

# Our Commitment to Political Transparency

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CBRE values transparency and upholds the highest standards in the way we do business. The company’s [Standards of Business Conduct](#) and applicable laws related to political, lobbying and legislative engagement govern our approach to Legislative Affairs.

## Compliance and Oversight

Legislative Affairs is part of CBRE’s Corporate Responsibility team and reports to the Chief Responsibility Officer, who oversees and advises on decisions concerning CBRE’s involvement in the legislative process to ensure that ethical conduct and political transparency are at the forefront of these activities. Follow this link for more information about CBRE’s [Corporate Responsibility](#) program.

## Policy on Political Campaign Contributions

CBRE does not support or oppose any political candidates, parties or committees. We prohibit the use of company funds and other resources for contributions to political candidates and do not reimburse directly or indirectly employees who choose to make them. Employees who choose to participate in political campaign activities must do so on personal time using personal resources.

## Public Policy Engagement

Legislative and regulatory policy can have wide-reaching impacts on the commercial real estate industry. CBRE’s Legislative Affairs program identifies and analyzes policy to educate government officials and business leaders on issues that impact our company, clients and industry. The program relies on in-house legislative specialists and subject-matter experts across the business. Typically, CBRE does not take a position on legislation or proposals, unless there is a direct impact on our company or business. Rather, we provide data, modeling and analysis, and on-the-ground insights on real estate issues to inform policymakers about potential impacts.

CBRE’s priority policy issues include: professional licensing requirements, employment law, tax impacts on real estate, building standards, land use/development, landlord/tenant issues, building operations and sustainability, clean air standards, practices and standards for valuing commercial properties, workplace safety, diversity and wellbeing, and other issues that directly impact the business environment.

## Lobbying

CBRE monitors legislation in some jurisdictions that might have a significant impact on our company, clients or industry. This includes the use of professional lobbyists and internal resources. The two main functions of CBRE Legislative Affairs are to 1) raise awareness within CBRE about proposed laws and regulations that impact business,

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and 2) educate policymakers about the commercial real estate industry through data-driven research. Our goal is to help government officials make fact-based and well-informed policy. The company conducts legislative outreach and targeted lobbying activities at the federal level and in various states when needed, which may include taking a position on legislation or proposals that affect the company. We disclose the company's lobbying activities and expenditures in accordance with applicable laws.

### **Memberships and Associations**

CBRE makes available a [list](#) of the individual U.S. trade associations to which the company pays annual dues of \$25,000 or more, and the portion of the dues that the associations say are used for lobbying expenditures. CBRE publicly reports aggregate amounts of these fees on an annual basis. Legislative Affairs' engagement with a trade association does not constitute the company's endorsement of all its policy positions. Individual CBRE professionals may be members of local business associations but generally do not to participate in legislative activities unless expressly approved by the company. These business associations sometimes allocate a small portion of membership fees for legislative activities, which are not tracked by CBRE.

### **Employee Political and Civic Activity**

CBRE encourages our employees to be active in their communities and to participate in the political process on their own time if consistent with the company's Standards of Business Conduct and our U.S. Policy on Political Activities. In the United States CBRE provides paid time off for employees to vote in federal general elections.

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