

# MODERN SLAVERY STATEMENT

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2024  
Financial Year





## ACKNOWLEDGEMENT OF COUNTRY

Cushman & Wakefield respectfully acknowledge First Nations peoples as the Traditional Owners of the land on which we work, live and operate, and we pay our respect to their Elders past and present in maintaining the culture and spiritual connection to the land.

We recognise that this is, always was, and will always be land that belongs to First Nations peoples.

*Artwork: Ngumbaay Ngurambang ("One Home" in Wiradjuri) by Nathan Peckham.*

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# INTRODUCTION

As CEO, I take very seriously my responsibility to ensure that we respect human rights in everything we do. This responsibility extends to our people, our clients, our suppliers and the communities in which we operate.

As a full service global commercial real estate and facilities management company, we are constantly driven to solve complex strategic problems in the built environment. Our people are central to our success, and it is through their proactive efforts that we shape our approach to preventing and responding to threats of modern slavery in our operations and supply chains.

I am proud to introduce our fifth Modern Slavery Statement, which highlights our unwavering commitment to the fair and equitable treatment of all stakeholders.

Throughout the reporting period, we have continuously refined our approach to assessing and mapping modern slavery risks at Cushman & Wakefield and across our supply chain. By deepening our collaboration with industry partners and suppliers, and enhancing training and communication for our people, we have significantly strengthened our ability to identify and address these risks.

As a leader in the commercial real estate industry, Cushman & Wakefield must take a stand against all forms of modern slavery. We continue to work tirelessly to eradicate all forms of modern slavery from our operations and supply chain through a risk-based approach. We remain committed to continuously reviewing and improving our approach to how we manage these risks.

We recognise that we are only one part of the ongoing fight against modern slavery. We therefore continue to work collaboratively with our partners and industry peers to eradicate all forms of modern slavery right across our industry.

Cushman & Wakefield's operating philosophy is to never settle for a world that has been built, but to relentlessly drive it forward, because 'Better Never Settles'. This purpose describes both the journey and the ethos of our organisation. We are dedicated to continuously driving forward for our clients with a restless spirit and relentless energy. We look forward to building stronger, more trusting relationships across our supply chains, enabling us to more effectively address modern slavery risks.



**Noral Wild**

CEO, Australia & New Zealand  
Cushman & Wakefield





# ABOUT THIS STATEMENT

**This is a joint Modern Slavery Statement from Cushman & Wakefield Pty Ltd (ACN 074 196 991), DTZ Australia Pty Ltd (ACN 106 515 931), DTZ Aus Holdco Pty Ltd (ACN 602 106 936) and DTZ Aus Bidco Pty Ltd (ACN 169 965 995), issued under the Australian Modern Slavery Act 2018 (Cth) (Act). For the purposes of this Modern Slavery Statement, the reporting entities and the entities that they control or own are together referred to as 'we', 'us', 'our' or 'Cushman & Wakefield', whereas Cushman & Wakefield refers to our global group. This Modern Slavery Statement covers the reporting period of 1 January 2024 to 31 December 2024.**

Founded in 1917, Cushman & Wakefield is a full-service global real estate services leader, driven to solve complex problems in the built environment. Our core values drive our business forward, inspire innovation and ensure that we deliver service excellence every day. Across our global platform, we remain committed to ethical conduct and responsible business practices. In Australia, we leverage our global platform with the local expertise of over 1,400 individuals nationwide to serve a diverse range of clients across the public, private and government sectors. Across Cushman & Wakefield, our values guide us to maintain a strong commitment to safety, integrity and diligence.

## Our strategic priorities:

At Cushman & Wakefield, our strategic priorities shape our business operations and how we work with our partners and stakeholders. These priorities have been designed to ensure that Cushman & Wakefield continues to build as a resilient, forward-thinking and thriving company, continuously driving solutions for our clients.

Cushman & Wakefield's strategic priorities remain:



### STRENGTHEN THE CORE

We are committed to continuing the momentum in our core business. This includes building on our financial strength, continuing our dedicated client focus and owning the narrative to ensure that we are known as the premium brand in our industry.



