



Annual Report

Ethics Everywhere

Calendar Year 2021





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Introduction



Christian Ulbrich – CEO

Ethical behavior and conduct are part of our culture, and more generally a part of who we are as an organization. Our Ethics Everywhere program is focused on empowering our people to make ethical decisions every day.

We are proud to have been recognized as one of the World’s Most Ethical Companies every year since 2008 by the Ethisphere Institute. This recognition is exclusively granted to organizations that can demonstrate the existence of a superior employee and leadership culture that promotes ethical business practices.

The companies recognized must have adequate systems and programs in place to reasonably prevent ethical failures and mishaps, and I am proud of our efforts.

In this report we transparently detail our business and the ethics program we have implemented over many years to equip our employees and business partners with the skills and resources necessary to combat the ethical challenges a company of our size and scale faces.



Claire Handley – Chief Ethics and Compliance Officer

As one of JLL’s three core values, ethics are at the heart of our culture, underpinning every facet of our business and helping us achieve our purpose of shaping the future of real estate for a better world.

We have branded our ethics program **Ethics Everywhere** and its focus is on empowering our people to make ethical decisions every day, not just when someone is watching. It makes us all responsible for creating a culture grounded in trust, fairness, and accountability. It reminds us that the integrity of our organization is built on the integrity of our people, and it helps us make a positive difference to our clients, colleagues, and communities so we can all thrive.

In 2021, Covid-19 continued to challenge our operations with significant numbers of our workforce working remotely and facing unprecedented circumstances. But we viewed it as real-world assessment of our ethics

program. A robust program should not be dependent on the location of our staff but rather the strength of our ethical culture and the effectiveness of our reporting and detection systems, policies, and training.

JLL has published its ethics statistics on an annual basis since 2005 and this year, we have expanded the report to include a description of the core elements of our ethics and compliance program. At JLL we believe being transparent with our experience is part of being an ethical organization.

We invite you to read this report and learn more about the governance and strategic steps we take to manage the ethical risks an organization of our size routinely faces.



About JLL

Who we are

JLL (NYSE: JLL) is a leading professional services firm that specializes in real estate and investment management. You can learn more about JLL and our services in our [Annual Report](#). JLL's purpose is to shape the future of real estate for a better world, underpinned

by our three core values of teamwork, ethics, and excellence. These values are at the heart of our culture and support our commitment to uphold the highest possible standards of ethics and sustainability for our clients, our communities and each other.

Our operating environment

JLL is committed to maintaining the highest ethical standards and to 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 international borders and has complex supply chains, we must work hard to ensure that our standards are upheld across every facet of our business. Our ethics and compliance program is designed to address challenges in our operating environment, including:

Scale of our operations

JLL offers integrated services worldwide, employing approximately 98,000 employees that serve clients in more than 80 countries from 380 corporate offices. The scale of our operations means we operate across diverse geopolitical and cultural environments, with differing operating standards and regulatory expectations.

Nature of our operations

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 57,000 suppliers worldwide in over 80 countries and spend approximately \$10 billion, with the most complex supply chains in our Work Dynamics and Property & Asset Management business lines.

Dispersed workforce

JLL manages over 5.5 billion square feet of real estate for clients. Many staff work at and from third party premises which impacts available communication channels.

Why we report on our ethics program

At JLL, we hold ourselves accountable to our shared values and work towards our common purpose with integrity. We want our employees, clients, supply partners, investors, and the communities we work in to know that our commitment to ethical behaviour is at the centre of everything we do. We believe transparency builds trust, and trust builds long lasting relationships.

This report will provide an overview of our ethical operating conditions and the solutions we have implemented to address the compliance risks we face. We believe in continuous improvement and, as such, we are always looking for ways to use our resources to better mitigate risk.

Ethics and compliance risks

Each year, the Global Ethics & Compliance team conducts a top-down and bottom-up risk assessment – which includes an assessment of our high-risk countries and business lines – to identify new and emerging risks, review our existing key risks, rank, and prioritize those risks and develop or update our mitigation plans.

Our key areas of focus relate to:

Anti-money laundering

In many countries JLL, as a real estate service provider, is required to perform enhanced due diligence checks on clients and counterparties of investment and leasing transactions. To ensure we do not unknowingly facilitate the transfer of illicit funds, we have implemented policies, processes, and systems to meet our regulatory requirements and to identify high-risk transactions and the true source of funds.

Bribery and corruption

Laws in many countries prohibit giving or receiving anything of value for the purpose of obtaining or retaining business or securing any improper business advantage. Offering or making illegal, improper, or questionable payments of money or other valuable consideration to clients, supply partners, government officials or anyone else to gain a business advantage can lead to high fines, prison sentences and reputational damage. JLL aims to prevent bribery and corruption in all of our businesses, wherever we do business.

Competition and Antitrust

Antitrust and fair competition laws throughout the world regulate how businesses deal with one another, for example they typically cover price discrimination, price fixing, restraint of trade, market allocation schemes and monopolies. As a major participant in the real estate sector, with thousands of employees and many supply partners and clients, it's critical that we compete and interact fairly with our stakeholders.

Privacy and data protection

Privacy rights are enshrined in law in a rapidly increasing number of countries around the world. Respecting an individual's privacy rights is fundamental to our values and ethics. Failure to respect these rights may cause damage and distress to individuals leading to complaints which may in turn result in regulatory fines and remediation, reputational damage, and loss of trust in JLL to protect individual's personal information.

