

Modern Slavery Statement

2024



About JLL

Introduction

Jones Lang LaSalle Incorporated and its subsidiaries (“JLL”) approve and issue this joint Modern Slavery Statement (this “Statement”) under the UK Modern Slavery Act, the Australian Modern Slavery Act, the German Supply Chain Due Diligence Act, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (collectively, the “Acts” and individually, the “Act”).

This Statement complies with JLL’s UK, Australian, German, and Canadian businesses’ reporting obligations under the respective Acts, but our responsibilities and commitments to manage our exposure to the risks of modern slavery and human trafficking apply in our operations and supply chains across all our global businesses. This Statement covers the reporting period of January 1, 2023, to December 31, 2023.

Who we are

For over 200 years, JLL (NYSE: JLL), a leading global commercial real estate and investment management company, has helped clients buy, build, occupy, manage and invest in a variety of commercial, industrial, hotel, residential and retail properties. A Fortune 500 company with annual revenue of \$20.8 billion and operations in over 80 countries around the world, our more than 106,000 employees bring the power of a global platform combined with local expertise. Driven by our purpose to shape the future of real estate for a better world, we help our clients, people and communities SEE A BRIGHTER WAYSM. JLL is the brand name, and a registered trademark, of Jones Lang LaSalle Incorporated. For further information, visit ir.jll.com.

Our operations

We deliver an array of real estate services across four global business lines – Markets Advisory, Capital Markets, Work Dynamics, and JLL Technologies – and we manage our investment management business globally as LaSalle Investment Management (“LaSalle”).

We leverage the strength of this global full-service platform to provide the best capabilities to our clients locally, regionally, and globally, including:

- Leasing: representation of landlords and tenants for real estate leases
- Capital markets: representation of sellers and buyers in the sale and purchase of real estate on behalf of clients
- Integrated property and facility management: ensuring the efficient and proper operation of real estate assets
- Project and Development Services: consultation, management, design and build
- Advisory
- Consulting and research
- Real estate valuation
- Technology
- Sustainability

Through LaSalle, which is one of the world’s largest and most diversified real estate investment management companies, we provide clients with a broad range of real estate investment products and services in private and public capital markets.

Our supply chains

The specialized nature of commercial property services requires us to deliver a variety of services through long (and often multi-tiered) supply chains.

We have over 70,000 supply partners worldwide in over 80 countries and manage spend of approximately \$12.6 billion

annually across our corporate operations and on behalf of clients. Our most complex supply chains exist in our Integrated Property & Facilities Management, Project & Development Services, and Property & Asset Management business segments.

The types of goods and services we procure for our business are:

- Information technology goods and services (hardware, software, servers, consultants)
- Professional services (lawyers, accountants, consultants, auditors, recruiters, financial advisors, market intelligence, data)
- Office goods and services (stationery, food and drink), travel services, property/facility management services (food and hospitality, HVAC, janitorial, landscaping, office services, pest control, security, UPS maintenance, transportation, water treatment, workplace strategy, fire/ health and safety, technology services, electrical/mechanical, plumbing/ hydraulics, kitchen/bathroom consumables)
- Project and Development Services (consultation, management, design and build)
- Financial services (insurers, banking)

The types of goods and services we procure for our clients are:

- Property/facility management services (food and hospitality, HVAC, janitorial, landscaping, office services, pest control, security, UPS maintenance, transportation, water treatment, workplace strategy, fire/life/safety, technology services, electrical/ mechanical, plumbing/ hydraulics, kitchen/ bathroom consumables)
- Project management and consultation: construction and development projects (construction/fit-out, architecture, engineering, environmental services)
- Research
- Marketing
- Consulting services
- Design, build and fit-out services

We include modern slavery contractual obligations for our supply partners, including a commitment to abide by our global [Human Rights Policy](#), which prohibits violations of human rights anywhere in our operations or our supply chains,

and our [Vendor Code of Conduct](#), which requires our supply partners to comply with modern slavery laws and refrain from engaging in modern slavery, forced labor, and human trafficking.