### OPERATE WITH RIGOR

Across the organisation, we strive for financial flexibility and rigorous prioritisation, measuring progress and holding ourselves accountable while empowering decision-making to better serve our clients. We continue to build on our focus on developing a high-performance culture, supporting our people and making the organisation more diverse and inclusive.



### DRIVING GROWTH

We continue to evolve our business for the long view, shifting our focus to longer-term growth, in both revenue and market-share as well as growth in key client segments.

Our business and operations

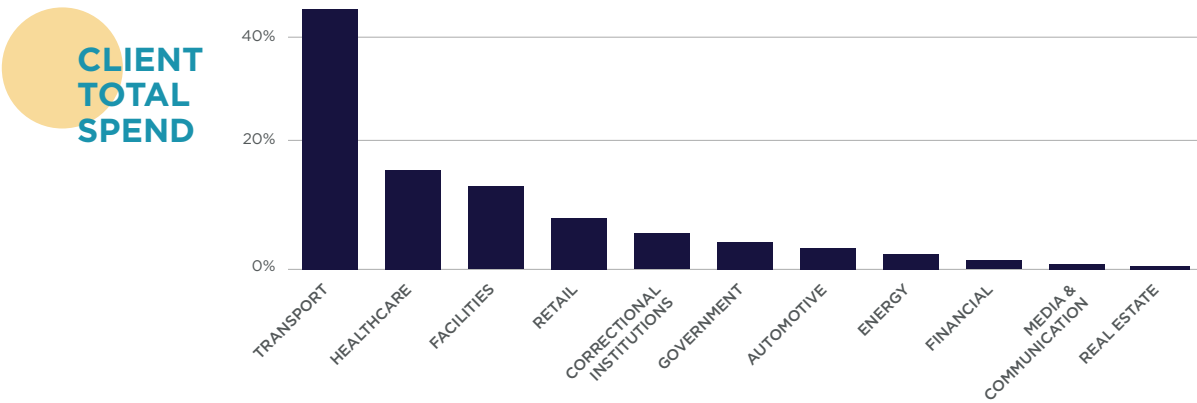
- Integrated Facilities Management (including Facilities Management, Trades Services, Workplace Services and Asset Services);
- Commercial Real Estate Services;
- Project & Development Services;
- Advisory Services;
- Global Occupier Services; and
- Business Operations (including Human Resources, Legal, Ethics & Compliance, Information Technology, Marketing, Communications & Research and Finance).

Cushman & Wakefield in Australia employs over 1,400 people, offering comprehensive real estate services to occupiers and investors. As one of the leading global real estate firms, Cushman & Wakefield provides a wide range of services including property management, brokerage, investment management, and advisory. With a strong presence across major Australian cities, the company leverages its extensive market knowledge and expertise to deliver tailored solutions that meet the unique needs of each client. Cushman & Wakefield is committed to driving value and performance for both occupiers and investors in the dynamic Australian real estate sector.

Our supply chains

The unique and tailored services we deliver to our clients often require us to build multi-tiered supply chains. In Australia, we work with around 3,000 suppliers, with our most complex supply chains being built within our Integrated Facilities Management (IFM) business.

In FY24, our Australian IFM business recorded total supplier spend of A\$245.20 million, supporting 46 diverse clients across sectors including banking, retail, and government agencies.



Cushman & Wakefield is committed to upholding ethical and sustainable business practices across all areas of our operations. This commitment is central to our supplier selection and management processes.

Our supplier network provides a broad range of goods and services. Most of our property service providers are based in Australia, with a small number of international suppliers located across the Asia Pacific region, including Singapore. Regardless of location, we apply the same high ethical standards and maintain a zero-tolerance approach to modern slavery. We continue to monitor and assess supplier compliance to ensure alignment with our values and expectations.

As a key part of the larger global Cushman & Wakefield organisation, we benefit from some centralised services provided by overseas suppliers. However, our global platform shares the approach of our Australian business and is always conscious of the global nature of supply chains. We are committed to ensuring that all our suppliers, no matter where they are located, adhere to our core values and ethical practices.

Throughout FY24, we further refined our approach to mapping and monitoring modern slavery risk by enhancing our robust supplier management processes. Our ongoing supplier engagement gathers important insights into labour practices, ensuring our risk priorities reflect operational realities as well as our high standards of ethical and sustainable business practices. Our ongoing efforts to improve processes demonstrate our commitment to maintaining strong, ethical and long-lasting relationships with all our suppliers.