Ethical culture

Our stakeholders put their trust in JLL and they have high expectations about our ethical conduct and business practices. It is vital that we meet those expectations by acting with honesty and integrity to build trust and foster inclusive, responsible, and lasting relationships. A culture of ethics helps us to make a positive difference. It's how we shape the future of real estate for a better world. Our commitment to ethics is more than just obeying the law. Each one of our people is responsible for creating a culture that's grounded in trust, fairness, and accountability.

Human rights

We respect and promote human rights. We believe everyone is entitled to these rights without discrimination. They should not be violated for any reason. Respecting human rights is fundamental to our values, culture and our [global sustainability program](#). Due to the nature of the types of service industries we operate in (including hospitality, janitorial, security services and construction) and the geographically dispersed supply chains we manage, combating the risk of modern slavery is a key focus area for JLL.

Sanctions

Sanctions laws prohibit direct and indirect transactions with certain countries, companies, and individuals. Engaging with or facilitating others to engage with prohibited companies or individuals can lead to large fines, sanctions designations and reputational damage.

Third party risk

Arguably this is not a discrete area of risk, as it intersects with the other areas identified in this section. However, third parties require specific attention as they pose a unique challenge that requires a specific compliance strategy. It's important to us that those we work with operate in an ethical manner.



Assessing and Addressing Risk

To ensure that our resources are directed to where it is most needed, we adopt a risk-based approach to mitigation. Our risk-based approach focuses on the likelihood of a risk materializing and the subsequent impact of that risk if it were to occur. The annual compliance risk assessment (refer to Ethics and Compliance Risks for more information) conducted by

the Global Ethics and Compliance team is instrumental in determining where to allocate resources.

At a global level we implement a variety of risk management mechanisms aimed at making JLL resilient to ethics and compliance related risks.

Those mechanisms include the following:

Ethics and Compliance Governance structure



Code of Ethics

The ethical principles that guide our operations globally are embodied in our Code of Ethics, which applies to all employees of JLL and the members of our Board. The Code of Ethics is the cornerstone of our Ethics Everywhere Program, by which we establish the operating framework to communicate, monitor and enhance our ethical culture and maintain compliance with our Code. We are proud of, and are determined to protect and enhance, the global reputation we have established. As we operate in a service industry, the integrity our brand represents is one of our most valuable assets. As we have done in prior years, in 2021 we ensured that our staff certified to our Code of Ethics.



Speaking up

We encourage an open and inclusive speak up culture where people feel empowered to ask questions and raise concerns without fear of negative treatment or retaliation. JLL has implemented a reporting helpline and online platform, managed by an independent third party, which supports anonymous reporting and confidential case management. [Our Whistleblower & Non-Retaliation policy](#) is available on our public website and sets out global standards for reporting details how we manage the investigation process and reiterates JLL's commitment to protecting reporters from any form of retaliation. The helpline is only one method of communicating concerns. We encourage colleagues to be comfortable communicating directly with their managers, one of our Ethics Officers, or their Human Resources representative.

Vendor Code

We expect each of our supply partners, meaning any firm or individual providing a product or service to us, or indirectly to our clients as a contractor or subcontractor, will share and embrace the letter and spirit of our commitment to integrity. While supply partners are independent entities, their business practices may significantly reflect upon us, our reputation, and our brand. Accordingly, we expect all supply partners to adhere to the JLL Vendor Code of Conduct, which we publish in multiple languages on our website.

Education and policies

We believe in the power of education and awareness. It empowers our staff to identify issues and take appropriate action in a timely manner – whether that action is avoiding a potential issue or raising a concern with our Ethics and Compliance team. In 2021, we delivered 250,000 discrete education sessions to the equivalent of approximately 80% of our workforce. Our staff were offered the following education modules: Anti-Money Laundering, Antibribery & Corruption, Data Privacy, Conflicts of Interest, Ethics, Fair Competition, Recognizing and Avoiding Fraud, and Modern Slavery.

Policies are an important tool to communicate our expectations and commitments to our people as well as the third parties we work with. They are typically reviewed by senior stakeholders and members of the Legal team before approval by our Chief Legal Officer, and as such are an important component of the way we set the tone from the top. JLL undertook a policy review project in 2020 and 2021 aimed at ensuring that our policies were clear, concise, and reflective of our present-day position and needs.

