



Equal Employment Opportunity and Affirmative Action

This policy does not alter the nature of any at-will employee's employment and may be changed or replaced at any time with or without notice.

I. Purpose

JLL is committed to developing and maintaining a diverse workforce. JLL strongly believes in equal opportunity extended to all individuals in all aspects of the employment relationship, including recruitment, hiring, training, promotion, transfer, discipline, layoff, recall and termination without regard to race, color, religion, creed, age, sex, pregnancy (including childbirth, lactation, breastfeeding and related conditions), family responsibility (e.g. child care, elder care), national origin or ancestry, citizenship, marital status, sexual orientation, gender identity or expression, transgender status, veteran's status, genetic information, or status as a qualified individual with a disability, protected leave status or any other protected characteristic in accordance with applicable law. The company also endeavors to make reasonable accommodations for sincerely held religious beliefs and known physical or mental disabilities of otherwise qualified employees and applicants with disabilities, including for conditions relating to pregnancy, childbirth, lactation, and breastfeeding, unless the accommodations would impose an undue hardship on the operation of our business and ensures that employment decisions are based only on valid job requirements.

JLL will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information or third-party vendors (unless applicable business case exists) or social media assessment platforms, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by JLL, or (c) consistent with JLL's legal duty to furnish information. As a general rule, JLL does not share individual employee compensation information with clients and instead provides aggregate or anonymized data as required by client contract or upon request.

II. Procedures

- A. All employees are responsible for maintaining a positive work environment free from any form of unlawful discrimination or harassment.

- B. JLL complies with federal, state and local equal employment opportunity laws and affirmative action requirements.
 - 1. Affirmative Action Plans are developed and implemented in conformance with applicable laws and/or regulations. The Plans are prepared and maintained by Human Resources and relevant portions of the company's Section 503 and VEVRAA plans are available for employee review. Employees may contact Human Resources, Legal, one of the Ethics Officers identified in JLL's Code of Business Ethics or Employee Relations to request a review.
 - 2. JLL's equal employment policy is distributed internally and externally.
 - 3. Company recruiting activities are designed to increase workforce diversity.
 - 4. JLL continuously monitors the effectiveness of its non-discrimination and anti-harassment policies, as well as the affirmative action program and other efforts to increase workforce diversity.
 - 5. JLL displays employment posters required by federal, state and local laws.
 - 6. The company has an audit and reporting system to allow for effective measurement of its affirmative action activities.
 - 7. JLL considers requests for reasonable accommodations for religious beliefs and disabilities (including but not limited to, issues caused or contributed by pregnancy, childbirth, lactation, breastfeeding, and related conditions).
 - a. Employees and applicants are invited to identify any physical or mental impairment that relate to the essential functions of the job, describe functional limitations that may result from the impairment, and suggest any accommodation believed appropriate.
 - b. Requests for accommodations, including a leave of absence, may be made to the employee's supervisor or a member of Human Resources. Human Resources should be consulted regarding all requests for accommodations.
 - c. The Chief Operating Officer or Functional Leader of the employee's group must be involved in consideration of any accommodations that require significant expense.

8. Employees and applicants for employment will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in:
 - a. Filing a complaint;
 - b. Opposing any act or practice made unlawful by, or exercising any other right protected by, any Federal, State or local law requiring equal opportunity, including Section 503 of the Rehabilitation Act, the affirmative action provisions of VEVRAA, and Executive Order 11246; or
 - c. Assisting or participating in an investigation, compliance evaluation, hearing or any other activity related to the administration of any Federal, State or local law requiring equal opportunity, including Section 503 or Rehabilitation Act, the affirmative action provisions of VEVRAA, and EO11246.

III. Problem Resolution

1. Employees should contact their supervisor either in writing or verbally to discuss concerns, complaints or perceived violations of company policy. Alternatively, employees may contact Human Resources, Legal, one of the Ethics Officers identified in JLL's Code of Business Ethics, Employee Relations or the Ethics Helpline (877-540-5066). Complaints will be investigated promptly.
2. Any form of retaliation for making a good faith-based complaint, or participating in the investigation of a complaint, is strictly prohibited.
3. Legal should be notified immediately upon notice or receipt of a formal lawsuit or agency charge.

IV. Exceptions/Revisions

This policy has been reviewed and approved by Human Resources and Legal. Policy revisions require the approval of the HR Policy Review Committee and Americas HR Leadership Team. To the extent that any law or regulation conflicts with this policy, that law or regulation will apply.

Revision History

Date	Description
August 25, 2017	Policy Modified
January 8, 2018	Policy Modified
October 2, 2019	Edited detail on plan availability and Employee Relations contact information
October 11, 2019	Edited to provide additional information on accommodation
June 17, 2021	Compensation data sharing enhancements