We further strengthened our approach to managing our modern slavery risks in FY24 through working with industry partners to ensure that our risk indicators align with best practice and emerging trends.

## Our approach to managing Modern Slavery Risks in our operations and supply chains:



## POLICY COMMITMENT

Cushman & Wakefield maintains a zero-tolerance policy towards modern slavery and human trafficking. This commitment is embedded in our values and is reflected in all aspects of our business operations. We expect the same commitment from all business partners and suppliers.



## RISK ASSESSMENT

Regular risk assessments carried out across our business allows us to identify and focus efforts on areas within our operations and supply chain where there may be a risk or perceived risk of modern slavery.



## SUPPLIER ENGAGEMENT

We work closely with our suppliers to understand their labour practices and ensure alignment with our ethical expectations. All suppliers are required to comply with applicable laws and regulations, including those related to modern slavery.



## EMPLOYEE TRAINING

In FY24, we enhanced our employee training program to build awareness of modern slavery and equip staff with the tools to identify and report suspected cases. These updates support a more informed and proactive workforce.





## TRANSPARENCY AND ACCOUNTABILITY

We uphold transparency in our business practices and report on our efforts to address modern slavery risks through both internal and external channels.



## CONTINUOUS IMPROVEMENT

While we recognise the progress made, we also acknowledge that addressing modern slavery risks is an ongoing process. As such, we continue to review and refine our policies, procedures and practices to ensure they remain effective and aligned with emerging best practices. We are committed to meeting our obligations under all modern slavery legislation. Upholding fundamental human rights is non-negotiable and we expect the same commitment from our partners and suppliers. Our employment practices are founded on principles of merit and freedom of choice, with no tolerance for coercion or forced labour.

Throughout our operations and supply chain, we maintain a steadfast commitment to ethical standards. Our primary objective is to work actively to mitigate potential risks and liabilities associated with modern slavery, in full compliance with the Act and in line with our values. We are dedicated to fostering a culture of responsibility and accountability across our organisation, striving to uphold fundamental human rights and prevent any form of exploitation or abuse.

In our fifth annual Modern Slavery Statement, we present a thorough overview of Cushman & Wakefield's continuous effort to identify, address and minimise the risks associated with modern slavery. We remain committed to continuously evaluating the efficacy of our actions and maintaining transparency in our process. Through this transparency, we aim to sustain our positive influence across our industry, driving standards of best practice.

This Statement has been prepared with the input of our Modern Slavery Working Group and relevant subject matter experts across the business. At Cushman & Wakefield, we take a unified approach to addressing modern slavery.



# RISKS OF MODERN SLAVERY

## RISK ANALYSIS

Our primary objective is to work actively with our suppliers and internal stakeholders to identify, assess, and address the risk of modern slavery across our operations and supply chain.

**We assess risk using a combination of factors, including:**

- **Geographic location** – countries or regions with higher prevalence of modern slavery;
- **Industry sector** – sectors known for vulnerable workforces or complex subcontracting arrangements;
- **Labour practices** – workforce characteristics such as reliance on migrant or low-skilled labour;
- **Procurement category** – categories with known risks, such as cleaning, construction, or PPE; and
- **Supplier responses** – insights gathered through our Supplier Assessment Questionnaire (SAQ).

This multi-dimensional approach enables us to focus on higher-risk areas and prioritise engagement where it can have the greatest impact.

Risks to ethical sourcing standards within our supply chain can include:

- Excessive working hours;
- Working visa conditions;
- Intentional and unintentional underpayment;
- Retention of worker's identity documents;
- High levels of sub-contracting;
- Sham contracting; and
- Absence of complaints and whistleblowing processes;

During FY24, we refined our approach to mapping and monitoring modern slavery risk by deepening collaboration with our industry partners and suppliers, while sharpening our market insights.

## INDUSTRY COLLABORATION

Throughout FY24, we actively participated in monthly Property Council of Australia - Informed365 consortium meetings, working alongside peers to review current developments and validate inherent risk ratings across sectors and geographies. These sessions were instrumental in aligning our risk indicators with industry best practice and emerging trends. In addition, our IBISWorld membership gave us access to detailed service category research, enhancing our understanding of sector-specific risks.

