

CBRE GLOBAL INVESTORS, LLC CBRE GLOBAL VALUE INVESTORS, LLC

Part 2A of Form ADV The Brochure

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This brochure provides information about the qualifications and business practices of CBRE Global Investors, LLC ("CBRE Global Investors") and CBRE Global Value Investors, LLC ("CBRE Global Value Investors", and together with CBRE Global Investors "we" or the "Advisers"). If you have any questions about the contents of this brochure, please contact the Chief Compliance Officer (Tel: 213-683-4200). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. CBRE Global Investors' registration number is: 801-48858. CBRE Global Value Investors' registration number is: 801-56790.

Additional information about the Advisers is also available on the SEC's website at: www.adviserinfo.sec.gov.



2. Material Changes

This current brochure is dated March 31, 2017 and replaces the prior one dated March 29, 2016. Since that time, our brochure has been revised to incorporate information about both CBRE Global Investors and CBRE Global Value Investors, where previously each had prepared a separate brochure. As a result, nearly all items of the brochure have been revised to incorporate information unique to one entity or the other. (In other words, if you had previously received CBRE Global Investors' brochure, you will see additional information pertaining to CBRE Global Value Investors, and vice versa.) As part of these changes, we are now reporting a combined assets under management amount in Item 4.

In addition to these changes, we revised our procedures for allocating investment opportunities among our clients, which is described in greater detail in Item 6. In general, we simplified our allocation procedures by removing the "registration program" and consolidating two existing allocation processes which applied to different property types such that we are applying the rotational allocation process for any deals that are appropriate for and pursued by more than one client. Separately, we also provided additional information regarding our engagement and compensation practices relating to affiliated service providers under Item 11, explaining the scope of services, including accounting and administration-related services at the fund / account and investment level, as well as our practices relating to general fee and expense reimbursements under Item 6.

Pursuant to regulatory requirements, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th of each year. We will provide an interim delivery of this document if any changes are sufficiently material. Copies of the most recent version of this form are always available at any time, without charge.

3. Table of Contents

2. Material Changes.....	2
3. Table of Contents.....	2
4. Advisory Business	3
5. Fees and Compensation	4
6. Performance Based Fees and Side-by-Side Management.....	6
7. Types of Clients.....	9
8. Methods of Analysis, Investment Strategies and Risk of Loss.....	9
9. Disciplinary Information.....	13
10. Other Financial Industry Activities and Affiliations.....	13
11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	14
12. Brokerage Practices	19
13. Review of Accounts	20
14. Client Referrals and Other Compensation	20
15. Custody	21
16. Investment Discretion.....	21
17. Voting Client Securities	21
18. Financial Information	22

4. Advisory Business

The Investment Management business of CBRE Group, Inc. ("CBRE") started in 1972. CBRE Global Investors was formed in 1994 (under the name of a prior owner). CBRE Global Value Investors was formed in 1999 and began investing in real estate in April 2000. The Advisers are indirect, wholly owned subsidiaries of CBRE (a publicly traded company in the United States). The Advisers, together with their affiliates within the Investment Management division of CBRE, provide real estate and real estate related investment and asset management services (including equity and debt) to clients in the United States, the United Kingdom, continental Europe, the Middle East and Asia.

We primarily engage in two lines of business: (i) we act as sponsor, manager, general partner and/or investment adviser of commingled investment vehicles and other programs, such as limited partnerships, limited liability companies, joint ventures and other commingled or investment vehicles ("Investment Funds") (we call these Investment Funds the "Strategic Partners U.S.", "Core" and "Wood Partners" funds); and (ii) we act as manager, general partner, investment adviser and/or investment manager or adviser/sub-adviser for separately managed accounts for certain clients ("Separate Accounts"). Our Investment Funds and Separate Accounts (together, our "clients") cover a range of the risk/return spectrum and make investments in real estate and real estate related assets (including land and development assets).

The Advisers generally provide investment advisory or management services to each client in accordance with a limited partnership agreement (or analogous organization document), investment management or advisory agreement, portfolio management agreement, asset management agreement, sub-advisory agreement or a similar type of agreement (each, an "Advisory Agreement"). Generally, our investor base for the Investment Funds includes large institutional investors, such as public and corporate pension plans. Many of these investors have their own independent consultants or advisers to assist them in their investment choices. Investors in our Investment Funds are generally required to be "accredited investors" within the meaning of Regulation D under the Securities Act of 1933, as amended. For our Investment Funds, investment advice is provided directly to the Investment Funds and/or underlying fund entities, subject to the discretion and control of the Investment Funds' general partners (or analogous party), and not to investors in Investment Funds based upon their individual needs. Investment restrictions of the Investment Funds, if any, are generally established in the organizational or offering documents of the applicable Investment Fund, Advisory Agreements and/or side letter agreements negotiated with investors in the applicable Investment Fund. For our Separate Account clients, investment advice is provided directly to the client (but not to the client's individual beneficiaries/stakeholders), subject to the discretion and control of the client. Investment restrictions for the Separate Account clients, if any, are generally established in the organizational documents of the applicable client or in the Advisory Agreements with the client.

Clients may impose certain restrictions, investment criteria and limitations with respect to Separate Accounts. In particular, clients may impose investment guidelines and/or restrictions that will be taken into account in acquiring, financing, managing and selling assets for the account. Investment guidelines or restrictions may limit the Advisers' ability to fully invest the account according to the investment objective desired by the client.

As of December 31, 2016, the Advisers and their affiliates within the Investment Management division of CBRE managed on a discretionary and non-discretionary basis approximately \$86.6 billion in client assets consisting of real estate and real estate related assets held for investment purposes.¹ Of this amount, the AUM of the

¹ Assets under management (AUM) refers to the fair market value of real estate-related assets with respect to which the Advisers and their affiliates within the Investment Management division of CBRE provide, on a global basis, oversight,

Advisers and their Relying Advisers (as defined in applicable SEC rules and noted under Item 10) was approximately \$9.6 billion, all of which is managed on a discretionary basis.

CBRE invests its own capital in many of our Investment Funds and, in more limited situations with Separate Account clients, to further align our interests with those of our investors, or for tax or other structuring purposes – see Item 7, Types of Clients.

5. Fees and Compensation

For its real estate investment management or advisory services, the Advisers are usually paid an asset management, portfolio management or investment management or advisory fee based upon the cost or fair market value of assets under management, the amount of committed equity, the amount of equity invested in the applicable Investment Fund or the net operating income generated by a portfolio. In some cases, this includes a base asset management fee paid by the Investment Fund's real estate investment trust subsidiary.

In addition, the Advisers often receive an acquisition fee based upon the cost or purchase price of an acquired asset; a disposition fee based on the sales price of an asset, and/or a due diligence, underwriting or similar fees for diligence and underwriting related services as part of an acquisition of an asset and certain other miscellaneous fees ("Transaction Fees"). These Transaction Fees can be substantial. For a discussion of material conflicts of interest created by the receipt of such fees, please see Item 11 below.

