

Modern Slavery Statement

2025 Financial Year

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Introduction





CUSHMAN & WAKEFIELD MODERN SLAVERY STATEMENT

This Statement is made on behalf of Cushman & Wakefield Debenham Tie Leung Limited, C & W (U.K.) LLP and C & W Management Services LLP and is written in accordance with the requirements of the UK Modern Slavery Act (2015). The Act requires businesses with a turnover of more than £36 million to disclose information regarding their policies and actions over the financial year to eradicate modern human slavery and trafficking from their operations and supply chain.

Whilst this Statement complies with Cushman & Wakefield's UK businesses' reporting obligations under the UK Modern Slavery Act, Cushman & Wakefield's Global Code of Business Conduct also states that "Involuntary servitude, slavery or practices similar to forced labor have no place in the Company's operations. The Company has zero-tolerance for slavery and human trafficking, and Cushman & Wakefield policy prohibits all forms of forced or compulsory labor."

The Boards of these entities gave approval for this Statement on 14 October 2025:

A handwritten signature in black ink, appearing to read 'Ravinder Saluja'.

Ravinder Saluja
On behalf of Cushman & Wakefield Debenham Tie Leung Limited and C & W (U.K.) LLP

A handwritten signature in blue ink, appearing to read 'Benjamin Cullen'.

Benjamin Cullen
On behalf of C&W Management Services LLP

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Our Business



Our Business

Cushman & Wakefield is a full service global commercial real estate services company, with over 100 years of experience, 52,000 professionals and 400 offices worldwide. Cushman & Wakefield offers a broad range of services including integrated facilities management, commercial real estate transaction services, project and development services, global occupier services, investment management, valuation and consulting.

Our clients are in the public, private and not for profit sectors. We strive to provide services in a manner that protects the human rights of the people involved in our business. We expect our suppliers to provide services responsibly.



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Our Supply Chain



Our Supply Chain

The nature of commercial property services requires us to deliver a variety of services through long (and often multi-tiered) supply chains. Cushman & Wakefield's UK business engages annually with a variety of supply partners and manages spend in the millions of pounds across our corporate operations and on behalf of clients. Our supplier spending profile includes the following industries:



Facilities
Maintenance



Cleaning



Recruitment
Services /
Temporary
Labor



Food Services /
catering



Construction



Movers &
Relocation

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Our Policies in relation to Modern Slavery



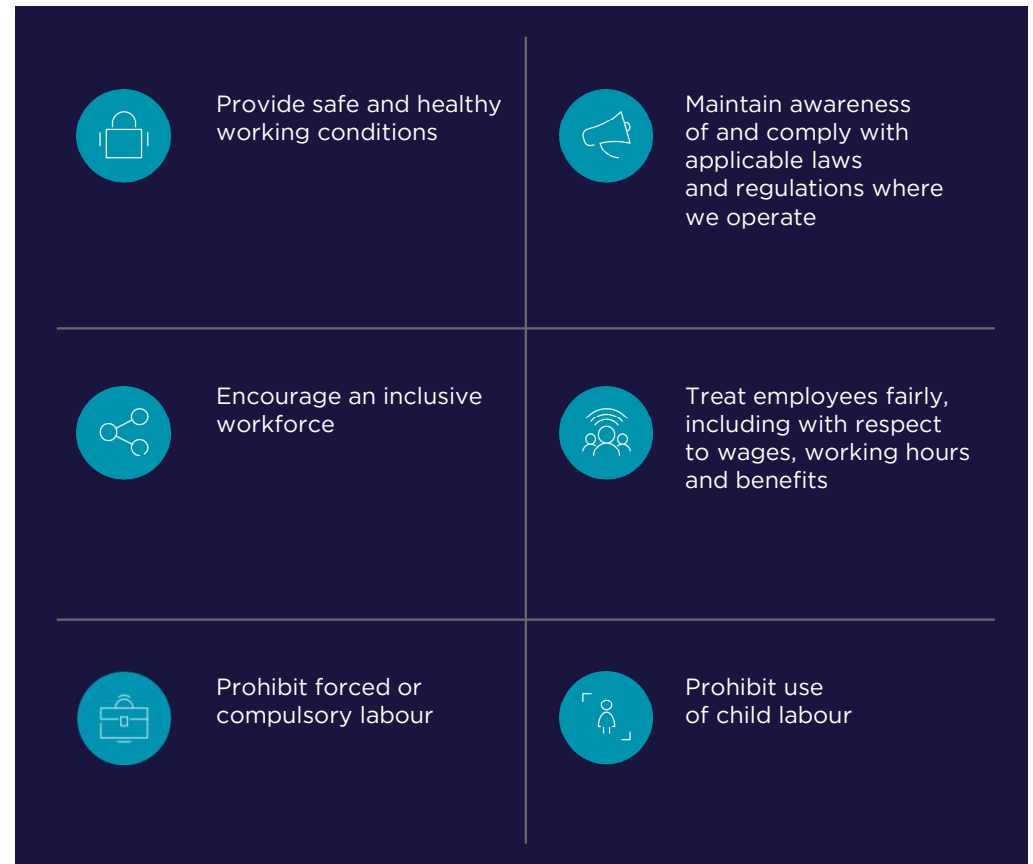
Our Policies in relation to modern slavery