## ONGOING STAKEHOLDER ENGAGEMENT

We maintained regular engagement with suppliers, procurement teams, and Client Account leads to gather frontline insights into labour-related risk exposure. These ongoing conversations ensure our risk framework remains grounded in operational realities and aligned with our ethical standards.





## INTEGRATED DATA & SPEND ANALYTICS

We combined external benchmarks (through Informed365) with our internal spend data to improve sector-level risk scoring. This enabled more dynamic prioritisation of risk based on relevant factors, rather than relying solely on supplier numbers or spend thresholds.

## CASE-STUDY ANALYSIS

We analysed all reported modern slavery incidents in Australia and key international markets, mapping these insights against our own supplier tiers. This allowed us to identify gaps in our controls and target remediation efforts more effectively.

## SELF-ASSESSMENT QUESTIONNAIRE (SAQ)

Our SAQ evolved significantly during FY24 to strengthen supplier engagement and deepen our understanding of modern slavery risk across our network.

## SME-TARGETED “LITE” SAQ

We launched a streamlined version of our SAQ, tailored for small and medium enterprises (SMEs). This reduced the question load by approximately 40%, while still capturing critical indicators of modern slavery risk. Designed to increase participation among lower-resourced suppliers, this version ensures meaningful insights without compromising data quality.

## DEEP-DIVE MODULES FOR HIGH-RISK SECTORS

We developed sector-specific deep-dive modules for high-risk categories such as cleaning and grounds maintenance. These modules explore targeted risk controls, including wage audit protocols, worker interviews, and grievance mechanisms, helping us better understand risk dynamics in these areas.

## PLATFORM ENHANCEMENTS VIA INFORMED365

Significant improvements were made to the Informed365 platform during FY24, enhancing both usability and functionality. A modern slavery dashboard now provides visual insights into inherent risk, supplier engagement, and reporting progress. New features include:

- Automated reminders for assessment completion;
- Flags for third-party verification or overdue responses;
- Document upload capabilities; and
- Intuitive navigation to track risk by sector and supplier.

## SCORING & EVALUATION FRAMEWORK

Informed365 incorporates a risk-based scoring and weighting system to assess supplier responses. Each SAQ question is rated for relevance to modern slavery, allowing us to focus on higher-impact areas. Although adoption remains voluntary, we are exploring further alignment to support structured evaluations and industry benchmarking.

## CONTINUOUS IMPROVEMENT PATHWAYS

Responses to five key questions in the SAQ now trigger automated Continuous Improvement Pathways. Where gaps are identified, suppliers receive tailored feedback, practical resources, and targeted actions. Progress is monitored over time to track improvements and build supplier capability.

## ONGOING QUESTION SET REFINEMENT

Through our active participation in the Property Council of Australia – Informed365 Consortium in FY24, we contributed to refining the SAQ. Feedback informed the clarification of language, removal of non-actionable questions, and improvements to ensure greater relevance for international supply chains.





# SUPPLY CHAIN SEGMENTATION

During FY24, we utilised four risk-exposure categories to focus our efforts to have the most significant impact on our modern slavery assessments and began refining each segmentation. The following enhancements are currently in development or under active consideration:

## CATEGORY A (HIGH RISK / HIGH SPEND)

A proposed “Tier-1 sub-tier” would identify suppliers with more than 50% of operations or supply chain exposure in high-risk geographies, supporting more frequent compliance engagement, potentially on a quarterly cycle.

## CATEGORY B (HIGH RISK / LOW SPEND)

Bi-annual risk review calls and communications are being considered to strengthen engagement with smaller providers and facilitate the sharing of modern slavery risk mitigation practices.

## CATEGORY C (LOW RISK / HIGH SPEND)

A random audit mechanism is under development to validate ongoing compliance, with a particular focus on suppliers demonstrating irregular or fluctuating spend patterns.

## CATEGORY D (LOW RISK / LOW SPEND)

Opportunities are being explored to streamline monitoring through annual desktop reviews and automated de-risking functionality integrated across our sourcing, supplier registration, and spend analytics platforms.