Additionally, as further described in Item 6 below, with respect to certain Separate Accounts and Investment Funds, the Advisers receive a performance or incentive fee based on certain criteria.

We do not have a set fee schedule. Fees for Separate Account clients are generally individually negotiated with the client upfront and are set forth in applicable Advisory Agreements. No compensation is payable until services are rendered. Fees for our Investment Funds are typically set on a fund-by-fund basis, are disclosed in the fund's Private Placement Memorandum or prospectus, and set out in the organizational documents or Advisory Agreements of those funds or in separate side letter or other agreements with the applicable investor.

Certain of the Advisers or their affiliates and employees (including CBRE) may also be an investor in an Investment Fund ("Advisor Investors"), in which case they will receive their percentage interest of income, profits and gains/losses as an investor in addition to the management fees, incentive distributions and Transaction Fees received by the general partners (or analogous party), one of the Advisers or their affiliates.

With respect to certain Investment Funds, Adviser Investors do not pay management fees in connection with their investment in such Investment Fund. Notwithstanding that such Adviser Investors will not pay management fees, Adviser Investors will pay for their pro rata share of certain Investment Fund expenses or the pro rata portion of such Adviser Investors' expenses will be allocated to the applicable Adviser or affiliate or the general partner of the applicable Investment Fund.

investment management services and other advice. These assets generally consist of: investments in real estate; equity in funds and joint ventures; securities portfolios; operating companies; and real estate related loans. This AUM is intended principally to reflect the extent of the Advisers' presence in the global real estate market, and its calculation of AUM may differ from the calculations of other asset managers.

Our fees are exclusive of third party fees, costs and expenses (including payments to the Advisers' affiliates) actually incurred in connection with the affairs of our Investment Funds or Separate Accounts, including, without limitation, those incurred for:

- i) identifying, investigating, acquiring, owning, financing, hedging, expanding, operating, originating, managing, maintaining, repairing, improving and disposing of assets of the Investment Fund or Separate Account and for providing services;
- ii) property condition, architectural, engineering, environmental or other studies of or reports on proposed or existing investments, including for due diligence, for compliance with law and regulation, for tenant counterparty and other background checks and credit evaluations;
- iii) legal counsel, accountants, appraisers, service providers and other consultants (including fees in connection with the provision of administration, financial, accounting and reporting services to the Investment Funds and their limited partners and to Separate Account clients);
- iv) reasonable and necessary expenses of the members of the advisory board and investor participation in meetings of Investment Fund limited partners;
- v) insurance matters permitted under the applicable Advisory Agreements, taxes, assessments, utilities and similar costs;
- vi) litigation and other dispute resolution matters;
- vii) administrative expenses;
- viii) costs related to any credit facility and debt (including principal and interest payments) and in connection with the origination, syndication or acquisition of real estate-related indebtedness and preferred equity;
- ix) other costs and expenses that would not otherwise be operating expenses (subject to approvals as may be required under the applicable Advisory Agreements);
- x) portfolio management fees;
- xi) asset management fees payable to a subsidiary;
- xii) lease and tenant related matters, including leasing commissions, tenant improvements, tenant concessions, ownership costs, tenant retention expenses;
- xiii) travel, accommodation and related expenses, business development and marketing activities (including personnel providing marketing and related services for such investments from our or an affiliate's offices), training activities, hardware, software (including Yardi, Workspace, Hightower, and View the Space) and other applications, as related to the business or operations of Investment Funds and the investments of such Investment Funds and Separate Accounts;
- xiv) all quotation and valuation costs and expenses, including, without limitation, the fees and out-of-pocket expenses of any appraiser;
- xv) all costs relating in any way to any offerings of interests in Investment Funds following the first closing (regardless of whether interests in such Investment Funds are ultimately issued), including costs relating to preparing offering documents, verifying investor or client suitability requirements, establishing any related vehicles and complying with any and all applicable laws, orders and regulations related thereto, as determined by the Advisers in their sole discretion, complying with the laws of applicable jurisdictions and payment of filing fees;
- xvi) any other matters as are permitted under the applicable Advisory Agreements; and
- xvii) amounts to be contributed or advanced to any Investment Fund or Separate Account subsidiary or investment for the purpose of such entity or investment paying any cost of the type described in the foregoing items (i) through (xvi).

Unless provided for in the applicable Advisory Agreements or fund documents and other than the expenses summarized above which are charged through, the Advisers will be responsible, without reimbursement from Investment Funds or Separate Accounts, for the costs and expenses of its own internal general overhead, namely the cost of its office space, supplies, salaries or other compensation of its employees (but excluding

those of a service provider, and costs of consultants, advisors and others retained to provide services for Investment Funds or Separate Accounts).

In addition, some joint venture or service provider arrangements entered into with Investment Funds or Separate Accounts or related parties provide for a promote, incentive or other fees or ownership interest in the subject property to be granted to such joint venturers or service providers. Such compensation will be ultimately borne by the client or the client's property and not the Advisers and, for certain clients, the clients will be bearing two levels of promote and fees – one to the applicable Adviser and one to the service provider or joint venturer.

From time to time, the general partner (or analogous party) of an Investment Fund creates certain “special purpose vehicles” or similar structuring vehicles for purposes of accommodating certain tax, legal and regulatory considerations of investors (“SPVs”). In the event the general partner (or analogous party) creates an SPV, consistent with the organizational documents of the Investment Fund, the SPV, and indirectly, the investors thereof, will typically bear all expenses related to its organization and formation and other expenses incurred solely for the benefit of the SPV.

In certain cases, a co-investment vehicle, a parallel vehicle or other similar vehicle established to facilitate the investment by investors to invest alongside the Investment Fund is formed in connection with the consummation of a transaction or portfolio. In the event such a vehicle is created, the investors will typically bear all expenses related to its organization and formation and other expenses incurred solely for the benefit of the vehicle.

The co-investment vehicle, parallel vehicle or other similar vehicle will generally bear its pro rata portion of expenses incurred in the making an investment. If a proposed transaction is not consummated, no such vehicle generally will have been formed, and the full amount of any expenses relating to such proposed but not consummated transaction (including any expenses relating to the organization of such vehicle that was not ultimately formed) would therefore be borne by the Investment Fund or Investment Funds selected by the applicable Adviser as proposed investors for such proposed transaction.

For Separate Accounts, clients or the properties which they own are generally charged for the management fees. Generally, management fees for Separate Accounts are charged quarterly in arrears. To the extent that a Separate Account is in existence less than a full calendar quarter, the management fee will generally be prorated. Performance-based compensation, if any, is either billed to the client or deducted from the clients' assets.

For Investment Funds, management fees are charged either quarterly or monthly in arrears. Other fees are generally deducted after the applicable services are performed. The fees and incentive distributions are typically deducted from the assets of the pooled vehicle or from cash flows attributable to such funds.