Cushman & Wakefield is actively working to ensure slavery and human trafficking is not taking place across our business. Our policies provide guidance to ensure that we conduct business ethically and transparently by clearly defining the standards expected from our employees and suppliers.

These policies include:

Global Code of Business Conduct

Cushman & Wakefield's Global Code of Business Conduct sets out the ethical standards which employees must uphold. Cushman & Wakefield promotes human rights by upholding the UN Global Compact in our business practices. We conduct business with integrity, honesty, and transparency, and adhere to the following principles:

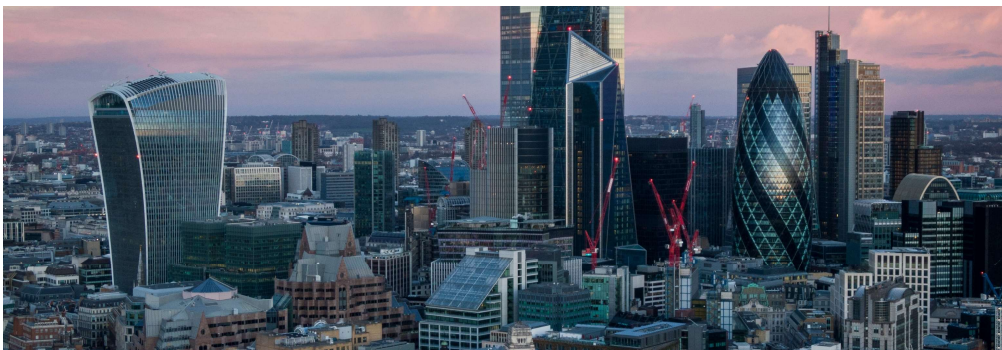


Our Policies in relation to modern slavery

Our Global Code of Business Conduct outlines Cushman & Wakefield's commitment to prohibiting all forms of forced or compulsory labour and the prohibition of child labour.

Involuntary servitude, slavery or practices similar to forced labour have no place in the Company's operations. The Company has zero-tolerance for slavery and human trafficking. We are also committed to ensuring compliance with all applicable modern slavery laws.

All Cushman & Wakefield employees are required to certify that they have read, understood and will follow our corporate policies and the principles outlined in our Global Code of Business Conduct. New employees sign the certification in accordance with the onboarding process.



Global Vendor / Supplier Integrity Policy

Cushman & Wakefield conducts business with reputable suppliers and implements due diligence measures to address a variety of risks, including modern slavery risks. We act ethically and responsibly because it is the right thing to do and the business practices and actions of our suppliers could potentially reflect upon our company, our reputation and our brand.