# HIGH-RISK INDUSTRIES

In FY24, our industry risk tool identified—and in some cases reprioritised—the following sectors as requiring enhanced oversight, in line with our commitment to eliminating modern slavery from our supply chain:

- Building, structural and fabrication services;
- Cleaning and facilities management;
- Security services (including event and mobile patrols);
- Freight, logistics and last mile delivery;
- Raw materials and components (particularly textiles and metals);
- Consumables (FMCG, hygiene goods and single-use plastics);
- Catering supply chains (coffee, perishables);
- Laundry, waste management and pest control; and
- Grounds care and horticultural services.

# ETHICAL SOURCING FRAMEWORK

**Through our clear ethical standards, our risk management framework and our proactive auditing program, we manage risk, have full visibility, uphold standards and values and safeguard human rights.**

Our Ethical Sourcing Framework ensures responsible and sustainable supply chain management. It promotes fair treatment of workers, minimizes environmental impact and follows the internationally recognised 'Base Code' for ethical practices. This code includes clauses on freely chosen employment, respect for collective bargaining, safe working conditions, no child labour, fair wages, reasonable working hours, no discrimination, recognised employment relationships, and prohibition of harsh treatment.

During FY24, we continued to work with clients on ethical sourcing initiatives. This year's focus was on refining our framework to better align with updated Fair Work Awards, enhancing worker interviews and wage audit processes. These adjustments have allowed us to better detect and address risks of underpayment and unsafe working conditions within high-risk service categories such as cleaning and grounds maintenance.

The Ethical Sourcing Framework consists of three steps and supplements our overarching risk management framework. Each supplier is individually assessed, inherent industry risk is considered, and a risk rating is applied. Risk ratings define spot check frequencies, and any non-conformance informs possible further action to be decided by a risk committee, e.g. targeted investigations or external independent audits.





# ETHICAL SOURCING SPOT CHECKS & AUDITS

Cushman & Wakefield is committed to preventing and remedying non-compliance in our supply chain. We set expectations of our suppliers from supplier registration, continuing through our Code of Business Conduct and related policies. Ethical sourcing spot checks and audits help us to verify the performance of our suppliers and allow us to measure risk objectively, monitor compliance and identify any issues to address. They initiate open dialogue with suppliers on ethical standards and expectations and can act as a catalyst to drive positive change.

Where deemed necessary or appropriate—typically based on risk, allegations, or client request—Cushman & Wakefield carries out spot checks or audits. These activities provide a pragmatic, risk-based approach to help ensure adherence to ethical sourcing standards.

## Criteria assessed includes:

- Business legitimacy and integrity of records
- Underage labour
- Discrimination and disciplinary practices
- Forced labour
- Working hours and overtime
- Freedom of association and the effective recognition of the right to collectively bargain
- Harassment and abuse practices
- Wages, benefits, and terms of employment
- Subcontracting compliance





## MITIGATION

**Cushman & Wakefield maintains stringent supplier management practices, constantly refining and expanding these measures in alignment with our commitment to counteract modern slavery risks. In compliance with the Act, we have implemented enhanced governance in our registration and procurement processes. Additionally, we have emphasised training and raised awareness to understand and combat these risks.**







We have developed a standard approach, compliant with the Act, to serve as a model for incorporating similar strategies across other company sectors. Our aim is to detect and reduce the risk of modern slavery throughout our supply chains, reinforcing our commitment to ethical business practices. This includes:

- **Identifying** assessing and monitoring potential risk areas in our supply chains;
- **Ensuring** that high-quality spend and engagement data is held and analysed;
- **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.

The measures outlined below are a critical aspect of our mitigation strategy. They will serve as the foundation for future implementation across all areas of our business in upcoming reporting periods.

# PROCUREMENT PROCEDURE

Cushman & Wakefield sources a wide range of goods and services in accordance with its ANZ Procurement Policy and related sourcing, procurement and contract management procedures. 'Procedures' are standard procurement processes and are steps that:

- 01** Can be evolved and changed for continuous improvement.
- 02** Enable users to do their work effectively within the specified guidelines.

In FY24, we undertook a comprehensive review of our procurement documentation to align more explicitly with modern slavery obligations. This included an update to our templates and tender process, which now include targeted questioning on supplier history with the Fair Work Ombudsman, compliance with labour laws, child and forced labour prohibitions, supply chain due diligence practices and the maintenance of employment records. These updates enhance transparency, drive accountability and enable more informed supplier evaluations.

