



MODERN SLAVERY  
STATEMENT  
2020 FINANCIAL YEAR



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# INTRODUCTION

**As one of the leading real estate services firms in Australia, Cushman & Wakefield is committed to running its business responsibly. With over 1,200 employees nationwide, we continue to ethically service our broad base of clients across public, private and not-for-profit sectors in Australia and across the globe.**

Cushman & Wakefield Australia practices zero-tolerance for slavery and human trafficking. We prohibit all forms of modern slavery, and require our suppliers to maintain and promote fundamental human rights.

Employment decisions must be based on free choice without any coerced or prison labour, use of physical punishment, threats of violence or other forms of physical, sexual, psychological, financial or verbal abuse as a method of discipline or control.

We recognise our responsibility to affect change by engaging in ethical practice throughout our operations, including supply chain procurement and we are proud of the steps we have taken to address modern slavery.

2020 is our first reporting year under the Australian modern slavery legislation, and this Statement represents the first step in an ongoing supply chain management program designed to effectively identify and address the risks of modern slavery.

This Statement demonstrates the results of our findings, a summary of the actions Cushman & Wakefield Australia has taken, and is taking, to identify the risks of modern slavery, address and mitigate these risks and assess the effectiveness of those actions.

We are committed to continuing our efforts to combat modern slavery in future years.

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Australia and New Zealand

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Managing Director CRE  
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Acting Head of Project  
and Development Services  
Australia and New Zealand

**Jodi Swinburne**  
Chief Financial Officer &  
Chief Operating Officer  
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## ABOUT THIS STATEMENT



This is the inaugural joint statement from Cushman & Wakefield Pty Ltd (ACN 074 196 991), DTZ Aus Holdco Pty Ltd (ACN 602 106 936) and DTZ Aus Bidco Pty Ltd (ACN 169 965 995). For the purposes of this Statement, the three reporting entities and the entities it controls or owns are together referred to as we, us, our or Cushman & Wakefield Australia, whereas Cushman & Wakefield refers to the global group.

This Statement is submitted by Cushman & Wakefield Pty Ltd on behalf of itself and the other reporting entities. Cushman & Wakefield Pty Ltd provides commercial real estate services and is the main operating entity of the Cushman & Wakefield business in Australia. DTZ Aus Bidco Pty Ltd and DTZ Aus Holdco Pty Ltd both function as holding companies within the corporate structure of Cushman & Wakefield in Australia.

This Statement has been prepared with the input of a working group comprised of central support functions, including our Legal, Compliance, Supply Chain Management and Health Safety Security Environment & Quality (HSSEQ) teams (Modern Slavery Working Group) which service the various entities that form part of the group controlled by Cushman & Wakefield Australia.

All Cushman & Wakefield Australia entities take a unified approach to modern slavery and the boards of each of those entities have been consulted in the preparation of this Statement. This Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) in respect of our financial year 1 January 2020 to 31 December 2020 (Reporting Period).



# OUR BUSINESS, OPERATIONS & SUPPLY CHAINS



## BUSINESS

Cushman & Wakefield Australia is organised into the following five core groups:

- Recurring Business, which consists of facilities management, workplace and asset services;
- Transactional Business, which consists of commercial real estate agency services;
- Project Development Services;
- Global Occupier Services; and
- Internal Support Services, which includes human resources, information technology, marketing and finance.



## OPERATIONS

Cushman & Wakefield Australia has approximately 1,200 employees in Australia and provides a suite of real estate services to its clients, covering:

- property portfolio management;
- workplace strategy and solutions;
- transaction management services, such as managing the acquisition, disposal, renewal and renegotiation of commercial leases;
- capital market investments;
- trades services;
- facilities management; and
- project management and development services.



## SUPPLY CHAINS

Cushman & Wakefield Australia has over 3,000 suppliers, providing a wide range of goods and services.

The majority of our supply chain is made up of locally based property services businesses, with a minority of service providers based overseas, in countries including Singapore and the United Kingdom. As part of the global Cushman & Wakefield organisation, we also share and benefit from certain centralised services provided by suppliers based overseas. The majority of the goods sourced by Cushman & Wakefield Australia are sourced locally, though we recognise that goods locally sourced can still derive from overseas supply chains.

Our established end-to-end supplier management processes, including our robust supplier registration framework, generate engagement and spend data for visibility over our supplier base, all of whom have committed to compliance with our internal requirements as part of our registration process.

