

# Modern Slavery Statement

2023



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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, the “Act”).

This Statement complies with JLL’s UK and Australian 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, 2022, to December 31, 2022.

## Who we are

JLL (NYSE: JLL) is a leading professional services firm that specializes in real estate and investment management. JLL shapes the future of real estate for a better world by using the most advanced technology to create rewarding opportunities, amazing spaces and sustainable real estate solutions for our clients, our people, and our communities. JLL is a Fortune 500 company with annual revenue of \$20.9 billion, operations in over 80 countries and a global workforce of more than 103,000 as of December 31, 2022. JLL is the brand name, and a registered trademark, of Jones Lang LaSalle Incorporated. 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. For further information, visit [ir.jll.com](https://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 & 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 72,000 supply partners worldwide in over 80 countries and spend approximately \$12.4 billion annually, with the most complex supply chains existing in our Integrated Property and Facilities Management, Project & Development Services, Property & Asset Management and Tétris 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/ life/safety, technology services, electrical/mechanical, plumbing/ hydraulics, kitchen/bathroom consumables)
- Project & 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 & fit-out services

We impose strict anti-modern slavery contractual obligations on 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.

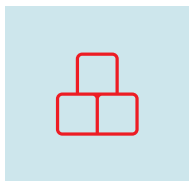
We continually review our operations and supply chains to understand modern slavery risks associated with them. As part of this review, we consider sector and industry risk, products and services risk, geographic risk, and entity risk.

## Areas of vulnerability identified in our operations include:



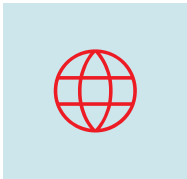
### **Sector and industry risk:**

JLL encounters risk through the supply partners we hire to provide 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 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:**

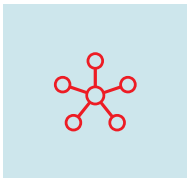
JLL, like others in our industry, has high supply partner spending in five key sectors in which modern slavery is prevalent: construction, janitorial, landscaping and ground maintenance, hospitality, and security services. In addition, JLL develops technology products and provides technology solutions to clients, which may pose a risk from technology components made by forced labor. 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 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 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 piloting the training of our supply chain employees.

# Actions to assess and address modern slavery risks

In 2022, we continued to strengthen the management of our program and to increase education and awareness by developing new quick-hit training, engaging cross-functionally, and refining our information gathering and escalation processes.

## Effective management

Established in 2020, initially in Australia, the JLL Modern Slavery Committee (the “Committee”) expanded its membership to representatives from all three of our operating regions and continued to meet throughout 2022. The Committee includes members of the Global Ethics & Compliance functions, Sourcing & Procurement, Human Resources, and our higher-risk business segments (our Integrated Property and Facilities Management, Project & Development Services, Property & Asset Management and Tétris business segments). The Committee has continued to engage in improving our modern slavery program.

Our new 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.

In 2022, we looked for new ways to reach our employees in higher-risk business lines and also began a concerted effort to reach certain supply partners. This involved developing new training modules in multiple languages, as well as introducing 90-second speed training developed for supply partner employees, which we piloted on 7,799 of our own employees. This will be made available to all employees in 2023.

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

### Actions included:

- Continued communications to global Legal & Compliance teams and our global network of Ethics Liaisons for distribution to business lines
- Continued communications across regional, local, and business-line channels to raise awareness of the risks of modern slavery
- Communication of toolkits and resources to help managers communicate our program to their teams and clients
- 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.



## Education and awareness

Training and education for our employees and supply partners is essential to help combat modern slavery. Tailored training dramatically 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.

In 2022, we continued to concentrate on delivering our modern slavery training, with our employees in higher-risk business segments and in our Sourcing & Procurement function, completing 11,626 training modules on modern slavery on our learning management system. Our Sourcing & Procurement function, which has over 900 employees globally, is the front line of defense in our program to combat modern slavery in our supply chains, which is why we drove extra training and awareness programs to members of this team.

In addition to educating our own staff, we provided targeted modern slavery awareness training in 2022 to 35,917 supply partner employees across multiple sites in Property & Asset Management in Asia Pacific.

We also rolled out our 90-second speed training on modern slavery awareness to some of our supply partners via JLL's own 'OnSite' platform, developed to manage health, safety, and site compliance issues. The training covers understanding labor rights and modern slavery, red flags for modern slavery, and how to report an issue. In its first-round roll-out, we targeted supply partner employees in countries that have English as a first or second language. We will be expanding the training to other countries when multi-lingual packages have been developed. In 2022, 308 supply partner employees completed the training.

We continued to promote our internal Ask Ethics tool and our public-facing [Ethics Everywhere Helpline](#) in 2022, where employees and others can submit reports and questions anonymously.

We also created modern slavery awareness material for deployment in our client sites. The resources provided clients with the option to co-brand collateral in order to partner with us 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

On December 2, 2022, United Nations International Day for the Abolition of Slavery, one of our global clients launched a joint education and awareness initiative with us across 48 countries in the spirit of this day's focus on eradicating modern slavery. Our Facility Management teams displayed at our client's offices digital and hard copy posters highlighting the signs of modern slavery and how to report any concerns, leveraging the client's helpline. Posters were translated where appropriate, and provided the client's local helpline phone numbers and web reporting options.

