



2022

Modern Slavery Statement

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About JLL

Introduction

Jones Lang LaSalle Incorporated and its subsidiaries (“JLL”) approve and issue this joint Modern Slavery and Human Trafficking Statement (this “Statement”) under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (collectively, the “Acts” and individually, an “Act”).

This Statement applies to JLL’s UK and Australian businesses with a reporting obligation under the respective Acts, but our responsibilities and commitments to manage our exposure to the risks of modern slavery and human trafficking in our operations and supply chains across all our global operations. This Statement covers the reporting period of January 1, 2021, to December 31, 2021.

Who we are

JLL (NYSE: JLL) is a leading professional services firm that specializes in real estate and investment management.

JLL’s purpose is to shape the future of real estate for a better world, underpinned by our three core values of teamwork, ethics, and excellence. These values are at the heart of our culture and support our commitment to upholding the highest possible standards of ethics and sustainability for our clients, our communities, and each other. As part of this, we strive to provide best-in-class commercial real estate services in a manner that protects the human rights of all the people involved in our business, and we are committed to ensuring that slavery and human trafficking are not present anywhere in our business or supply chains.

Our structure

A publicly listed company incorporated in the United States with headquarters in Chicago, IL, JLL offers integrated services worldwide to clients seeking increased value by owning, occupying, developing, or investing in real estate. JLL is a Fortune 500 company with annual revenue of \$19.4 billion, operations in over 80 countries, and a global workforce of more than 98,000 as of December 31, 2021. Our [Annual Report](#) provides more details about JLL’s business, locations, and legal entity structure.

Our operations

We deliver an array of real estate services across four global business segments, focused on product offerings – 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 management: construction and development projects
- Advisory
- Consulting and research
- Real estate valuation
- Digital solutions services

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. Investment solutions include private and public equity in multiple real estate property types, commercial debt investment vehicles, global indirect investments in private equity funds, joint ventures and co-investments, real estate investment trusts, and other real estate equities.

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 57,000 suppliers worldwide in over 80 countries and spend approximately \$10 billion, with the most complex supply chains in our Work Dynamics and Property & Asset Management business lines.

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, and 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/life/safety, technology services, electrical/mechanical, plumbing/hydraulics, kitchen/bathroom consumables)
- Project management services (construction, architecture, engineering, environmental services)
- 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 services (construction/fit out, architecture, engineering, environmental services)
- Research
- Marketing
- Consulting services
- Design, build & fit out services

We impose strict anti-modern slavery contractual obligations on our suppliers, 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 suppliers to comply with modern slavery laws and refrain from engaging in modern slavery, forced labor, and human trafficking.

Through the due diligence efforts that occur in various parts of our organization, we are increasingly able to identify modern slavery red flag issues across our supply chains.

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 political 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 reviewed our operations and supply chains to improve our understanding of the modern slavery risks associated with them. As part of this review, we considered indicators of modern slavery, including sector and industry risk, products and services risk, geographic risk, and entity risk.

Areas of the vulnerability identified in our operations included:



Sector and industry risk: As a participant in the commercial property services sector, we encounter risk through the suppliers we hire to provide services to our clients, who may employ people just starting in the labor market, without higher education, or on entry-level wages for property management and construction projects. We recognize that some of the products our suppliers 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), and manufactured components of office furniture/furnishings.



Products and services risk: JLL, like others in our industry, has high supplier spending in five key sectors in which modern slavery is prevalent: construction, janitorial, landscaping and ground maintenance, hospitality, and security services. Having a supply chain that operates in these areas increases our inherent exposure to certain operators who are becoming more clandestine in their approach as governments and other large organizations increasingly condemn modern slavery practices. Accordingly, it's critical that our due diligence processes are robust enough to identify and manage potential issues.



Geographic risk: JLL operates in more than 80 countries, including 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
- Identifies a weak government response to modern slavery

Operating in such environments poses a considerable challenge for us, as it means we are advocating for a change in behavior 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 undertake numerous due diligence and monitoring activities to reduce this exposure, including training our supply chain employees.



COVID-19 risk: We recognize supply chains around the world continue to be affected by COVID-19 in the form of mandatory vaccination requirements, staff shortages, order cancellations or redirections, factory/site closures, and business closures. The impact of COVID-19 could disproportionately affect some workers and increase their exposure to modern slavery practices, e.g., loss of income, denial of workplace rights, excessive work hours, unsafe conditions, and an inability to safely return to home countries or states.

Training plays a major role in combatting modern slavery. By training our people, we prevent not only inhumane conduct in our supply chains but also combat modern slavery in the private lives of those we train. This secondary benefit is an important one, as many people are not aware of the impact modern slavery has on individuals, their families, and communities in general. In 2021, we made a concerted effort to train a large number of our workers in India – we delivered awareness training to 3,500 employees.



