

COMPASS, INC.

Effective Date: May 27, 2026
Distribution: Public Websites
Policy Owner: Ethics & Compliance Department
Version: 12

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Approved by the Board of Directors for Compass, Inc.

1. INTRODUCTION

This statement is published in accordance with the U.K. Modern Slavery Act 2015 and outlines the approach and steps Compass, Inc. (“Compass”) takes to prevent modern slavery in our business and supply chains associated with the registered operations (including authorized franchisees) in the United Kingdom. As background, on January 9, 2026, Compass completed its acquisition (the “Merger”) of Anywhere Real Estate Inc. (“Anywhere”). Upon closing of the Merger, Anywhere and its subsidiaries became wholly owned subsidiaries of Compass. This post-Merger statement is made for the financial year ending 2025, builds on Anywhere’s previous disclosures, and outlines the steps Compass, Anywhere, and their subsidiaries (together, the “Company”) have taken to prevent, identify, and address modern slavery risks across our business and supply chain.

The Company recognizes its obligation to protect human rights all around the world. We take very seriously our responsibility to remain alert to any risks to human rights and are wholly committed to ensuring that our business practices, as well as those of our supply chains, do not foster or support slavery or human trafficking in any way.

2. STRUCTURE OF OUR COMPANY AND ITS BUSINESS

Compass has been based in New York City, New York, United States of America, since its incorporation and its annual revenues exceed £36 million per year. Prior to the Merger, Anywhere was, and remains, headquartered in Madison, New Jersey, United States of America, which is now a second headquarters location for the Company. Anywhere’s annual revenues also exceed £36 million per year.

As of December 31, 2025, Anywhere reported its operations in three segments: (1) Owned Brokerage Group, or Brokerage (company-owned real estate brokerage operations in the United States); (2) Franchise Group, or Franchise (franchise operations for seven real estate brands with over 17,000 offices worldwide in approximately 120 countries and territories as of December 31, 2025 as well as relocation services), and (3) Title (title and settlement services in the United States).

COMPASS, INC.

Commencing March 31, 2026, the Company reports its operations in three segments: (1) Brokerage (including company owned real estate brokerages under the Compass brand); (2) Franchise (including franchise operations for the Christie's International Real Estate ("Christie's") brand); and (3) Integrated Services (which now includes both title and settlement services as well as relocation services).

2.1 Franchise

A leader of integrated residential real estate services in the U.S., Anywhere supported over 900,000 closed home transactions in 2025, while Compass supported approximately an additional 250,000 closed home transactions in 2025. In 2025, Franchise at Anywhere consisted of indirect wholly owned Anywhere subsidiaries, and franchised a portfolio of well-known, industry-leading franchise brokerage brands, including: CENTURY 21®, Coldwell Banker®, Coldwell Banker Commercial®, Corcoran®, ERA Real Estate®, Sotheby's International Realty® and Better Homes and Gardens® Real Estate, within the United States, including New Jersey. It also, through its indirect wholly owned subsidiary, Anywhere Real Estate Group LLC, directly granted franchise and master franchise rights outside the United States.

The newly combined Company, within the Franchise segment, also franchises and operates company owned real estate locations in the United States under the brand name At World Properties LLC d/b/a @properties real estate. The Company franchises or licenses the Christie's International Real Estate® brand within and outside of the United States, in addition to the foregoing brands. Franchise licenses its brand trademarks and systems to independent third parties to allow them to directly provide real estate services or operate a franchise system in a designated region under one of the Company's Franchise brands. It is mandatory for all franchisees and licensees to comply with the law (including, since 2017, laws prohibiting human trafficking) when managing their business operations and supply chain. With very limited exceptions, Franchise does not provide or approve a supply chain or individual suppliers for licensees, franchisees or master franchise owners outside the United States.

