POLICIES

Scope

Cushman & Wakefield strives to integrate responsible practices into its operations. Our board and its committees share responsibility for overseeing various sustainability-related matters, including substance and transparency across three focus areas: driving net zero, accelerating progress and creating positive places. We believe that responsible sourcing plays an integral role in executing on our strategy and achieving our stated goals. Cushman & Wakefield's Global Responsible Sourcing Policy sets guidelines and expectations relating to direct and indirect sourcing, procurement, and contracting activities.

Any individual or business line representative who participates in any of the steps of the purchasing process should read, understand, and follow the Global Responsible Sourcing Policy and is fully accountable and responsible for understanding the policy.

Application

The Global Responsible Sourcing Policy applies globally across all service lines and operations. It aligns with our corporate values, standards and practices outlined in our Global Code of Business Conduct, Global Environment Policy, Global Health and Safety Policy, and Global Vendor/Supplier Integrity Policy. Operating in a way that is consistent with this policy is the collective responsibility of all employees, suppliers, and subcontractors with leadership from the Procurement team.

Definitions and Roles

United Nations Global Compact	The United Nations Global Compact (UNGC) is a voluntary, CEO-level initiative that calls on companies to align their strategies and operations with its Ten Principles across four areas — human rights, labor, environment, and anti-corruption — and to report on implementation through an annual Communication on Progress. Cushman & Wakefield is a participant in the UNGC.

Net-Zero Emissions	Net-zero means reducing Scope 1, 2, and 3 greenhouse gas (GHG) emissions across a company's entire value chain to zero or a residual level consistent with a 1.5°C pathway and neutralizing any remaining residual emissions through permanent carbon removals. This definition is consistent with the SBTi Corporate Net-Zero Standard, to which we subscribe.
Social Responsibility	Social responsibility is the idea that people and organizations should act ethically and in ways that contribute positively to society and the environment. It's an ethical framework that requires individuals and corporations to fulfill their civic duty and make decisions that balance economic growth with the welfare of people and the environment.

Policy Details

1. **Expectations**

   The following expectations outline our commitment to overseeing procurement activities in a manner that aligns with our sustainability strategy, targets, and objectives. These expectations have been derived from internationally recognized norms outlined in the United Nations Global Compact (which Cushman & Wakefield joined as a participant in 2018) and demonstrate our commitment to the principles of responsible sourcing.

   Cushman & Wakefield recognizes that expectations set forth in this policy may differ from local laws and customs and expects our employees and suppliers to comply with all applicable laws, and to respect these standards within the context of the laws of their geography to the extent practicable.

   A. **Employee Expectations**

   - **Leadership and Engagement:** Employees at all levels are expected to lead by example, promoting and implementing approved sustainability initiatives, as appropriate, within their areas of influence when possible.
   - **Training and Awareness:** Employees will be made aware of and/or receive regular training on responsible sourcing practices, sustainability goals and the importance of responsible procurement.

- **Collaboration:** Employees are encouraged to collaborate with our clients, suppliers, and other stakeholders to drive innovation and responsible procurement practices.
- **Accountability:** All employees are accountable for conducting themselves in a way that is consistent with this policy and contributing to its objectives. They are expected to promptly report any supplier non-compliance or ethical concerns through appropriate channels in accordance with the Global Code of Business Conduct.

B. **Supplier Expectations**

We expect suppliers to develop and implement robust policies and procedures that outline their commitment to mitigate environmental and social impacts within their respective organizations and supply chains.

Environmental Responsibility

Recognizing that the built environment contributes to almost 40% of global greenhouse gas (GHG) emissions, Cushman & Wakefield has set science-based targets to achieve net-zero emissions across the entire value chain (scopes 1, 2 and 3) by 2050. Our progress toward these targets to date can be viewed in our most recent Sustainability Report. To achieve these targets, we partner with suppliers, vendors, and clients to develop and implement innovative sustainability solutions for both our corporate operations and value chain.

Suppliers are expected to:

- Comply with all applicable environmental laws, regulations and local statutes.
- Demonstrate their commitment to environmental responsibility by implementing environmental management systems within their organizations and establishing programs, practices, and protocols to achieve their environmental objectives.
- Understand the environmental impacts of their products and services throughout their entire lifecycle.

- Set science based GHG emissions reduction targets to reduce the energy and carbon impacts of their products and services throughout their lifecycle.
- Reduce environmental impacts, to the extent reasonably practicable and appropriate, by minimizing waste and maximizing the efficient use of natural resources, energy, water, and other raw materials.
- Track, measure, and report on the environmental sustainability data to Cushman & Wakefield, upon request, of products and services supplied to Cushman & Wakefield on an annual basis.

Social Responsibility

Cushman & Wakefield is committed to fostering an inclusive workplace that supports economic development and advances inclusion in our communities while ensuring all workers within our supply chain are provided with a safe and healthy work environment where they are treated with dignity and respect.

Supplier are expected to:

- Create initiatives that build understanding and awareness of how to foster a workplace culture rooted in respect, fairness, and opportunity for all.
- Where permitted under applicable law, identify opportunities within their talent lifecycle processes to promote inclusion and track the representation of their workforce.
- When procuring goods and services for their respective operations, proactively seek partnerships with an inclusive range of suppliers that will create long-term economic value for all.
- Prohibit the use of underage labor, as defined by national law or regulation, and shall in no instance permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs. Suppliers must ensure that policies and processes are established and implemented within their organization’s recruitment and hiring processes that will support the elimination of underage labor (as defined by the

International Labor Organization Core Convention No. 138 and Core Convention No. 182).

