# **CBRE Slavery and Human Trafficking Statement**

September 2016

CBRE suppliers are critical to our success, and we expect them to provide services in a responsible manner. In 2015 we elevated procurement and supply chain as one of the seven strategic pillars of our corporate responsibility programme, reflecting a heightened focus on our opportunity to use our multi-billion dollar global supply chain to promote sustainable business practices.

#### Summary

CBRE Group, Inc. is the world's largest commercial real estate services and investment firm, with 2015 revenues of \$10.9 billion and more than 70,000 employees (excluding affiliate offices). CBRE serves real estate owners, investors and occupiers worldwide. We believe the key to our advantage is delivering the broadest, deepest, highest-quality real estate solutions anywhere in the world and doing so through a foundation of responsible business practices. Our <u>RISE values</u> - Respect, Integrity, Service, Excellence - continue to be instrumental to our success, helping to set a culture that enables CBRE to be not only profitable, but to fulfil our wider responsibilities as a corporate citizen.

In 2015, we were named to both the FTSE4Good Index and the Dow Jones Sustainability Index (North America), acknowledging our leadership in environmental, social and governance policies and performance around the world. In 2016, we were named, for the third year in a row, to Ethisphere Institute's list of 'World's Most Ethical Companies', and also named in CR Magazine's Top 100, in recognition of our commitment to ethics and compliance as well as responsible business practices. Our <u>annual Global Corporate Responsibility report</u> outlines some significant accomplishments in each area of our corporate responsibility programme over the last year.

### **Global Workplace Solutions**

In 2015, our business acquired Johnson Controls' Workplace Solutions business which increased the scope and scale of our supply chain through its range of services, as well as CBRE's overall platform, capability and supply chain expertise. The result is that CBRE's occupier business, Global Workplace Solutions, brings a breadth and depth of real estate and integrated facilities management capability that is unprecedented in the market today.

Our 2015 priority has been to integrate CBRE's businesses and governance structures. This has included a stakeholder group specifically on slavery and human trafficking.

#### Commitment

We have detailed below specific steps we have taken across our business to ensure that slavery and human trafficking is not taking place, and that we meet requirements upon us in line with relevant legislation<sup>1</sup>.

- We require our suppliers to comply with all applicable laws and we expect our suppliers to uphold the principles of our own <u>Standards of Business Conduct</u> (SOBC) which all employees certify compliance with annually.
- In 2015 we reviewed and updated our <u>Global Human Rights Policy</u> (first published in 2012) which commits CBRE to respecting human rights and working with business or associate organisations that uphold the same ambition and operate in line with standards in this and other legislation.
- Our <u>annual Global Corporate Responsibility report</u> follows the Global Reporting Initiative (GRI) framework, and we are a signatory to the UN Global Compact.
- In the areas of our business where we perceive the risks are greatest we have included a specific contractual obligation for the supplier to align their operations with the United Nations Universal Declaration of Human Rights. We have also required the supplier to notify us of any breaches of which they become aware.

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### Verification

- We have identified key suppliers in our business that we believe may represent a greater risk with respect to issues related to modern slavery and human trafficking, and have undertaken to require that these suppliers provide written confirmation of policies, procedures and other measures implemented to mitigate such risk. As part of our compliance programme, we will (a) monitor the implementation of these measures on an ongoing basis and (b) request specific follow up information where necessary.
- Activities deemed as higher risk are supported by an internal and supplier monitoring and governance programme.
- We retain in all Supplier Agreements, and will exercise when necessary, the right to audit supplier adherence to their obligations set out above.

## **Training and awareness**

- CBRE provides key supply chain management personnel with training on slavery and human trafficking, particularly with respect to mitigating risks within our supply chain.
- In 2016/17 we will continue to work with our outsourcing partners who provide accreditation on our activities to specifically raise standards, awareness raising and training, and report on that to our stakeholders. This includes the launch of a new Global <u>Supplier Code of Conduct</u> in 2016.

## Internal accountability

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

If you have an ethics or legal concern, please <u>click here</u> for more information on reporting this. This statement will be renewed each financial year and is signed on behalf of CBRE.

19 September 2016

Martin Samworth Chief Executive Officer - EMEA

Date

<sup>1</sup>The California Transparency in Supply Chains Act 2010 and The Modern Slavery Act 2015 (United Kingdom)