

Modern Slavery Statement

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Introduction

Jones Lang LaSalle Incorporated and its subsidiaries (“JLL”) approves and issues this Modern Slavery and Human Trafficking Statement under Section 54(1) of the UK Modern Slavery Act 2015 (MSA). JLL carries on business in the UK through its affiliates there, but our responsibilities and commitment to uphold the principles of the UK Act extend across all our global operations.

About JLL

JLL is a Fortune 500 professional services and investment management firm specializing in real estate. 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 93,000 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](#).



93,000 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

Our vision is to provide best-in-class commercial real estate services in a manner that both promotes the human rights of all the people we work with, and is sustainable. Like most large organizations, the size and geographical dispersion of our business can make visions such as this challenging to realize. To help us in achieving our vision we have identified three key challenges to focus on.

Geographical challenges

JLL operates in more than 80 countries, including countries identified in the 2018 Global Slavery Index as having the largest estimated absolute numbers of people in modern slavery – 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 action to address modern slavery, including India, Japan, Mexico, Russia, Saudi Arabia and South Korea, and countries in which the Global Slavery Index identifies a weak government response to modern slavery, such as Singapore and Hong Kong. This poses a considerable challenge for us, as we are advocating for a change in behavior that is commonplace and, in some locations, unregulated by the authorities.

As an organization, we pride ourselves on the ethical nature of our operations. Accordingly, we will use the influence we have with clients and supply partners to promote business practices that protect the most vulnerable in society.

Complex supply chains

The specialized nature of commercial property services requires the delivery of 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 the 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 of our global Sourcing and Procurement team, 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 higher goals for ourselves.

High-risk service categories

In addition to the complex supply chains in commercial property services, JLL, like most in our industry, has significant supplier spend in sectors in which modern slavery is prevalent: construction, janitorial, landscaping and ground maintenance, hospitality and security services. However, irrespective of the types of services we acquire, or the location in which those services are delivered, we strive to work with ethical supply partners.

Proactively Managing Modern Slavery Risk

In the 12 months since our last statement, we have continued to invest in the proactive management of modern slavery risk in our business and supply chain. We recognize that those engaging in unscrupulous labour practices are constantly changing their methods of exploitation; as such we must stay vigilant and continually evolve our response. Below is a description of the key mechanisms we used in 2019 to combat modern slavery and the key challenges in our industry:

Education and training

Over the years, we have recognized that tailored training and education is an important means of combatting 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. As mentioned earlier, we operate in countries where modern slavery practices may be deemed normal or acceptable. By making our employees aware of the devastating impact of modern slavery on individuals and communities, we are able to rely on those individuals in our battle against modern slavery.

Education and training highlights from 2019:

We launched an internal communications campaign, directing employees to our dedicated Modern Slavery intranet site, which includes our information and training toolkit. The campaign included:

- emails to global legal and compliance teams and Ethics Liaisons for distribution to business units;
- digital signage, posters, infographics and leaflets for display in offices and elevators in our major offices; and
- articles in JLL's regional, local and business newsletters.
- Tetris, our leading Design+Build fit-out specialist for business spaces, required all employees in its EMEA region to participate in tailored training. The UK completed the training in 2019, with remaining staff scheduled to complete the training in 2020.
- JLL's Australian Sustainability team, working in collaboration with our Global Ethics & Compliance team, developed a Modern Slavery Fact Sheet to educate our Australian business on its obligations under the new Australian modern slavery legislation.

Proactively Managing Modern Slavery Risk

Sourcing and Procurement Due Diligence

The Sourcing and Procurement team are amongst our greatest assets in ensuring that our supply chain remains free of modern slavery related practices. They are the part of our organization that has the most touchpoints with suppliers and prospective suppliers. 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 the situation or terminate their services (if necessary). It's critical to our vision that our suppliers acknowledge and understand our strong and uncompromising approach to modern slavery.

Sourcing and Procurement engages in a variety of initiatives aimed at assessing the conduct of suppliers and prospective suppliers:

- Developing its technology platform to facilitate its risk-based approach to the supplier selection and ongoing monitoring, including attention to suppliers' policies, practices and management systems related to key risk areas such as labour compliance, human rights, working conditions, forced labour and child labour.
- Requiring every supplier to certify in their contract that they will abide by JLL's Vendor Code of Conduct, which prohibits modern slavery, forced labour and human trafficking. Further, our supplier contracts require that suppliers do not engage in any of the activities comprising modern slavery.

Proactively Managing Modern Slavery Risk

Risk Assessments and Audits

Due to the large number of vendors across multiple geographies that we engage on behalf of our clients, we have adopted a risk-based approach that aims to allocate the majority of our resources to the areas where we have the greatest risk. The reality is that 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.

The compliance team for one of our largest accounts has set a standard for client collaboration through performing the risk assessment described below, which they completed in 2019:

- Taking a global risk-based approach, the team selected 25 high-risk suppliers and engaged in the following:
 - issued a questionnaire aimed at assessing compliance with labour laws, and promoted the available recourse to supplier employees to raise concerns;
 - conducted negative media searches;
 - reviewed contracts to ensure regulatory clauses were complete, and promoted that JLL's Vendor Code of Conduct was appropriately adopted;
 - reviewed supply chain management controls; and
 - examined supplier wage practices (covering wages and deductions) through sample checks of pay stubs.
- The team then identified 30 additional high-risk suppliers across 12 countries where minimum wage requirements had recently changed. The goal of this exercise was to confirm that suppliers were passing the rate increases through to the employees as of the effective date. The JLL team gained a high level of assurance through over 1,000 checks conducted; they identified isolated exceptions and collaborated with the suppliers to remediate them.

The team for this account continues to partner with the client on supply-chain issues, and has shared its processes with other account teams, which we hope will lead to additional partnerships with our clients.

Policies

As mentioned in previous statements, we convey our commitment to eliminating modern slavery in several policies, including our Code of Business Ethics, Vendor Code of Conduct and through our adoption of the

Responsible Business Alliance Code of Conduct.

In addition, we recently updated our anti-modern slavery corporate policy, renaming it Human Rights and posting it on our public website.

Looking Ahead

Our goal for 2020 is to continue what we have begun; focusing on raising awareness, evolving best practices and enhancing consistency in our approach. We will continue our internal focus on implementing activities for specific, higher risk business groups. We know we can't tackle all of the challenges presented by modern slavery by ourselves, and will continue our efforts to collaborate with clients and suppliers. Our focused activities include:

1. 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. Working with internal audit to increase modern slavery testing items to all audits.
4. Continuing to develop supply chain monitoring and auditing processes with client accounts, Sourcing and Procurement and internal audit.
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.

Board of Directors Approval



Sheila A. Penrose
Chairman of the Board



Christian Ulbrich
Global Chief Executive Officer