6. Performance Based Fees and Side-by-Side Management

Certain of the Advisers receive performance fees or incentive fee distributions for certain Separate Account clients. Such fees are specifically tailored to the Separate Account client and are generally based on achieving a return or a level of net operating income for a portfolio above a pre-specified benchmark. There is no standard performance fee or incentive fee structure for Separate Accounts; performance-based compensation structures are dependent on the nature of the client and the mandate. Accordingly, these structures vary from client to client.

The Advisers also receive from certain of their sponsored Investment Funds performance fees and incentive distributions (including carried interest payments) based on surpassing a pre-specified return or benchmark and, for closed-end Investment Funds, returning investors' capital contributions. Such incentive distributions may be based on realized returns and/or meeting a pre-specified return or high-watermark, or, in certain cases, an incentive distribution based on unrealized returns. For its open-end U.S. Core Fund, CBRE Global Investors receives a performance fee based on the fund's outperformance against a stated benchmark. There is no standard performance fee or incentive fee structure for Investment Funds which are dependent on the nature of the fund and fund strategy. Accordingly, these structures vary from client to client.

Because of the receipt of Transaction Fees and the different performance-based compensation or incentive distribution arrangements in place for certain of our clients, we have an incentive to (i) favor clients that pay such fees, compensation or distributions over those that do not or (ii) favor clients that pay such fees, compensation or distributions at a higher effective rate or that have a different vintage or investment basis. Without our controls, this incentive could, for example, affect our decision to effect real estate transactions for some clients and not for others if we believe the transaction will be more profitable for us. Similarly, our receipt of such fees, compensation or distributions in the absence of controls could also incentivize us to make investments that are riskier or more speculative than we would make if we did not receive such fees, compensation or distributions. In addition, certain Separate Accounts and Investment Funds may have similar and, in some instances, overlapping investment strategies and objectives.

These risks are mitigated by our structure and our policies and procedures which seek to provide that investment decisions are made without consideration to our pecuniary interests, and instead are made in accordance with the governing legal documents relating to a client account, our fiduciary duties to all client accounts and our Investment Allocation Program, described below.

INVESTMENT ALLOCATION PROGRAM

The Advisers have updated their allocation policy for U.S. investments which is designed to ensure that each U.S. Investment Fund and Separate Account (together, a "client") is treated consistently, fairly, and equitably, taking into account the differences in mandates and the uniqueness of individual investment opportunities.

Under the updated U.S. allocation policy, an initial screening process is used to determine the appropriate client(s) for a potential investment opportunity by reviewing client investment criteria, including, without limitation, the following factors: client capital requirements, risk profile, geographic location/target market, property type, transaction structure, return requirements, leverage requirements/limitations, and CapEx requirements.

If the CIO-Americas deems that a potential investment opportunity is appropriate for more than one client, and more than one client wishes to pursue the opportunity within the applicable time frame (in each case, as determined by the applicable Portfolio Manager on behalf of the client), then the opportunity will be allocated based on a rotational sequence. Rotational allocation offers opportunities first to the client that has gone the longest time since last being awarded an allocated opportunity. A client who is awarded an allocated investment will lose its priority placement in the rotation queue (i.e., the client will drop to the end of the rotation queue) irrespective of whether the client subsequently closes on the awarded investment. The rotational allocation list will include all active funds and separate accounts in the Americas other than the Strategic Partners fund series. However, the Strategic Partners fund series may pursue an opportunity that no other client wishes to pursue.

The client that receives an allocation must be able to accept the entirety of the opportunity; there will be no partial allocations (for example, a client only wants 49% of a transaction). If a client fails to close on an opportunity (or fails to demonstrate reasonable progress in actively pursuing the allocated opportunity within

seven business days (or such other reasonable time period) of such allocation) that has been allocated to it, the opportunity may be reallocated in accordance with this allocation policy as if it were a new transaction, and that client will lose its priority placement in the rotation queue and will drop to the end of the rotation queue.

If the CIO-Americas deems that a potential investment opportunity is appropriate for only one client, or only one client wishes to pursue the opportunity, the investment opportunity may be pursued by such client and will not impact the client's order placement in the rotation queue.

Notwithstanding the foregoing, the following potential investment opportunities will be excluded from the rotational allocation policy described above and will not impact the client's order placement in the rotation queue:

- Value-Add: Opportunities that are classified as "value-add" (using the criteria below) will first be offered to the Strategic Partners fund series.
- Programmatic / Follow-On: Opportunities that relate to a programmatic venture or a follow-on transaction will first be offered to the client which established the programmatic relationship or completed the predecessor transaction.
- Client Sourced: Opportunities identified and introduced by a client will first be offered to the client that identified and introduced the opportunity so long as they are not broadly marketed opportunities.
- Portfolio Manager Sourced: Opportunities identified and introduced by the Portfolio Manager for a specific client will first be offered to the client for which she/he serves as the Portfolio Manager.

If one of the above opportunities is not accepted by the eligible client (and therefore not pursued by it), then the opportunity will be allocated pursuant to the rotational allocation process.

"Value-Add" Criteria

The below criteria are guidelines that will be used to help determine if an opportunity is considered value-add; an opportunity does not need to satisfy all of the criteria.

- *Leasing characteristics:*
 - More than 20% vacant,
 - More than 30% of the current leases are terminating in the next 24 months, or
 - More than 40% of a combination of current vacancy or lease expirations in the next 24 months.
- *Capital characteristics:* More than 20% of the building gross asset value must be invested in base building work, tenant improvements, and leasing commissions over the first 24 months.
- *Return characteristics:* More than 30% of the unlevered gross IRR is derived from appreciation.
- *Holding period characteristics:* The base case hold period is 5 years or fewer.

This criteria is only a guideline and the Chief Investment Officer of the Americas ("CIO-Americas") can determine, based on additional factors, if a transaction that does not fall within the criteria is still considered value-add.

This policy provides an objective framework to categorize and allocate investment opportunities. In the event that the application of this policy results in a conflict within the investment team, the determination or resolution will be mediated by the CIO-Americas or an appropriate designee.

7. Types of Clients

The Advisers' Separate Account clients include public and corporate pension plans, sovereign wealth funds, endowments, foundations, family offices, other institutions, and other real estate investment vehicles.

The Advisers also serve as an investment manager or adviser of Investment Funds formed in order to facilitate investment by institutional investors. Such Investment Funds are typically formed as Delaware, Luxembourg, or Cayman Islands limited partnerships or limited liability companies. Unless otherwise stated in a prospectus or other constituent documents for an Investment Fund, the minimum required investment amount for an investor in an Investment Fund is generally \$5 million, although the Advisers and their affiliates have discretion to accept a lower investment amount.

8. Methods of Analysis, Investment Strategies and Risk of Loss

INVESTMENT STRATEGIES

The Advisers and their affiliates within the Investment Management division of CBRE sponsor the following real estate investment programs.