Modern slavery risks

JLL is committed to maintaining the highest ethical standards and engaging in practices that enhance the welfare, safety, and well-being of our employees, business partners, and wider communities across the world. Like any large organization that operates across geographical borders and has complex supply chains, we must work hard to overcome challenges to ensure that these standards are upheld across every facet of

our business. This Statement identifies the key modern slavery challenges we inherently face as an organization.

We regularly review our operations and supply chains to understand modern slavery risks associated with them. As part of this review, we consider sector and industry risk, products and services risk, geographic risk, and entity risk.

Areas of vulnerability identified in our operations include:



Sector and industry risk:

JLL encounters risk through the supply partners we hire to provide property management and construction services to our clients, who may employ people just starting in the labor market, without higher education, on entry-level wages, or who are otherwise vulnerable. We recognize that some products our supply partners or we procure to provide services may also pose a modern slavery risk, such as office consumables (coffee, paper products, and fresh fruit), personal protective equipment (PPE), manufactured components of office furniture/furnishings, and technology equipment.



Products and services risk:

JLL, like others in our industry, has high supply partner spending in five key sectors where modern slavery is prevalent: construction, janitorial, landscaping and ground maintenance, hospitality, and security services. Products such as solar panels, which we may procure for the sustainability services we provide, pose additional risks, as do technology components made from forced labor, which may find their way into the technology products JLL develops and technology solutions JLL provides to clients. Having a supply chain that operates in these areas increases our inherent exposure to services provided or products made using forced labor as well as to certain operators who are becoming more clandestine in their approach as governments and other large organizations increasingly condemn modern slavery practices.



Geographic risk:

JLL operates in more than 80 countries, including in regions where there is geopolitical tension or in countries identified in the Global Slavery Index as having a higher prevalence of modern slavery in their populations. Additionally, we provide services in countries where the Global Slavery Index indicates there is little to no government action to address modern slavery; and/or identifies a weak government response to modern slavery.

Operating in such environments poses a challenge, as we may inadvertently engage with supply partners in locations where modern slavery activities are commonplace, or unregulated by the authorities. We continue to promote business practices that protect the most vulnerable in society as we work with clients and supply partners to increase awareness and implement controls to mitigate risk.



Entity risk:

The nature of our services means we have complex supply chains, which inherently exposes us to third-party conduct risk. We strive to reduce this exposure through training our supply chain employees and other diligence activities.

Actions to assess and address modern slavery risks

In 2023, we continued to strengthen the management of our program and to increase education and awareness by expanding the reach of the Modern Slavery Express Training we developed in 2022, engaging cross-functionally, and incorporating requirements and activities developed in response to the German and Canadian Acts.

Effective management

The JLL Modern Slavery Committee (“Committee”) continued to expand its membership and meet throughout 2023. The Committee includes members of our Ethics & Compliance function, Sourcing & Procurement, Human Resources, and our higher-risk business segments (Integrated Property & Facilities Management, Project & Development Services, Property & Asset Management, and Tétris).

Our modern slavery incident management process gives clear direction to our employees about how to identify and report suspected instances of modern slavery in the workplace.

Building awareness of our program and our annual Statement with our colleagues across the world remained a key activity throughout the year.

Actions included:

- Communications to our Legal & Compliance teams and our global network of Ethics Liaisons for distribution to business lines
- Communication of toolkits and resources to help managers inform their teams and clients about our program
- Communications across regional, local, and business-line channels to raise awareness of the risks of modern slavery
- An all-company message to announce the publication of our Statement

These actions directed employees to our dedicated Modern Slavery intranet site, which includes various resources and training.

Education and awareness

Education and awareness for our employees and supply partners are essential to help combat modern slavery. Tailored training increases the level of industry-specific understanding of the issue, while providing clear reporting processes for anyone who suspects an incident. Due to the geographic diversity of our business, we focus on ensuring that our employees are aware of the devastating impact modern slavery has on individuals and communities, and how they can support our battle against modern slavery, regardless of local customs.