## 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 avoid engaging with questionable prospective supply partners or, in the case of existing supply partners, we work with them to remediate their practices or terminate their services (if necessary).
- We continued to issue modern slavery questionnaires in 2022 to supply partners in their prequalification stage, focusing on higher-risk geographies, sectors, products and services, and entities in our Integrated Property and Facilities Management, Project & Development Services, Property & Asset Management and Tétris business segments, 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, supply partner risk ratings, and conversations with supply partners about continuous improvement and the importance of our [Vendor Code of Conduct](#) in our relationships with them.
- Building on regional ESG questionnaires, our Sourcing & Procurement team developed globally applicable modern slavery due diligence questions for a new onboarding tool for supply partners. The onboarding tool will be piloted in the United States in 2023, with the aim of deploying it globally in the future.
- In 2022, we continued to ensure that our contracts contained provisions requiring our supply partners to comply with our [Vendor Code of Conduct](#) and refrain from engaging in any of the activities comprising modern slavery.
- We used Risk methods (a Sphera company) supply chain risk management software, containing 5,311 of JLL's worldwide high-use supply partners and clients, which allows monitoring of numerous issues, including human rights.

### **Tétris's supply chain engagement**

JLL's Tétris business segment launched a human rights and modern slavery risk survey among more than 140 large, medium, and small supply partners in 2021. Soliciting and analyzing responses to the risk survey was one of the key focuses of Tétris' third-party oversight risk response plan.

The team completed the analysis in 2022, and recommendations resulting from the survey include increased training internally at JLL and for supply partners, continued monitoring of supply partners' practices, and a review of contracting clauses to ensure that these risks are regularly monitored and remain a high priority with stakeholders.

- In Asia Pacific in 2022, Sourcing & Procurement completed supply chain reports for 12 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 the case was escalated through to our Global Ethics and Compliance team for further investigation and action.
- We conducted a review of our internal operations in 2022, focusing on our Talent Acquisition function and JLL Business Services. The review centered on our recruitment processes for employees and contractors in our three geographical regions, addressing issues such as contract language, wages and working hours, charges for recruitment costs, training and equipment, external recruiters, and migrant workers. We confirmed that our policies and procedures generally foster transparency in employment terms and conditions, and we identified ways to enhance our processes to be sure that external recruiters share our commitment to keep modern slavery out of our operations. We are developing a plan to implement in 2023.

### **Addressing new legislation**

In 2022, JLL's German business focused on preparations for the German Supply Chain Due Diligence Act implementation, coordinating with our global Legal & Compliance and Sourcing & Procurement functions to align German requirements with JLL's global program. Along with a review of JLL's current policies, risk assessments, procedures, and preventive and remedial measures, the team is developing questionnaires for supply partners in JLL's higher-risk businesses and corporate functions, as well as an audit process and documentation to meet Germany's reporting requirements.

### **Strengthening supply partner relationships**

Following the implementation of a modern slavery risk management framework on behalf of a large Government Business Enterprise's facility management supply chain in 2020, in 2022 we made further progress on implementing the compliance program. The program focused on documenting whether supply partners managed by JLL on behalf of the client had a modern slavery statement regardless of the legal requirement. This process identified that many supply partners were unaware of modern slavery, so our Sourcing & Procurement team used this as an opportunity to educate these supply partners. The team also provided a modern slavery statement template that supply partners could revise and adopt for their own organizations. All supply partner modern slavery compliance documentation is stored centrally and is accessible to both JLL and the client to allow timely reporting on supply partner compliance related issues.

## Risk assessments and audits

- In 2022, we developed a modern slavery risk assessment “walk-through” for our Australia Property & Asset Management and Asia Pacific Work Dynamics business lines by adding a section to their “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 in 2022, completing 1,006 checks of 33 supply partners across our Asia Pacific, EMEA, and Americas regions. The review included control testing to ensure supply partner 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 supply partner surveys and searches for signs of modern slavery issues. Overall, the review showed 95% 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.

## 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 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 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 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 Ethics](#). New hires sign the certification in accordance with their onboarding process. In 2022, we launched a major update of our [Code of Ethics](#), creating a clearer, simpler, and more engaging document. Our new Code is highly accessible, which will foster greater commitment and understanding. We have applied the same standards to revising our [Vendor Code of Conduct](#), due out in 2023, which, like the [Code of Ethics](#), includes specific references to human rights and modern slavery.

# 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 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, 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.
- Reviewing the responses to our supply partner prequalification questionnaires and internal questionnaires to identify mitigation efforts or the need to follow up with conversations about continuous improvement.
- 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 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 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 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 representatives from higher-risk business segments and functions to increase engagement and awareness

2

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

4

Raising awareness of modern slavery and how to spot red flags with our on-site and remote workers. This includes exploring options for collaborating with our clients

5

Continuing the risk assessment of our internal operations across all functions and regions, with deeper dives into higher-risk operations or geographies

6

Capturing metrics about modern slavery in our operations and supply chains so that we can have more useful conversations about how we can improve our modern slavery risk responses

# Board of Directors' approval



**Siddharth N. Mehta**  
Chairman of the Board

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**Christian Ulbrich**  
Global Chief Executive Officer

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