- Direct real estate investments. This includes the following strategies:
 - ▷ A “Core” strategy seeks to invest in real estate with stable current income and appreciation returns commensurate with a low to moderate level of risk. The majority of the return will be based on cash flow. Investments are typically located in major markets and are substantially leased, institutional-quality assets. Leverage is moderate with generally an upper limit of 40% loan to value or cost. Property types are institutional-quality office, industrial, retail and multi-family.
 - ▷ A “Value Added” strategy seeks to invest in real estate with a moderate risk profile and greater appreciation potential than Core. The returns will come from a blend of income and appreciation. Leverage is generally limited to 60% loan to value or cost. Property types are institutional-quality office, industrial, retail, hotel and multi-family.
 - ▷ An “Opportunistic” strategy seeks to invest in real estate with high-risk attributes; returns are often largely dependent on future appreciation. Leverage can be 75% loan to value or cost or greater. Property types include office, industrial, retail, hotel and multi-family. Investments in operating companies and development are also considered.
- Real estate debt. This includes the origination, syndication and acquisition of mortgage loans, mezzanine loans and real estate-related securities.
- Unlisted indirect real estate. This includes global unlisted real estate portfolios, fund-of-fund vehicles or third-party funds, club and joint venture transactions, and recapitalizations and investments in existing real estate portfolios managed by third parties.
- Listed real estate and infrastructure company securities. This includes global listed real estate and infrastructure securities portfolios.

METHOD OF ANALYSIS

A portfolio or fund manager is typically assigned to each program, fund series or client (or more than one complementary client with similar strategies). Each manager is supported by the Advisers' shared resources, including a newly-consolidated Americas acquisition and asset management team, as well as by research,

legal, compliance, and investor reporting. The Advisers seek to harness their own real estate investment strengths as well as the resources of CBRE's leasing, property management, acquisition and disposition brokerage, and debt professionals for the benefit of our investors.

The Advisers use an investment analysis approach that is grounded on thorough due diligence of, and underwriting on, a real estate related investment. The acquisition and disposition team utilize a disciplined, research-based investment process that dictates a structured approach for the selection, underwriting, pricing, closing, operation and disposition of investments. Generally, the Advisers' real estate investment team focuses on investments in high-quality properties in highly rated major metropolitan areas. Property-level operating and exit strategies are formulated during the acquisition phase of an investment and these strategies may be continually re-evaluated based on the client's investment strategy and the research outlook for the capital and property markets.

The due diligence and underwriting process is designed to mitigate physical and financial risk and to uncover opportunities for creating value. The general focus of due diligence is to audit and challenge the information provided by the seller, developer or fund manager and to evaluate broader opportunities represented by potential transactions. Specialists are generally engaged to assess physical and environmental conditions, tenant credit, building measurement and other aspects of the investment.

In development transactions, the team may also retain third-party and affiliated service providers to assess and evaluate development feasibility, construction risk, and development partner background. The team may complete a detailed tenant review, including tenant interviews, to understand tenant creditworthiness and opportunities for value creation through negotiating improved rental rates or longer lease terms.

A key element of the underwriting and due-diligence processes includes input from CBRE or third-party leasing specialists. "On-the-ground" local market and tenant information, including rental data, leasing activity and new development potential, may be utilized to help ensure that the advice provided to clients capitalizes on, and adjusts to changing market conditions. These leasing specialists may also provide the teams with "local market intelligence" including how the property is positioned and perceived in the marketplace, factors impacting tenant demand, strategic threats to the asset and opportunities to add value through repositioning strategies. In addition, working with these specialists allows the team to prepare a more comprehensive capital expenditure budget that outlines the costs involved in repositioning an asset from a physical perspective including curing deferred maintenance issues.

An Americas Investment Committee generally approves certain acquisitions, dispositions, financings and new joint ventures related to investments made on behalf of clients. The Americas Investment Committee includes employees with substantial experience in commercial real estate investment management and operations and, in select cases, senior members of the dedicated investment team for the applicable investment program or operating unit. In addition, to ensure a level of independence, the Americas Investment Committee has an independent member with no affiliations to the team (please note that following the death of the existing independent member, the Advisers are, at the time of publication, conducting a search for a new independent member). Select material transactions exceeding certain dollar or percentage thresholds are also reviewed by a Global Investment Committee comprised of senior members of global management.

RISKS

Investors in Investment Funds should refer to the applicable offering memorandum or private placement memorandum for a further discussion of risks.

General Real Estate Risks. Real property investments are subject to varying degrees of risk. The yields available from equity investments in real estate depend in large part on the amount of income generated and expenses incurred. If the investments do not generate revenues sufficient to meet operating expenses, including debt service, tenant improvements, leasing commissions and other capital expenditures, clients may be required to fund or borrow additional amounts to cover fixed costs, and the cash flow of such client account (and, with respect to Investment Funds, its ability to make distributions to investors) will be adversely affected. Although each investor will be investing in a range of investments, all real estate investments are speculative in nature and the possibility of partial or total loss of capital exists. Clients should not enter into an advisory relationship with us, and investors should not subscribe to or invest in an Investment Fund we manage unless they can readily bear the consequences of such loss. Revenues and the value of properties may be adversely affected by a number of factors, including: the national, state and local economic climate and real estate conditions (such as oversupply of or reduced demand for space and changes in market rental rates); the perceptions of prospective tenants of the safety, convenience, location and attractiveness of the properties; our ability, on behalf of a client, to provide or procure adequate management, maintenance and insurance for real estate properties held in client accounts; the financial condition of tenants, buyers and sellers of property; the ability to collect on a timely basis all rent from tenants; the expense of periodically renovating, repairing and releasing spaces; structural or property level latent defects; uninsured losses or delays from casualties or condemnation (such as hurricanes, floods and earthquakes); increasing operating costs (including real estate taxes and utilities) which may not be passed through to tenants; and acts of God and other factors beyond our control.

Certain significant expenditures associated with investments in real estate (such as mortgage payments, real estate taxes, insurance and maintenance costs) are generally not reduced when circumstances cause a reduction in rental revenues from the property. In addition, real estate values and income from properties are also affected by such factors as compliance with applicable laws, including regarding zoning and usage, environmental and tax laws, interest rate levels and the availability of financing. The amount of available rentable square feet of commercial property is often affected by market conditions and may, therefore, fluctuate over time. Investments in existing entities (e.g., buying out a distressed partner or acquiring an interest in an entity that owns a real property) could also create risks of successor liability.

Illiquid Investments. Real estate investments are relatively illiquid. Our ability to quickly modify the contents of a client portfolio in response to changes in economic and other conditions will be limited. There can be no assurance that a client will be able to dispose of an investment when it finds disposition advantageous or necessary or that the sale price of any disposition will recoup or exceed the amount of an investment by such client.

Investments in Real Estate Debt. Originating and investing in real estate related debt has unique risks. In addition to the risks of borrower default (including loss of principal and nonpayment of interest) and the risks associated with real property investments, an Investment Fund or Separate Account originating and investing in debt will be subject to a variety of risks in connection with such debt investments, including the risks of illiquidity, lack of control, mismanagement or decline in value of collateral, contested foreclosures, bankruptcy of the debtor, claims for lender liability, violations of usury laws and the imposition of common law or statutory restrictions on such Investment Fund's or Separate Account's exercise of contractual remedies for defaults of such investments.