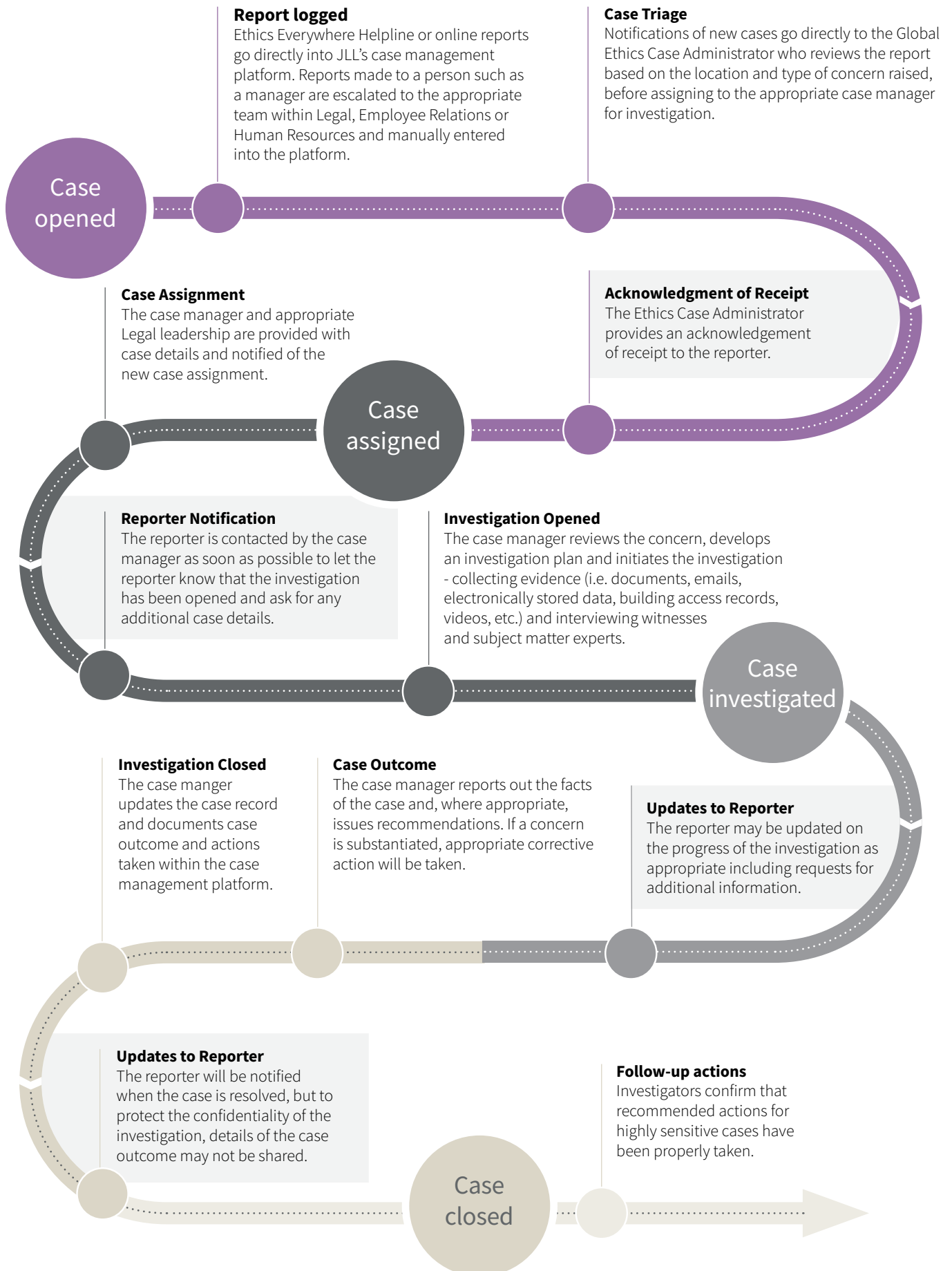
Ethics Everywhere Program

Our program provides guidance and direction to help our employees follow the spirit of our Code of Ethics. It empowers our people to speak up and raise integrity concerns with confidence, and without fear of retaliation.



Incident investigation and response

We take every allegation or suggestion of impropriety or unethical conduct seriously. This means we equally assess the merits of every allegation. The following diagram details the steps we take when an issue is raised with us:



In addition to our general risk mitigation, for our high-risk areas we have developed specific programs designed to better control the relevant risks.

Anti-money laundering

Studies have shown that the real estate industry is an attractive means for criminals to legitimize funds obtained illegally. To ensure that we do not facilitate such activities we have implemented an anti-money laundering and counter-terrorism financing program (“AML Program”) that complies with the various laws relevant to our operations. The JLL AML Program focuses on three key themes:

- **People:** we have numerous Money Laundering Reporting Officers and analysts with an extensive knowledge of anti-money laundering laws, standards and practices, as well as the skill and ability to identify risks and implement appropriate mitigation procedures. We regularly train our experts to keep them apprised of key developments.
- **Policies and procedures:** to ensure our approach is consistent across geographies and businesses (to the extent relevant), we have developed policies and procedures that detail the steps that our people must take to assess and ultimately reduce the risk of a transaction being used to facilitate money laundering. Where appropriate, we liaise with the relevant authorities to manage our suspicions.
- **Technology:** we have implemented in-house and third party technology platforms to help us to efficiently analyse, assess and monitor the third parties we work with or are considering working with.

Bribery and corruption

As a world leader in real estate services, JLL operates in over 80 countries and provides services to public, private, and government clients. We often work with or through third parties to deliver services. To mitigate the risk of bribery and corruption, we perform an annual risk assessment to identify higher-risk geographies or business operations and use the results of the risk assessment to inform our Anti-Bribery and Corruption program and annual anti-bribery review. We work with our Global Internal Audit team to independently

assess the effectiveness of the controls the selected geographies or businesses have in place. That assessment includes a review of client and vendor due diligence practices, travel & expense, accounts payable procedures, and Human Resources hiring methodologies. Additionally, our corporate governance policy on anti-bribery and corruption outlines the expectations we have for those who work with and for us. To ensure our people have appropriate information and knowledge to identify and avoid bribery and corruption we provide several training opportunities in different modalities. You can find more information on our anti corruption program [here](#).

Competition and Antitrust

At JLL we are committed to behaving in a manner that is fair, transparent, and compliant with relevant laws. Through our internal policies, Code of Ethics and Vendor Code of Conduct we outline our expectations and provide our people with guidance on appropriate behavior. We believe that training is a vital component of combatting the risk of anti-competitive behavior. Accordingly, we make online training available to our workers in a variety of global languages and deliver in-person training where appropriate. Additionally, through our “Speak-Up” program we encourage staff and third parties to raise a concern or suspicion of anti-competitive behavior.

