JLL | Achieve Ambitions

2021

Modern Slavery Statement

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Introduction

Jones Lang LaSalle Incorporated and its subsidiaries ("JLL") approves and issues this joint Modern Slavery and Human Trafficking Statement under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 ("Statement"). The Statement applies to JLL's UK and Australian businesses with a reporting obligation under their respective Acts, but our responsibilities and commitment to manage our exposure to the risks of modern slavery and human trafficking in our operations and supply chain extend across all our global operations. This Statement covers the reporting period of January 1, 2020 to December 31, 2020.

About JLL

JLL (NYSE: JLL) is a leading professional services firm that specializes in real estate and investment management. 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. Globally, JLL's 91,000 employees serve clients in more than 80 countries from nearly 300 corporate offices. For additional details about JLL's business and locations, see our Annual Report.

91,000 employees

80+ countries we operate in

5 billion square feet in property and integrated facility management services worldwide

81,000 suppliers in our higher risk businesses, including Facilities Management, Project and Development Services, Fit-Out and Property Management

Modern Slavery in Real Estate Services: The Challenge

JLL's purpose is to shape the future of real estate for a better world. Three core values shape our culture and define who we are: teamwork, ethics and excellence. These values underpin our commitment to our clients, to our communities and to each other. As a global company, we have an essential responsibility to drive sustainability and corporate social responsibility efforts. Accordingly, we strive to provide best-in-class commercial real estate services in a manner that promotes the human rights of all the people we work with. Like most large organizations, the size and geographical dispersion of our business can make such goals challenging to realize and this Statement identifies the key modern slavery challenges we inherently face as an organization.

Geography

JLL operates in more than 80 countries, including countries identified in the 2018 Global Slavery Index as having higher prevalence of modern slavery in their populations – such as Pakistan, India, China, the Philippines and Russia. Additionally, we provide services in countries where the Global Slavery Index:

- indicates there is little to no government action to address modern slavery, including India, Japan, Mexico, Russia, Saudi Arabia and South Korea; and
- identifies a weak government response to modern slavery, such as Singapore and Hong Kong

Operating in such environments poses a considerable challenge for us, as it means we are advocating for a change in behavior in locations where elements of modern slavery 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.

Complex supply chains

The specialized nature of commercial property services requires us to deliver services through a long and often multi-tiered supply chain. Such supply chains are inevitably less transparent, and more difficult to manage due to our lack of direct control. Although we impose strict anti-modern slavery contractual obligations on our suppliers, including a commitment to abide by our global Human Rights Policy and Vendor Code of Conduct, the real challenge lies in monitoring our many suppliers to ensure that their behavior corresponds with our expectations and values.

Through the due diligence efforts that occur in various parts of our organization, we are increasingly able to identify modern slavery red-flag issues. Nonetheless, we recognize that standards and expectations for the eradication of modern slavery increase continuously and that we must keep setting stretch goals for ourselves.

High-risk service categories

JLL's top five supplier spend categories, like most in our industry, are in 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 bad actors. With modern slavery practices being publicly condemned by governments and large organizations, those that engage in such practices are becoming more clandestine in their approach. Accordingly, it's critical that our due diligence processes are robust enough to identify and manage potential issues.

Proactively Managing Modern Slavery Risk

On a global level, at the beginning of 2020, we assessed our modern slavery program to identify opportunities to increase the robustness of our processes for combatting modern slavery. 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 on work sites and improve vendor monitoring

2

Focus on external activities to expand our partnerships with clients, increase vendor monitoring and training and develop metrics

3

Assess the effectiveness of the first two phases to determine if JLL's anti-modern slavery initiatives align with global best practices

Looking specifically at how to best satisfy the new legislative obligations in Australia, we established an anti-modern slavery committee comprised of leaders from our most exposed businesses and support functions. The committee met regularly and focused their efforts on initiatives that could reduce the likelihood of modern slavery occurring in the high-risk parts of our operations. During the year, they targeted senior management engagement in high-risk businesses such as Facilities Management, Project and Development Services, Property and Asset Management, Marketing, Human Resources, Finance, and Information Technology.

Our global efforts in 2020 reflect our continued efforts to educate our employees, partner with workers and business partners to identify risks through due diligence and provide our businesses with the tools to spot potential problems.

Proactively Managing Modern Slavery Risk

Education and training

We recognize that tailored training and education is an important means of raising awareness to help combat modern slavery. Educating our employees and supply partners can dramatically increase the level of industry-specific understanding about the issue and provide those that suspect its occurrence with a clear avenue to report it internally or via our external reporting Ethics Helpline.

Because we operate in countries where modern slavery practices may be deemed acceptable, we focus on making all of our employees aware of the devastating impact modern slavery has on individuals and communities, relying on our teams to support our battle against modern slavery regardless of local customs.

Education and training highlights from 2020:

We provided online training to approximately 4000 employees via our learning management system, which is available to all employees on demand, as well as via webinar at the request of certain businesses. Our training efforts focused on high-risk businesses and geographies:

- Tétris, our leading Design+Build fit-out specialist for business spaces in our EMEA region
- Americas and Australia Sourcing and Procurement
- Americas Facilities Management compliance personnel for client accounts
- Property and Asset Management, Facilities Management and Project and Development Services in Australia, Indonesia, Philippines, Thailand, India and Sri Lanka
- Ethics Liaisons, a global network of JLL volunteers representing 144 client accounts and 29 business groups, which supports our Ethics Everywhere program by disseminating ethics communications, newsletters and other collateral throughout the organization
- Human Resources, Information Technology, Legal and Marketing teams working directly for our Property and Asset Management, Facilities Management and Project and Development Services businesses in Australia, Indonesia, Philippines, Thailand, India and Sri Lanka

We continued our internal communications campaign to build awareness and announce our annual Modern Slavery Statement. The campaign included:

- emails to global legal and compliance teams and our global network of Ethics Liaisons for distribution to business units
- articles in JLL's regional, local and business newsletters (including Sourcing and Procurement, Americas Corporate Solutions, LaSalle Investment Management and a client account global newsletter)

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

Proactively Managing Modern Slavery Risk

Due Diligence

Our business units and sourcing and 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 risks of modern slavery activities in our supply chain.