Nonperforming Loans; Foreclosure Process. Real estate loans may be at the time of their origination or acquisition, or may become, nonperforming. Such loans may require a substantial amount of workout negotiations and/or restructuring, which may entail a reduction in the interest rate or a write-down of the principal of such loan. Even if a restructuring were successfully accomplished, a risk exists that replacement "takeout" financing will not be available, and as a result foreclosure may be necessary. The foreclosure process can be lengthy and expensive.

Cybersecurity Risk. The Advisers, the clients' service providers and other market participants increasingly depend on complex information technology and communications systems to conduct business functions. These systems are subject to a number of different threats or risks that could adversely affect the clients and investors in the Investment Funds and Separate Accounts, despite the efforts of the Advisers and such service providers to adopt technologies, processes and practices intended to mitigate these risks and protect the security of their computer systems, software, networks and other technology assets, as well as the confidentiality, integrity and availability of information belonging to the clients and investors in the Investment Funds. For example, unauthorized third parties may attempt to improperly access, modify, disrupt the operations of, or prevent access to these systems, the clients' service providers, counterparties or data within these systems. Third-parties may also attempt to fraudulently induce employees, customers, third-party service providers or other users of the Advisers' systems to disclose sensitive information in order to gain access to the Advisers' data or that of Separate Account clients or the Investment Funds' investors. A successful penetration or circumvention of the security of the Advisers' systems could result in the loss or theft of an investor's data or funds, the inability to access electronic systems, loss or theft of proprietary information or corporate data, physical damage to a computer or network system or costs associated with system repairs. Such incidents could cause clients, the Advisers or their service providers to incur regulatory penalties, reputational damage, additional compliance costs or financial loss.

Additional Risks. Additional risks associated with real estate development activities include the following: an Investment Fund or Separate Account may abandon development activities after expending resources to determine their feasibility; the construction cost of a project may exceed original estimates; occupancy rates and rents at a newly completed property may not be sufficient to make the property profitable; financing may not be available on favorable terms for development of a property; and the construction and lease up of a property may not be completed on schedule (resulting in increased debt service and construction costs) (in all cases including risks beyond the control of the applicable general partner, such as weather or labor conditions or material shortages). Development activities are also subject to risks relating to inability to obtain, or delays in obtaining, necessary zoning, land-use, building occupancy and other required governmental permit or regulatory authorizations. These risks could result in substantial unanticipated delays or expenses and, under certain circumstances, could prevent completion of development activities once undertaken, any of which could have an adverse effect on an Investment Fund or Separate Account. If any of the above occurs, the ability of a fund to make distributions to its underlying investors could be adversely affected. In addition, new development activities, regardless of whether they are ultimately successful, may require a substantial portion of management's time and attention, and market conditions may change during the course of development that make such development less attractive than at the time it was commenced.

Development Risk. Investment strategies may include real estate development, which will be subject to the risks normally associated with such activities. Such risks include risks relating to the availability and timely receipt of zoning and other regulatory approvals, the cost and timely completion of construction (including risks beyond the control of the Advisers, such as weather or labor conditions or material shortages) and the availability of both construction and permanent financing on favorable terms. These risks could result in substantial unanticipated delays or expenses and, under certain circumstances, could prevent completion of development activities once undertaken, any of which could have an adverse effect on the Investment Fund or Separate Account. Properties under development may receive little or no cash flow from the date of acquisition through the date of completion of development and may continue to experience operating deficits after the date of completion. In addition, market conditions may change during the course of development that makes such development less attractive than at the time it was commenced.

Hedging Risk. Investment strategies may employ hedging techniques designed to protect an Investment Fund or Separate Account against adverse movements in interest rates. While such transactions may reduce certain

risks, such transactions themselves may entail certain other risks. Thus while the Investment Fund or Separate Account may benefit from the use of these hedging mechanisms, unanticipated changes in interest rates may result in a poorer overall performance for the Investment Fund or Separate Account than if it had not entered into such hedging transactions. To the extent that the Advisers elect to employ hedging strategies (and they are under no obligation to do so), the use of hedging instruments carries certain risks, including the risk that losses on a hedge position will reduce earnings and funds available for distribution. There is no perfect hedge for any investment, and a hedge may not perform its intended purpose of offsetting losses on an investment and, in certain circumstances, could increase such losses. There can be no assurance that techniques used in hedging strategies will always be available, that the Advisers will engage in these techniques when available, or that the hedging strategies will be successful in limiting any applicable risks.

9. Disciplinary Information

The Advisers have not been subject to any legal or disciplinary events which require disclosure under this item. Likewise, the Advisers' personnel have not been subject to any legal or disciplinary events which require disclosure under this Item.

10. Other Financial Industry Activities and Affiliations

CBRE Group

As noted above, each of the Advisers are indirect, wholly owned subsidiaries of CBRE. CBRE is a leading diversified commercial real estate services firm, with operating divisions or subsidiaries in commercial real estate brokerage, mortgage banking, appraisal, property management, outsourcing, development services, investment management, due diligence, marketing, workspace strategy, sustainability, fund accounting, reporting, and administration.

Affiliations Generally

The Advisers are affiliated with several types of entities, including but not limited to:

- Broker-dealer
- Investment adviser
- Real estate broker
- Appraisal
- General partners

Many of these affiliations are not material to our advisory business or our clients. Significant affiliations are identified in our Form ADV Part 1.

Broker-Dealer

A small number of employees are also registered representatives of a FINRA-registered affiliated broker-dealer, CBRE Capital Advisors, Inc., and market limited partnership and similar interests in Investment Funds sponsored by CBRE Global Investors. See Item 12 for additional information regarding CBRE Capital Advisors.

Investment Advisers

The following advisers are registered with the SEC (either directly or as a Relying Adviser) and are covered by the disclosures in this brochure:

- CBRE Global Investors, LLC

- CBRE Global Value Investors, LLC
- CB Richard Ellis Investors SP Asia LLC
- CBRE Capital Partners U.S. Manager, LLC
- CBRE Global Investors GPIF Management, LLC
- CBRE Global Investors WCM Management, LLC

Additionally, the Advisers are affiliated with investment advisers within the Investment Management division as part of the global offering, and some of these advisers are separately registered with the SEC or are exempt reporting advisers. Further, some of these advisers are registered in their local jurisdiction. These advisers are disclosed in Form ADV Part 1.

Real Estate Related Service Providers

On behalf of clients, the Advisers often engage affiliates for sales and acquisition brokerage, property, project and construction management, leasing, debt financing, due diligence, development, marketing, workspace strategy, sustainability, fund accounting, reporting, administration, performance, axis portal, consulting and other services from time to time. We believe that the affiliation with CBRE and access to the CBRE platform is a benefit that our clients expect. However, having multiple affiliates that are in the real estate services business gives rise to a conflict of interest if the Advisers have the discretion to select, or are responsible for recommending to a client, service providers that are affiliates. See Items 5 and 11 for additional information regarding the use of affiliated service providers.