Data privacy and protection

We have implemented a Global Privacy Governance Program throughout the company which assigns individual and management accountability for upholding key principles contained in privacy laws. The privacy program encompasses 12 key privacy elements, which include many activities: fundamental to day-to-day privacy risk control, e.g., respecting individual privacy rights (Right to be Informed, Data Subject Access Requests etc), privacy incident monitoring, data classification and retention and deletion. Our company-wide Privacy Champion network also enables us to effectively educate our various business lines and monitor privacy risks.

Ethical culture

All the initiatives we undertake, whether at the global level or at the specific risk mitigation level, are designed to control the risk of a diminished ethical culture. So, as part of our Ethics Everywhere program, we focus on measuring and monitoring the perceptions of our people and external third parties:

People Survey: Twice a year all employees are asked to provide feedback about their experience at JLL. The survey covers an array of topics, including how they perceive the strength of our ethical culture and availability of reporting mechanisms, which provides us with valuable insights.

The Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices, has awarded Ethics Inside Certification to JLL every year since 2008. Ethics Inside Certification involves a comprehensive review and evaluation of existing corporate governance systems and practices, ethics and compliance program and practices, ethical culture, corporate citizenship and responsibility initiatives, as well as an assessment of our reputation and leadership. As part of the process, JLL is benchmarked against best practices, established standards and Ethisphere's data set highlighting the programs and practices of the World's Most Ethical Companies, including industry peer companies.

Human rights

JLL is committed to preventing human rights abuses in our business and supply chain. Due to the nature of our extended supply chain, our primary human rights risk relates to forced labor (including modern slavery). Accordingly, we work with our clients and supply partners to minimize the risk that those that work for and with us are doing so under duress or in inhumane conditions. Through our governance structures, education and awareness initiatives, and our due diligence practices, we have implemented controls to mitigate the risk of modern slavery in our operations. However, we recognize that our program is continually improving and that more can be done to improve the quality and breadth of our program. We provide a detailed description of our program in our global [Modern Slavery Statement](#).

Sanctions

An important part of our compliance program is verifying that entities or persons with which we do business are not on sanctions lists. We have established a program that combines powerful third-party screening technology with the skills of our dedicated analysts to determine whether any current or prospective employee, client or supply partner appears on any relevant watchlists.

Third party risk

As an organization with extensive third-party business partners, it is critical that those partners share the same commitments to ethical conduct as JLL. The JLL Vendor Code of Conduct outlines the expectations we have of third parties. It is incorporated into our commercial relationships with third parties through legally binding contract clauses, and in certain cases re-enforced through audits and training. Additionally, our sourcing and procurement function has implemented a vendor lifecycle program that covers the key areas of screening and certification, qualifications and due diligence, contract management, and monitoring. We are strong believers in continuous improvement and as such routinely search for ways to make our program more robust and efficient.

2021 highlights and recognitions

AskEthics

During 2021 we launched our Ask Ethics mobile app. The app was developed in-house and provides a new channel for reporting as well as a tool to help our people navigate our Code of Ethics, find answers to common ethical questions or find the right people for additional support. It includes a comprehensive database of answers to ethical and operational questions. In addition, the app allows for disclosures of gifts and entertainment and personal conflicts of interest. It empowers our people to access ethics resources and support “on the go.”

Speaking Up Guide & Toolkit for Managers

Managers play an important role in an encouraging ethical culture. The guide brings together the key things managers need to know and do to encourage speaking up within their teams. The toolkit provides ready-to-use materials and resources in different modalities (written messages, visuals and video) to help them foster a safe, inclusive and ethical culture.

Collaboration

JLL is actively involved in efforts to improve the integrity and transparency of global markets through collaboration with the World Economic Forum Partnering Against Corruption Initiative (PACI), the Gatekeepers Framework (a joint initiative between PACI and the Global Future Council on Transparency and Anti-Corruption) and BELA (the Business Ethics Leadership Alliance), among other programs.

Recognitions

- World’s Most Admired Companies, Fortune Magazine
- World’s Most Ethical Companies®, Ethisphere Institute
- Ethics Inside Certification, Ethisphere Institute



Monitoring our ethics

We have collected and tracked our ethics statistics for many years. When that data is coupled with our annual risk review process, we obtain valuable insight that allows us to review our program's effectiveness and adjust our program based on empirical data.

Our complete ethics statistics are presented at the end of this report, including comparisons to prior years and benchmarking against data published by Navex Global, the provider of our helpline services. Ethics statistics are inherently difficult to interpret accurately. An increase in the number of allegations could mean that the ethical environment of an organization has deteriorated. But it could also reflect a positive development in terms of our efforts to communicate our Whistleblowing policy which empowers employees to report their concerns.

In 2021, there were 129 matters where serious ethical lapses resulted in termination of employment, illustrating JLL's commitment to take action to protect and promote an ethical workplace. This is up slightly from the 127 terminations in the prior year and represents only 0.13% of our population.

Employees and leaders who do not fulfill their ethical responsibilities face disciplinary action, including termination of employment. Publishing statistics relating to terminations ensures our people understand that unethical behaviour will not be ignored. It demonstrates not only the effectiveness

of our investigations process, but also our resolve to take appropriate actions in response. Almost all of these situations could have been avoided with some common sense or personal self-policing. Today, an increased use of technology and forensics, together with better reporting of concerns by colleagues, makes it increasingly unlikely that misconduct will go undetected. We hope that knowledge of this will help deter bad conduct that can lead to serious personal consequences.