## COMPANY POLICIES

Cushman & Wakefield continues to uphold our Global Vendor/Supplier Integrity Policy and Global Code of Business Conduct throughout all business areas. These documents reflect our company's zero-tolerance stance towards modern slavery, detailing our structured reporting channels and whistleblowing mechanisms. Through these guidelines, Cushman & Wakefield can effectively review and monitor supplier adherence to our ethical principles. Integral to our commitment, all new suppliers must accept the Global Vendor/Supplier Integrity Policy during their onboarding process. Ensuring transparency and responsibility, both the Global Vendor/Supplier Integrity Policy and the Global Code of Business Conduct are publicly accessible on our website, demonstrating our alignment with the requirements of the Act.

### Responsible Sourcing Procurement Policy

At Cushman & Wakefield, we believe that by sourcing ethically, we take responsibility for the impact that our business decisions have on the people and communities through our supply chain. During FY24, we developed a new Global Responsible Sourcing Policy to formalise our expectations around ethical, social and environmental performance across our procurement and supply chain activities. This policy, which is aligned with our Global Code of Business Conduct and sustainability goals, outlines supplier obligations to uphold human rights, avoid modern slavery and implement robust risk identification and mitigation frameworks. The Responsible Sourcing Procurement Policy will guide our ethical purchasing practices.

## 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 Vendor/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 part of these audits and spot checks during the Reporting Period.





## WHISTLEBLOWING PLATFORM

In line with our core protocols for reporting modern slavery risks and ethical concerns, Cushman & Wakefield continued to strengthen awareness of and access to our global whistleblowing platform during FY24. This secure channel enables employees, suppliers and other external stakeholders to report suspected instances of modern slavery, with the option to remain anonymous.

Our enhanced framework, governed by the Global Whistleblowing Policy, ensures that all disclosures are treated confidentially and without risk of retaliation. We are committed to fostering a culture of transparency, where individuals feel supported and safe to speak up. Our employees receive regular training to reinforce this commitment.

### Key actions undertaken in FY24 to improve accessibility and visibility included:

- Simplification of phone-line navigation;
- Increased on-site signage at managed properties; and
- Rollout of a QR code linking directly to the reporting portal.

Anyone wishing to raise a modern slavery concern may also request a meeting with a member of company management, Legal, Ethics & Compliance, or Human Resources. Once notified, the receiving representative must promptly inform a member of the Ethics & Compliance team to ensure appropriate follow-up and oversight.



## SUPPLIER ADHERENCE

We implement various measures across different parts of our business to reinforce our zero-tolerance stance on modern slavery throughout our supply chain, including:

- Conducting due diligence risk assessments;
- Clearly communicating our ethical expectations to suppliers;
- Requiring suppliers to accept and comply with Code of Business Conduct and related policies;
- Including clauses in our standard supplier agreements that explicitly prohibit modern slavery, impose reporting and record-keeping obligations, and grant us termination rights for any breaches; and
- Incorporating questions into tender documentation to assess the steps tenderers take to address modern slavery risks within their organisations.







## TRAINING

We provide targeted training to equip our people with the knowledge and skills to identify and respond effectively to ethical risks, including those related to modern slavery. Our programs focus on raising awareness, improving risk detection, and ensuring appropriate actions are taken to mitigate potential issues within our operations and supply chain.

During FY24, we developed an on-demand modern slavery training module, and this is scheduled for release through our HR and training platform, Workday. This training will be mandatory for all new starters in our Australian business before being expanded to all employees. It ensures consistent awareness of modern slavery risks and clear understanding of reporting pathways. This initiative reflects our ongoing commitment to equipping employees with the skills to recognise and address ethical risks effectively.