Employee training

In 2023, we continued to concentrate on delivering our modern slavery training to our employees in higher-risk functions.

Across these functions we nearly doubled the number of employees in the pilot group who completed our 90-second Modern Slavery Express Training, reaching over 15,000 employees through our learning management system. A further 500 employees completed one of our longer modern slavery training modules. Most employees completing modern slavery training were in our Work Dynamics business line, which includes business segments at higher risk for modern slavery activities (e.g., Integrated Property & Facilities Management, Sourcing & Procurement), our Markets Advisory business line, and our Human Resources corporate function.

We also targeted our Human Resources and Marketing teams in Australia for education on our program, including how they can promote and assist with its implementation and development. The education included information about JLL's resources and where to find them; introduced the modern slavery questionnaire for distribution to HR and Marketing supply partners such as recruiters, job placement platforms, background-check providers, benefit providers and others; reminded the teams about our 90-second Modern Slavery Express Training and 15-minute training module (for employees and supply partners); and highlighted the Incident Response Procedure and Ethics Everywhere Helpline.

Ethics & Compliance awareness initiatives

We continued to promote our internal Ask Ethics tool (which we converted to a Chatbot format to simplify and expedite use) and our public-facing [Ethics Everywhere Helpline](#) in 2023, where employees and others can submit reports and questions anonymously.

In addition, we updated and automated our database of standard responses to client and potential client questionnaires, which increasingly include questions about our approach to human rights issues and how we keep modern slavery activities out of our operations and supply chains. Employees use this database to provide clients information about our program.

Ethics & Compliance completed a major update to JLL's [Whistleblower and Non-Retaliation Policy](#) to strengthen understanding of our global process for reporting ethics concerns, and JLL's commitment to protection from retaliation. In connection with the update, we developed Speak Up Training to promote a speak-up culture across our businesses and created a Speak Up Portal containing useful information and materials. We improved our external JLL Ethics Everywhere websites to provide clearer guidance to external persons who may have potential whistleblower claims. In certain EU countries, our external Ethics Everywhere websites now contain a new one-page guide to our Whistleblower and Non-Retaliation Policy and process, for transparency reasons.

In preparation for implementing the requirements of the German Supply Chain Due Diligence Act, our German Ethics & Compliance team issued a communication introducing the law and implementation of an initial supply partner evaluation form to begin the risk analysis process.

Training for our supply partners

We continued to roll out our 90-second Modern Slavery Express Training to our supply partners. The training covers the fundamentals of labor rights and modern slavery, red flags for modern slavery, and how to report an issue.

In its first-round rollout, we targeted supply partner employees in countries that have English as a first or second language (Australia, Canada, India, Kenya, New Zealand, Philippines, Singapore and the U.S.). To facilitate the rollout, we created templates for our category managers to introduce the training to their supply partners.

In late 2023, we started translating our supply partner training in five languages (Simplified and Traditional Chinese, Japanese, Bahasa Indonesian, and Thai). We are working on adding more translations in Spanish, Portuguese, Polish, French, Arabic, Italian, German, and Malay in 2024.

We use multiple platforms to deliver this training to cater to the needs of particular businesses. Some deliver the training via JLL's own 'Onsite' platform, developed to manage health, safety, and site compliance issues. Our Property & Asset Management (PAM) business in Australia delivers the training by Cm3, which workers must complete before they come to a JLL-managed site. This enables the PAM business to obtain 100% completion by all supply partner workers (24,530 workers in 2023). We also created a version of the module in QuestionPro so that all supply partners have direct online access.

We plan to offer further supply partner modern slavery training globally via QuestionPro in 2024, as it affords uniform and easy access and does not depend on supply partners having access to a JLL system.