Our vendor and supplier Business Conduct Principles outline our expectations in the areas of business integrity, labour practices, health and safety and environmental management.

Violations of our Business Conduct Principles will result in a review of our business relationship, up to and including, termination of that relationship in accordance with our contractual rights and applicable law.

Global Whistleblower Policy

In order to promote an ethical and socially responsible work environment, Cushman & Wakefield's Global Whistleblower Policy encourages staff to speak up and raise questions and concerns including those concerning modern slavery. The policy also outlines how we protect individuals that report their concerns.

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Managing Modern Slavery Risk



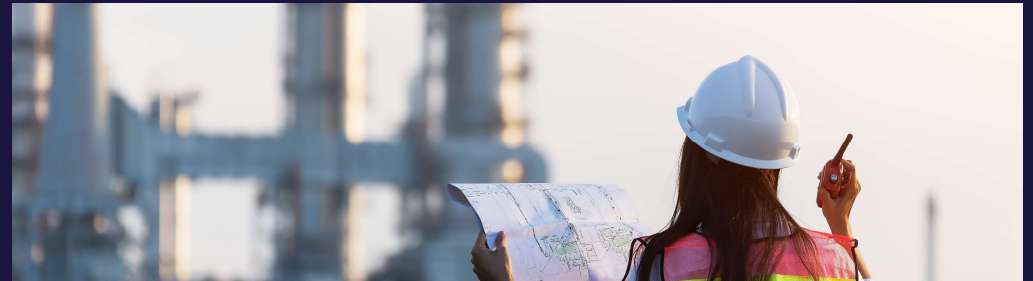
Managing Modern Slavery Risk

Cushman & Wakefield is committed to maintaining the highest ethical standards and engaging in practices that enhance the welfare, safety and wellbeing of our employees, business partners and wider communities across the world. We have assessed key areas of our business to improve our understanding of associated modern slavery risks.

Specific areas of vulnerability identified in our operations include:

Sector and industry risk

Cushman & Wakefield encounters risk through the supply partners we hire to provide property management and construction services to our clients. These partners may employ people just starting in the labour market, low skilled workers and subcontractors without higher education, on entry-level wages, or who are otherwise vulnerable to exploitation due to their lack of bargaining power and limited employment options. These individuals are therefore more likely to accept poor working conditions, low wages and other forms of abuse.



Products and services risk

Cushman & Wakefield UK has a high volume of supplier spend in sectors that are potentially vulnerable to modern slavery, such as construction, cleaning, grounds maintenance, hospitality and security services. Having a supply chain that operates in these areas increases our inherent exposure to modern slavery risks through the products that we or our supply partners procure to provide services such as office consumables, fast moving consumer goods, personal protective equipment, manufactured components of office furniture/furnishings and technology equipment. The sourcing and receiving of products and materials throughout the supply chain may span many countries, each with varying levels of modern slavery risk and reduced visibility into the further levels of our supply chain.

Managing Modern Slavery Risk

Geographic risk

Cushman & Wakefield has offices in 60 countries, including in regions where there is geopolitical tension or in countries identified in the Global Slavery Index as having a higher prevalence of modern slavery in their populations. In addition, global factors such as political instability, economic fluctuations and natural disasters can impact supply chains and lead to disruptions and extended lead times. Operating in such environments poses a challenge, but we are committed to promote business practices that protect the most vulnerable in society as we continue to regularly assess our supply chain to ensure that we identify and mitigate any potential risks of modern slavery.

Entity risk

The nature of our services means we have complex supply chains, which exposes us to third party conduct risk. We strive to reduce this exposure through training and other due diligence activities.



Actions to assess and address modern slavery risks

We have implemented the following:



Supplier onboarding tool

Our supplier registration process involves in depth documentation and assessments of health, safety and compliance. We assess suppliers' policies and practices through the use of the Avetta onboarding tool.

