

Principal Documents

Key Definitions

Parent Documents

[Altus Group Code of Ethics and Business Conduct](#)

Child Documents

Other Related Documents

Policy Q&A

legalsupport@altusgroup.com

Purpose, Benefits and Scope

This statement is made, approved and published pursuant to section 54 of the UK Modern Slavery Act 2015

Altus Group has a zero-tolerance approach to slavery, human trafficking and forced labour, both within our business and in our supply chain. Our commitment to acting ethically and honestly in how we do business is underlined in our Code of Ethics and Business Conduct.

Our Business and Supply Chain

Altus Group is a leading provider of asset and fund intelligence for the commercial real estate industry. Our parent company, Altus Group Limited, is registered in Canada and achieves a global annual turnover of more than £36m. Altus Group has offices in the UK as well across North America, Europe, Middle East, Australia, New Zealand and Asia.

Our supply chain provides us with a variety of business, data and technical solutions. We conduct diligence on suppliers prior to engaging with them. Most of our suppliers are internationally recognized companies. Some of our suppliers operate in areas where there is increased risk for modern slavery. In 2024 we intend to expand and further develop our supplier risk assessment to provide improved insights and reporting on modern slavery issues and initiatives to ensure we continue to assess and develop our anti-modern slavery measures.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. Our Code of Ethics and Business Conduct reflects our commitment to acting ethically and with integrity in all our business relationships, and all of our employees are legally bound to it. It also requires any of our personnel who become aware of any illegal or unethical behaviour to report it to executive officers or other appropriate personnel.

This commitment to ethical business practices is also further protected by our Whistleblowing Policy.

Procurement Process and Supply Chain Compliance

Our suppliers are carefully selected and approved. All of our supplier relationships are reviewed on a regular basis.

Our major suppliers are contractually bound to obey all local laws. Any suggestion that a supplier might be in breach of this commitment by engaging in slavery, human trafficking or other form of forced labour or servitude would result in an investigation and would render the contract liable for termination.

Training

Our employees and independent contractors receive annual training on the Code of Ethics and Business Conduct and are required to acknowledge their understanding and compliance with the Code. Employees are expected to uphold the principles of the Code throughout their employment with the company.

Signed by: "Terrie-Lynne Devonish"

Position: Chief Legal Officer and Corporate Secretary

On behalf of the Board of Directors of Altus Group Limited

Document Control

Revision History

Date	Revision	Summary of Changes	Modified By
March 2021	First version created	N/A	
March 2022	Annual statement	None	Thomas Hoover, paralegal
May 2024	Annual statement	Updated "Our Supply and Business Chain," "Procurement Process and Supply Chain Compliance" and "Training"	Terrie-Lynne Devonish, Chief Legal Officer

Review and Approval

Name	Role	Review/Approval	Date
Terrie-Lynne Devonish	Chief Legal Officer	Review	April 22, 2024