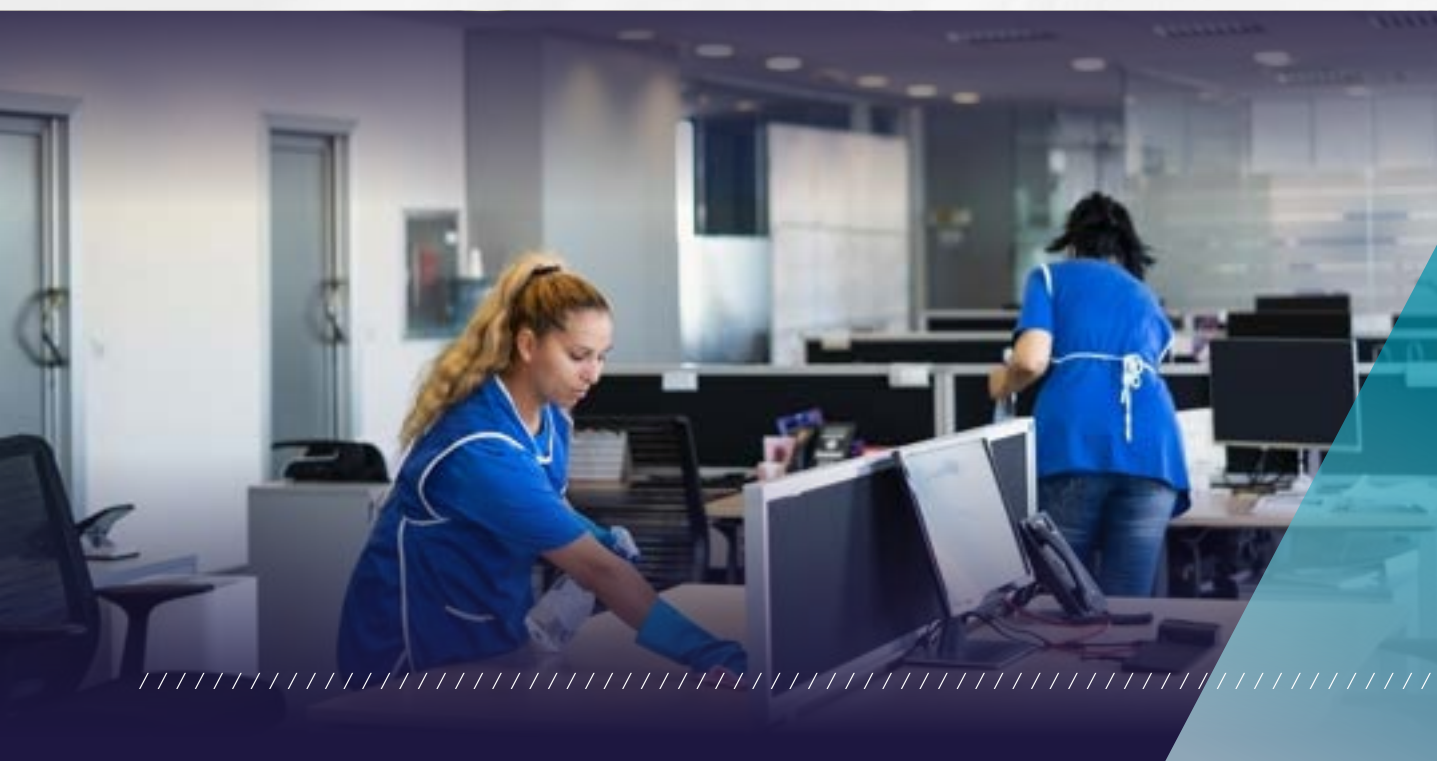
## MODERN SLAVERY STATEMENT

Since the implementation of the Modern Slavery Act on 1 January 2019, Cushman & Wakefield has consistently released an annual Modern Slavery Statement, as required by the Act.

Our compliance journey has been characterised by our strong commitment to identifying and addressing modern slavery risks within our operations and supply chain. Each year, we continue to gain valuable insights and strategies for improvement.

The rigorous reporting criteria of the Act not only enhance our awareness of our modern slavery risks but also underscore our proactive efforts to combat them and to eradicate modern slavery from our industry. Our annual Modern Slavery Statement is a vital tool for reporting - both internally and externally - on our progress and planned actions for addressing modern slavery risks.

As we present our fifth Modern Slavery Statement, we do so with a sense of growth and increased understanding from previous years. Our dedication to accountability remains unwavering, and we are committed to continually refining our approaches to effectively tackle modern slavery within our sphere of influence.





## REPORTING POLICY AND RESPONSE PLAN

In addition to our Whistleblowing platform, Cushman & Wakefield further developed its response and governance framework to formalise how we address modern slavery allegations.