## OUR SUPPLY CHAIN OPERATES ACROSS THE BELOW INDUSTRIES

Risk Rating: ● Very High ● High ● Medium ● Low

Cleaning	●
Building Structural & Fabric	●
Consumables	●
Freight & Logistics	●
Laundry	●
Waste	●
Pest Control	●
Furniture & Fittings	●
Grounds & Gardening	●
IT Support/Service Desk	●
Relocations	●
P&E	●
Security Guarding	●
Doors	●
Electrical	●
Communication	●
Fire	●
HVAC	●
Mechanical	●
Plumbing	●
Security Equipment	●
Vertical Transportation Systems	●
Specialist Equipment	●





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# COVID-19

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During the Reporting Period, Cushman & Wakefield Australia, its clients and partners were significantly disrupted by the COVID-19 pandemic and its impact on society, workplaces and supply chains. Cushman & Wakefield Australia actioned its Pandemic Preparedness Plan in early 2020 in response to these challenges.

The pandemic increased the risk of modern slavery practices in certain industries and regions of the world, but also made it more difficult to review compliance, with travel and access limited due to national and international government restrictions, and changes in the way we and our suppliers operate.

Cushman & Wakefield Australia reviewed its modern slavery roadmap in response to the pandemic, consistently reviewing and reprioritising activities to maintain supply chain continuity and visibility, with manufacturing capability, workforces and labour requirement shifting quickly as cities were locked down and needs changed.

The Cushman & Wakefield Australia businesses worked closely with supplier partners and monitored and managed changes in workforce requirements and shifting supply chain demands, particularly in Q2 and Q3, where supply chains relevant to our businesses (particularly in cleaning categories) were significantly impacted.

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# RISKS OF MODERN SLAVERY

## RISK ANALYSIS

### INDUSTRY RISK RATING

As the first level of our risk analysis methodology, Cushman & Wakefield Australia's Compliance, Supply Chain Management and HSSEQ teams carried out a risk mapping exercise to build a risk rating methodology and ultimately identify areas within our business that carry a high risk of modern slavery.

Key elements of the risk mapping exercise included:

- engagement of both service line representatives from within our business and supplier groups to provide advice and insights in relation to their areas of expertise;
- research into modern slavery risk factors and how they translate to locally and globally sourced goods and services;
- obtaining industry advice and data on known high-risk industries; and
- researching examples of modern slavery in Australia and overseas markets and considering how those examples relate back to our supply chains.

### SELF-ASSESSMENT QUESTIONNAIRE

The second level of our risk analysis methodology assessed risk at a supplier level.

Cushman & Wakefield Australia partnered with a third-party cloud-based platform to create a supplier-level modern slavery compliance framework. An important component of that framework included the development of a custom supplier questionnaire (Self-Assessment Questionnaire).

The Self-Assessment Questionnaire assesses suppliers in the following areas:

- the supplier's general understanding of modern slavery;
- the visibility the supplier has over its own supply chain;
- the extent to which employees or workers are based overseas;
- the levels of education, training and awareness in relation to modern slavery;
- any external review and oversight of the supplier; and
- any criminal proceedings against the supplier.

This Self-Assessment Questionnaire was sent out to a pilot group of suppliers during the Reporting Period, with the results used to fine-tune the risk mapping methodology and revise the Self-Assessment Questionnaire.

### SERVICES AND GOODS INDUSTRIES IDENTIFIED AS POTENTIAL MODERN SLAVERY RISKS

We identified key service and goods industries within our operations and supply chain that may be potentially at risk of contributing to modern slavery practices, which include:

- building, structural and fabrication services;
- cleaning services;
- freight and logistics services;
- raw materials and components;
- consumables, including bathroom consumables, other fast moving consumer goods (FMCG);
- catering services and related goods, including coffee; and
- laundry, waste and pest control services.

We provide some further detail below regarding certain areas where we have identified specific risks of modern slavery practices within our operations and supply chains.

**BUILDING, STRUCTURAL AND FABRICATION:** We provide a wide range of building services both through self-delivery and contracted relationships with third party Australian suppliers. The building services and construction industry, with its need for low-skilled labour and labour hire agencies, makes it susceptible to risks of modern slavery where transparency of hiring practices is sometimes compromised.

**SOFT SERVICES:** Cushman & Wakefield Australia has contracts with Australian companies for certain soft services, including the provision of cleaning services and associated consumables. Soft services such as cleaning operate in a market that is price competitive, which can depend on low-skilled migrant labour to be cost effective. This can contribute to an environment of vulnerable workers exposed to modern slavery risks.