Some reported ethics concerns resulted from unintended mistakes or misunderstandings, and we conducted individual or group training to address those situations. Some allegations were determined to be unfounded or not supported by sufficient evidence. In a few cases, we determined that allegations were falsely made due to personal conflicts between employees, or an effort to hide or establish an excuse for poor performance. Additionally, some of the allegations involved employees of clients or vendors. In all cases where we were able to determine that unethical behaviour occurred, we took disciplinary action including counselling, training or re-assignment.

Tracking these statistics provides an important source of data to help: 1) inform our Ethics Everywhere program, 2) develop and target trainings and 3) improve ethics and compliance processes.



The information in the table below shows our global helpline statistics for 2021 as compared to the global benchmark published by our helpline provider, Navex Global.*

| Navex Benchmark | Navex Global Survey | JLL |
|---|------------------------------------|-------------------------------------|
| Reports per 100 employees | 1.3 | 1.1 |
| Anonymous reports | 50% | 18% |
| % of reports that are inquiries only | 10% | 4.3% |
| Civility and other HR matters as a % of all reports** | 50% | 61% |
| Helpline reporting (calls and web form) | 78% | 29% |
| All other methods of reporting | 22% | 70% |
| Substantiation Rate | 43% | 34% |
| Geographic Reporting | Americas 86% APAC 7% EMEA 8% | Americas 72% APAC 20% EMEA 8% |

* Navex publishes an annual benchmarking report (*Navex Risk & Compliance Hotline & Incident Management Benchmark Report*) with data gathered from the many companies for which it provides helpline services.

**In both JLL’s experience and in the benchmarking, the highest number of overall reports were related to ‘HR, Diversity and Workplace Respect, Unlike in prior years, JLL’s number of reports in this category were higher than Navex’s benchmark due to a change in how Navex categorizes matters. Navex removed reports previously categorized as ‘other’ from the ‘HR, Diversity and Workplace Respect category and now reports them separately. Added together, Navex’s HR, Diversity and Workplace Respect, + Other categories are equal to 63% versus JLL’s 61%.

JLL’s results were lower than Navex’s average in terms of cases per hundred employees (1.1 versus 1.3), and our substantiation rate was lower (34% versus 43%). Our geographic reporting percentage was more evenly distributed across our regions.

Anonymous reporting increased by 1%, yet the percentage of hotline reporting versus all other methods continues to remain much lower than the Navex average (29% versus Navex’s 78%). We believe this indicates a healthy culture where employees feel empowered to speak up to their managers, HR or Ethics Officers without fear of retaliation.

Our percentage of reports representing inquiries dropped to 4.3%.



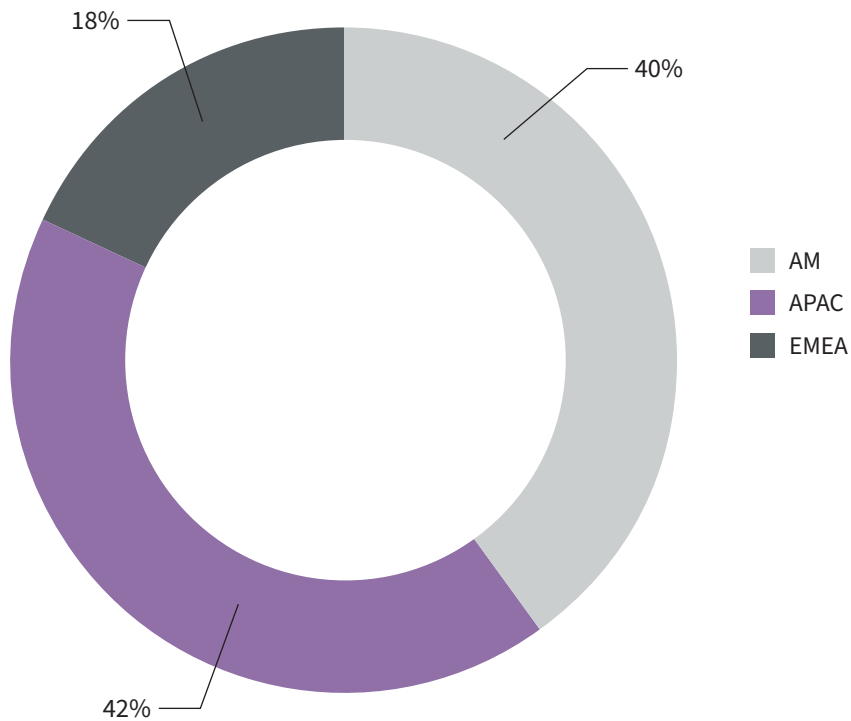
In addition to the helpline data, we obtain and maintain broader data on the investigations we conduct. We have been maintaining this data for a number of years, so we are also able to share a trend analysis:

| | 2021 | | 2020 | 2019 | 2018 | 2017 | 2016 | 2015 | 2014 | 2013 | 2012 |
|---|--------|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Total Number of Matters | 1,108 | ↓ | 1,118 | 1,148 | 1,095 | 884 | 638 | 503 | 333 | 250 | 253 |
| Total Number of Employees | 98,000 | ↑ | 91,000 | 93,000 | 90,000 | 82,000 | 77,000 | 61,500 | 58,100 | 52,700 | 48,000 |
| Number of matters per 100 Employees | 1.1 | ↓ | 1.2 | 1.2 | 1.2 | 1.02 | 0.83 | 0.82 | 0.57 | 0.47 | .053 |
| Total Number of closed matters where we determined there was an ethics violation | 375 | ↓ | 445 | 450 | 443 | 435 | 328 | 346 | 277 | 183 | 194 |
| Percentage of matters where we substantiated or partially substantiated the claim | 34% | ↓ | 40% | 39% | 40% | 58% | 51% | 69% | 83% | 73% | 77% |
| Percentage of matters where we took some kind of action | 59% | ↑ | 51% | 58% | 59% | 75% | 59% | | | | |
| Number of Actions Taken | 650 | ↑ | 574 | 665 | 641 | 560 | 375 | 346 | 277 | 183 | 194 |
| Terminations | 129 | ↑ | 127 | 155 | 151 | 167 | | | | | |