2.2 Brokerage

In 2025, Brokerage at Anywhere operated a full-service real estate brokerage business principally under the Coldwell Banker®, Corcoran® and Sotheby's International Realty® brand names in many of the largest metropolitan areas in the U.S. Following the Merger, Brokerage under the Company also includes the Compass and @properties brands.

2.3 Title

Title provides full-service title, escrow, and settlement services within the United States to consumers, real estate companies, corporations, and financial institutions primarily in support of residential real estate transactions. This segment also includes our share of equity earnings or losses from our minority-owned mortgage origination joint venture, and from our minority-owned title insurance underwriter joint

COMPASS, INC.

venture. Following the Merger, Title was expanded to Integrated Services and includes our global relocation services operations.

Cartus Corporation, also an indirect wholly owned Company subsidiary, provides relocation services to businesses globally, of which one location is in the U.K. Cartus Corporation maintains an office in Swindon via one of its ultimate U.K. subsidiaries, Cartus Limited (together referred to as “Cartus”). The Swindon office operates as a hub for its employees to use as a base for team or client meetings and when the need arises to work at the office. Cartus operates a remote working model for all its employees in the U.K. The Company, including Cartus’ area of operation, does not use seasonal workers. Cartus assists its clients in developing their global workforce and managing their mobility process (including packing and moving furnishings). It also assists its clients with real estate purchase or rental and settling into new communities around the world. Relocation management services involve providing support to employees (and dependents) of their business clients when they have accepted a request from their employer to relocate domestically within a country or to another part of the world as part of their job role. A full range of International and U.K. domestic services offered by Cartus is available at www.cartus.com.

3. SUPPLY CHAIN

The Company’s supply chains vary based on the business unit. For the business units that operate in the U.K., the supply chain is principally made up of third-party vendors from whom the Company procures goods and services for the benefit of the Company and Cartus. Such vendors provide goods and services that include facilities management, hospitality service, information technology equipment, post-room management, stationery, and cleaning. Cartus also maintains a global and U.K. domestic supply chain network that consists of sub-contractors that provide services to Cartus’ clients.

4. POLICIES AND GOVERNANCE AGAINST SLAVERY AND HUMAN TRAFFICKING

The Company is committed to ensuring that slavery and human trafficking do not exist in any part of our business or in our supply chain. We believe in operating with the highest ethical standards and respect for human rights everywhere. We understand that despite universal laws condemning the practice, modern slavery and human trafficking still occur and that every company must do its part to ensure that slavery does not play a role in its products or services. We are committed to playing our part in this global effort to help end the scourge of slavery around the world. As part of this mission, Cartus publishes a Human Rights Policy, which affirms its commitment to human rights and the prohibition on child labor and any form of compulsory labor within Cartus and its supply chain.

COMPASS, INC.

4.1 Corporate Governance

The Company remains committed to ensuring that its people (including onsite contractors) are paid fairly for the important work they do. The Company continues to adhere to internationally recognized pay standards such as the “Living Wage” in the U.K.

Prior to the Merger, Anywhere’s Global Code of Ethics set out our compliance position in line with internationally recognized human rights principles, which include modern slavery. Post-Merger, as Anywhere integrates into Compass, the Company relies on the principles of both the Anywhere Global Code of Ethics, as well as the governing Compass Employee & Director Code of Ethics (the “Compass Code of Ethics”). The full Compass Code of Ethics is hosted on our global company intranet site and public-facing website. Compliance is embedded in the culture of our company, and led from the Company’s Executive Leadership Team, who set the tone and expectation for all our employees and suppliers.

Accountability for compliance with the Compass Code of Ethics, the principles found in Anywhere’s Code of Ethics, and the Global Compliance Program rests with Shacara Delgado, the Company’s Chief Ethics & Compliance Officer.

4.2 Supply Chain and Suppliers

The Company condemns all practices of slavery and human trafficking, and we require our supply chain and suppliers to comply with our values. As part of our process for onboarding a new Anywhere supplier, we require them to review and agree to adhere to the principles of our Vendor Code of Ethics (“Vendor Code”) during our relationship. Under both the Anywhere Vendor Code and the Compass Agent and Vendor Code, the Company prohibits the use of forced labor and child labor for suppliers and their subcontractors. The governing Compass Agent and Vendor Code is hosted on our global company intranet site and public-facing website.