**RAW MATERIALS & COMPONENTS:** Our supply chain comprises large amounts of raw materials and components, and is long and complex. The end-to-end supply of materials sourced and received can span many countries, where the associated modern slavery risk may vary significantly.

# MITIGATION

Cushman & Wakefield Australia already had robust supplier management practices in place before the Reporting Period, but has used the Reporting Period to review, amend and add to those practices as part of its strategy to combat modern slavery. As part of its mitigation strategy, Cushman & Wakefield has focussed on core parts of its business, establishing a platform for wider deployment of initiatives across other parts of its business in future reporting periods.

We have worked towards implementing the identification and mitigation of modern slavery risk throughout our supply chains, by:

- identifying, assessing and monitoring potential risk areas in our supply chains;
- ensuring that high-quality spend and engagement data is held;
- engaging suppliers through a procurement process that considers modern slavery risk;
- providing a mechanism to report suspected incidents of modern slavery; and
- establishing a process for investigating incidents and engaging with suppliers to remediate identified modern slavery risks where appropriate

Our mitigation of modern slavery risk also relies on the following measures, some of which were already in place before the Reporting Period. These measures will also form the basis for further deployment across our business in future reporting periods.



## INTERNAL CODES

Cushman & Wakefield's Global Supplier Code of Conduct and Code of Ethics applies across our businesses. This Code of Conduct clearly sets out Cushman & Wakefield's zero tolerance approach to modern slavery and has been shared extensively with our suppliers.



## DUE DILIGENCE

Cushman & Wakefield Australia has in place a process which screens suppliers for economic sanctions in several international watch lists, including CISADA, Dow Jones Adverse Media, Anti-corruption and Watch Lists, OFAC and OFAC\_SSI.



## CONTRACTUAL OBLIGATIONS AND AUDIT RIGHTS

We have incorporated compliance obligations specifically relating to modern slavery in our standard supplier contract templates, procurement documentation and supplier registration process. Our supplier contracts and Cushman & Wakefield's Global Supplier Integrity Policy also allow our internal auditors to monitor, test and audit our suppliers' compliance with their contractual obligations. We have adapted and expanded our audit and spot check processes to address supplier compliance with modern slavery obligations.

No deficiencies in respect of modern slavery practices were reported as a result of these audits and spot checks during the Reporting Period.



## SUPPLIER INTEGRITY POLICY

Cushman & Wakefield's Global Supplier Integrity Policy prohibits modern slavery practices, details our reporting structure and whistleblowing platforms and enables Cushman & Wakefield Australia to audit suppliers' compliance behaviours. All new suppliers are required to agree to the Global Supplier Integrity Policy as part of the supplier onboarding process.



## SUPPLIER ADHERENCE

We implement certain measures across different parts of our business to cascade our zero tolerance of modern slavery down to our suppliers, including:

- our due diligence risk assessment process as outlined in the Due Diligence section above;
- clearly communicating our expectations and ethics to our suppliers;
- providing our policies and codes of conduct to our suppliers;
- inserting into our standard-form supplier agreements terms that specifically prohibit modern slavery and impose reporting and records maintenance obligations on suppliers, together with associated termination rights for breach of such provisions; and
- tender documentation incorporating questions regarding the steps taken by tenderers to address modern slavery within their organisations.



## WHISTLEBLOWING PLATFORM

In addition to the core internal processes to anonymously report violations of our ethical standards, we have enhanced our existing global whistleblowing platform to allow our employees, contractors, and suppliers to anonymously report suspected violations of our modern slavery standards and practices. We make it clear to our employees and suppliers that they will not be subject to any repercussions for reporting such risks and support them in doing so through the whistleblowing platform.



## TRAINING

To promote a high level of understanding of the risks of modern slavery in our supply chain and our business, we have developed an internal training and awareness program for our staff. This internal training program was developed in the Reporting Period and will be deployed in 2021. The training program will cover what modern slavery is, how it applies to Cushman & Wakefield Australia and its businesses, and how to report suspected or actual instances of modern slavery.

Our standard form supplier agreements also require suppliers to provide modern slavery training to their staff.



# MITIGATION

## REPORTING POLICY AND RESPONSE PLAN

In addition to our whistleblowing platform, Cushman & Wakefield Australia developed a response and governance structure to formalise responses to modern slavery allegations.

A central part of the governance structure is the establishment of the Modern Slavery Risk Committee, comprised of representatives from the Supply Chain, Legal, Compliance and HSSEQ teams, to address any reports of potential modern slavery incidents. The Modern Slavery Risk Committee is responsible for further investigation of potential or actual incidents of modern slavery within Cushman & Wakefield Australia's businesses, operations and supply chains and how incidents and reports are referred and escalated. The Modern Slavery Risk Committee will also meet periodically to review any prior modern slavery reports, identify improvements in reporting and governance structures, and monitor performance of the business against relevant modern slavery remediation objectives.



