of our goods and services - including China, Indonesia and India - that present a high potential for modern slavery risks as these are high-risk geographies for modern slavery practices as identified by the Global Slavery Index 2018.</p> <p>We have identified that suppliers may also have operations located in countries with potential civil unrest and in countries with unregulated work practices and conditions. However, given that a large proportion of our goods and services are procured locally in Australia we evaluate this presents overall low modern slavery risks in our supply chain.</p>
COVID-19 RISKS	We recognised during 2020, due primarily to the COVID-19 pandemic, that supply chains globally were being impacted by staff reductions, production shortages, delays, and factory shutdowns of critical suppliers.

Based on the assessment CBRE has undertaken so far, CBRE’s believes its risk of causing, contributing to or being directly linked to modern slavery is low, on the basis the majority of our suppliers are locally based in Australia and Australia is not a high-risk geography.

ACTIONS TO ASSESS AND ADDRESS RISK

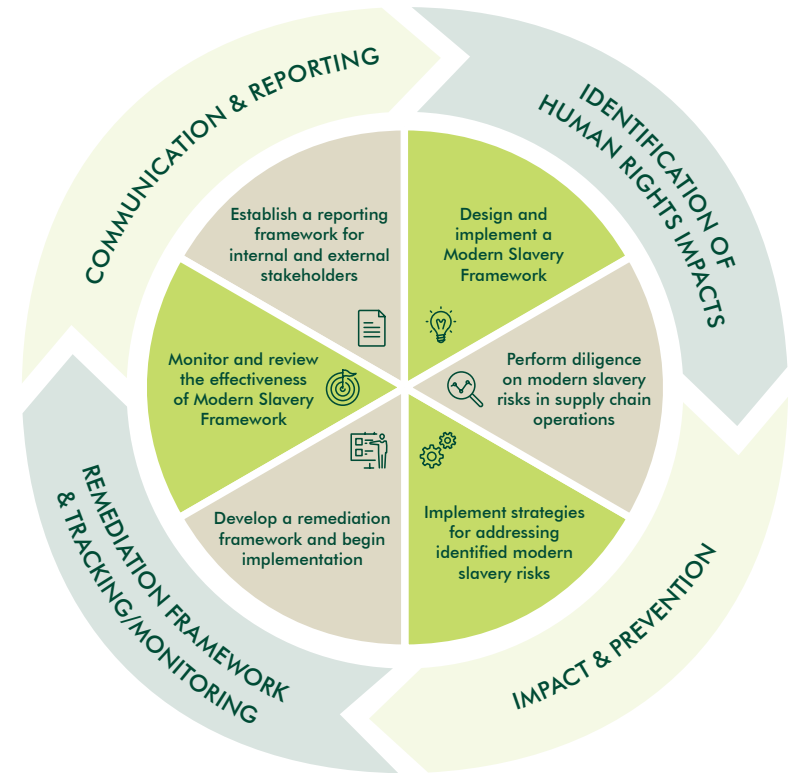
MODERN SLAVERY FRAMEWORK

As an industry leader and responsible business, CBRE seeks to use its position to promote the highest standards for ethics and business conduct. We understand that our scale and procurement practices can positively influence vendors to operate in a socially responsible way to the benefit of our clients, vendors and the community.

CBRE is committed to consistently reviewing and strengthening our processes and systems to minimise

the risk of human rights infringements anywhere in our supply chain.

We understand the importance of working collaboratively with our clients, employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains, including developing and implementing CBRE's Modern Slavery Framework.



Our Modern Slavery Framework focuses on four key areas which are explored in further detail below.



DESIGN & ASSESS

In 2020, CBRE began risk mapping its Australian supply chain and identified that cleaning, security, catering, human resources services and personal protective equipment were areas of risk.

DEVELOPMENT OF A LEGAL AND REGULATORY FRAMEWORK

CBRE reviewed its local policies and procurement procedures and commenced updating them to reflect best-practice methods of identifying and addressing modern slavery risks in its supply chain.