Anywhere and its subsidiaries’ contracts with suppliers also require compliance with all laws. Beginning in April 2017, Cartus included in all new supplier contracts and amendments to existing supplier contracts an express prohibition on the use of forced, child, bonded or indentured labor, slavery, or human trafficking by suppliers and their subcontractors. Anywhere Real Estate Group LLC (a part of Franchise), also included this express prohibition in its franchise agreements both within and outside the United States beginning in April 2017.

The Company acknowledges that no policy can address every scenario encountered by a supplier and that contractual obligations alone do not guarantee compliance. Therefore, the Company’s Agent & Vendor Code, contracts, and the principles set out in the Anywhere Vendor Code are not intended as a substitute for a supplier’s own responsibility and accountability to exercise their own good judgment and to conduct

COMPASS, INC.

their operations professionally and responsibly in line with good business conduct. This responsibility also extends to each supplier's obligation not to engage in modern slavery or human trafficking.

Where a supplier is found to be in violation of the Compass Agent & Vendor Code, the principles of the Anywhere Vendor Code, or any applicable laws including human trafficking or modern slavery, the Company will work with all parties involved to ensure that any victims receive the correct support and help in terms of access to justice, compensation and remedy. The Company will also investigate the incident and take appropriate steps with the applicable supplier to prevent this from occurring in the future. We have a zero-tolerance policy toward slavery and human trafficking. In the event the Company feels the supplier's response is unsatisfactory or any organization within our supply chain fails to meet our ethical standards on this issue, the Company will terminate its relationship with such supplier.

5. DUE DILIGENCE PROCESSES

In addition to maintaining robust policies prohibiting human trafficking and forced labor, we take the following actions to mitigate the risk of slavery in our business and supply chains:

5.1 Employee Recruiting and Onboarding

After a review of our hiring processes, the Company deems the risk of modern slavery in its recruitment process as low. Specifically, the Company conducts background checks on all individuals considered for employment within the company. In the U.K., we also require evidence of a candidate's Right to Work in the U.K., along with background and right to work checks in relation to U.K citizens. This is done through our third-party provider who uses a technology platform that is approved by the U.K. Home Office for these types of checks. Finally, where appropriate, we also conduct passport checks. Work visa checks are completed using the U.K. government's code share service.

5.2 Supplier Diligence

After a review of our key suppliers and their processes, the Company considers the risk of modern slavery by the key suppliers we engage to provide services to our group of companies as low. However, we acknowledge that certain categories of suppliers who form part of Cartus' supply chain management network, and who provide services to Cartus' clients, may be at a slightly higher risk of having modern slavery occur within its operations. Therefore, Cartus employs the following procedures and conducts assessments on all its suppliers:

- Our selected Cartus suppliers are subjected to due diligence performed by our company employees, which includes, but is not limited to OFAC and Politically Exposed Persons continuous monitoring against global watch lists and sanctions lists; and

COMPASS, INC.

- Suppliers must agree to abide by the principles of the Vendor Code of Ethics, which includes a prohibition on any form of forced labor whether in the form of indentured labor, bonded labor, or prison labor by an Anywhere supplier and/or its subcontractors.

The Company fosters an environment of open conversation where its employees or suppliers may report instances of unethical behavior or practices. This may be escalated through their Manager, Human Resources Business Partner, or the Ethics and Compliance Department. Additionally, if employees do not wish to report concerns through these channels, both Compass and Anywhere maintain a reporting system to allow persons to notify the company of any violations of its Code of Ethics. Reports may be made anonymously, where permitted by law. We encourage persons within and outside the company to submit any concerns about our operations to our system. We fully protect any person who makes a good-faith report from retaliation or victimization.