Our response plan is based on the following high-level approach:

- a potential instance of modern slavery is identified by an employee, contractor or personnel of Cushman & Wakefield Australia
- the Modern Slavery Risk Committee is notified of the potential instance
- senior stakeholders convene an urgent meeting to respond to the potential instance. The senior stakeholders will review the underlying modern slavery issue and incident. Following this review, a consensus will be formed on the appropriate action to be taken.

We have also implemented further mechanisms of escalation, including regional and global compliance, whereby senior stakeholders may establish an investigation committee or workgroup to lead each investigation, who will then report findings to the Global Chief Ethics and Compliance Officer of Cushman & Wakefield.

We did not identify any instances of modern slavery in our operations or supply chains during the Reporting Period.

## REMEDATION

If we discover an issue of non-compliance with our policies or if it is apparent that an individual has suffered harm as a result of such an issue by one of our suppliers, we will endeavour to have our supplier identify and correct those issues. We also have processes in place to identify the underlying causes of those issues to prevent that issue recurring in the future, with that supplier specifically and with our other suppliers generally. If a supplier fails to make progress in respect of its required remediation, we may subject it to review and sanctions, including the potential termination of our relationship.



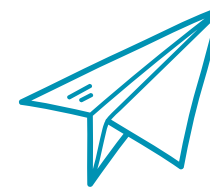
# EFFECTIVENESS

We consider our contractual audit rights with our suppliers to be one of our most effective methods of evaluating the effectiveness of our modern slavery mitigation practices detailed above. As outlined on page 12, our internal HSSEQ team conducts an audit process, which incorporates modern slavery elements and includes supplier site visits.

Further measures through which Cushman & Wakefield Australia evaluates the effectiveness of our modern slavery mitigation measures include:

- regular reviews of risk assessment processes, looking at both industry and suppliers to evaluate their relevancy and fitness for purpose, led by the Supply Chain Compliance Coordinator;
- continued engagement of the Modern Slavery Working Group to discuss and act on feedback and evaluation outcomes;
- assessing training effectiveness and attendance through our internal Learning & Development function, including the assessment of the percentage of trained staff and feedback received on training content;
- working with suppliers and auditing them where necessary as part of the HSSEQ auditing programme, in order to check and evaluate their compliance with our modern slavery policies and their contractual obligations to Cushman & Wakefield Australia;
- ongoing engagement with the industry and attendance by supply chain team members at information sessions considering trends in any modern slavery issues reported and assessing how those issues were handled;
- conducting quarterly meetings with our specialist technology service provider to review and update the Self- Assessment Questionnaire, for the purpose of further improving the information collected under the Self-Assessment Questionnaire. This will help to inform and drive improvements in the identification and reporting of modern slavery risks; and
- reviewing supplier response levels to the Self-Assessment Questionnaire.

# FURTHER STEPS



CUSHMAN & WAKEFIELD AUSTRALIA IS COMMITTED TO CONTINUING AND ENHANCING ITS MODERN SLAVERY RISK MITIGATION STRATEGY IN THE LONG TERM.

- Review effectiveness of Year 1 & Year 2 activities and embed changes into business as usual processes.
- Continue to develop supply chain visibility, with probable focus on materials and consumables.
- Further expand auditing planning and initiatives based on Year 1 and Year 2 audit and survey outcomes.

YEAR 1

AS DESCRIBED IN THIS STATEMENT

YEAR 2



- Review effectiveness of Year 1 activities and embed changes into business as usual processes.
- Continue to develop visibility over more remote layers of our supply chain.
- Further expand risk mapping and surveying techniques.
- Roll out training across our business.

YEAR 3





# APPROVAL

This Statement is jointly made by Cushman & Wakefield Pty Ltd (ACN 074 196 991), DTZ Aus Holdco Pty Ltd (ACN 602 106 936) and DTZ Aus Bidco Pty Ltd (ACN 169 965 995) for the financial year ending 31 December 2020. This Statement has been approved by the sole director of Cushman & Wakefield Pty Ltd on behalf of itself and the other reporting entities covered by the Statement, pursuant to section 14(2)(d)(iii) of the Modern Slavery Act 2018 (Cth).



Reece White  
Director  
Cushman & Wakefield Pty Ltd





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[cushmanwakefield.com](https://cushmanwakefield.com)

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