IMPLEMENTATION OF CBRE'S PROPRIETARY COMPLIANCE TECHNOLOGY PLATFORMS

CBRE has two digital integrated vendor onboarding platforms: 'MySupplier' and 'Property Management PulseConnect' where vendors are required to answer over 80 questions which are aligned to CBRE's global minimum operating standards. The questions are risk-based and provide base level data collection, compliance screening in financials, work, health and safety (WHS), environment and sustainability risks.

In 2020 a responsible sourcing questionnaire aligned to the modern slavery legislation was added to both platforms. New vendors and existing vendors are pre-qualified or re-certified annually through the platforms.

In 2020 the following number of vendors have completed the digital onboarding questionnaires:

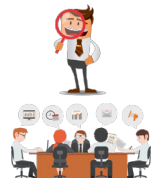
- Over 1000 vendors were pre-qualified and re-certified through the Property Management PulseConnect platform; and
- Over 200 GWS and corporate services vendors were processed through the MySupplier platform encompassing human resource services, hard and soft services.

CBRE RISK 'ECOSYSTEM':

Audits and Governance / Performance Reviews

CBRE preferred suppliers and high-risk supplier audit program. Third party standardised social site audits for a higher level of assurance.

Audits (desktop /site) and Governance



Desk Top Audits / Technology Partners

World-Check and Eco Vadis will be providing sanction screening including legal and adverse media watch. Additional compliance levels for GWS and Property Management to support the MSA remediation framework, also covering financial reviews, WHS, ESG and MSA.

Service Providers can be plugged in for specialist requirements, CBRE portal's provides flexibility to change



Pre-Qualification / recertification – CBRE proprietary technology

Suppliers are categorised based on risk and spend, then complete an on-line questionnaire of 80-90 questions, providing base level data collection, compliance screening as it relates to: Modern Slavery, financial, WHS, environment, sustainability. All suppliers are required to accept CBRE's Supplier Code of Conduct, PO & SO Terms and Conditions, HSE Policy.

CBRE developed online portal for automated vendor onboarding, maintenance and monitoring covering all vendors (Global minimum standards configurable for specific local / regional requirements)



CBRE has developed an enhanced due diligence process. Our global technology partners are EcoVadis, World Check and Avetta, and these technology partners enable CBRE to perform ESG desktop audits, track adverse media and perform advanced sanction screening. The 'Ecosystem' represents part of CBRE's escalation procedures should a violation of responsible sourcing principles, including in relation to a modern slavery risk be identified.

CBRE'S SOURCE-TO-CONTRACT PLATFORM MYSOURCE

CBRE is moving to a fully automated 'Source-to-Contract' process. The Property Management business has reviewed and optimised the procurement process and is transitioning to digital delivery of all operating practices and procedures. As part of this process, the ESG evaluation criteria has been further enhanced to ensure compliance with modern slavery legislation.

MONITORING & REVIEWING

COMPLIANCE TOOLS

CBRE's proprietary compliance tools are used to monitor, maintain, pre-qualify and re-certify all CBRE vendors. For example:

Our Property Management team uses the PulseConnect risk and compliance tool, which is a fully integrated 'Procure-to-Pay' solution and in 2020:

- new vendors were onboarded and pre-qualified through the PulseConnect platform.
- vendors who were re-certified and onboarded were required to sign a Responsible Sourcing Statutory Declaration, confirming there is no undisclosed subcontracting and that they comply with CBRE's Global Supplier Code of Conduct.
- cleaning and security vendors were the strategic focus and approximately 250 vendors were re-certified through the PulseConnect platform, representing approximately 80% of total spend on these categories.

GWS uses the MySupplier supplier risk and compliance tool used to monitor, maintain, pre-qualify and re-certify GWS vendors from a modern slavery perspective. MySupplier is integrated with CBRE's Enterprise Resource Planning (ERP) systems to ensure that in 2020:

New vendors were onboarded and pre-qualified through the MySupplier platform and confirmed the following:

1. subcontracting arrangements - that they have policies and procedures in place to maintain adherence to modern slavery compliance;
2. adherence to modern slavery compliance in all the countries in which they operate in and verification that they do not engage in slave labour, human trafficking or exploitation, or any other activity which would constitute an abuse of human rights; and
3. compliance with CBRE's Global Supplier Code of Conduct.

