

Modern Slavery Statement

2025

About JLL

Introduction

Jones Lang LaSalle Incorporated and its subsidiaries, including LaSalle Investment Management (“LaSalle”) (collectively referred to as “JLL”), approve and issue this joint Modern Slavery Statement (this “Statement”) under the UK Modern Slavery Act, the Australian Modern Slavery Act, the German Supply Chain Due Diligence Act, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (collectively, the “Acts” and individually, the “Act”).

This Statement has been prepared in compliance with JLL’s UK, Australian, German, and Canadian 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, 2024, to December 31, 2024.

Who we are

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 \$23.4 billion and operations in over 80 countries around the world, our more than 112,000 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. 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 modern slavery and human trafficking are not present anywhere in our business or supply chains. For further information, visit 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 and 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 real estate 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 71,000 supply partners worldwide in over 90 countries and spend approximately \$14.5 billion annually, with

the most complex supply chains existing in our Integrated Property & Facilities Management, Project & Development Services, and Property & Asset Management 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/ health and safety, technology services, electrical/mechanical, plumbing/hydraulics, kitchen/bathroom consumables)
- Project and 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)
- Real Estate investment management (via LaSalle): property management, valuation, brokerage, leasing, advisory, finance and accounting, and marketing and distribution
- Research
- Marketing
- Consulting services
- Design, build and fit-out services

We impose strict 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, on entry-level wages, or who are otherwise vulnerable, for property management and construction projects. We recognize that some products that we or our supply partners procure to provide services may also pose a modern slavery risk, such as office consumables (coffee, paper products, and fresh fruit), personal protective equipment, 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 services provided or products made using forced labor as well as to certain operators who are becoming more clandestine in their approach as governments and other large organizations increasingly condemn modern slavery practices. So, it is 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 training our supply partner employees.

Actions to assess and address modern slavery risks

Effective management

The JLL Modern Slavery Committee (“Committee”) continued to expand its membership and meet quarterly throughout 2024. The Committee includes representation from a cross-functional group of members from our global Ethics & Compliance, Sourcing & Procurement, Sustainability, and Human Resources teams, and our higher-risk business segments.

Committee members drive modern slavery awareness and compliance across our organization by disseminating program information to their teams, promoting education and awareness initiatives, working cross-functionally on risk identification and mitigation strategies, and engaging with clients and supply partners about our program.

Additionally, Committee members empower their teams to:

- aid clients with supply chain compliance by completing modern slavery questionnaires, agreeing to relevant contractual clauses, and participating in reviews and audits
- support supply partners by promoting awareness of our program and providing guidance on recognizing and reporting modern slavery red flags in supply chains

Building awareness of our program and our annual Statement with our colleagues across the world remains a key activity throughout the year.

Actions included:

- An all-company message to announce the publication of our Statement.
- Worldwide communications to our Legal & Compliance teams, our Ethics Liaisons, and business segment channels to raise awareness of Modern Slavery.

- A review and revision of our modern slavery intranet site, ensuring its content remained up-to-date and relevant for our employees.

Education and awareness

Education and awareness for our employees and supply partners are 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.

Employee training

We continue to concentrate on delivering our modern slavery training to our employees. Sourcing & Procurement remains the front line of defense in our program to combat modern slavery in our supply chains. In 2024, almost 600 of our Sourcing & Procurement professionals completed our Modern Slavery Express Training. Since our Express Training was rolled out, almost 20,000 employees have completed it.

We reviewed and updated our comprehensive modern slavery training module offered to our employees through our learning management system to ensure it remained current and relevant to our operations and supply chains. It is now available in Portuguese, Simplified and Traditional Chinese, Malay, Polish, French, German, Spanish, Thai, Japanese, Indonesian, and English.

Our 2024 mandatory Code of Ethics certification and training campaign incorporated a module on modern slavery. Globally, we achieved a completion rate exceeding 93% among our employees for this campaign. More than 2,000 additional modern slavery training modules were also completed by our employees.

Ethics & Compliance awareness initiatives

We have continued to improve our AskEthics chatbot, which was launched in 2023 and converted to a chatbot format to provide employees with expedited access to frequently asked ethics questions. We anticipate the release of an updated version of the chatbot which uses Generative AI to provide users with improved responses. We also modified our public-facing [Ethics Everywhere Helpline](#) where employees and others can submit reports and questions anonymously to ensure users can exercise global or local reporting options.