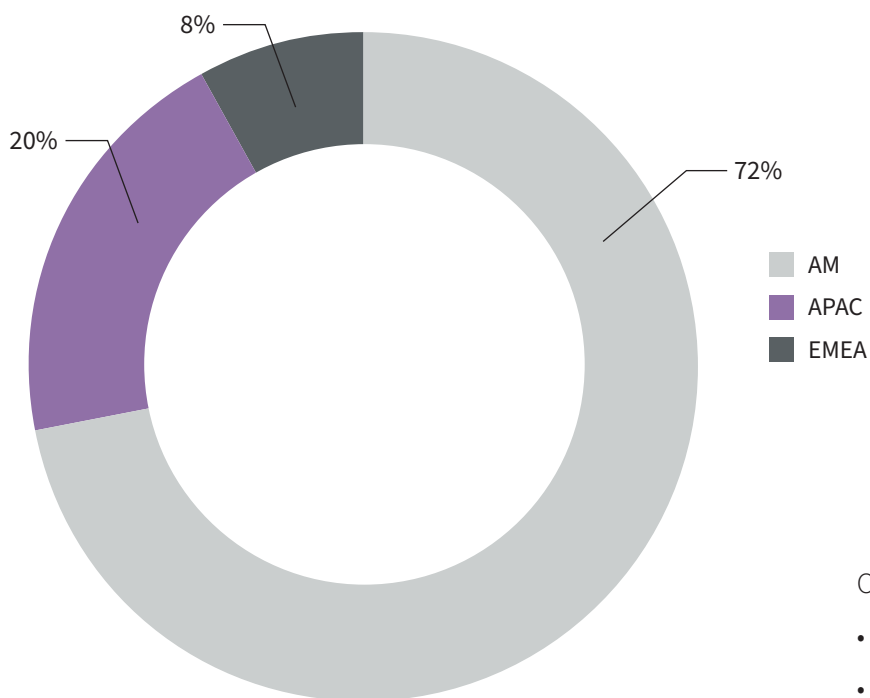


Appendices

Employee Population by Region



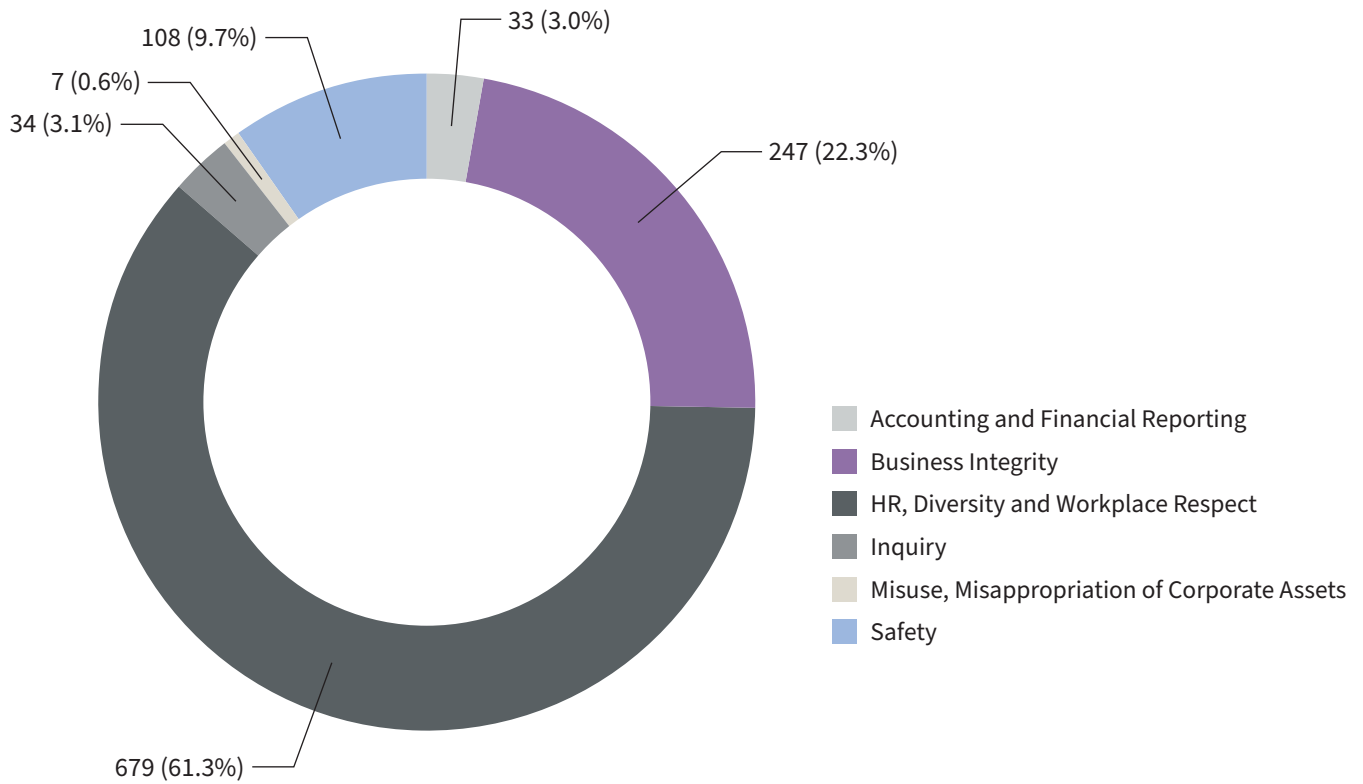
Ethics Matters by Region



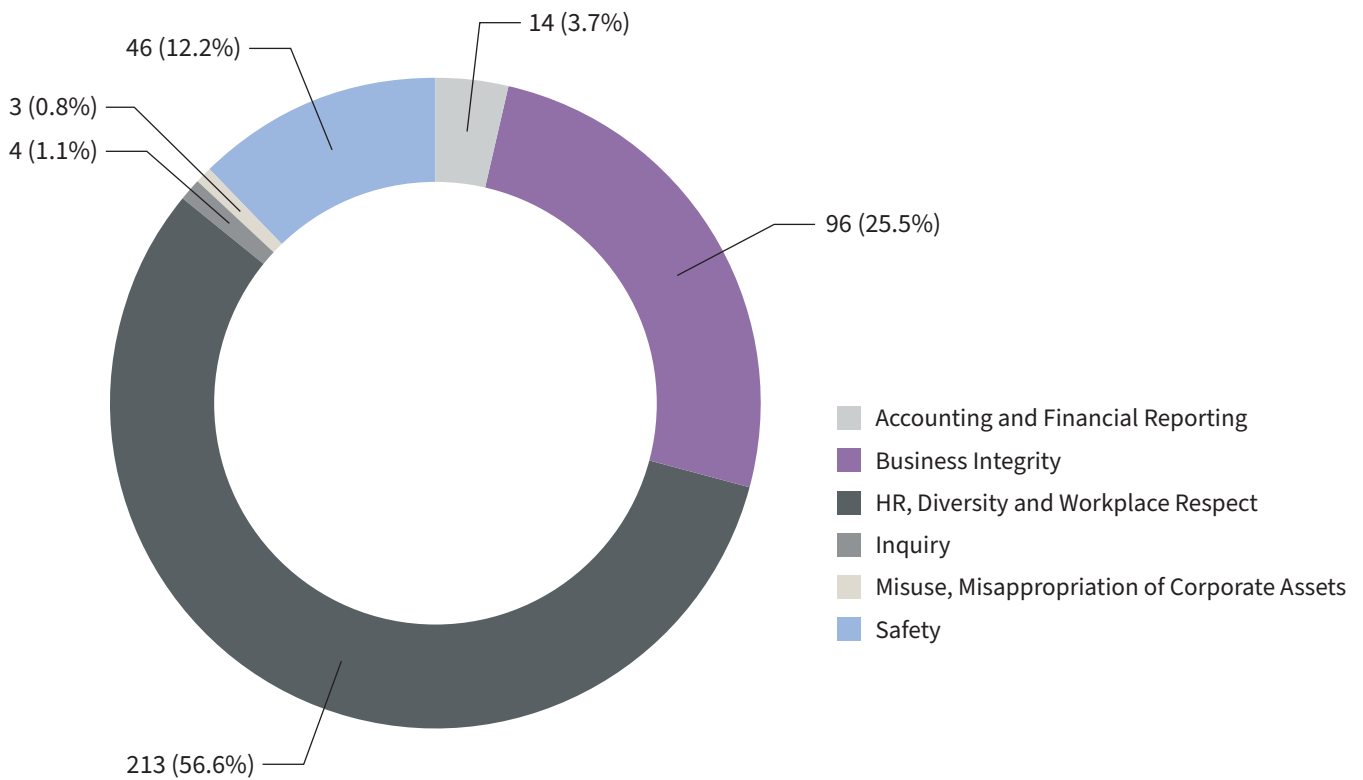
Of 1,108 total matters:

- 167 occurred in India (15.07%)
- 745 occurred in the U.S. (67.24%)
- Together, these two countries make up 82.31% of all our ethics matters in 2021.