CONTRACT DOCUMENTS

As part of the legal and regulatory framework, CBRE commenced updating its standard legal precedent documents for vendors to include clauses requiring suppliers to observe and comply with modern slavery legislation and applicable laws, including the *Modern Slavery Act 2018* (Cth) and laws which prohibit slavery-like practices. This included purchase order and service order terms and conditions and supplier agreements, whereby vendors are now required to acknowledge acceptance of the updated Global Supplier Code of Conduct to ensure they are aware of their obligations, as well as confirming that they understand CBRE's modern slavery expectations and values.

REMEDICATION & MITIGATION

COMPLIANCE TOOLS

In 2020, CBRE developed and implemented a simple risk-based proprietary responsible sourcing remediation framework. The verification of vendor responses to the responsible sourcing questionnaire is managed by the PulseConnect platform team for CBRE's Property Management vendors. During the reporting period:

- over 900 Property Management vendors have been processed through the remediation framework;
- recertification and remediation dashboards were developed in consultation with key Property Management clients; and

- a responsible sourcing incident response procedure was developed, including red flag escalation protocols, property, and site level remediation mechanisms. If a responsible sourcing risk is identified through the remediation process, a red flag and incident response process has also been developed and implemented

Property Management partnered with cleaning industry members and its preferred auditing panel of vendors to define a responsible sourcing audit methodology and benchmark, and has developed:

- a tier one high risk and preferred vendor audit program;
- an internal audit program which includes spot check auditing methodology

COMMUNICATIONS & REPORTING

A strong framework exists within CBRE that enables the appropriate reporting and management of identified modern slavery risks. This includes mandatory reporting to the Pacific Governance Risk Committee, and to the Executive Committee.

TRAINING

CBRE has developed employee, client and vendor tailored modern slavery training materials. Key highlights to the CBRE training program include:

- all Property Management employees and key stakeholders from across the GWS and corporate services business lines were invited to a CBRE-tailored one-hour workshop chaired and presented by the Ethics and Compliance Officer and the Senior Procurement Director;
- more than 1000 employees were trained across the breadth and depth of the organisation (15 virtual workshops); and
- a tailored training workshop was presented to the Executive Team in 2020.

REPORTING HELPLINE

CBRE has a Global Ethics Helpline that is available to all members of staff, suppliers and 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 Global Ethics and Compliance team.

Our supply chain risk management approach is further supported through:

- the implementation of modern slavery framework solutions for clients and vendors;
- the development of a supply chain risk management framework, procedures, third party ethics solution tools and auditing capability to support our world class procurement practices;
- the introduction of a vendor Quality Development Program;
- CBRE is registered on the Property Council of Australia's Informed 365 supplier platform and is an active participant in the industry's collaborative strategy to minimise modern slavery risks from supply chains.

GOVERNANCE AND ACCOUNTABILITY FRAMEWORK

CBRE is committed to conducting business in alignment with the United Nations Guiding Principles on Business and Human Rights. In FY2020 we established a Modern Slavery Steering Committee to ensure modern slavery compliance, which included internal key stakeholders from procurement, compliance, legal and operations teams to enable a company-wide approach. The first step in developing CBRE’s Modern Slavery Framework was to conduct a gap analysis of CBRE’s policies and management systems against the United Nations Guiding Principles, which informed the thinking around the creation of our Modern Slavery Framework.