I was totally unaware that ‘modern slavery’ existed --- certainly an eye-opener for me.

Just happy that JLL is taking time to educate staff on these issues, and making people aware that this still goes on around the world and in so many countries

Good to bring this to our attention. It’s something not really thought about too much. Well done.

This was very important; worldwide issues are relevant

Actions to assess and address modern slavery risk

In 2020, we assessed our modern slavery compliance program to identify opportunities to increase its robustness. The outcome of that assessment was a three-phase plan:

- 1
 Focus on internal activities to expand training, develop tools to help employees spot red flags at worksites, and improve supplier monitoring
- 2
 Focus on external activities to expand our partnerships with clients, increase supplier monitoring and training, and develop metrics
- 3
 Assess the effectiveness of the first two phases to determine if our anti-modern slavery initiatives align with global best practices

In 2021, we continued the implementation of that plan by engaging in the following activities to assess and address modern slavery risk in our operations and supply chains.

Effective management

- Following its establishment in 2020, the JLL Australian Modern Slavery Committee (“Committee”) continued to meet regularly throughout 2021 to consider ongoing modern slavery challenges and how they could be addressed. Senior management engagement in our high risk business lines, including Work Dynamics, Project & Development Services, Property & Asset Management, and Human Resources, continued to be engaged in the improvement of our modern slavery compliance program.
- The Committee included members of the Global Ethics & Compliance functions, our high risk business lines, and Human Resources. In 2022, we plan to expand the membership of the Committee to senior management in the Americas, Asia Pacific, and EMEA. The Committee has proved to be an effective tool for raising modern slavery awareness in leadership, identifying areas for improvement, and aligning the program amongst business lines, and we want to achieve a similar outcome in other locations.

Education and awareness

Training and education for our employees and supply partners are essential to help combat modern slavery. Tailored training can dramatically increase 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 all 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.

Our Sourcing & Procurement function, which has over 600 employees globally, is the front line of defense in our program to combat modern slavery in our supply chains, which is why we have driven extra training and awareness programs to members of this team.

In 2021, we expanded our modern slavery training to 8,898 employees globally, primarily in our Sourcing & Procurement function and our Work Dynamics and Property & Asset Management business lines in Asia Pacific. This training was in some cases delivered face-to-face, but in most cases, it was delivered via our learning management system, which is available to all employees on demand, as well as via webinar at the request of certain businesses. In 2022, we plan to update this training to reflect changes in the global modern slavery landscape and increase uptake in the Americas and EMEA.

We continued to build awareness of our modern slavery compliance program and our annual statement with our colleagues across the world throughout the year.

Initiatives included:

- Communications to global Legal and Ethics & Compliance teams and our global network of Ethics Liaisons for distribution to business units
- Toolkits and resources to help managers communicate our program to their teams and clients
- 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

Our communications directed employees to our dedicated Modern Slavery intranet site, which includes various resources and our training toolkit.

We also provided modern slavery onboarding training to 79,937 supplier employees in our Property & Asset Management business line in Asia Pacific, and training to our clients and suppliers in our Work Dynamics business line in Asia Pacific.

We recognized that COVID-19 was a modern slavery risk in our supply chains, and our response was to rely on and improve our existing due diligence (modern slavery detection) initiatives, including our risk assessment activities, our supplier prequalification questionnaire, supplier contractual clauses, and raising awareness of COVID-19 modern slavery red flags through communication and training. In 2020 and 2021, we delivered to our Sourcing & Procurement teams awareness training on COVID-19 and its effects on supply chains and vulnerable workers. In 2022, we plan to expand the delivery of this training to additional business lines and functions, as well as supplier employees.

We launched Ask Ethics, a tool we designed to support our employees with their legal, ethical, and compliance-related queries. It contains written scenarios to guide employees' actions, help them find more information, report possible issues, or seek more advice. Employees can access Ask Ethics in "anonymous mode", which encourages them to navigate freely through scenarios. Many of the scenarios include a "Report" button, so JLL employees log in and report an incident through the tool if they choose. They can also report anonymously through our publicly available [Ethics Helpline](#).

For JLL's MU! 2021 Conference (management conference for U.S. Property Managers), we partnered with Polaris, a leading data-driven social justice movement to fight labor and sex trafficking, to present "Closer Than You Think – The untold truths about human trafficking", which aimed to raise awareness of how modern slavery and human trafficking can arise generally and in properties JLL manages.