Contractual clauses

All Facilities Management suppliers must agree to comply with the Cushman & Wakefield Global Vendor/Supplier Integrity Policy, which requires our supply partners to comply with modern slavery laws and refrain from engaging in modern slavery, forced labour and human trafficking. Within our UK business we have incorporated compliance obligations in our standard supplier contract templates. Our terms and conditions require all suppliers are required to comply with applicable laws prohibiting modern slavery, including the UK Modern Slavery Act 2015. It is critical that our suppliers acknowledge and understand our strong and uncompromising approach to modern slavery.

Due diligence

Cushman & Wakefield carries out systematic screening of our supply chain for adverse media and broader compliance risks. We use a globally recognized compliance screening platform to screen all new suppliers as part of the onboarding process and existing suppliers are continuously monitored. Any items of concern are escalated to the Compliance team for analysis and remedial action, as appropriate. Through the due diligence processes, we are increasingly able to identify and manage potential risks of modern slavery activities in our supply chain. By being able to identify red flags early, we can either avoid engaging questionable prospective suppliers or, in the case of existing suppliers, work with them to remediate their practices or terminate their services if necessary.

There were no escalations in 2024 that resulted in investigations of modern slavery or other human rights violations.



Actions to assess and address modern slavery risks

We have implemented the following:

Global Ethics Helpline

We maintain an ethics helpline (EthicsPoint) administered by an external provider, where employees, contractors, clients, supply partners and members of the public can confidentially report concerns or suspicions in relation to behaviours that are inconsistent with our Code of Conduct, Policies or the law, including suspicions regarding slavery or human trafficking in our business or supply chain. It is confidential and available 24 hours a day, 7 days a week and reports

can be made anonymously. We encourage our stakeholders to raise any concerns that someone may be doing something which violates our values, policies or the law. All reports are independently recorded by an external third party and are vetted and overseen by the Compliance Team. We did not receive any EthicsPoint reports in 2024 related to violations of human rights or cases of modern slavery.

Training & Communication

We routinely remind our staff (and where appropriate, suppliers) of their obligations under our Code of Conduct and Legal & Compliance policies including adherence to section 54 of the Modern Slavery Act. We have provided tailored Modern Slavery training to specific, higher risk business groups in the UK.

Modern Slavery Risk Assessment

We have conducted a risk based review of our UK suppliers, looking at supplier spend categories and identifying the highest risk categories in relation to modern slavery. We also undertook additional and enhanced due diligence of suppliers within the highest risk categories and verified whether our suppliers had their own Modern Slavery Act statements where required.



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Looking Ahead



Looking ahead

To date, we have not identified or been informed of any instances of slavery and human trafficking in our business or supply chain. In the event a report is received, we will act immediately and resolutely. This includes working with suppliers to remedy any breaches but also instantly terminating contracts and reporting to law enforcement and other bodies as appropriate.

In 2025, we will continue to work on raising awareness of modern slavery across the business and evolve our internal processes to ensure they are in line with best practice, adopt and adhere to any updates in UK legislation; evolve supply chain monitoring and supplier due diligence processes and continue to provide tailored training for higher risk business lines. Cushman & Wakefield is continuing to develop key performance indicators to measure our effectiveness in addressing modern slavery risks.

Our focused activities for the next year will include:



Monitoring changes in the legislative landscape, adapting strategies and procedures to meet evolving legal standards and best practices, working with regulators as needed, and increasing collaboration with business partners.



Updating and delivering targeted modern slavery training to our employees in our high-risk business lines and functions.



Capturing metrics about modern slavery in our operations and supply chains, so that we can have more useful conversations about how we can improve our modern slavery risk responses.



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. Cushman & Wakefield has numerous industry and business accolades for its award-winning culture and commitment to Inclusion, sustainability and more.

For additional information, visit:

www.cushwakefield.com

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