POLICIES AND PROCEDURES

In CBRE’s existing governance framework, we have policies and procedures to ensure we have strong frameworks to consider and address modern slavery risks in our operations and supply chain, including:



GLOBAL HUMAN RIGHTS POLICY

Which recognises CBRE’s responsibility to respect human rights in its operations, to promote an appropriate example and make a positive global impact;



GLOBAL CBRE SUPPLIER CODE OF CONDUCT

Which is primarily based on the Ten Principles of the United Nations Global Compact covering Human Rights, Labour Practices, Anti-Corruption and Environmental Practices and establishes expectations on supplier business conduct as it relates to how goods and services are provided to us and our client; and



GLOBAL WHISTLE-BLOWER POLICY

To ensure eligible whistle-blowers, and those who may be involved in an investigation, understand the following: the ways in which a whistle-blower can make a disclosure of information; the protections which arise under whistle-blower laws; CBRE’s process for handling and investigating disclosures, and ensuring the fair treatment of the individuals involved; and how whistle-blowers will be supported and protected by CBRE.

COVID-19

The COVID-19 pandemic has brought further challenges to addressing modern slavery and highlighted social and economic inequalities worldwide. CBRE has assessed the impact of the COVID-19 pandemic on its practices and risks of modern slavery.

CBRE worked in partnership with its suppliers and clients to minimise the impacts of COVID-19. In the majority of our clients’ assets, cleaning and security services were increased in frequency and CBRE (in conjunction with industry and our clients) developed specific pandemic cleaning and security protocols, based on best practice play books, to ensure that vulnerable workers were protected from the impacts of COVID-19. This involved but was not limited to ensuring suppliers’ employees received the appropriate level of training, had sufficient PPE, and were compliant in mandating their usage at all CBRE and client assets.

FUTURE ACTIONS

We have also planned to undertake further actions to identify and address CBRE’s modern slavery risks as set out in the ‘2021 focus’ section below.

ASSESSING OUR EFFECTIVENESS

We recognise that modern slavery may impact our business activities and we have introduced a framework for reducing modern slavery risks in our operations and supply chains.

CBRE has a zero-tolerance approach to modern slavery and is committed to consistently reviewing and strengthening its processes and systems to minimise the risk of human rights infringements anywhere in its operations and supply chain.

We are committed to reviewing the effectiveness of our actions and during the reporting period we did this by:

<p>Regularly reviewing our modern slavery processes, with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks</p>	<p>Having a dedicated working group for modern slavery compliance</p>
<p>Continuing to develop and evolve our supply chain reporting to provide greater transparency around modern slavery risks and highlight the effectiveness of our modern slavery action plan against key performance metrics</p>	<p>When commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate</p>
	<p>The completion of modern slavery awareness training for our broader employee and supply chain population and/or for targeted groups of professionals in specific service lines, support functions or geographies</p>

We monitor our performance against several key performance indicators which were developed to measure the effectiveness of the framework in identifying and addressing modern slavery risk. These include:

<p>Establishing metrics across our business, incorporating measures such as progress with the roll-out of MySupplier and PulseConnect</p>	<p>Modern slavery remediation status</p>
<p>20% of Property Management suppliers were re-certified</p>	<p>Recording the number of actions that have been implemented within established deadlines</p>
<p>Over 200 GWS vendors were on-boarded through the platform</p>	<p>Over 900 Property Management suppliers were remediated through the platform</p>
<p>Monitoring the number of supplier adverse media and compliance screening protocols</p>	<p>Approximately 742 Property Management suppliers executed a Responsible Sourcing Supplier Declaration which included affirming the Supplier Code of Conduct</p>
<p>Taking action as a result of red flags identified through the remediation and onboarding process</p>	<p>Monitoring the percentage of employees who have completed training on modern slavery</p>

We are committed to reviewing the effectiveness of the actions we have planned to undertake in the next reporting period as set out in the '2021 focus' section on the following page.

CBRE's Modern Slavery Framework was developed to ensure a consistent company-wide approach in response to the risk of modern slavery to our business operations and supply chain. A critical step in developing the Modern Slavery Framework was the creation of the Modern Slavery Steering Group to provide oversight and governance of the overall framework and program. The key objective of the group is to ensure the Modern Slavery Framework remains fit for purpose and is continuously improving to remain compliant to the legislation and regulatory environment in which we operate.