- Prohibit the use of forced labor and ensure that employment decisions will be based on free choice and there may be no coerced or prison labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control. Suppliers should maintain policies and processes reasonably designed to identify, prevent, and mitigate risks of modern slavery, forced labor, and human trafficking within their operations and supply chain. Suppliers must also ensure that employees:
    - Always maintain control of their personal possessions and identity documents;
    - Not be subject to predatory lending practices or inflated interest rates that lead to debt bondage;
    - Not be required to lodge monetary deposits or pay recruitment fees or other fees for their employment either directly or through third parties; and
    - Can terminate their employment without excessive or unlawful notice periods.
- Develop and maintain robust safety, health, and well-being management systems that will proactively manage health and safety risks to support an incident-free work environment where occupational injuries and illnesses are prevented.
- Respect workers' freedom of association without fear of retaliation and in compliance with local laws.
- Develop and implement a risk mitigation strategy and monitoring program to address any identified workplace human rights issues.

Governance

Cushman & Wakefield understands the importance of strong governance practices. Through our Global Code of Business Conduct, we have defined our approach to governing the conduct of our employees across the organization. We expect all our suppliers to act ethically and conduct business with integrity.

Supplier are expected to:

- Develop and implement written policies and procedures that outline their organization’s expectations of employee conduct and business ethics.
- Maintain processes to identify, disclose, and appropriately manage actual, potential, or perceived conflicts of interest.
- Comply with all applicable anti-bribery and anti-corruption laws and regulations, and maintain policies, procedures, and controls reasonably designed to prevent, detect, and respond to bribery and corruption risks including kickbacks, facilitation payments, improper gifts, hospitality, charitable contributions, and other improper business practices.
- Comply with all applicable economic sanctions, export control, customs, and trade laws and regulations and shall not engage in activities that could cause Cushman & Wakefield to violate such laws.
- Assign compliance oversight accountability to a specific individual or team within their organization.
- Conduct ethics and compliance training for their employees on a regular basis.
- Provide grievance mechanisms where employees can anonymously report concerns without fear of retaliation
- Establish mechanisms to monitor compliance with their policies and standards proactively.
- Document and communicate formal issue escalation and disciplinary processes.
- Conduct business in a manner consistent with the principles and requirements set forth in Cushman & Wakefield's Global Vendor/Supplier Integrity Policy, as amended from time to time.

2. **Monitoring and Compliance**

Suppliers should monitor their own compliance with Cushman & Wakefield’s Global Responsible Sourcing Policy and promptly remediate any identified non-compliance matters. We reserve the right to require that suppliers demonstrate their compliance with this policy at any time. Demonstration of

compliance may include completing and submitting written documentation in the form of policies and procedures, self-assessment questionnaires and, from time to time, onsite assessments that will be conducted by either a Cushman & Wakefield employee or an appointed third-party acting on Cushman & Wakefield's behalf.

Suppliers are expected to promptly notify Cushman & Wakefield of material violations of applicable law, significant ethical misconduct, human rights violations, forced labor concerns, bribery or corruption concerns, sanctions-related concerns, or other matters that could materially impact their relationship with Cushman & Wakefield.

We recognize parts of this policy may be challenging for small businesses to implement in their organizations. As such, we believe in continuous improvement and will actively support those suppliers through specific initiatives and programs designed to help them meet policy expectations and build their capacity. Support may include training, mentorship and access to resources tailored to their needs. Collaboration opportunities with industry organizations can also be explored to provide additional resources. By offering this support, Cushman & Wakefield aims to create an inclusive environment where all suppliers can thrive and contribute to our sustainability and responsible sourcing goals.

Violation of This Policy

Policy guidelines are established to protect the Company's and/or client's interests, and all employees are responsible for understanding the policy. If an employee is found to be conducting business in a way that is inconsistent with this policy, they may be subject to disciplinary action, up to, and including, termination.

If it is found that a supplier has failed to conduct business in a manner that is consistent with this policy, the supplier will be required to remediate any non-compliance in a timely manner. Failure to remediate or communicate the status of remediation to the satisfaction of Cushman & Wakefield's standards may result in termination of the relationship and/or potential legal action.

Administration

The Global Procurement Department is responsible for the administration of this Policy. All employees are responsible for consulting and conducting business in a

way that is consistent with the most current version of this Policy. A regular review cycle will ensure the Global Responsible Sourcing Policy remains relevant and responsive to evolving sustainability challenges and industry standards. This cycle will involve periodic assessments of effectiveness and relevance, incorporating stakeholder feedback, industry trends and regulatory changes to maintain the highest responsible sourcing standards and continuously improve the organization’s sustainability practices.

Policy Tracking

Tracking Item	Detail
Policy Name	Global Responsible Sourcing Policy
Policy Owner & Title	Angela Zou, Chief Procurement Officer
Department	Global Procurement
Effective Date	October 15, 2026
Revision Schedule	Annual