Supply partner engagement

Sourcing & Procurement's 2023 Global ESG Strategy included modern slavery as one of five focus areas. As a part of this strategy, our modern slavery activities in the supply chain centered on delivering compliance and managing risk in our supply chain around modern slavery, while leveraging the foundational efforts from our Ethics & Compliance team.

Key initiatives in 2023 included:

1. Defining JLL's ESG requirements for supply partners, such as asking supply partners to commit to having their own modern slavery statement
2. Issuing an ESG request for information to help JLL establish a baseline to identify where supply partners are on their modern slavery journeys and to place supply partners in JLL's modern slavery maturity model
3. Developing and agreeing ESG roadmaps with supply partners, including setting success metrics such as 100% completion of JLL's Modern Slavery Express Training

Client awareness

We updated our modern slavery awareness material for deployment in our client sites and made it available on our intranet site. We can co-brand the collateral provided to clients to demonstrate our partnership in our ongoing efforts to mitigate the risk of modern slavery within our business and through our supply chains, as well as to promote ethical conduct in the workplace. Clients also have options to add other details, such as their own helpline information.

Partnering with our clients

In December 2023, our compliance team for one of our largest accounts recognized United Nations International Day for the Abolition of Slavery, partnering with the client to hang posters and email the entire supply chain with the goal of raising awareness of red flags and how to report concerns.

Due diligence

- Our business lines and Sourcing & Procurement professionals continue to improve their understanding of

the risks of modern slavery. That increase in knowledge has made it easier to implement processes to identify and mitigate the risks of modern slavery activities in our supply chains. By being able to identify red flags early, we seek to avoid engaging with questionable prospective supply partners. In the case of existing supply partners, we work with them to remediate their practices and mitigate the financial impact on vulnerable populations that results from measures taken to eliminate questionable practices. If efforts to remediate are not possible, we terminate their services.

- In 2023, our Sourcing & Procurement team developed globally applicable modern slavery due diligence questions, building on existing questions at the regional level. These will launch as part of the global deployment of JLL's new Supplier Portal powered by Aravo. The rollout will begin in 2024 with a focus on our Work Dynamics business line, starting with the US, Australia, and UK. Additional countries will follow.
- In 2023, we continued to direct our businesses to include clauses in our supply partner contracts requiring our supply partners to comply with our [Vendor Code of Conduct](#), which prohibits engaging in any of the activities comprising modern slavery.
- We used Sphera Supply Chain Risk Management software (previously "riskmethods"), containing 5,885 of JLL's worldwide high-use supply partners and clients to monitor numerous issues, including human rights.
- We initiated a partnership in December 2023 with Integrity Next, a leading solution for supply chain sustainability management to enhance our ESG supply chain efforts including modern slavery.
- JLL remains aware of the risk of contributing to loss of income for vulnerable families due to our efforts to eliminate modern slavery, forced labor or child labor in our supply chains and across business lines. To date, we have neither observed nor received any reports of a loss of income as a result of the trainings, methods, reporting, or steps we have put in place internally or with our supply partners.

Complying with new legislation

Building on the preparations started in 2022, JLL's German business is well into implementation of the German Supply Chain Due Diligence Act (LkSG), aligning German requirements with our firm-wide Modern Slavery program. We developed a questionnaire and training video for core direct supply partners in their corporate and IFM business and will use the questionnaire to categorize high-risk supply partners and develop monitoring and contracting strategies. There is an awareness-raising campaign that the team is supplementing with training modules and other resources to reinforce what employees should look for and what we can do if we spot red flags.

In 2023, JLL's Canadian Legal & Compliance team initiated a compliance review of policy and procedure in advance of Canada's rollout of new modern slavery legislation. Working with Human Resources and Procurement, the team will develop a campaign in 2024 that includes initiating mandatory reporting under the Act in Canada and targeted mandatory modern slavery awareness training (on forced labor and child labor) to employees in higher-risk business lines.

Strengthening supply partner relationships

JLL continues to improve its bespoke modern slavery compliance program for a large Australian government business enterprise's supply chain since first implementing a modern slavery framework for the account in 2021.