CONSULTATION

During 2020, there was consultation and collaboration within CBRE as the Executive Committee, that is comprised of a number of senior representatives from each business line including Chief Executive Officer, Chief Financial Officer, Chief Operating Officer and Senior Managing Directors was provided training and advised by the Ethics and Compliance Officer about our approach to modern slavery compliance, including the risk assessment and preparation of this statement. This process of consultation also included representatives on behalf of the CBRE entities. As noted on the previous page, a Modern Slavery Steering Group was established and met to discuss modern slavery risks in the business and the development of a modern slavery program and this statement for CBRE.

Prior to being put to the Board for review and approval, this statement was provided to the following people, committees and teams. For review and input:



2021 FOCUS

As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in CBRE’s operations and supply chains and we are committed to continuous improvement in this regard.

In 2021 we will focus on:



POLICIES AND PROCEDURES

- The development of a Modern Slavery Action Plan for modern slavery compliance to focus and prioritise our actions for future reporting periods;
- The development of a Modern Slavery policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation;



GOVERNANCE

- The establishment of a Modern Slavery Committee to be chaired by Chief Ethics and Compliance Officer – Pacific;



AUDITING

- Implementing an audit and benchmark program and identify areas for improvement;



RISK IDENTIFICATION

- Reviewing and monitoring of specific entity risks will continue;
- Heat mapping to identify other ‘at-risk’ categories which require the attention of our global and local procurement teams;



REMEDIATION

- Continuation of the remediation framework, focus on enhanced reporting and providing greater supply chain transparency;
- Operationalisation of the remediation framework in MySupplier for GWS;



TRAINING

- Focus on supplier training as part of the remediation framework;
- Continue training across CBRE including for senior leaders and those involved in procurement decisions;



CLIENTS

- Continued engagement and collaboration with our clients, industry and our supplier base to raise awareness and mitigate modern slavery risk throughout the supply chain;



SUPPLIERS

- Re-certification will focus on security for both Property Management and GWS, along with marketing services and landscaping for Property Management.
- Utilisation of the framework, PulseConnect and MySupplier platform to review and consider risks of all suppliers and undertake any necessary remediation steps;
- Identified specific entity risk will be considered and investigated and remediated as required; and
- Business lines will undertake risk assessments and investigations into their supply chain and take steps to mitigate and remediate any risks or breaches, including identifying alternate lower risk suppliers where items are produced or manufactured in Australia where possible.

In order to assess the effectiveness of these actions, we plan to:

<p>Review our modern slavery risk assessment methodology to consider whether we are appropriately identifying and evaluating our modern slavery risks;</p>	<p>When commencing a new operation or engaging a new supplier, assess whether our existing risk management processes remain appropriate;</p>
<p>Review the supplier questionnaire to consider whether we are appropriately identifying and evaluating our modern slavery risks;</p>	<p>Monitor the number of suppliers who are re-certified through the Modern Slavery Framework;</p>
<p>Monitor the number of pre-qualified and onboarded vendors including completion of the modern slavery questionnaire;</p>	<p>Monitor the number of our suppliers who have completed a Responsible Sourcing Supplier Declaration including affirming the Supplier Code of Conduct;</p>
<p>Monitor the number of employees who have completed training on modern slavery.</p>	

RELATED ACTIVITIES

As part of the world’s largest commercial real estate services firm, we recognise the impact we have on our communities, clients, employees and stakeholders – and why our pillars of corporate responsibility are key to providing industry leadership that grows our business in socially responsible ways:



RESPECT

We act with consideration for others; ideas and share information openly to inspire trust and encourage collaboration

INTEGRITY

No one individual, no one deal, no one client, is bigger than our commitment to our company and what we stand for

SERVICE

We approach our clients’ challenges with enthusiasm and diligence, building long-term relationships by connecting the right people, capital and opportunities

EXCELLENCE

We focus relentlessly on creating winning outcomes for our clients, employees and shareholders

This includes regularly engaging in human rights and community initiatives. Examples of some of these are:



UNITED NATIONS GLOBAL COMPACT

CBRE has been a member of this since 2007.