We also made further improvements to our database of standard responses to client and potential client questionnaires by implementing a chatbot interface, making it faster and easier for employees to access and locate the required information. Employees use the chatbot to locate and provide information to clients about our approach to human rights issues and how we keep modern slavery activities out of our operations and supply chains.

JLL maintains an Ethics Everywhere Helpline: a reporting helpline and online platform managed by an independent third party. Available in multiple languages 24/7, the platform provides anonymous reporting and confidential case management. Our [Whistleblower and Non-retaliation Policy](#), available on our public website, sets out global standards for reporting, describes how we manage the investigation process, and details our commitment to protecting reporters from any form of retaliation.

Apart from the Helpline, there are other ways for our employees to raise a concern or ask a question about ethics, such as communicating directly with their manager, a senior leader, one of our Ethics Officers, or an HR representative. Helpline details are posted internally on our Ethics Everywhere intranet site and Speaking Up portal.

Training for our supply partners

JLL continued to roll out our Modern Slavery Express Training to our supply partner employees. The education and awareness training covers the fundamentals of labor rights and modern slavery, red flags for modern slavery, and how to report an issue.

We expanded the language offerings available. The training is now accessible in Arabic, Chinese (Traditional and Simplified), English, French, German, Indonesian, Italian, Japanese, Polish, Portuguese, Spanish, and Thai. JLL employees can access template emails in multiple languages and share links to the training and resources with supply partners via our modern slavery intranet site. The training is available by QuestionPro for easy online access and to help track completion.

We continued providing training through two platforms: JLL's 'Onsite' for managing health, safety, and site compliance, and Cm3 for supply partner prequalification and management. Our Property & Asset Management team in Australia used Cm3 to ensure 100% of supply partner employees completed their training.

We plan to extend our modern slavery training globally via QuestionPro in 2025 to priority supply partners, as it affords uniform and easy access and does not depend on supply partners having access to a JLL system.

Supply partner engagement

Sourcing and Procurement's 2024 Global Responsible Procurement Strategy included modern slavery as one of its six focus areas. As a part of this strategy, our modern slavery activities in the supply chain continued to build on the foundational efforts from our Ethics & Compliance team.

Key initiatives in 2024 included:

1. Distributing JLL's responsible procurement requirements to around 1,100 supply partners, which included an ask for supply partners to have their own modern slavery statement. Supply partners were asked to respond and confirm overall alignment with the requirements.

2. In 2023, we established a baseline for modern slavery statement and actions among our key supply partners. Building on this effort, in 2024 we shared the results of our maturity model with those partners. We then asked them to create roadmaps aligning with JLL's responsible procurement requirements. By the end of 2024, 43 supply partners had successfully established these roadmaps.
3. Asking key supply partners to complete JLL's Modern Slavery Express Training or to demonstrate that they have substantially similar training in place.
4. Adding over 50,000 supply partners to the IntegrityNext Platform to analyze responsible procurement risk (inclusive of modern slavery prevalence) by country and industry and inviting an initial cohort of approximately 1,500 high-priority supply partners to respond to IntegrityNext responsible procurement risk assessments, including questionnaires related to labor, human rights, and supply chain responsibility. In 2025, we will create action plans based on supply partner responses and continue to expand the assessment invitations to a greater number of supply partners.

Partnering with our clients

We conducted a comprehensive supply chain risk assessment for one of our key clients, with a primary focus on modern slavery risks. Utilizing the IntegrityNext platform, we analyzed 285 supply partners across 13 countries, representing 72% of the client's JLL-managed supply partners. The assessment paid particular attention to critical issues such as forced labor, child labor, and working conditions.

Our analysis produced a detailed risk-based supply partners mapping, highlighting specific areas of concern related to modern slavery. This allowed the client to prioritize their efforts in addressing potential human rights issues within their supply chain. JLL provided tailored recommendations for risk mitigation and performance improvement, enabling our client to strengthen their commitment to combating modern slavery and enhancing their ethical business practices.