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.

Among our initiatives aimed at assessing the conduct of suppliers and prospective suppliers are:

- Requiring every supplier to certify in their contract that they will abide by JLL's Vendor Code of Conduct, which prohibits modern slavery, forced labor and human trafficking. Further, our supplier contracts require that suppliers do not engage in any of the activities comprising modern slavery
- Providing modern slavery onboarding training for select suppliers
- Implementing the *riskmethods* supply chain risk management software currently containing 3,900 of JLL's worldwide high-use suppliers and 72 JLL clients, which allows monitoring on numerous issues, including human rights
- Engaging with clients to share best practices and align on initiatives
- Developing and deploying a supplier questionnaire program in our Australian business functions and our Facilities Management and Project and Development services business lines, which we plan to roll out globally
- Engaging a third-party due diligence vendor to meet the specific needs of the Australian Property and Asset Management business
- Continuing refinement in supplier onboarding and monitoring in our sourcing and procurement processes

Proactively Managing Modern Slavery Risk

Risk Assessments and Audits

Due to the large number of vendors across multiple geographies that we engage on behalf our clients, we have adopted a risk-based approach, allocating the majority of our resources to the areas where we have the greatest risk. Risk varies depending on business line, geography, and the category of suppliers we engage for our clients. To maximize our likelihood of identifying and rectifying modern slavery practices, we have decided to aim our resources at the areas in which we can have the greatest impact.

In 2020, we updated our global risk assessment, which helped us prioritize our focus for the year. Our risk assessment examines our business units' activities and suppliers they use against external indices such as the Global Slavery Index and the U.S. Trafficking in Persons report. This year, we also considered developments in sanctions regimes to designate entities and individuals that engage in human rights abuses. We solicited comments from regional and local JLL employees to verify our high-level assessment and provide additional information regarding controls they have in place. Our highest risks remain in Asia, the Middle East, Brazil and the United States.

Policies

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 or supply chain. 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. Our new "Whistle-blower and Non-Retaliation Policy" further supports our efforts to encourage speaking up.

Opportunities for improvement: assessing our effectiveness

We believe in continuous improvement. With that approach in mind, we have critically assessed the effectiveness of our 2020 program, and identified opportunities to increase the impact of our efforts:

1. Engage with stakeholders to develop core metrics that can be used to determine our progress
2. Follow external experts and NGOs to ensure that our approach is in line with best practices
3. Review the feedback from the training sessions conducted in 2020 to determine how we can make training more engaging and effective
4. Encourage specific business lines to develop innovative solutions for managing their risks.

Looking Ahead

JLL welcomes the increased focus on transparency and reporting in the context of modern slavery by governments around the world, and our goals for 2021 will include adapting to new legislation in the UK and elsewhere. We will continue to work on raising awareness, evolving best practices and enhancing consistency in our approach, as well as on implementing internal activities for specific, higher risk business groups and external efforts to align our efforts with more of our clients. Our focused activities include:

1. Expanding training for Sourcing and Procurement teams and high-risk vendors, for the Corporate Solutions transitions team, facility and property managers, Engineering & Operations, and Health, Safety and Environment teams
2. Adding modern slavery issues to facility checklists for facility and property managers, construction and fit-out businesses and Engineering and Operations to facilitate identification of potential issues for escalation
3. Continuing to develop supply chain monitoring and auditing processes with client accounts, Sourcing and Procurement and internal audit
4. Updating our Vendor Code of Conduct to simplify messaging and to ensure that our suppliers are aligned with our expectations that modern slavery will not be present in our supply chain
5. Addressing challenges of mitigating /remediating illegal activities while protecting victims
6. Implementing and requiring transparent terms / conditions of recruitment
7. Developing more sophisticated key risk indicators for modern slavery as part of JLL's ongoing company-wide enterprise risk management analysis
8. Implementing modern slavery risk management programs for specific client accounts

Working together with clients

In 2020, JLL's Sourcing and Procurement team used data from the Walk Free Foundation and our own proprietary industry knowledge to map the key modern slavery risks for a large Australian government owned corporation's facility management supply chain. Based on our analysis of over 500 suppliers we identified those with high, medium or low risk and then developed a compliance program for those suppliers based on their risk levels.

Our risk mapping process examined inherent risks – such as by industry, jurisdiction, and service delivery model. This targeted approach ensured that we were able to pursue the elimination of modern slavery and labor rights abuses from the supply chain without placing an unnecessary compliance burden on suppliers with low risk. Upon gaining an understanding of our high, medium and low risk suppliers, we implemented a risk management program that reduces our client's exposure to modern slavery risk.

This program was developed across 2020 and early 2021, and will be rolled out to additional clients, as appropriate, in 2021 and beyond. The program will help us identify, mitigate and manage modern slavery risk in our client's supply chain. We plan to identify other government and private clients in 2021 that we can partner with to implement similar initiatives.

Consultation to Prepare a Joint Statement

In accordance with JLL's global approach to eliminating modern slavery in our company operations, our Global Ethics and Compliance team facilitated the review and consultation of our modern slavery practices and this Statement with the reporting entities, including the Australia Modern Slavery Committee, which represents the Australian entities.

Board of Directors Approval

Siddharth N. Mehta
Chairman of the Board

Christian Ulbrich
Global Chief Executive Officer

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