PROPERTY WITH PURPOSE

CBRE’s strategic framework that guides and strengthens our social obligations in Australia and New Zealand. It aligns with key areas of focus that we believe present the biggest opportunities for us to make a meaningful contribution. This framework governs not only our legal responsibilities but has been enhanced further to support our mission to give back to the communities in which we operate, how we employ and the support we offer our people.



DOMESTIC AND FAMILY VIOLENCE RESPONSE FRAMEWORK

CBRE is committed to providing a safe workplace, supporting victims/survivors of domestic violence through crisis support and the prevention of domestic violence through gender equality. CBRE is proudly working towards becoming a White Ribbon Accredited Workplace.



CAREER TRACKERS

CBRE partners with Career Trackers, an organisation that creates paid internship opportunities for Indigenous students to build a brighter future.



THE PINNACLE FOUNDATION

CBRE is a proud supporter of Pinnacle Foundation which provides educational scholarships, mentoring and opportunities for young LGBTIQ+ Australians to realise their full potential and overcome challenges.



AUSTRALIAN WORKPLACE EQUALITY INDEX

CBRE has proudly obtained Silver Accreditation for the Australian Workplace Equality Index. AWEI stands as the definitive national benchmark on LGBTQ workplace inclusion and comprises the largest and only national employee survey designed to gauge the overall impact of inclusion initiatives on organisational culture as well as identifying and non-identifying employees. The Index drives best practice in Australia and sets a comparative benchmark for Australian employers across all sectors.

This statement was reviewed and approved by the Board of CBRE on 10 June 2021.



PHIL ROWLAND

Chief Executive Officer, Advisory Australia and New Zealand

APPENDIX 1

CBRE ENTITIES

This is a joint statement given by CBRE Pty Limited (ACN 057 373 574) (CBRE) on behalf of CBRE, CBRE (GCS) Pty Ltd and CBRE (FM) Pty Ltd (each of which are reporting entities for the purposes of the *Modern Slavery Act 2018* (Cth)) and covers the activities of their owned and controlled entities set out in below during the year ended 31 December 2020. The owned and controlled entities of and including, CBRE Pty Limited ABN 57 057 373 574 are:

Size Ranking	Metro Area	Total Multifamily Stock
CBRE Pty Limited	ABN 57 057 373 574	Level 21, 363 George Street, Sydney NSW 2000
CBRE (A) Pty Limited	ABN 083 694 320	Level 21, 363 George Street, Sydney NSW 2000
CBRE (C) Pty Limited	ABN 64 003 205 552	Level 21, 363 George Street, Sydney NSW 2000
CBRE (FM) Pty Limited	ABN 89 010 724 964	Level 21, 363 George Street, Sydney NSW 2000
CBRE (GCS) Pty Limited	ABN 13 127 372 329	Level 21, 363 George Street, Sydney NSW 2000
CBRE (P) Pty Limited	ABN 91 010 964 744	Level 21, 363 George Street, Sydney NSW 2000
CBRE (RP) Pty Limited	ABN 92 127 174 207	Level 21, 363 George Street, Sydney NSW 2000
CBRE (V) Pty Limited	ABN 15 083 694 357	Level 21, 363 George Street, Sydney NSW 2000
CB Richard Ellis (P) Holdings Pty Ltd	ABN 35 052 372 460	Level 21, 363 George Street, Sydney NSW 2000
CBRE Capital Advisors (Asia Pacific) Pty Limited	ABN 31 003 309 537	Level 21, 363 George Street, Sydney NSW 2000
CBRE Residential Valuations Pty Limited	ABN 94 007 755 106	Level 21, 363 George Street, Sydney NSW 2000
CBRE Valuations Pty Limited	ABN 94 007 755 106	Level 21, 363 George Street, Sydney NSW 2000
Aurora Projects Pty Limited	ACN 003 870 719	Level 21, 363 George Street, Sydney NSW 2000
Montlaur Project Services Pty Ltd	ACN 101 092 899	Level 5, 606 St Kilda Road, Melbourne VIC 3004
Paragon Project Management Pty Ltd	ABN 38 054 200 190	Level 21, 363 George Street, Sydney NSW 2000
Trammell Crow Company (Aust) Pty Limited	ABN 45 092 983 572	Waterfront Place, Level 2, 1 Eagle Street, Brisbane QLD

