

LEGAL

Global 06.23 Human Rights

EFFECTIVE DATE: June 14, 2012

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LAST REVIEWED
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I. POLICY

- A. CBRE, Inc. and its direct and indirect subsidiaries (“**CBRE**” or “**the Company**”) are committed to protecting the rights of people where CBRE operates and to ensure that they are treated with dignity and respect. CBRE is dedicated to complying with the Ten Principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.
- B. In accordance with CBRE’s RISE values and its Standards of Business Conduct (“**SOBC**”), CBRE is committed to the value of and respect for all people and follow and uphold all laws and regulations in all countries in which CBRE’s operate.
- C. This Policy is intended to supplement and reinforce the SOBC, Global Policy 7.2 Supplier Standards and Code of Conduct, Global Policy 4.2.12 Racial Misconduct, Global Policy 4.2.11 Sexual Misconduct, and CBRE’s various country specific policies on human rights-related issues.

II. SCOPE

- A. This Policy applies to all of CBRE’s Business Segments and its entire Operating Platform **globally**, including without limitation, all corporate office locations, Lines of Business, Functional Areas and Operational Business Units, including without limitation, Investment Management, Advisory Services and Global Workplace Solutions.
- B. CBRE is committed to working with and encouraging CBRE’s stakeholders, including suppliers, customers and other business relationships, to uphold the principles in this Policy and to adopt similar policies within their businesses. The CBRE Supplier Code of Conduct applies to CBRE’s suppliers and is aligned with the expectations and commitments in this Human Rights Policy.
- C. This Policy specifically addresses CBRE’s commitment to promoting all human rights, including women’s rights and minority rights, on a global scale. While definitions vary depending on the governing or international body, those areas in which CBRE can make a positive contribution are listed below.

III. PROVISIONS AND CONDITIONS

- A. Child Labor

1. CBRE does not engage in or condone the unlawful employment or exploitation of children in the workplace.
2. CBRE is committed to combating the exploitation of children and therefore prohibit any use of child labor with any suppliers, or other third-party arrangements.
3. CBRE will work to raise awareness internally of such exploitation and cooperate with law enforcement authorities to address any such instances of which the Company becomes aware.

B. Human Trafficking, Slavery and the Right to Voluntary Labor

1. CBRE respects the free choice of all persons and strictly prohibits forced or compulsory labor, including prison labor for any employees.
2. CBRE will not do business with, tolerate, or associate with organizations or entities that condone or are engaged in the practice of coercing or imposing of work with little or no freedom of choice.
3. CBRE endorses the UN Guiding Principles on Business and Human Rights and will work to raise awareness within CBRE's employee population of CBRE's responsibility to protect Human Rights.
4. CBRE will cooperate with law enforcement authorities to address any such instances that come to the attention of the Company.

C. Freedom Against Prejudice and Discrimination

1. CBRE unequivocally stands against violence, disrespectful communications and conduct, prejudice or discriminatory behavior toward others whether motivated by race, color, ethnicity, gender, gender identity and/or expression, sex, sexual orientation, age, disability, national origin, citizenship, ancestry, place of birth or descent, religion, veteran or military status, or any other protected class or characteristic protected by applicable law.
2. Each region, line of business, and country will ensure that it has the requisite policies and practices in place to foster a work environment that is free from racial misconduct, prejudice, discrimination, harassment and retaliation.

D. Safe and Secure Workplace

1. CBRE is dedicated to providing a safe and healthy workplace for all of its employees and preventing accidents to employees, customers, suppliers, and visitors. CBRE's Workplace Safety & Well-Being Policy Statement details these commitments to achieving world-class HSE performance.
2. CBRE will ensure compliance with this commitment in every location and facility in which CBRE's employees work.

E. Work Hours and Wages

1. CBRE is steadfast in complying with all laws and regulations dealing with the wages CBRE pays its employees and the hours they work.

2. CBRE's policy will be further defined at the regional and country level, as appropriate to prevent the exploitation of the local workforce. CBRE is committed to being an ethical employer that strives to improve labor standards, respects CBRE's employees' contributions, and rewards them fairly.
3. CBRE is committed to providing equal pay for equal work.

F. Freedom of Association

CBRE respects the rights of employees and complies with all local laws and regulations concerning freedom of association and collective bargaining.

G. Indigenous Peoples

CBRE respects the rights of indigenous communities, including land rights, in CBRE's operations, in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

IV. DUE DILIGENCE

- A. CBRE conducts regular human rights due diligence within CBRE's own operations, CBRE's value chain and new business relationships. Additionally, CBRE conducts a systematic periodic review of the risk mapping of potential issues. CBRE's due diligence processes cover the following human rights issues: forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal pay and discrimination.
- B. The process also considers vulnerable groups at risk, including CBRE's own employees, women, children, indigenous people, migrant workers, third-party contracted labor and CBRE's local communities.

V. CBRE'S COMMITMENT

- A. CBRE will periodically identify where CBRE's activities could impact human rights, address those concerns, and embed human rights practices into CBRE's global culture as an ongoing commitment to CBRE's RISE Values and to being a responsible business.
- B. Activities may also include incorporation of controls into third party business relationships, training for targeted "at risk" groups, and internal and external communications, including publications outlining the steps and measures CBRE have taken in the reporting year.
- C. CBRE is committed to communicating this policy with CBRE's employees as well as CBRE's external stakeholders. This policy has been approved at the most senior level of CBRE's business.
- D. CBRE is committed to publishing Modern Slavery & Human Trafficking Statements annually. These Statements outline specific steps CBRE has taken across CBRE's business to ensure that slavery and human trafficking are not taking place and that CBRE meets the requirements upon us in line with relevant legislation, including the U.K. Modern Slavery Act (2015) and the Australia Modern Slavery Act (2018).

VI. REPORTING VIOLATIONS

- A. CBRE has a robust reporting and investigations policy (see Global Policy 4.2.9 Investigations of Legal and Ethical Misconduct).
- B. Employees, contractors and suppliers can report actual or suspected violations or make inquiry through the mechanisms identified in CBRE's Standards of Business Conduct or Supplier Code of Conduct

C. CBRE will take swift and decisive action to remedy any violation of this Policy.