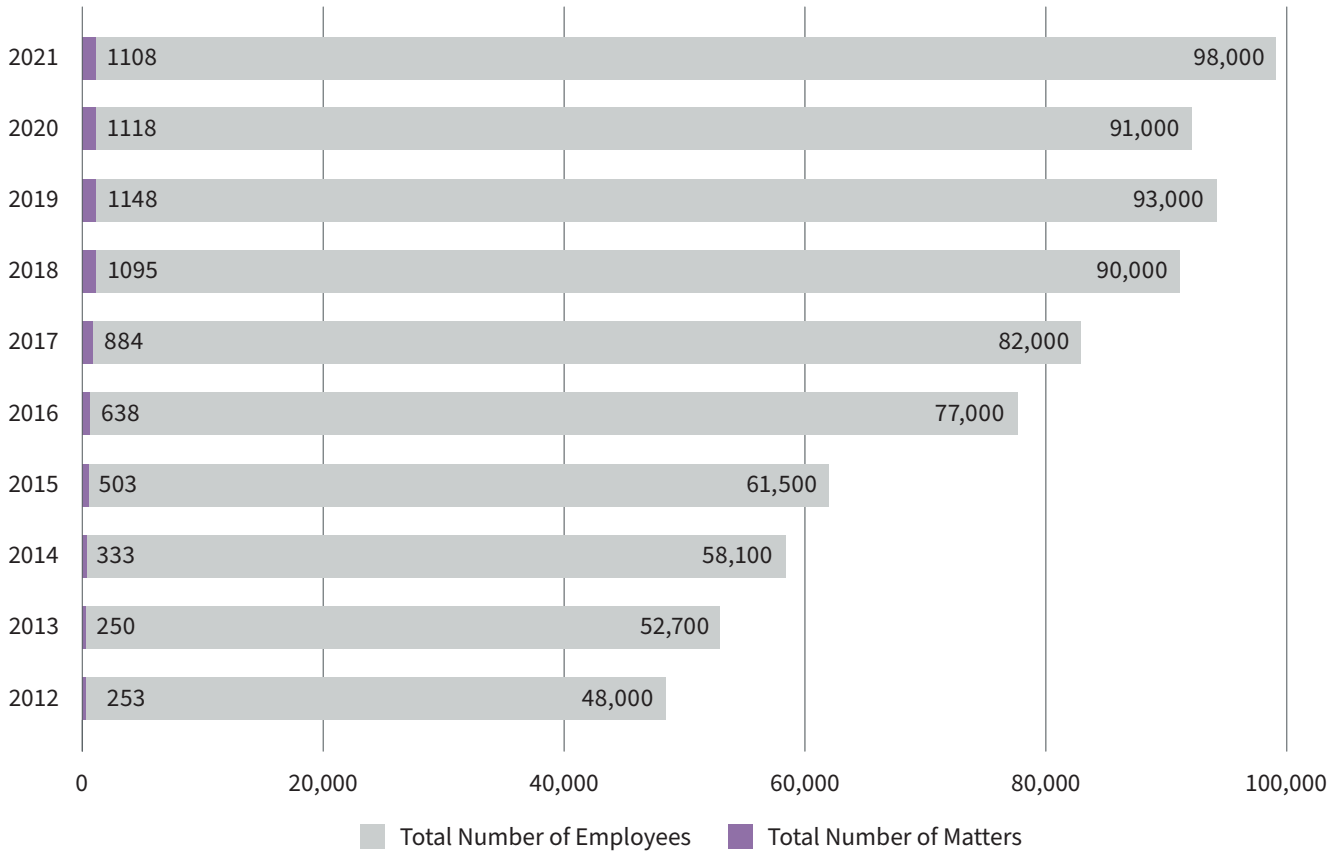
All matters by category



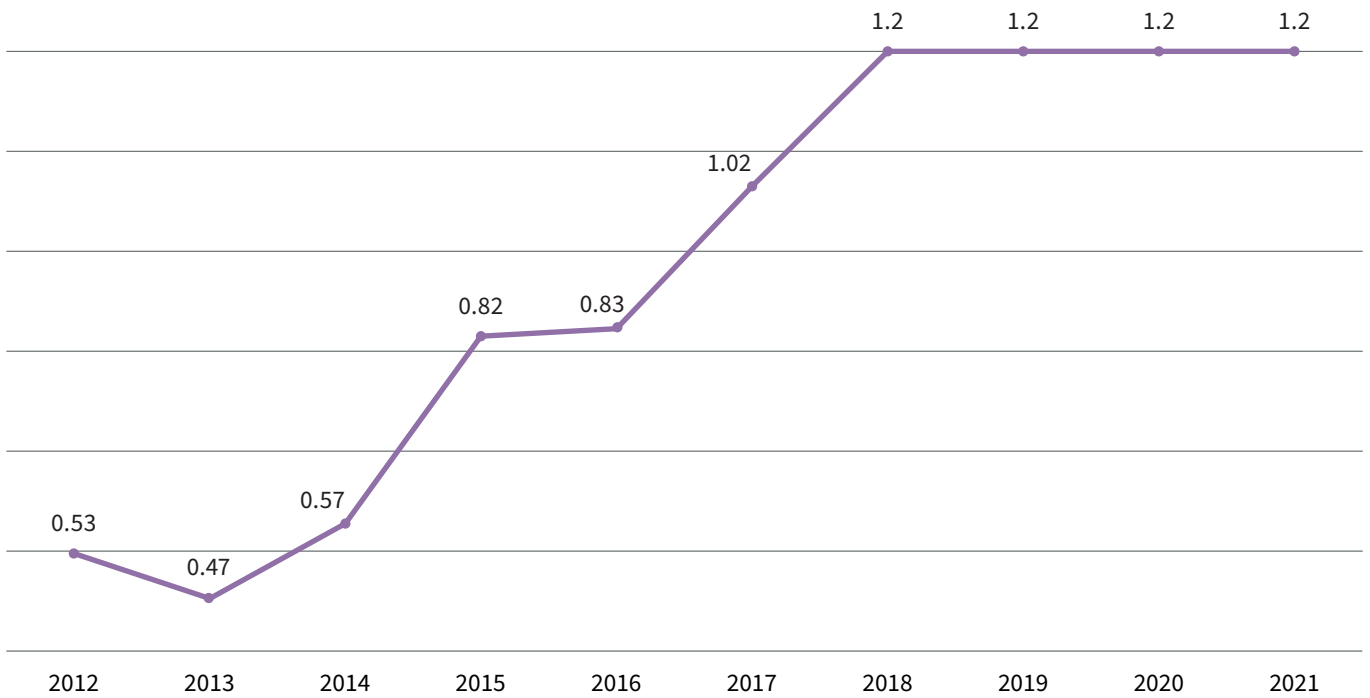
Substantiated matters by category



Number of employees vs. number of matters



Number of matters per 100 Employees





For more information, please visit our [website](#).

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