APPENDIX 2

OVERVIEW OF CBRE'S BUSINESS LINES AND SUPPLY CHAIN

ADVISORY & TRANSACTIONS AND CAPITAL MARKETS

The Capital Markets and the Advisory & Transaction Services business lines are brokerage businesses operating under the entities CBRE Pty Ltd, CBRE (V) Pty Ltd and CBRE (C) Pty Ltd, specialising in the sale and leasing of commercial property, hotels and development sites predominantly across the industrial and logistics, retail and office markets in Australia. We also provide advisory services across these same sectors, with a focus on workplace strategy, supply chain optimisation, retail analytics and structured transactions. All properties are located in Australia.

The Capital Markets and the Advisory & Transaction Services business lines works across 14 offices in NSW, Victoria, Queensland, South Australia and Western Australia.

The Capital Markets and the Advisory & Transaction Services business lines' supply chains are predominantly serviced based suppliers related to marketing and sales of property. The majority of these suppliers are on-going, long-term contracts, offering services including media bookings, creative services and marketing support to sell property. The other remainder are on shorter-term relationships of a transient service nature i.e. photography, printing and design. We consider the risk of modern slavery in our supply chain in this business line is low, as our suppliers are all based in Australia and New Zealand and are in low risk business areas. These include self-employed photographers, graphic designers and media and marketing companies. However, there is a risk that some goods such as signage / boards, although purchased through Australian and New Zealand based companies, may be manufactured in countries where modern slavery is a risk.

RESIDENTIAL PROJECTS

Residential Projects is a national brokerage business operating under the CBRE RP Pty Ltd entity, specialising in the provision of sales and marketing campaigns for residential apartments, predominantly off-plan in Australia and Hong Kong. Properties are located in Australia and sales predominately originate within Australia making up the majority of the total sales, or Hong Kong and other overseas locations making up the balance of sales.

The Residential Projects business line employees 150 employees over 4 offices in Sydney,

Melbourne, Brisbane and Gold Coast and a small team of approximately 6 in Hong Kong who are jointly managed with CBRE UK, together with a network of over 30 third party real estate agents who sell the same residential apartments.

The Residential Project supply chain is predominantly serviced based suppliers related to marketing and sales of property. The majority of these suppliers are on-going long-term contracts offering services including media bookings to sell property.

The other remainder are shorter-term contracts of a transient service nature for example photography, printing. We consider the risk of modern slavery in our supply chain in this business line is low as our suppliers are all predominantly based in Australia and are in low risk business areas, for example self-employed agents, photographers, graphic designers and media and marketing companies. However, there is a risk that some goods such as tech and stationery items, although purchased through Australian based companies, may be manufactured in countries where modern slavery is a risk.

PROPERTY MANAGEMENT

CBRE's Property Management business provides services including property management, facilities management, real estate accounting, sustainability and customer experience to commercial property owners spanning the office, retail, industrial, public realm, residential, mixed-use and tertiary education sectors. With almost 800 professionals across Australia, the team oversees the safety and management of 23.2 million square metres of real estate and over 17,000 tenants on behalf of over 500 clients, ranging from private owners to multi-national Real Estate Investment Trusts. Property Management operates under the following entities; CBRE Pty Limited, CBRE (V) Pty Limited and CBRE (C) Pty Limited. We manage the following supply chain categories on behalf of our clients:

- Facilities Management – including cleaning, security, waste management, pest control, HVAC, fire protection, electrical, mechanical, hydraulic, vertical transport, fire protection and landscaping.
- Project Management – including fabric upgrades and interior fit out.
- Corporate – including technology, data, IT hard & software, marketing services, professional services, HR services, stationary, consumables and PPE.