5.3 Cartus Supply Chain Management Network Diligence

Cartus' supply chain management network consists of over 250 suppliers globally. Although our highest concentration of suppliers is within the United States and United Kingdom, our suppliers deliver services in over 100 countries. Suppliers go through a rigorous vetting and onboarding process which includes OFAC screening, credit review and contractual terms that expressly prohibit the use of child, forced, bonded or indentured labor, slavery, or human trafficking. Many also undergo a third-party risk assessment.

6. TRAINING

6.1 Corporate Employees

All employees are required annually to complete Code of Ethics training or certify that they have reviewed and continue to comply with the Company Code of Ethics. Each employee must attain a certification at the end of this training course by answering a series of questions on topics covered in the course to ensure an understanding of the principles and the ability to recognize any breach of the policy. Furthermore, each employee can report any concerns as part of this training and a copy of the policy is available to all employees.

Cartus delivered training to employees who work with supply chain vendors to ensure an understanding of modern slavery risks and to prevent modern slavery and human trafficking risks in our supply chains and our business. Anywhere provided the same training to its corporate procurement personnel. Cartus also extends this training to employees in its Account Management, Human Resources, Operations, and Legal departments who either have a certain level of involvement in the procurement process or who have responsibilities that relate to Cartus clients.

COMPASS, INC.

6.2 Suppliers (including Cartus Supply Chain Management Network)

Cartus' supply chain network members must complete and successfully pass an annual online compliance-training course. The course covers a variety of topics under Ethical Behavior, PII/System Security, Cultural Sensitivity, and Health Safety & Environment, including human trafficking, forced labor, illegal child labor and bonded labor practices. Furthermore, such suppliers also need to complete a specific module within this training course that covers human trafficking, forced labor, illegal child labor and bonded labor to assist them in recognizing and addressing how to address such practices.

During our annual Global Supplier Network Conferences, we set the tone at the top and review with our supplier's leadership the compliance training course. We highlight the Code of Ethics Line and remind them of their responsibility and ability to report any possible violation, even anonymously.

7. EFFECTIVENESS IN FIGHTING SLAVERY

7.1 Reporting Concerns

The Company maintains a reporting mechanism for its employees to raise or report any concerns relating to a breach of the Company Employee & Director Code of Ethics or the Anywhere Code of Ethics. For the reported financial year, there have been no reports of any breach or concerns regarding modern slavery or human trafficking.

7.2 Supply Chain and Supplier Assessments

Cartus requires its suppliers to complete annual assessments, which include an affirmation of their commitment to prohibit the use of forced, child, bonded or indentured labor, slavery, or human trafficking. The assessment requires our suppliers to read and attest to our Vendor Code of Ethics.

Cartus has the contractual right to conduct on-site audits of suppliers. When Cartus performs on-site audits of our vendors, its auditors check for violations of the Vendor Code of Ethics. For the fiscal year 2025, there have been no reported cases of labor concerns related to human trafficking, forced labor, illegal child labor and bonded labor practices made to Cartus supply chain management.

8. CONTINUED COMMITMENT

The Company remains committed to reviewing and assessing its policies, procedures, and training to protect against human trafficking and modern slavery. Our policies play an integral role in our work to embed respect for human rights throughout our business. Our Company Code of Ethics explicitly includes a policy statement that we are holding our vendors to our ethical standards, and that we will not tolerate child labor, human trafficking, and other labor abuses in our supply chain. Our policies reflect how

COMPASS, INC.

seriously we take our responsibility to protect human rights globally and ensure that our business practices do not foster or support slavery or human trafficking in any way. They also help us set clear expectations for our employees, suppliers, and other business partners, and they also establish a framework that helps us hold others accountable as they work to meet our compliance standards.

This statement was approved by the Board of Compass, Inc. and is signed by:

Approved:



Robert Reffkin
Compass, Inc., Chairman of the Board
Date: May 29, 2026