General Partners and Related Entities

The Advisers form affiliates to act as the general partner, adviser, manager or similar role for particular Investment Funds or Separate Accounts.

Potential Conflicts

For a description of certain conflicts of interest created by the relationships among the Advisers and the parties described above, as well as a description of how such conflicts are addressed, please see Item 11 below.

11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

CODE OF ETHICS

The Advisers have adopted a written Code of Ethics (the “Code”) in its Investment Management Policies and Procedures, which is in compliance with its obligations as a registered investment adviser with the SEC. The Investment Management Policies and Procedures is applicable to and is made available to all employees. Among other things, the Investment Management Policies and Procedures requires the Advisers and their employees to act in clients’ best interests and abide by all applicable regulations, and it prohibits insider trading. All employees are required to make annual certifications certifying that they are in compliance with the Investment Management Policies and Procedures. Clients and prospective clients may review a copy of the Code by contacting the Advisers at the address or telephone number listed on the first page of this document.

Pursuant to the Code, certain supervisory persons are considered “access persons” and required to (1) report personal securities transactions on at least a quarterly basis, (2) provide a detailed summary of certain holdings and securities accounts (both initially upon commencement of employment and annually thereafter) over which such employees have a direct or indirect beneficial interest, and (3) pre-clear acquisitions of securities in IPOs

or private placements. From time to time, securities of certain public companies are placed on a “restricted list” with such supervisory persons being restricted from trading in such securities without pre-clearance from the Compliance Department.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

The Advisers solicit investments from existing clients and investors in new investment vehicles it sponsors. The decision whether or not to invest is made by the client/investor or an independent fiduciary or consultant of the client/investor.

In order to further align our interests with those of investors in our Investment Funds, the Advisers (or their affiliates, principals or employees) typically invest in Investment Funds alongside investors in amounts up to a cap (for example, 2% of the Investment Fund's aggregate Capital Commitments, excluding the General Partner and its Affiliates), and subject to a dollar cap. We may also invest alongside Separate Accounts. An Investment Fund or its general partner (or analogous party) may reduce all or a portion of the management fee and performance fee payable with respect to investments made by the Advisers (or their affiliates, principals or employees).

The Advisers, their affiliates, members, officers, principals and employees from time to time buy or sell securities or other instruments that we have recommended to clients. In addition, officers and employees also buy securities in other investment vehicles (including private equity funds, hedge funds, real estate funds and other similar investment vehicles) which may include potential competitors of clients. Such transactions are subject to the Advisers’ Investment Management Policies and Procedures (which contains the Code). The investment policies, fee arrangements and other circumstances of these investments may vary from those of clients. If officers, principals and employees of the Advisers have made large capital investments in or alongside clients, they could have conflicting interests with respect to these investments.

Please see Item 6 – Performance-Based Fees and Side-by-Side Management for additional information regarding our receipt of performance-based fees. Compensation of our senior management, and principal fund managers, is based in part on our success in receiving these fees.

Pursuant to the Advisory Agreements, the general partner (or analogous party) may be required to return excess amounts of carried interest to the Investment Fund via a “clawback”. A clawback obligation creates an incentive for the general partner (or analogous party) to defer disposition of one or more investments or delay the liquidation of an Investment Fund if a more immediate disposition and/or liquidation would result in a realized loss to the Investment Fund or would otherwise result in a clawback situation for the general partner (or analogous party). Conversely, this clawback obligation creates an incentive for the general partner (or analogous party) to accelerate disposition of one or more investments or the liquidation of an Investment Fund if this would enable the general partner (or analogous party) to receive a carried interest and avoid a clawback obligation even if delaying the disposition or liquidation (and holding the underlying assets for longer) may realize a greater return for the Investment Fund and its underlying investors.

Irrespective of the forgoing, the Advisers believe that they have a strong incentive to achieve maximum risk-adjusted returns to investors over the long term/life of the Investment Fund or Separate Account.

MANAGEMENT OF CLIENTS

The Advisers advise a number of clients that have investment objectives similar to each other. The Advisers may in the future establish one or more additional Investment Funds, or advise additional Separate Accounts, with investment objectives substantially similar to, or different from, those of current clients. Allocation of

available investment opportunities between the clients and any such other clients could give rise to conflicts of interest. In addition, it is expected that employees of the Advisers responsible for managing a particular client will have responsibilities with respect to other clients managed by the Advisers, including future clients. Conflicts of interest may arise in allocating time, services or functions of these officers and employees.

FEE STRUCTURE

Because certain Transaction Fees are based upon the purchase price or sales price of an asset, this fee structure creates an incentive to invest capital in an asset or sell an asset when an Adviser may not otherwise have done so for another client or in situations which may not be in the best interests of the client.

Because certain fees are based upon the fair market value of assets under management or the net operating income generated by a portfolio, such fees may increase over time due to market appreciation, increases in rent or other reasons, irrespective of the amount of work an Adviser has done with the asset. For other fees that are based on invested capital, the fee structure creates an incentive to deploy capital when an Adviser may not otherwise have done so and it may receive the same level of fees even if the fair market value of the assets have otherwise declined, there is a drop in tenant occupancy or income from the property or other adverse conditions on the property.

When estimating fair market value, the Advisers will apply a methodology based on its judgment, in light of the nature, facts and circumstance of the investments. Such appraisals are (i) inherently subjective in certain respects and rely on a variety of assumptions, including assumptions about projected cash flows for the remaining holding periods for the client's investments, and (ii) based in large part on information at the time of the appraisal, and market, property and other conditions may change materially after that date. Furthermore, real estate and certain real estate related assets generally cannot be marked to an established market or readily tradable assets. The exercise of discretion in valuing investments gives rise to conflicts of interest, as higher valuations would result in increased compensation to one or more of the Advisers.

As discussed above in Item 6, the Advisers are entitled to performance-based compensation under the terms of the Advisory Agreements of certain clients. The existence of the performance-based compensation creates an incentive for the Advisers to cause such clients to make more speculative investments than they would otherwise make in the absence of performance-based compensation.

AFFILIATED SERVICE PROVIDERS

As discussed above in Item 5, the Advisers retain affiliates, which receive fees and expense reimbursements from the applicable client or Property, as applicable. Such fees and reimbursements are in addition to any management fee or performance-based compensation received by the Advisers.

Advisory Agreements and other client governing documents contain guidance and/or restrictions on the use of affiliated service providers. For example, some Separate Account clients have the right to review and approve fees paid to affiliates and/or the proposed written agreements with affiliates, or require that the fees be confirmed by quotes or bids. With respect to Investment Fund clients, the use of affiliated service providers is generally disclosed in the offering document and the independent advisory board of the Investment Fund (described below under "Side Letter Agreements") typically reviews the rates and fees charged by affiliates.

