



Global Human Resources Policies

Global Anti-Harassment and Anti-Discrimination Policy

Department: Human Resources
Functional Owner: Employee Relations
Date: May 2018

Purpose:

To communicate Cushman & Wakefield's commitment to ensuring employees are treated fairly and equitably and internal mechanisms for addressing inappropriate conduct of this nature. Accordingly, this policy forbids any inappropriate and/or abusive conduct regardless of whether that conduct is based on an individual's legally protected status.

Applies to:

All Cushman & Wakefield¹ employees, globally. This includes Cushman & Wakefield directors, officers, partners, members, employees and brokerage professionals and independent contractors² (collectively, "Employees") and its contractors and those of its subsidiaries and joint ventures under the Company's operational control³ anywhere in the world.

POLICY FORBIDDING DISCRIMINATION

Cushman & Wakefield makes employment decisions on the basis of merit. We are committed to attracting, retaining and developing a highly qualified, diverse and dedicated workforce. We hire and promote people on the basis of their qualifications, performance and abilities. Cushman & Wakefield does not discriminate, and does not permit its employees or third parties to discriminate against other employees or applicants because of age, ancestry, citizenship status, color, creed, the requesting, denial or taking of any job-protected and approved Leaves of Absence, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, and breastfeeding),

¹ The term "Cushman & Wakefield" is used broadly herein to cover all entities that hire employees or engage independent contractors, as applicable

² Independent contractors are independent vendors who assist the Company in the development and carrying out of business on a strategic basis. Independent contractors shall abide by the Global Human Resource policies as part of the obligations assumed under their respective agreement with the Company. Should the independent contractor be a legal entity and not an individual, then such independent contractor shall cause and direct its associates linked to the services provided to the Company, if requested by the Company, to acknowledge and abide by the policies.

³ Compliance with the Global Human Resources policies shall not be construed or interpreted as creating an employment relationship between an Employee and a particular Company entity where none otherwise exists. Compliance with Global Human Resources policies by an independent contractor or an officer or associate of such independent contractor shall not be construed or interpreted as creating an employment relationship between such independent contractor, or officer or associate of such independent contractor, and the Company.



gender, gender identity or expression, genetic characteristics, marital status, sex, sex stereotyping, national origin, mental and physical disability, race, religion, sexual orientation or sexual preference, genetic information, citizenship, or military or veteran status, including the perception that a person has any of these characteristics or that the person is associated with a person who has, or is perceived to have, any of these characteristics, or any other consideration or characteristic protected by applicable laws. Equal employment opportunity will be extended to all persons in all aspects of the employer-employee relationship, including recruitment, hiring, upgrading, training, promotion, transfer, compensation, benefits, discipline, layoff, recall and termination.

POLICY FORBIDDING HARASSMENT

Cushman & Wakefield believes in treating every employee with dignity. Accordingly, national laws and this policy forbid any unwelcome conduct that is based on an individual's age, ancestry, citizenship status, color, creed, the requesting, denial or taking of any job-protected and approved Leaves of Absence, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, and breastfeeding), gender, gender identity or expression, genetic characteristics, marital status, sex, sex stereotyping, national origin, mental and physical disability, race, religion, sexual orientation or sexual preference, genetic information, citizenship, or military or veteran status, including the perception that a person has any of these characteristics or that the person is associated with a person who has, or is perceived to have, any of these characteristics, or any other consideration or characteristic protected by applicable laws. Cushman & Wakefield is thus committed to providing a work environment that is free of unlawful discrimination, including harassment that is based on any legally protected status. Cushman & Wakefield will not tolerate any form of harassment that violates this policy.

Prohibited Conduct

The conduct prohibited by this policy, whether verbal, physical, visual, or through use of electronic or social media, includes any discriminatory employment action and any unwelcome conduct that is inflicted on someone because of that individuals' protected status.

Among the types of unwelcome conduct prohibited by this policy are epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. Cushman & Wakefield's prohibits that conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

Harassment and Abusive Conduct Regardless of Protected Status

This Policy also forbids any inappropriate and/or abusive conduct regardless of whether that conduct is based on an individual's legally protected status or rises to the level of a legal violation. Abusive conduct is defined as conduct of a manager or employee, with malice, that a reasonable person would find hostile, offensive and unrelated to legitimate business interests. Abusive conduct, may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct, "bullying", or anything that a reasonable person would find threatening, intimidating, or humiliating, or the sabotage or undermining of a person's work performance.

This policy supersedes and replaces any prior policy on the same topic. This policy is also superseded where greater rights or protections are afforded under applicable law or applicable collective bargaining agreement.



Sexual Harassment

Although the following information is equally applicable to harassment on any discriminatory basis, because sexual harassment is often difficult to describe, particular attention is given to its definition.

Sexually suggestive verbal or physical conduct of any kind, even conduct which is intended as joking or teasing, is inappropriate in the workplace or work-related settings and will not be tolerated. Each employee is expected to be sensitive to the issue of discrimination and harassment. In many countries and where legally required, Cushman & Wakefield provides training, including modules on anti-harassment, to managers and employees and each employee is required to complete and/or to attend such sessions.

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment (quid pro quo harassment);
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Unwelcome sexual conduct can include, but is not limited to, unwelcome sexual advances, abusive language or writing related to an individual's sex, sexual orientation or sexual behavior outside the workplace, comments about an individual's body, telling sexually-oriented jokes or making sexually offensive comments or gestures, or showing or displaying pornographic or sexually explicit objects in the workplace (including cartoons or pictures). Any employee who has questions about what constitutes inappropriate behavior in the workplace or work-related settings, should discuss these concerns with his or her manager or Human Resources representative.

