

Section 172 (1) Statement

(this statement is specific to CBRE Limited ("the Company"))

OUR STAKEHOLDERS

The Directors of the Company have acted in accordance with their duties codified in law, which include their duty to act in the way most likely to promote the success of the Company for the benefit of its shareholders. In doing so, Directors must pay regard to the Company's stakeholders and to CBRE's reputation for high standards of business conduct, having regard to matters set out in section 172(1) of the Companies Act 2006.

Directors consider stakeholder factors when making decisions at Board and Executive Committee levels, when setting strategy, developing policies, fostering the corporate culture and guiding and delegating decisions to management and employees.

CBRE's RISE values (Respect, Integrity, Service, and Excellence) reflect the Company's consideration of the wide community of stakeholders and the focus on creating outcomes that benefit all of them.

The Company has taken steps to embed a deeper understanding of the responsibilities ascribed to the Directors under section 172(1) of the Companies Act 2006 at a CBRE Group level in the UK and across the management committees of its associated and subsidiary companies. Guidance has been provided by the Company's Secretariat to explain the importance of the considerations referred to in the section 172 (1) as part of good decision making, to ensure that proposals coming to the Directors contain appropriate information on the potential impact of business decisions on all the Company's stakeholders, and other relevant matters.

The following statements identify the key stakeholder groups and outlines methods that Directors used to engage with them, understand the issues to which they should have regard and gather feedback.

Employees

CBRE's success depends on its ability to attract and retain qualified and experienced employees. The Company employs around 2,500 people directly, in addition to staff employed by the wider CBRE UK group who support the business.

- The Company participates in the global CBRE 'Your Voice' employee engagement survey. The aim of the survey is to understand how engaged its employees are and what elements of their work experience at CBRE influence their engagement; whilst also accessing what the Company can do better to improve the engagement and wellbeing of its employees, so they are able to perform at their best.
- The Directors carefully analysed the results of the survey and have created focused action plans in four key areas: collaboration, platforms and systems, work well, and senior leadership. The Company's business leaders implement tailored action plans in these areas and the progress made against actions are tracked regularly.
- The Directors understand that the Company needs to ensure that its culture is inclusive of the diversity it has, and is introducing an outcome that, year-on-year, its leaders are expected to increase their engagement results from the annual Your Voice survey.

- Covering the nine characteristics of the Equality Act 2010, the Company's D&I strategy aims to create an inclusive environment with equal opportunities no matter what race, religion, gender and gender identity, sexual orientation, marital status, and ability.
- The Company does not tolerate any form of discrimination. It believes that diversity of thought brings innovation and the different perspectives this brings, allows the Company to provide truly creative solutions for its clients.
- Other initiatives to meet the Equality Act and inclusive culture requirements include:
 - The adoption of a Diversity and Inclusion Policy, Discrimination, Harassment and Victimisation Policy and Grievance Policy.
 - An inclusive leadership programme to build the skills of employees to lead teams inclusively.
 - Reporting on Gender Pay Gap annually.
 - Visible targets have been set regarding gender and BAME representation at senior levels.
 - Being signatories of Business in the Community's 'Race at Work' Charter, the Social Mobility Pledge, Time to Change pledge and the UK Government's Disability Confident scheme.
 - The adoption of the six employee resource groups that cover all of the protected characteristics.
 - Having a Gender identity, expression and transition toolkit.
- All of the Company's Executive Directors are required to attend Inclusive Leadership Workshops, that includes them making a personal pledge to progress the Company's D&I strategy. The workshops will be extended to all Senior Directors in 2020.
- The Company runs a series of awareness-raising events, including a 'Diversity Week' showcasing the principles of inclusion, leadership commitment and role model stories.
- The Company is the first to be accredited by the National Equality Standard in the property sector, a benchmark that sets clear equality, diversity and inclusion (EDI) criteria against which companies are independently assessed.
- In our third year of gender pay gap reporting, the Company has voluntarily published its ethnicity pay gap data. This builds on its commitment to the Business in the Communities Race at Work Charter which the Company became signatories of in October 2019.
- The Company's returners programme, Back to You, is open to everyone, regardless of gender, age or reason for a career break. The programme offers on-the-job work experience, coupled with skills workshops that are designed to brush up existing skills and develop new ones.
- The Company supports its employees through an array of Employee Resource Groups and Affinity Networks, which are as follows: Ability Network (supporting people with disabilities and long-term conditions), Faith Network, Family Network, REACH Network (CBRE's Race, Ethnicity and Cultural Heritage Network), Proud Network (supporting LGBTQ+ people and Allies), Women's Network, Armed Forces Network and Junior Board.

