

DIVERSITY & INCLUSION POLICY

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CBRE is committed to supporting the principle of equal opportunities, and opposes all forms of unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic origin, sex, pregnancy, marital or civil partnership status, disability, religion, belief, age, sexual orientation, gender identity or expression, socio-economic status, trade union membership or on the fact that an individual is a part-time worker or fixed term employee.

Our aim is to recruit, train and promote the best person for the job and to create a working environment free from unlawful discrimination, victimisation and harassment in which all employees are treated with dignity and respect. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against on any of the above grounds.

All employees will be made aware of the requirements of this policy and will be obliged to co-operate to ensure that the policy is carried out effectively.

Any form of discrimination may be unlawful and will be treated as a disciplinary offence resulting, if appropriate, in disciplinary action.

Note that the Diversity & Inclusion Policy, including the harassment and victimisation policy and complaints procedure, do not form part of employees' contracts of employment and may be changed by CBRE in its absolute discretion at any time.

Scope of Diversity & Inclusion Policy

This policy applies to the advertisement of jobs, recruitment, terms and conditions of employment, career development, counselling, training, promotion, grievance and disciplinary procedures and all other aspects of employment.

All employees are required to comply with the Diversity & Inclusion Policy when dealing with other employees (including temporary or agency staff and consultants), job applicants, clients, suppliers, customers and contacts of the Company, and anyone else with whom they come into contact during the course of their employment.

In particular, all employees must take care to guard against more subtle and unconscious forms of discrimination which may not be immediately obvious. This may result from generalisations about the capabilities, characteristics or interests of a particular group which influence the treatment of individuals.

Who is responsible for this policy?

Our board of directors (the board) has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility, including regular review of this policy, has been delegated to the Diversity, Inclusion and Responsible Business Manager.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. The Head of People has overall responsibility for equal opportunities training.

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If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact the Diversity, Inclusion and Responsible Business Manager to request training or further information.

Recruitment

CBRE will ensure that information about vacancies will be circulated as widely as possible in the circumstances to ensure that it reaches all sections of the community regardless of colour, race, nationality, ethnic origin, sex, pregnancy, marital or civil partnership status, disability, religion, belief, age, sexual orientation, gender identity or expression, socio-economic status, trade union membership or on the fact that an individual is a part-time worker or fixed term employee. All applications will be welcomed and will be considered on the relative merits of the applicant against the job and/or person specification for the position.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy.

If there is a genuine and lawful reason for limiting the vacancy to a particular group, this will be clearly stated, and the grounds for it, on any advertisements.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with Head of People approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any workplace adjustments);
- Questions to establish if an applicant is fit to attend an assessment or any workplace adjustments that may be needed at interview or assessment;
- To monitor diversity in the range of applicants (which will not form part of the decision making process); and
- To take positive action to assist applicants with disabilities.

CBRE is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made. All prospective employees, regardless of nationality, must be able to produce original documents before employment starts to satisfy immigration legislation. A list of acceptable documents is available from People Business Partners.

Terms and Conditions of Employment

CBRE will offer terms and conditions of employment that are free from all forms of direct and indirect discrimination and apply equally regardless of colour, race, nationality, ethnic origin, sex, pregnancy, marital or civil partnership status, disability, religion, belief, age, sexual orientation, gender identity or expression, socio-economic status, trade union membership or on the fact that an individual is a part-time worker or fixed term employee. No requirements or conditions will be imposed, directly or indirectly, which will or might place any group of employees at an unfair or unlawful disadvantage.

Grievance and disciplinary procedures will be operated without discrimination on the grounds of colour, race, nationality, ethnic origin, sex, marital or civil partnership status, disability, religion, belief, age, sexual orientation, gender identity or expression, socio-economic status, trade union membership or on the fact that an individual is a part-time worker or fixed term employee or any other unlawful grounds.

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Training, Career Development and Promotion

The Company will ensure that opportunities for training, career development and promotion are made equally available to all employees. The principal method of identifying training needs will be through the appraisal procedures and promotion decisions will be based on merit alone.

Disability Code of Good Practice

CBRE values the individual contribution of all employees and prospective employees from all sectors of the community at large. CBRE recognises its social, moral and statutory duty to employ people with disabilities and will do all that is practicable to meet this responsibility. The Company operates, therefore, the following Code of Good Practice on Disability:

- CBRE will take steps to raise awareness of disability throughout the organisation, particularly targeting all staff involved in recruitment and selection processes.
- CBRE will take reasonable steps to ensure that the working environment, working practices and terms and conditions of employment do not prevent people with disabilities from taking up positions for which they are suitably qualified and, in all other respects, the best person for the job.
- CBRE will bear in mind the desirability of avoiding barriers to the employment of people with disabilities when acquiring and fitting out buildings with equipment and devising working practices.
- CBRE will take steps to ensure that all people with disabilities have the same opportunities, subject to reasonable cost limitations/practicalities, as other staff to develop their full potential within the organisation.
- Only a person the Head of People (or equivalent) will take any decision not to make an adjustment which might enable or assist an employee or a prospective employee to be employed in a particular post. Before making such a decision, the relevant person will ensure that all possible adjustments have been fully investigated, including consultation with the employee or prospective employee concerned and any appropriate expert advice.
- Any employee who becomes disabled whilst in employment will be given the full support of managers and CBRE's People Department to maintain, or return to, a job appropriate to their experience and abilities.
- CBRE will encourage the participation of employees with disabilities to ensure that, wherever possible, its employment practices recognise and meet their needs and will consult employees with disabilities on actions to make sure they develop and use their abilities at work.
- CBRE will continue to provide services and facilities to clients with disabilities.

Further guidance can be obtained on an entirely confidential basis from the People Department. If you know or believe you might be disabled, you are warmly encouraged to discuss this with the People Department so that CBRE can ensure you achieve your full potential and that it complies with its duties.

Discrimination, Harassment and Victimisation in the workplace

CBRE is committed to providing a workplace where everyone has the right to work in an environment which promotes equal opportunity and prohibits discriminatory practices. CBRE

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will not tolerate any form of discrimination, harassment, or victimisation by or against employees. It is the obligation of all employees to behave in a way that supports this policy.

This policy is not designated to discourage normal social relations among colleagues or with the public. Its aim is to prevent discrimination or harassment. It is the responsibility of each individual to be sensitive towards the impact that he/she has on others and not to discriminate against or harass colleagues or condone discrimination or harassment by others. The policy applies not only to working at CBRE's premises, and those of any third party, but also includes travelling or staying away from home whilst on business or for a reason related to your employment.

Diversity, Inclusion and Responsible Business Manager

The Diversity, Inclusion and Responsible Business Manager will, with the assistance and co-operation of senior management, the People Department and other employees, take steps to ensure universal compliance with the policy.

Breaches of this policy

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment Policy. If you are uncertain which applies or need advice on how to proceed you should speak to the Diversity, Inclusion and Responsible Business Manager or your People Business Partner.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

Monitoring

To ensure that this policy is operating effectively, and to identify groups that may be under-represented or disadvantaged within the Company, we may monitor employees and applicants' ethnic group, caring commitments, gender, disability, sexual orientation, gender identity or expression, socio-economic status, religion and age.

Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any decision related to their employment.

Analysing this data helps the Company to take appropriate steps to avoid discrimination and improve equality and diversity.