

Cushman & Wakefield

UK Tax Strategy and Approach

The overall aim of Cushman & Wakefield's ("C&W") tax strategy is to support the success of our business by monitoring, reviewing, and conducting our tax affairs in compliance with all applicable laws, rules, regulations, and reporting requirements in the jurisdictions in which we operate.

Governance

Realising the integrity of our brand and reputation around the world is critical to our success, C&W maintains an internal policy on ethical behaviour with our [Global Code of Business Conduct](#).

Additional internal policies and procedures also support tax controls and comprehensive record-keeping requirements to manage tax risk, timely completion of C&W's filings, reporting obligations and payment of any taxes due. C&W has a dedicated tax team made up of professionally qualified and experienced employees who help formulate and implement our tax strategy, overseeing its execution and alignment with our corporate goals. This global tax team is led by the Chief Tax Officer who directly reports to the Global Chief Financial Officer. Regular reports on tax matters are made by the Chief Tax Officer and the Global CFO to the Audit Committee of the [Board of Directors](#). Regional finance leaders maintain communications with business teams and global leaders, including the EMEA Tax Director, the EMEA CFO and the Senior Accounting Officers.

Tax Planning

C&W complies with all tax rules and regulations on a worldwide basis and engages in tax planning that is aligned with our commercial business activities, as well as our broader objective to deliver long term economic value to shareholders. As such, any tax planning undertaken will have commercial and economic substance and will consider the potential impact on our reputation and corporate goals. We will not undertake tax planning that is contrived or artificial. All tax planning is conducted in accordance with our governance policies set out above and in full compliance with tax laws. In addition, we will reconfirm any proposed tax planning strategy with our external tax advisors, when necessary, based upon size, complexity and/or uncertainty of any given transaction.

Tax Risk

We aim to be recognized as a low risk and compliant business by HMRC and every tax authority with which we engage. C&W follows its internal controls and risk processes based on C&W policies. The parameters by which we assess and manage acceptable levels of tax risk are the same as that which C&W uses across the company to assess and manage all risks. We regularly identify, assess, and manage tax risks associated with our global business operations and account for them proactively and appropriately, in accordance with relevant accounting standards. We have implemented risk management measures to mitigate tax-related risks, challenges, and uncertainties effectively, including controls over tax compliance processes, strategy effectiveness and emerging tax issues and monitoring these both quarterly and annually. Our risk-based approach to tax management involves a rigorous review and approval process. Risk matters are discussed internally, with our external tax advisors as well as with our financial statement auditors.

Relationships with Tax Authorities

C&W is committed to upholding ethical tax practices aligned with our corporate values and societal expectations, ensuring responsible tax planning and the principles of openness, cooperation, and transparency with all tax authorities, and we seek to develop strong, mutually respectful relationships. In the UK, we maintain an ongoing constructive relationship with HMRC and our Customer Compliance Manager (CCM) and relevant specialists within HMRC. We are committed to prompt disclosure and transparency in all tax matters. If there is any uncertainty in the application of UK law, C&W will proactively consider engagement with HMRC.

This statement is intended to comply with UK tax legislation (Finance Act 2016, Schedule 19) and applies for the year ended 31 December 2024.