The Advisers endeavor to engage the best service providers in an applicable market (whether affiliates or unaffiliated third parties) with the most competitive fees and rates. Engagement rates and terms when hiring CBRE or its affiliates for services provided to a client or Property will be no less favorable than those of a

comparably qualified unaffiliated third party in an agreement negotiated on an arms-length basis in the applicable market. The terms of each CBRE service engagement will provide for rates and terms that are no less favorable than the rates and terms offered similarly situated clients for comparable transactions and services in the applicable market.

Affiliates of the Advisers are expected to be retained by the Investment Funds and Separate Accounts to provide services, including, but not limited to, property acquisition, financing and sale brokerage, leasing brokerage, property management, mortgage banking and other services. Other services include but are not limited to, services provided to, or with respect to, the Investment Fund or Separate Account, or an investment property, and, include services provided by the Advisers and its affiliates. Such services shall be reimbursed by the Investment Fund, Separate Account, or investment asset, as appropriate, and include those provided for or related to property and asset management, construction management, development, brokerage (whether for sales, acquisitions, leasing, mortgage banking, debt origination or otherwise), sustainability, workplace strategy, marketing, business development, training, due diligence, environmental, entitlement and zoning, appraisal, janitorial, security, engineering and landscaping, debt-related services, hedging services, custodial and depository services, the Investment Fund's or Separate Account's investments and entity (including REITs) related matters (including for licensing, qualification, maintenance, reporting, auditing and filing services), audits, tax preparation, filing and appeal services and other tax related services, regulatory and structuring (legal, tax, accounting or otherwise) related services, reporting, accounting, administration and benchmarking licensing the activities of the Investment Fund within and outside the United States, including for AIFMD purposes (which refers to the European Union "Alternative Investment Fund Managers Directive"), and other services provided by any service providers. Marketing, branding and related services will be provided by affiliated personnel.

A representative of such affiliate shall confirm that the fee rates are no greater than the applicable affiliate would charge an unaffiliated third party for similar quality services in each case within the applicable market (metropolitan area) for arrangements and properties of similar scale at the time such services are to be provided. Employee salaries and other costs and expenses of affiliates will be reimbursed by the Investment Fund or Separate Account in accordance with the applicable Advisory Agreement and/or the applicable service provider agreements.

Further, the Advisers will generally provide notice to the Advisory Board of an Investment Fund of any new services agreement paying a fee to an affiliate which is entered into by the Investment Fund with any affiliate after the date of the last meeting, which notice will generally summarize the fees payable to affiliates. The periodic financial reports provided to Investment Funds and, if required for the Separate Account, generally disclose payments made to affiliates for the applicable period, usually under a "Related Party Transaction" or similar footnote.

The Advisers are affiliated with Global Investment Administration (GIA), which provides investment administration services (including, but not limited to, accounting and reporting services). GIA was formed in 2015 through the transition of CBRE Global Investors' fund accounting and investment reporting personnel and is now part of CBRE's Asset Services, separate from CBRE Global Investors. GIA provides: fund accounting; reporting and administration and transfer agency; investor and other financial reporting; performance measurement; data aggregation; treasury, cash and debt management; and regulatory support services for the Advisers and other third-party clients. GIA provides services to Investment Funds and Separate Accounts. Where permitted, the costs of GIA services will be at the cost and expense of those clients or will be charged through to client properties or to the tenants in such properties.

EXPENSE/FEE REIMBURSEMENT

Consistent with the Advisory Agreements, the Advisers incur expenses, and a client may reimburse them for expenses (including without limitation travel expenses and meals and entertainment expenses) incurred in connection with the acquisition and disposition of Properties. Please see Item 5 for further details on expense reimbursements.

DIVERSE MEMBERSHIP

Investors in the Investment Funds may have conflicting investment, tax and other interests with respect to their investments in an Investment Fund. The conflicting interests among the investors may relate to or arise from, among other things, the nature of investments made by an Investment Fund, the structuring of the acquisition of investments and the timing of the disposition of investments. As a consequence, conflicts of interest may arise in connection with decisions made by the Advisers or their affiliates, including with respect to the nature or structuring of investments, that may be more beneficial for one investor than for another investor, especially with respect to investors' individual tax situations. In selecting and structuring investments appropriate for an Investment Fund, the Advisers and their affiliates will consider the investment and tax objectives of the applicable Investment Fund, not the investment, tax or other objectives of any investor individually.

SIDE LETTER AGREEMENTS

The Advisers from time to time enter into side letter arrangements with certain investors in Investment Funds providing such investors with different or preferential rights or terms, including but not limited to different fee structures, information, voting and reporting rights, co-investment rights, redemption, and liquidity or transfer rights. Except as otherwise agreed with an investor or otherwise set out in the Investment Fund's organization documents, the Advisers and their affiliates are not required to disclose the terms of side letter arrangements with other investors in the same Investment Fund.

Generally, each Investment Fund has established an advisory board, consisting of representatives of investors. A conflict of interest exists when some, but not all investors are permitted to designate a member to the advisory board. The advisory board may also have the ability to approve conflicts of interests with respect to the Advisers and the applicable Investment Fund, which could be disadvantageous to the investors, including those investors who do not designate a member to the advisory board.

OTHER POTENTIAL CONFLICTS

The Advisers and their clients have in the past and may in the future engage common legal counsel and other advisers in a particular transaction, including a transaction in which there may be conflicts of interest. Members of the law firms engaged to represent Investment Funds may also represent one or more investors in an Investment Fund. In the event of a significant dispute or divergence of interest between clients and an Adviser, the parties may engage separate counsel in the sole discretion of an Adviser, and in litigation and other circumstances separate representation may be required. Additionally, the Advisers and their clients from time to time engage other common service providers. In certain circumstances, the service provider may charge varying rates or engage in different arrangements for services provided to the Advisers or clients. This could result in the Advisers or certain of their clients receiving a more favorable rate on services provided to it by such a common service provider than those payable by other clients, or the Advisers receiving a discount on services even though its clients receive a lesser, or no, discount. This creates a conflict of interest between the Advisers, on the one hand, and clients, on the other hand, in determining whether to engage such service providers, including the possibility that the Advisers may favor the engagement or continued engagement of

such persons if it receives a benefit from such service providers, such as lower fees, that it would not receive absent the engagement of such service provider by the clients.

MAINTAINING INDUSTRY RELATIONSHIPS

In order to provide the quality of services that clients expect, we believe it is necessary for us to establish, maintain and enhance relationships with professionals in the real estate industry, such as attorneys, consultants, title companies, brokers and other service providers and professionals (collectively, “Relationship Parties”). Establishing meaningful and long-term relationships can be important factors in our ability to provide a high level of service to our clients. We and many Relationship Parties value important and long-standing relationships, and as such, we and our employees from time to time invite, or are invited by, Relationship Parties to participate in activities, such as sporting and networking events, concerts, golf and other outdoor outings and other recreational activities, and give or receive gifts related to attendance or participation in such activities (collectively, “Events”).

