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Jones Lang LaSalle Incorporated

Anti-bribery and anti-corruption compliance program



JLL's Anti-bribery and anti-corruption compliance program

Bribery and corruption are global issues that have serious consequences for societies, economies, and individuals. Corruption erodes trust, weakens good governance, hampers economic development, distorts fair competition, and undermines justice and human rights.

As a leading global commercial real estate services company, JLL Inc (and all its majority-owned subsidiaries) is committed to conducting business with integrity, transparency, and in compliance with all applicable laws and regulations. As part of our commitment to promoting

ethical practices, we have established an Anti-Bribery and Anti-Corruption Program designed to prevent bribery and corruption in all aspects of our operations.

The Program is guided by international standards, including the OECD Anti-Bribery Convention, the UK Bribery Act, the U.S. Foreign Corrupt Practices Act, and other relevant anti-bribery legislation. We believe that by implementing effective anti-bribery and anti-corruption measures, we not only protect our stakeholders but also contribute to the overall integrity of the global business ecosystem.

Features of JLL's Anti-bribery and anti-corruption compliance program

- 1** Our Code of Ethics and Anti-Bribery and Anti-Corruption policy explicitly prohibits offering, giving, or accepting bribes or engaging in corruption in any circumstances, anywhere we operate. Our Code of Ethics and policy apply to anyone who works at JLL, including our directors, officers, employees, and contractors. Each year our employees are trained on, and certify to, compliance with the Code of Ethics.
- 2** We include anti-bribery and anti-corruption obligations in our supply partner contracts, including a commitment to abide by our Vendor Code of Conduct. The Vendor Code of Conduct requires our supply partners to comply with all applicable anti-bribery and anti-corruption laws and refrain from engaging in bribery or corruption in any circumstances, regardless of local culture or market practice. They must also implement effective policies and procedures to prevent actual or perceived bribery or corruption.
- 3** Our Intranet sites contain business-oriented tools designed to help our employees prevent bribery and corruption, and spot and report potential bribery or corruption situations. These tools include: Risk Management guidelines for detecting potential bribery or corruption situations, performing due diligence for third party intermediaries, uncovering risks in mergers and acquisitions, and implementing controls for gifts and entertainment, charitable giving, and finance-related roles; an Anti-Bribery Manual covering potential bribery risks, how to spot them, and actions to prevent or report potential violations; and a Manager's toolkit to facilitate training on bribery and corruption and conflicts of interest.
- 4** We conduct regular training sessions and awareness programs through our Learning Management System, to educate our employees on the risks of bribery and corruption, relevant laws, and the importance of reporting any suspicious activities. We have specific modules on anti-bribery and anti-corruption, conflicts of interest, fraud, and gifts and entertainment. The Learning Management System allows us to track completion rates.
- 5** We review, identify, and assess bribery and corruption risks across our business operations. This includes conducting due diligence on employees, clients, vendors, and third-party business partners in line with our Codes, policies, and guidelines.
- 6** We have established internal controls and procedures to prevent and detect potential instances of bribery and corruption. These cover areas such as financial transactions, gift and entertainment policies, procurement processes, and interactions with government officials. For example, Sourcing & Procurement incorporates into its supply partner pre-qualification process questions regarding the applicant's own anti-bribery and anti-corruption policy.
- 7** 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.
- 8** Our Whistleblower and Non-Retaliation Policy encourages speaking up by addressing the challenges of remediating illegal activities while protecting victims. We do not tolerate any form of retaliation against anyone who reports a concern or complaint, cooperates with an investigation, or refuses to do something that violates our Code of Ethics, policies, or the law.



JLL periodically reviews its Anti-bribery and anti-corruption compliance program to evaluate its effectiveness and address emerging risks and lessons learned either from our internal ethics investigations or published issues relating to other companies operating in the same industry or geography.

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About JLL

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 108,000 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 [jll.com](https://www.jll.com)