Due diligence

- Our business segments and Sourcing & Procurement team continue to enhance their expertise in modern slavery risks, leading to improved processes for identifying and mitigating supply chain risks, early detection of red flags (preventing engagement with questionable prospective supply partners), collaborative remediation efforts with existing supply partners to improve their practices and minimize the financial impact on vulnerable populations, and termination of services (where remediation is not feasible).
- In 2024, Sourcing & Procurement began the global rollout of a new supply partner onboarding portal powered by Aravo. The portal is now live in the Americas for our Work Dynamics business segment. Other regions are scheduled for 2025. The supply partner onboarding questionnaire includes globally applicable modern slavery due diligence questions.
- We continued to ensure ethics, compliance, and Vendor Code of Conduct clauses were included in our contracts with supply partners. We have now developed multiple versions of these clauses, ranging from comprehensive provisions to simplified formats, to suit various contractual parties and situations.
- We used Sphera Supply Chain Risk Management software (previously "risk methods"), containing 6,015 of JLL's worldwide high-use supply partners and clients, which allows monitoring of numerous issues, including human rights.
- JLL remains aware of the risk of contributing to loss of income for vulnerable families due to our efforts to eliminate modern slavery, forced labor or child labor in our supply chains and across business segments. To date, we have neither observed nor received any reports of a loss of income as a result of the trainings, methods, reporting, or steps we have put in place internally or with our supply partners.

Complying with new legislation

Germany

Since 1 January 2024, the Supply Chain Due Diligence Act (LkSG) has applied to JLL's German business, requiring us to identify and address environmental and human rights risks within its own operations and among key direct and indirect supply partners. To address these risks, we have implemented several mechanisms, including a Statement of Principles, published on the local German website, standard contractual clauses, a questionnaire to categorize and manage high risk supply partners, and training materials to key supply partners, including education regarding our Whistleblower and Non-Retaliation Policy. We also created a working group shared to manage our German obligations and report to the Board.

Canada

In 2024, JLL Canada maintained alignment with global policies and training initiatives for modern slavery and our Code of Ethics. All employees worldwide were assigned annual Code of Ethics training, which encompasses modern slavery topics. Supply partners in Canada were required to acknowledge and adhere to our Code of Ethics online. Additionally, we incorporated a comprehensive clause in our contracts, obligating supply partners to uphold human rights, prohibit forced labor and child labor, maintain satisfactory labor relations, comply with anti-slavery and anti-human trafficking laws, implement due diligence procedures, and extend these commitments throughout their supply chains.

Policies and procedures

Our **Human Rights Policy** sets out our commitment to promoting workers' rights and fair labor practices and to eliminating modern slavery practices in our business and supply chains. This commitment is reflected in our **Code of Ethics** and **Vendor Code of Conduct**, which requires our supply partners to comply with 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 and reporters.

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, our policies, or the law. It is confidential and available 24 hours a day, 7 days a week, and reports can be made anonymously.

Our 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.

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. The 2024 certification included mandatory ethics and compliance training on select topics, including a modern slavery module.

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 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 and laws
- Quarterly meetings with our Committee, which includes representatives from our higher-risk business segments and teams
- Regularly engaging with senior management from our Work Dynamics and Property & Asset Management business segments, and our Sourcing & Procurement, Sustainability, Human Resources, and Legal & Compliance teams
- Monitoring supply partner responses to modern slavery questions on the new Aravo Supplier Portal and through our third-party platform, IntegrityNext, which helps us identify modern slavery risk by country and industry globally
- 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 operations and supply chains, our Ethics & Compliance team facilitated the review and consultation of our practices and this Statement with representatives of the reporting entities and our business segments and teams,

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 the Australian Act, and the Canadian Board of Directors, in accordance with the Canadian Act.

Looking ahead

Our focused activities for the next reporting period include:

1

Strengthening the membership of our Committee to have representatives from all our higher risk business segments and teams to increase engagement and awareness

2

Continuing to offer and deliver modern slavery training to our employees, including a Combating Modern Slavery course targeted to our Sourcing & Procurement teams

3

Extending our Modern Slavery Express Training via QuestionPro to priority supply partners

4

Expanding the rollout of the Aravo Supplier Platform, which includes globally applicable modern slavery due diligence questions, beyond Americas to include EMEA and APAC

5

Expanding responsible sourcing assessment invitations to a greater number of supply partners on IntegrityNext, monitoring supply partner responses, and creating action plans for improvement

6

Monitoring changes in the legislative landscape, working with regulators as needed, increasing collaboration with business partners

7

Ensuring our employees are aware of our modern slavery incident management process, AskEthics chatbot, Speak-up Portal, and client responses chatbot

8

Expand metrics and transparency about modern slavery risk and management in our operations and supply chains

Board of Directors' approval



Siddharth N. Mehta
Chairman of the Board

A blue ink signature of Siddharth N. Mehta.



Christian Ulbrich
Global Chief Executive Officer

A black ink signature of Christian Ulbrich.

About JLL

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