The primary benefits that we and our clients receive from our sponsorship and participation in these Events is to establish and further strengthen our relationships within Relationship Parties. We believe that working to have such relationships is important to help ensure that we are provided with the opportunity to capitalize upon active sources of investment opportunities, as well as to receive critical and reliable services and information. While we believe employee sponsorship or participation in these Events is beneficial to clients for the reasons described above, our subsequent selection and retention of such Relationship Parties as service providers could be viewed as a form of reimbursement for attending such Events, and we have an incentive to select service providers based on the expectation of receiving gifts or invitations to future Events. Notwithstanding that potential conflict of interest, we recognize and acknowledge our fiduciary duty to our clients, and have adopted policies and procedures designed to help prevent any Event from influencing our decision to hire or retain a service provider or to engage in any transaction on behalf of a client. Our policies and procedures require all gifts and entertainment valued in excess of certain thresholds to be pre-approved in writing by our Compliance Department and the head of the applicable business unit.

12. Brokerage Practices

On behalf of clients, the Advisers engage service providers as described in Item 5 above. The Advisers may have the discretion (under the applicable Advisory Agreements) to hire these service providers, including real estate brokers and to determine the commissions paid to those brokers. Because the Advisers are affiliated with a real estate brokerage company, limitations are sometimes imposed on their ability to hire affiliated brokerage companies. For some Separate Account clients, the relevant Advisory Agreements allow the client to review and approve fees paid to affiliated brokers. Commissions and other fees are not affected by the research used in the investment process. See also Item 11 for an additional discussion of our selection of affiliates as service providers for client transactions.

In engaging brokers and service providers, the Advisers' investment teams seek to select the best service provider at a competitive fee structure. The team considers a number of selection criteria when deciding on the hiring of a service provider, including, but not limited to: recent experience in the local market and property type, both user and investor; depth and breadth of regional and national experience; team knowledge and capabilities; conflicts of interest; prior experience with the team and/or company; pricing analysis and recommendations; fee proposal; and preferences from counterparty (whether it is a seller, lender or joint

venture party). Upon completion of the broker selection process, the team leader or the responsible asset manager will select a qualified broker and will execute an agreement (e.g. listing agreement).

13. Review of Accounts

The Advisers are investment managers of real estate and real estate related investments on behalf of clients. In that capacity, the Advisers are involved on a day to day basis in directly managing real estate related assets of its clients. No particular factor triggers review of assets. Each client portfolio is assigned to one or more portfolio manager(s) who are involved in supervising the management of the portfolio. In effect, the account is continuously under review.

See Item 8 for a further description of our Investment Committees, which review certain investment decisions.

For certain Separate Accounts and Investment Funds, the Advisers provide quarterly reports to clients or investors, as applicable, which include a quarterly summary of financial information about investments owned by the client. Annually, investors in Investment Funds and most Separate Account clients and receive a detailed financial statement together with such other information as is reasonably necessary in the judgment of the Advisers to advise Separate Account clients and investors in Investment Funds regarding the results of related operations. Annual statements are generally audited by a nationally recognized accounting firm.

14. Client Referrals and Other Compensation

The Advisers' affiliated broker-dealer, CBRE Capital Advisors, provides marketing services for certain of the Investment Funds and supervises certain personnel of the Advisers that are also registered representatives of CBRE Capital Advisors. For these services, CBRE Capital Advisors receives a fixed fee from the Advisers that is not contingent on subscriptions or investments made by investors in the Investment Funds. The Investment Funds are not assessed any fee and do not pay the expenses of CBRE Capital Advisors in connection with these activities. Other than CBRE Capital Advisors, the Advisers do not utilize the services of any third-party marketer or placement agent to market its Investment Funds or Separate Accounts. The Advisers have occasionally utilized such services in the past when marketing Investment Funds. In each instance, the third-party placement agent was compensated by the applicable Adviser or affiliate, and neither the investors nor the Investment Funds paid any fees. In addition, property managers, including affiliates, are typically able to use office space at properties without paying rent.

Please see Item 11 for information on certain additional conflicts of interest that arise when selecting and retaining certain Relationship Parties as service providers for clients.

15. Custody

In order to comply with Rule 206(4)-2 under the Advisers Act, we have procedures requiring that all Investment Funds are audited by a third-party accounting firm no less frequently than annually and sends the audited financial statements to all investors within 120 days of the Investment Fund's fiscal year end.

Separate Account clients generally receive account statements from their custodian on at least a quarterly basis. Separate Account clients should carefully review the quarterly account statements they receive from these unaffiliated custodians. We also urge clients to compare the statements received from their custodians with the statements they receive from us. Statements that we provide clients may vary from the statements received from custodians due to differences in the timing on posting transactions, accounting procedures, or other reasons. In order to comply with SEC regulations, either an annual audit is performed or an independent verification of funds and securities is conducted by a third-party accounting firm.

16. Investment Discretion

An Investment Fund or a Separate Account for which we have discretionary authority over investment acquisitions, financing and dispositions, directly or indirectly, is referred to as a "Discretionary Fund" or a "Discretionary Account". Our Investment Funds are discretionary. In the United States, our Separate Accounts are primarily non-discretionary, but in some instances we provide officers for, or have discretionary authority over, the client's investment entity or certain discretion over the Separate Account's investment activities.

As described in more detail under Item 5 above, with some limitations, the Advisers generally have investment discretion, under the Advisory Agreements, to hire service providers. Because the Advisers are affiliated with a large real estate services provider, limitations are imposed on their ability to select affiliates. As noted in Item 11 above, some Advisory Agreements permit the advisory board of an Investment Fund or a Separate Account client to review or approve fees paid to affiliated brokers, property managers and other service providers.

For clients that have granted discretionary authority to an Adviser, this authority is typically assumed through a power of attorney or contract provision granted or entered into by a Separate Account client, or through the constituent documents of an Investment Fund it advises.

17. Voting Client Securities

Clients of the Advisers typically do not purchase securities that require voting.

We have policies and procedures that we believe are reasonably designed to ensure that proxies are voted in the best interests of our clients and to recognize and resolve any material conflicts of interest that may arise in the course of such voting. To the extent the Advisers have discretion over client securities, the following guidelines are observed in exercising any voting responsibilities: (1) employees making any voting decisions will consult the relevant client's voting provisions, (2) securities will be voted in the best interest of the client, (3) the Chief Compliance Officer will check for any conflicts of interest with the applicable Adviser, (4) independent third party voting services may be used, and (5) the Chief Compliance Officer keeps a record of votes and conflicts check results. The Chief Compliance Officer will use his best judgment to address any such

conflict of interest and ensure that it is resolved in accordance with his independent assessment of the best interests of the relevant client.

Clients generally cannot direct our vote.

Clients may request additional information regarding how we have voted on specific proxies, or a copy of our proxy voting policies and procedures by sending a written request to the attention of the Chief Compliance Officer, at CBRE Global Investors, 515 S. Flower Street, 31st Floor, Los Angeles, California, 90071 or via facsimile at (213) 683-4301.

18. Financial Information

The Advisers do not have any financial commitment which impairs its ability to meet contractual and fiduciary commitments to clients. The Advisers have not been the subject of a bankruptcy proceeding.