All circumstances which suggest the possibility of sexual harassment will be investigated. Without exception, any employee who is found to have sexually harassed another employee, intentionally or unintentionally, will be subject to disciplinary action. The severity of the discipline imposed will be commensurate with the seriousness of the violation and without regard to the position of the offender. Disciplinary action may include written reprimands, mandatory counseling, transfer to another department, continued monitoring of the offender's behavior, unpaid suspension, denial of pay increases, demotion, or termination of employment.

Avoiding Prohibited Conduct

Everyone is expected to avoid any behavior or conduct that could reasonably be interpreted as prohibited harassment; no employees, not even the highest ranking individuals in Cushman & Wakefield, are exempt from the requirements of this policy. Every employee is expected to inform any person in the workplace whose conduct the employee finds unwelcome.

Reporting Procedure

1) Report to immediate manager

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Any employee who wishes to report inappropriate behavior under this Policy is encouraged to first speak to their immediate manager if appropriate and the employee feels comfortable doing so.

The immediate manager must treat any such discussions as confidential to the extent possible and should seek to:

- clarify the incident and circumstances surrounding the suspected inappropriate behavior;
- provide guidance to the complaining employee as to his or her rights under this Policy, and the process for making a report, and
- make an immediate reporting of the matter to Human Resources and/or the Legal Department

2) Report to the next level of management

If for any reason, the employee has a concern about reporting inappropriate behavior to their immediate manager, they may report to the next level of management. Such a report may be made orally or in writing.

The next level manager must treat any such discussions as confidential to the extent possible and should seek to:

- clarify the incident and circumstances surrounding the suspected inappropriate behavior;
- provide guidance to the complaining employee as to his or her rights under this Policy, and the process for making a report, and
- make an immediate reporting of the matter to Human Resources and/or the Legal Department

3) Report to Human Resources or other company officials

The employee may also report at any time the concern to Human Resources, and/or the Legal Department. Such a report may be made via orally or in writing.

4) Contact Cushman & Wakefield's Ethics Helpline, administered by EthicsPoint, an external provider

The employee may also report the concern to the Ethics Hotline.

- By Phone: 1 (866) 873-9854 (U.S. and Canada)
- By Weblink: [EthicsPoint](#)
- **Website direct address: <https://secure.ethicspoint.com>**

Any employee who witnesses or otherwise has knowledge of the discrimination against, or harassment of, another employee or any other conduct that violates this policy should report the same. All reports describing conduct that is inconsistent with this policy will be investigated promptly. To that end, parties involved in the situation (including the reporting party, anyone identified as the target of the behavior [if different than the reporting party], and anyone who allegedly violated this policy) will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy. Cushman & Wakefield may put certain interim measures in place while the investigation proceeds. Cushman & Wakefield will take further appropriate action once the report has been thoroughly investigated.

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Supervisors are to report any complaints of misconduct to a Human Resources Manager or Director so the company can try to resolve the claim internally. A person who receives a complaint from an employee regarding discrimination, harassment or any violation of this policy and who fails to respond adequately and effectively to such a complaint will be subject to disciplinary action, up to and including termination of employment.

Complaints, inquiries and reports will be treated as confidential to the extent compatible with the need to ensure that any offensive conduct of the type prohibited by this policy is eliminated, and appropriate steps are taken to prevent any further occurrence, and as required by applicable law.

Cushman & Wakefield will conduct an impartial and timely investigation into the reported conduct. Any employee who knowingly makes a false and malicious allegation of discrimination or harassment will be subject to appropriate discipline.

If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then Cushman & Wakefield will take corrective action, including discipline, up to and including dismissal, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of the parties involved. Cushman & Wakefield may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in the harassing conduct is not employed by Cushman & Wakefield, then Cushman & Wakefield will take whatever corrective action is reasonable and appropriate under the circumstances.

POLICY AGAINST RETALIATION

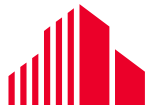
Cushman & Wakefield forbids any employee from treating any other employee or former employee or applicant adversely for reporting harassment, for assisting another employee or applicant in making a report, for cooperating in a harassment investigation or for filing a legal claim with a governmental agency. All employees who experience or witness any conduct they believe to be retaliatory should immediately follow the reporting procedures stated above under the Company's Global Anti-Harassment and Anti-Discrimination Policy. Retaliation of any kind against an employee making a good faith complaint of discrimination or harassment will not be tolerated and will subject the retaliator to disciplinary consequences, even if the original complaint of discrimination or harassment was found to be unsupported.

Information specific to the U.S.:

Cushman & Wakefield is an equal opportunity employer and makes employment decisions on the basis of merit.

- Consistent with this policy against workplace harassment, Cushman & Wakefield maintains posters on its bulletin boards that refer to legal definitions of harassment. These posters identify governmental agencies to contact for information on how and when to file administrative claims. Using the Cushman & Wakefield complaint process does not keep an

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employee from filing a claim with a state government agency or with a federal agency such as the EEOC.

- Employees may contact the EEOC at 1-800-USA-EEOC (1-800-872-3362) or their state government agency. Always check your local compliance posters to confirm the latest contact information.

The time period for an EEOC filing is 180 days or 300 days from the harassment. The time period for filing a claim continues to run during a Cushman & Wakefield's investigation. Our policy provides for immediate notice of problems to Cushman & Wakefield's officials listed above, so that we may address and resolve any problems without waiting for any legal proceedings to run their course.

Related Information: Global Code of Business Conduct
 Global Whistleblower Policy
 Global Inclusion and Diversity Policy