Due diligence

- Our business units and Sourcing & Procurement professionals are continuously improving 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 can either avoid engaging questionable prospective suppliers or, in the case of existing suppliers, work with them to remediate their practices or terminate their services (if necessary). It's critical that our suppliers acknowledge and understand our strong and uncompromising approach to modern slavery.
- We issued modern slavery questionnaires to 1,477 suppliers in their prequalification stage, focusing on high risk geographies, sectors, products and services, and entities in the Property & Asset Management, Work Dynamics, Project & Development Services business lines, and our Human Resources function. These allowed us to further enhance our due diligence on modern slavery risks in our supply chains with targeted questions, analysis of responses, personal follow-ups for amber and red flags, supplier risk ratings, and conversations with suppliers about continuous improvement and the importance of our Vendor Code of Conduct and Code of Business Ethics in our relationships with them.
- We also issued modern slavery questionnaires within our own operations to our Talent Acquisition function and JLL Business Services (JLL's integrated global business services platform), a project which continues in 2022. This review focuses on our recruitment processes for employees and contractors in various geographies and business lines, addressing issues such as contract language, wages and working hours, charges for recruitment costs, training or equipment, external recruiters, and migrant workers. If we identify any red flags with respect to modern slavery risks, we will work with those parts of our operations to improve their processes.
- Tétris, a regional leader for office, retail, and hotel design and build fit out services, launched a human rights and modern slavery risk pulse among more than 140 large, medium, and small companies in 2021. Soliciting and analyzing responses to the risk pulse was one of the key focuses of Tétris' third party oversight risk response plan. Thus far, the team has not identified any critical modern slavery risks in its supply chain but has recommended increased training internally and for suppliers, as well as continued monitoring of suppliers' practices and a review of contracting clauses in order to ensure that these risks are regularly monitored and remain a high priority with stakeholders.
- We continued to ensure that our contracts contained provisions requiring our suppliers to comply with our Vendor Code of Conduct and refrain from engaging in any of the activities comprising modern slavery.
- We continued to use risk methods supply chain risk management software, containing 4,617 of JLL's worldwide high-use suppliers and clients, which allows monitoring of numerous issues, including human rights.

Client modern slavery audit program

Throughout 2020, JLL’s Sourcing & Procurement team in Australia developed a modern slavery risk management framework on behalf of a large Australian government-owned corporation’s facility management supply chain. Using data from the Walk Free Foundation and our own proprietary industry knowledge, we mapped the key modern slavery risks across the property management supply chain – identifying the inherent risk profile of over 500 suppliers.

In 2021, we implemented a compliance program, which had differing levels of compliance procedures depending on the risk rating of the supplier. High risk suppliers under this program are subject to random audits, which check payment data against work order data to identify any red flags – as it is recognized that payment and work order discrepancies are a potential red flag for underpayment of wages.

Three major cleaning suppliers were audited in 2021, with one supplier found to have occasionally been mischarging. This triggered an investigation by our Sourcing & Procurement team, which found that it was caused by a human input error in the financial system of the supplier. Although no labor exploitation was found, it indicates that this audit process is effective at identifying potential wrongdoing by our suppliers.

Solar Panels modern slavery compliance deep dive

JLL identified solar panel manufacturers as a high risk category for modern slavery and conducted a deep dive on two major solar panel providers in 2021, seeking assurance and evidence that they did not use any component materials, intermediate goods, or finished goods from producers of silica-based products that were associated with the use of forced labor. We then mapped the supply chain of those providers and sought assurance from seven solar panel manufacturers that none of them were using such goods in the manufacturing of their products.

As part of this process, we also reviewed the suppliers’ processes and policies related to modern slavery and their position on sourcing goods from certain producers of silica-based products. We found our suppliers and their manufacturers had strong policies and procedures in place and had already banned the use of such goods.

Risk assessments and audits

- We piloted a modern slavery risk assessment “walk-through” using an engineering and operations risk mitigation platform in 2021. However, after receiving feedback from the business about the “walk-throughs” perceived suitability for that platform, we concluded that it would be more effective to add the “walk-through” process to our “Annual Compliance Sign-Off”. The first review using the Annual Compliance Sign-Off will be concluded in 2023.
- One of our largest accounts again performed a minimum wage and modern slavery compliance review, completing 1,300 checks of 44 suppliers in our Asia Pacific, EMEA, and Americas regions.

The review showed 98% compliance, demonstrating continuous improvement from prior reviews. The review included control testing to ensure supplier management processes were operating as intended and that minimum wage compliance was achieved for intended recipients in a timely manner. In addition, the team conducted supplier surveys and searches for signs of modern slavery issues, which prompted follow up surprise labor accommodation audits. The review identified a few isolated issues that the team is addressing with the suppliers, many of which are already complete.