Approach

As part of the annual program, new and existing supply partners that JLL manages on behalf of the client must indicate if their organization has either a modern slavery policy or a modern slavery statement.

In 2023, the program included more than 400 supply partners. Through the program we identified that many supply partners were unaware of modern slavery so our Sourcing & Procurement team used this as an opportunity to provide information as well as to share a modern slavery policy template that supply partners could adapt to their business circumstances.

For supply partners that did not want to adopt a policy, JLL conducted a risk assessment to identify the risk of modern slavery (low, medium, and high). JLL maintains the authority to remove or suspend a supply partner without client endorsement if we believe they are not compliant or pose a risk.

The JLL account stores all supply partner compliance documentation centrally and makes it accessible to both JLL and the client to enable both parties to efficiently monitor and analyze supply partner compliance statistics.

We commenced a new cycle of the program in December 2023 with improvements made to data capture technology to make it easier for supply partners to respond to inquiries.

Outcome

JLL achieved 100% compliance across the JLL-managed supply partners.

Risk assessments and audits

- As they have done annually since 2019, one of our largest accounts performed a minimum wage and modern slavery compliance review in 2023, completing 890 checks of 27 supply partners across our Asia Pacific, EMEA, and Americas regions. The team uses the review to confirm there are procedures and controls in place and operating as intended to help ensure supply partners achieve minimum wage requirements promptly, pass Change Control Notice minimum wage increases fully and timely to the intended recipients, and comply with local labor laws. In addition, the team conducted supply partner surveys and searched for signs of modern slavery issues. Overall, the review showed 98% compliance, identifying zero critical or high risks. The team identified a few isolated issues that they addressed with the supply partners, and in many cases, remediation is already complete.
- JLL used this review framework to partner with another major client, selecting one supply partner from each of five potentially high-risk countries in Africa and the Middle East for the initial review. The team sent supply partners a survey to complete and then scheduled meetings with each to review (where applicable) the Code of Ethics, conduct pay slip checks (payment of minimum wage and taxes where applicable), and review passport management, right to work (visas) and labor accommodation. Some actions resulted from the review, all of which the JLL team remediated. Actions included improving transportation safety due to conflicts in local regions, remediating minor health and safety findings at labor accommodation, reviewing pension and health contractual requirements, and providing pay slips to employees receiving payments via telephone transfer.
- The compliance team for a large client completed an external audit focusing on modern slavery issues and human rights risks across the organization, including reviewing their supply chain. The review assessed our program and the associated governance, including by conducting on-site reviews to ensure employees understood local practices including working hours, remuneration, health and safety, and ethics.

- In Asia Pacific in 2022 and early 2023, Sourcing & Procurement completed supply chain reports for 14 of our client accounts. A component of these reports involved conducting desktop searches for supply partners to identify any possible incidents of modern slavery. Through this search, JLL identified one alleged incident and escalated the case through to our Ethics & Compliance team for further investigation and action.

Policies and procedures

Our [Human Rights Policy](#) sets out our commitment to promoting workers' rights and fair labor practices and to eliminating modern slavery practices in our business and supply chains. This commitment is reflected in our [Code of Ethics](#), [Vendor Code of Conduct](#), and through our adoption of the Responsible Business Alliance Code of Conduct. We launched major revisions of our Code of Ethics (in 2022) and Vendor Code of Conduct (in 2023), creating clearer, simpler, and more engaging documents to foster greater commitment and understanding for the diverse populations in our operations and supply chains.

Our [Whistleblower and Non-Retaliation Policy](#) further supports our efforts to encourage speaking up by addressing the challenges of remediating illegal activities while protecting victims.

Our [Ethics Everywhere Helpline](#) is a confidential reporting platform available to our employees, contractors, clients, supply partners, and members of the public if they have a concern or suspect behaviors that are inconsistent with our Code of Ethics and our policies or the law. It is confidential and available 24 hours a day, 7 days a week, and reports can be made anonymously. In 2023, we improved content on the platform's website and increased the number of languages available to include Polish, Italian, German, Arabic, and Japanese.