- The Company offers all employees the opportunity to learn and develop throughout every stage of their career. A formal performance development programme is in place, designed to enable employees to set performance goal and identify development needs with their line manager. Formal instructional learning is offered through the central Advantage Academy, focusing on behavioural business skills as well as technical skills. The Advantage Academy is a combination of instructor-led learning and digital self-directed learning.
- In addition, the Company offers coaching and mentoring programme to allow others to learn from other experts internally and externally.
- The Company offers an internal mobility swap and share scheme to enable employees to learn about different aspects and roles within the wider business.
- The Company also offers a focused development programme for high performers and for strategic focus areas, such as management and leadership development.
- The Company has a central budget for employees to request sponsorship to enrol on any relevant professional qualifications.
- Employees are regularly kept apprised of business matters via an annual All Company Business Update, the weekly 'The Week @ CBRE UK' and other internal communications.

Suppliers

The Company carefully manages its policies on purchased services. The supply chain is regarded as fundamentally important to CBRE's own business as a provider of real estate advisory services.

The CBRE Group also expects that all contracted suppliers comply with CBRE's Supplier Code of Conduct as well as all applicable laws and legislation. The Supplier Code of Conduct sets out CBRE's fundamental ethical and business conduct requirements for its suppliers, incorporating anti-bribery / corruption, unfair business practices, information security and records maintenance, data privacy, conflicts of interest, labour, health and safety, environment and sustainability, and gifts and gratuities.

Suppliers are requested to contact their CBRE representative to raise any questions or concerns about the Supplier Code of Conduct, including its application to specific circumstances in connection with their performance of work for CBRE, or to report any suspected violations of the Code.

Clients

Client Care is one of CBRE's most important strategic initiatives. It encompasses the Company's account management and client experience programmes for its largest and most impactful Occupier and Investor clients. Client Care professionals deliver the power of the CBRE platform to the Company's clients by ensuring the Company is working seamlessly across all service lines and geographies. These teams engage senior CBRE leaders, market professionals and CBRE research and technology to drive measurably superior outcomes to the Company's clients.

Client Care facilitates a Global & Regional Client Feedback Programme using qualitative research, undertaken by an independent third party, to obtain feedback on a regular basis from the Company's biggest Occupier and Investor clients. This feedback is used as part of an "outer loop process" (i.e. corrective action planning with individual client issues/areas for improvement)

and “inner loop process” (i.e. to help drive internal change within CBRE for the benefit of all of the Company’s clients).

Community

At CBRE, acting responsibly and being successful commercially, go hand-in-hand. A key element of this is creating new opportunities for our local communities.

The Company contributes to a CBRE Group-wide charitable giving programme which donated \$14 million in 2019, of which 50% is donated to local charity causes decided within each country.

The Company carried out a range of local charitable activities through various partnerships, including with Action for Children. These charities enabled UK employees to donate their time to various local community projects and initiatives.

Environment

CBRE takes a holistic approach to business sustainability, and the Company develops strategies to significantly reduce carbon footprints and create long-term benefits and value for itself and its clients.

- The CBRE Group reduced Scope 2 greenhouse gas emissions by 28% between 2015 and 2018 and a further reduction of 30% by 2025 is planned.
- The Company has an embedded ESG strategy consisting of three pillars: Environment, Community and Culture, which is supported by a robust governance structure and employee engagement programme. Within the Environment pillar, the Company has an ambition to be net zero carbon across its business and operations by 2030 and has a robust set of KPIs to help achieve this.
- The Company has maintained the ISO14001 certification across all subscribed locations.
- Asset IQ, a CBRE IOT product, is installed within the Company’s main London offices to allow the Company to retrieve, display and analyse performance in real-time and enhance operational and energy efficiency.
- The Company’s multi-disciplinary Environmental Consultancy team engages with clients across the property and investment life-cycle to help them manage their environmental impacts. The Company is currently delivering environmental, social and governance strategies for over £12 billion of assets under management and have Asset IQ installed, and are providing energy consultancy advice, for circa 5 million sq ft.

Standards of Business Conduct

Across its global operations, the CBRE Group is firmly committed to conducting business with the highest integrity and in compliance with the law. Standards of Business Conduct (SOBC) have been in place since 2004 and were thoroughly updated in 2011, and must be read and adhered to by everyone who represents CBRE.

The SOBC embody the fundamental principles that govern CBRE’s ethical and legal obligations and are at the centrepiece of a global Ethics & Compliance Programme adopted by the CBRE Group in 2004. They are designed to reinforce CBRE’s RISE values and ensure compliance with the Company’s policies, and laws and regulations applicable globally.

Several areas of ethics and compliance training are provided to all employees annually, including (without limitation) SOBC, Harassment Prevention, People and Culture Behaviour, and Anti-Corruption Training.

Acting Fairly Between Members

S172 of the Companies Act 2006 requires the Company to act fairly between its members. The Company is 100% owned by CBRE Holdings Limited, another entity within the CBRE Group.