- We began an internal review of our own hiring and retention practices to see if any raised red flags for modern slavery, looking at practices such as charging recruitment fees, tying accommodation to employment

status, sham contracting, unmanageable lead times and purchasing practices, and unlawful wage deductions or underpayment.

Policies and procedures

Our [Human Rights Policy](#), which we reviewed in 2021, sets out our commitment to promoting workers' rights and fair labor practices and to eliminating modern slavery practices in our business or supply chain. This commitment is reflected in our [Code of Business Ethics](#), [Vendor Code of Conduct](#), and through our adoption of the Responsible Business Alliance Code of Conduct.

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 Helpline](#) is a confidential reporting platform available to our employees, subcontractors, clients, suppliers, and members of the public if they have a concern or suspect behaviors that are inconsistent with our [Code of Business Ethics](#) and our policies or the law. It is available 24 hours a day, 7 days a week, and reports can be made anonymously.

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 Business Ethics](#). New hires sign the certification in accordance with their onboarding process. In 2021, 92% of employees completed their certification.

In 2021, we commenced a thorough review of our [Code of Business Ethics](#) and [Vendor Code of Conduct](#), with the predominant aims of addressing the changing nature of our business, as well as making the Codes clearer, simpler, and more engaging. By making our Codes more accessible, we aim to foster greater commitment and understanding. The revised Codes, which include specific references to human rights and modern slavery, are due to be published in mid-2022.

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: In 2021, we:

- 1 Engaged with stakeholders to identify metrics that can be used to determine our progress
- 2 Reviewed external guidance from NGOs to ensure that our approach is in line with best practices
- 3 Reviewed our existing training material to determine if it remained useful for our many stakeholders

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

- Working closely with our Ethics & Compliance team, which includes modern slavery subject matter experts and representatives for each geographic region and 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, suppliers, and external factors such as COVID-19
- Quarterly meetings with our Committee, containing representatives from our higher risk business lines and functions
- Regularly engaging with senior management from Work Dynamics, Property & Asset Management, Procurement, Human Resources, and Legal & Compliance
- Reviewing the responses to our supplier prequalification questionnaires and internal questionnaires to identify mitigation efforts or need to follow up with conversations about continuous improvement
- Tracking figures, including the number of employees who completed their Code of Business 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 suppliers that completed our prequalification questionnaires and amber and red flags raised

Although we did not identify any direct instances of modern slavery in our operations or supply chains, JLL understands that this does not mean we have necessarily successfully eliminated it. The assessment of our effectiveness above is an indication of the maturity of our program – however, we understand through red flags we identified that there are occasional operators working for and with JLL who could be engaged in modern slavery. The hidden nature of modern slavery makes it difficult to conclusively assess the extent to which the program has been a success.

Consultation

In accordance with JLL's global approach to eliminating modern slavery in our company operations and supply chains, our Global Ethics & Compliance team facilitated the review and consultation of our modern slavery practices and this Statement with the representatives of the reporting

entities and our major business lines 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 Australian legislation.

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 globally consistent and in line with best practices. As part of this, we will implement tailored education and training for specific, higher risk business groups 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 senior management in the Americas, Asia Pacific, and EMEA to increase engagement and awareness in those regions across all business lines and functions
- 2 Implementing a modern slavery incident management process designed to ensure that we respond to all actual and suspected events of modern slavery in a uniform manner that aligns with international best practices
- 3 Updating our modern slavery training to reflect changes in the global modern slavery landscape and focus on the uptake in the Americas and EMEA
- 4 Rolling out modern slavery awareness training directly to the employees of our suppliers. This type of training helps ensure that those who may be impacted by modern slavery practices recognize that they can raise concerns with JLL
- 5 Raising awareness of modern slavery and how to spot red flags with our on-site and remote workers. This includes, where practicable, investigating options for collaborating with our clients
- 6 Expanding awareness training on COVID-19 and its effects on supply chains and vulnerable workers to additional business lines and functions, as well as supplier employees
- 7 Expanding our risk assessment of suppliers in all business lines globally, with deeper dives into high risk suppliers
- 8 Continuing the risk assessment of our internal operations across all functions and regions, with deeper dives into high risk operations or geographies
- 9 Capturing more and more meaningful metrics about modern slavery in our operations and supply chains so that we can have more useful conversations with management and our suppliers about how we can improve their modern slavery risk responses
- 10 Continuing to explore how COVID-19 impacts our operations and supply chains and what we can do to minimize the modern slavery risks that may arise as a result

Board of Directors' approval



Siddharth N. Mehta
Chairman of the Board



Christian Ulbrich
Global Chief Executive Officer