Cushman & Wakefield has established a Modern Slavery Risk Committee (the Committee) as part of our governance structure. The Committee comprises senior management and representatives from Procurement & Supply Chain, Legal, Ethics & Compliance and EHS teams. It is responsible for investigating potential or actual incidents of modern slavery within our operations and supply chains. The Committee also periodically reviews previous incidents, evaluates reporting procedures, and identifies opportunities to strengthen governance. Furthermore, it monitors the business's progress against modern slavery remediation objectives.

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

- A potential instance of modern slavery is identified and reported by an employee, contractor, or personnel of Cushman & Wakefield;
- The Committee is notified of the potential instance and urgently convenes to review the report;
- The Committee assesses the allegation and agrees on the appropriate course of action;
- If necessary, the Committee establishes an investigation team or working group to gather evidence, conduct a detailed assessment, and report findings, conclusions, and recommendations back to the Committee;
- Based on risk and investigation outcomes, the issue may be escalated to senior stakeholders, including Regional (APAC) and Global Ethics & Compliance leadership; and
- When a case of modern slavery is identified or strongly suspected, the Global Chief Ethics & Compliance Officer and relevant government authorities are notified as required. During the Reporting Period, no instances of modern slavery were identified within our operations or supply chains.



## REMEDIATION

If we identify non-compliance with our policies or determine that an individual has been harmed by a supplier's actions, we will work collaboratively with that supplier to address and resolve the issue. We also have processes to investigate the root causes and implement measures to prevent recurrence—both with the specific supplier involved and across our broader supplier network.

If a supplier fails to make adequate progress on required remediation, we may review the relationship and, where appropriate, impose sanctions — including the potential termination of our engagement.

# EFFECTIVENESS

**We consider our contractual audit rights with our suppliers to be one of the most effective methods of evaluating the effectiveness of our modern slavery mitigation practices detailed in this Modern Slavery Statement. Our internal EHS team conducts comprehensive audits, which incorporate modern slavery components and supplier site visits.**

Additional measures Cushman & Wakefield uses to evaluate the effectiveness of our modern slavery mitigation efforts include:

- **Implementing** enhanced risk assessment processes, with regular reviews to ensure industry practices and supplier standards remain relevant and effective. Oversight is provided by the Procurement & Supply Chain team;
- **Strengthening** the role of the Modern Slavery Working Group to maintain ongoing engagement and respond effectively to feedback and evaluation outcomes;
- **Enhancing** the assessment of training effectiveness and attendance through our internal Learning & Development function, including tracking training participation rates and collecting feedback to improve content quality and impact;
- **Collaborating** with suppliers and expanding the scope of auditing activities within our EHS auditing program, including evaluations of suppliers' compliance with modern slavery policies and contractual obligations;
- **Maintaining** ongoing engagement with the industry, with working group members attending information sessions to monitor emerging trends in modern slavery and review how reported issues were managed;
- **Holding** quarterly meetings with our specialist technology service provider to review and update the Self-Assessment Questionnaire, aimed at improving data collection and enhancing identification and reporting of modern slavery risks; and
- **Monitoring** supplier response rates to the Self-Assessment Questionnaire to ensure engagement and compliance.







## FURTHER STEPS

Cushman & Wakefield Australia is committed to continuing and enhancing its modern slavery risk mitigation strategy in the long term.

## APPROVAL

The Statement is jointly made by Cushman & Wakefield Pty Ltd (ACN 074 196 991), DTZ Australia Pty Ltd (ACN 106 515 931), 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 2024. This Statement had been approved by the directors 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).



**Noral Wild**

CEO, Australia & New Zealand  
Cushman & Wakefield



## About Cushman & Wakefield

Cushman & Wakefield (NYSE: CWK) is a leading global commercial real estate services firm for property owners and occupiers with approximately 52,000 employees in nearly 400 offices and 60 countries. In 2024, the firm reported revenue of \$9.4 billion across its core service lines of Services, Leasing, Capital markets, and Valuation and other. Built around the belief that Better never settles, the firm receives numerous industry and business accolades for its award-winning culture.

For additional information, visit [www.cushmanwakefield.com](http://www.cushmanwakefield.com).