Annually, all JLL employees are responsible for certifying that they have read, understood, and will follow our corporate policies and the principles outlined in our [Code of Ethics](#). New hires sign the certification in accordance with their onboarding process. The 2023 certification included mandatory ethics and compliance training on select topics. We plan to include in the 2024 mandatory training a modern slavery module.

Assessing our effectiveness

We believe in continuous improvement. With that approach in mind, we annually assess the effectiveness of our program and look to identify opportunities to increase the impact of our efforts.

The following activities help us determine whether our actions to assess and address modern slavery risks are working:

- Working closely with our Ethics & Compliance team, which includes modern slavery subject matter experts and representatives for each geographic region who meet regularly to review our global response to modern slavery and the local implementation of our policies, procedures, risk assessments, and education and awareness programs
- Reviewing and updating our policies, due diligence procedures, and risk assessment processes to reflect the changing nature of our clients, locations, services, supply partners, and external factors such as geopolitical risk and changes in global financial markets
- Quarterly meetings with our Committee, which includes representatives from our higher-risk business lines and functions
- Regularly engaging with senior management from Work Dynamics, Property & Asset Management, Sourcing & Procurement, Human Resources, and Legal & Compliance
- Monitoring supply partner responses to modern slavery questions on the new Aravo Supplier Portal and through our third-party platform, Integrity Next, which will help us identify modern slavery risk by country and industry as we implement the tool globally in 2024
- Tracking figures, including the number of employees who completed their **Code of Ethics** certification, number of workers who attended education sessions, number of reports received through our Ethics Helpline and how they were managed, and the number of supply partners that completed our prequalification questionnaires and amber and red flags raised

Consultation

In accordance with JLL's global commitment to minimizing the risk of modern slavery practices in our operations and supply chains, our Ethics & Compliance team facilitated the review and consultation of our modern slavery practices and this Statement with representatives of the reporting entities and our higher-risk business segments and functions, including the

Committee. The Statement was then reviewed and approved by the global Board of Directors, as well as the Australian Board of Directors, in accordance with the Australian Act, and the Canadian Board of Directors, in accordance with the Canadian Act.

Looking ahead

We will continue to work on raising awareness of modern slavery as a human rights violation and evolve our internal processes to be more consistent globally and aligned with best practices.

As part of this, we will implement tailored education and training for specific, higher-risk business lines and geographies while striving to work closely with more of our clients to align external efforts.

Our focused activities for the next reporting period include:

1

Expanding the membership of our Committee to representatives from more higher-risk business segments and functions to increase engagement and awareness

2

Updating and delivering targeted modern slavery training to our employees and our supply partner employees, especially in our higher-risk business lines and functions

3

Monitoring supply partner responses to modern slavery questions on the Aravo Supplier Portal and Integrity Next

4

Expanding risk assessments of our internal operations across all functions and regions, with deeper dives into higher-risk operations or geographies

5

Monitoring changes in the legislative landscape, adapting strategies and procedures to meet evolving legal standards and best practices, working with regulators as needed, increasing collaboration with business partners

6

Ensuring our employees are aware of our modern slavery incident management process, ethics reporting, speak-up portal and database of standard responses to be able to identify and escalate circumstances that may indicate modern slavery activities

7

Raising awareness of modern slavery and how to spot red flags with our on-site and remote workers and our supply partners, including exploring options for collaborating with our clients

8

Capturing metrics about modern slavery in our operations and supply chains, including through our Aravo Supplier Portal, so that we can have more useful conversations about how we can improve our modern slavery risk responses

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Board of Directors' approval



Siddharth N. Mehta
Chairman of the Board



Christian Ulbrich
Global Chief Executive Officer

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A handwritten signature in black ink, appearing to read "Ulbrich".

About JLL

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