Its supply chain is predominately serviced based suppliers in Australia and the focus in 2020 was on the risk areas associated with cleaning, security and catering.

GLOBAL WORKPLACE SOLUTIONS

The Global Workplace Solutions (GWS) business line operates under the entities CBRE (GCS) Pty Limited and CBRE (FM) Pty Ltd, and primarily provides facilities management and project management solutions to a range of Australian and international corporate tenants. The key areas of spend relate to hard and soft facilities management services, as well as project management.

- Facilities Management – including cleaning, security, waste management, pest control, HVAC, fire protection, electrical, mechanical, hydraulic, vertical transport, fire protection and landscaping.
- Project Management – including construction, building infrastructure and fabric upgrades, and interior fit out.
- Corporate – including technology, data, IT hard & software, marketing services, professional services, HR services, stationary, consumables and PPE.

The supply chain of GWS is predominately represented by serviced based suppliers in Australia and its focus in 2020 was on the risk areas associated with cleaning, security and catering.

GWS employs 552 employees across 94 CBRE and client offices in New South Wales, Victoria, Queensland, South Australia, Western Australia, Tasmania and the ACT.

DEBT & STRUCTURED FINANCE PACIFIC

The debt and structured finance (DSF) business line operates under the entity CBRE Capital Advisors (Asia Pacific) Pty Limited, which holds an Australian Financial Services Licence, and provides real estate investors and developers with complete funding solutions from a wide range of domestic and international capital sources. It also provides loan administration and management services to capital issuers in the Pacific region, predominately in Australia, including:

- assisting with sourcing, structuring, and arranging debt facilities;
- assisting with capital raising via share divestments and joint venture partnerships; and
- providing loan administration and asset management services to commercial mortgage lenders.

The DSF business employs nine employees over three offices in Sydney, Brisbane and Melbourne.

DSF's supply chain spend consists of the procurement of daily, real time market rate data.

VALUATIONS & ADVISORY SERVICES

CBRE's Valuations & Advisory Services business (VAS) in Australia operates under three separate company entities, one to deliver residential VAS services, another for all other VAS work, including commercial VAS and the third for the services provided through the Building, Depreciation and Cost Consultancy (BDCC) team. The entities relevant to each service are detailed below:

- Residential (single unit residential) VAS work is performed under the entity CBRE Residential Valuations Pty Ltd.
- All other VAS work (commercial work etc) is performed under the entity CBRE Valuations Pty Ltd.
- BDCC services are performed under the CBRE (A) Pty Ltd entity.

CBRE is one of the largest providers of valuation and advisory services in Australia, with the Pacific team comprising of more than 320 professionals completing over 320,000 assignments annually. Our areas of focus span across five sub-sectors being residential, commercial, agriculture/rural, hotels along with retirement and healthcare. We have offices and operations in NSW, Victoria, South Australia, Queensland, Western Australia, ACT, Tasmania and Philippines together with a network of 14 sub-contractors who provide various professional building consulting services (eg environmental assessment, fire safety, building cladding assessments) to our BDCC team within Australia.

The VAS supply chain is predominantly goods suppliers and service-based suppliers relating to general office supplies as well as the provision of data services to assist valuation requirements. Approximately 30% of these suppliers are on-going long-term contracts, offering services including the provision of data to assist valuation requirements, file storage services, phone system and other general office requirements. The other balance are shorter-term relationships of a transient service nature and typically include food, consumables and stationery for office staff. We consider the risk of modern slavery in our supply chain is low as our suppliers are all based in Australia and are in medium risk business areas. However, there is a risk that some goods and services such as maintenance and repairs, although purchased through Australian based companies, CBRE does not have visibility of its work practices and some goods may be manufactured in countries where modern slavery is a risk.

