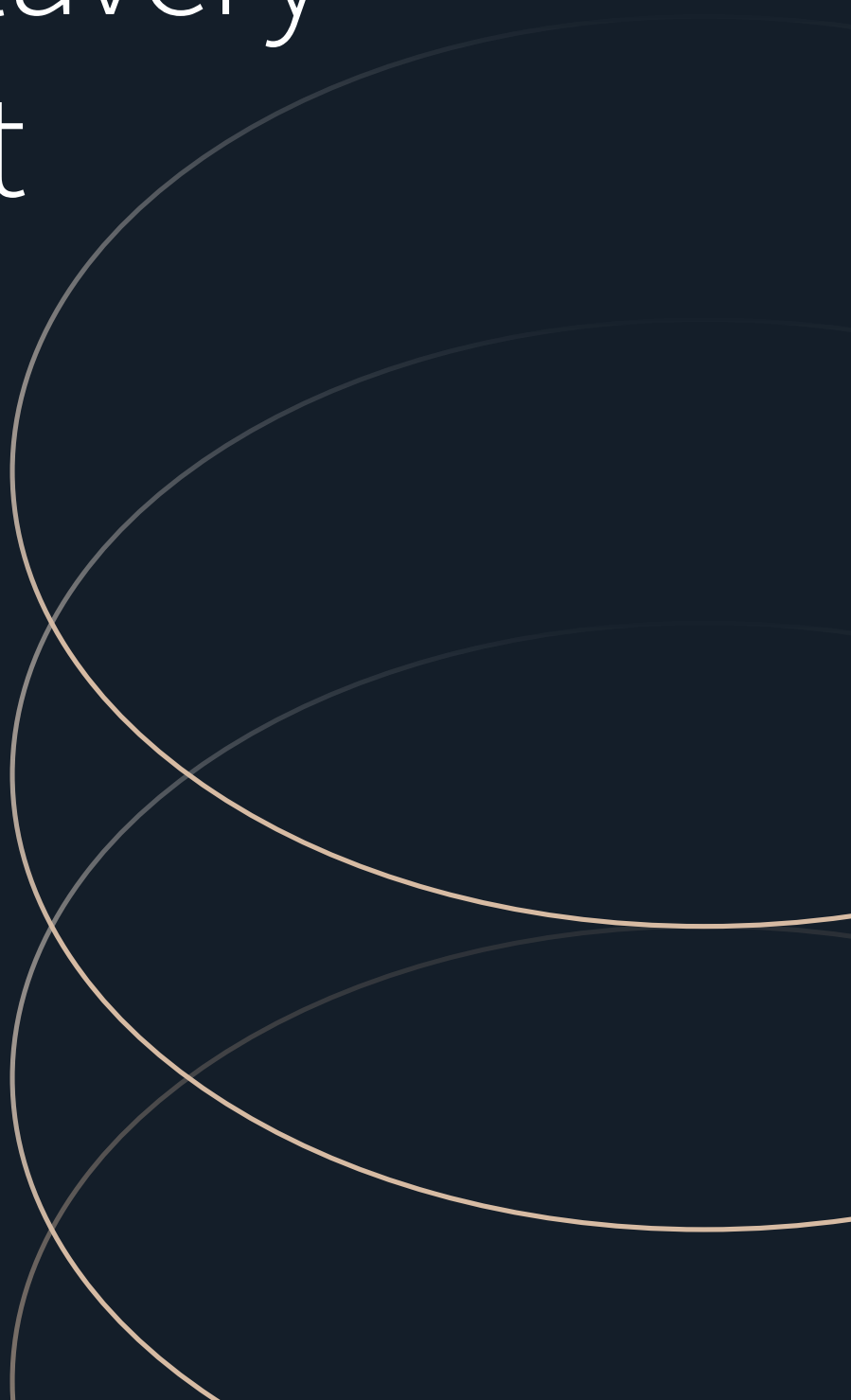


Modern Slavery Statement

2026



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, the Norwegian Transparency 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, Norwegian, 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, 2025, to December 31, 2025.

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 \$26.1 billion and operations in over 80 countries around the world, our more than 113,000 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 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.

See our [company information](#) for more details.

Our operations

We deliver an array of real estate services across four global business lines – Real Estate Management Services, Leasing Advisory, Capital Markets Services, Software and Technology Solutions – 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 Workplace 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 real estate markets.

Our supply chains

JLL operates a global supply chain with over 73,000 supply partners spanning more than 80 countries across the Americas, EMEA, and APAC regions. Our Sourcing & Procurement team spends approximately \$16.7 billion each

year, with the most complex supply chains existing in our Workplace Management, Project & Development Services, Portfolio Services and Property 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

All supply partners must comply with applicable laws, our [Vendor Code of Conduct](#), our [Human Rights Policy](#) and any additional modern slavery obligations in our supply partner contracts. Our [Ethics Everywhere program](#) provides

supply partners (and their employees) with a mechanism to report concerns or risks, enabling transparency and early identification across multiple tiers of our supply chain.

Governance

Our Modern Slavery Committee (“Committee”) oversees our program and includes representation from a cross-functional group of members from our global Ethics & Compliance, Sourcing & Procurement, and higher-risk business segments. The Committee meets quarterly to review the effectiveness and impact of the program, including ways to improve each year.

Sourcing & Procurement has primary responsibility for identifying and managing potential modern slavery incidents in our supply chain. For example, they:

- Provide regular training to supply chain partners on modern slavery risks
- Screen supply partners via environmental and social questions during JLL’s vendor onboarding process and monitor ongoing risks through IntegrityNext (responsible procurement risk analysis platform) and Sphera (supply chain risk management software). These platforms enable us to conduct risk analyses, including mapping our supply partners on IntegrityNext to identify where modern slavery risks may exist from an industry and country perspective. This analysis informs our supply chain risk management strategy and helps prioritize particular categories and countries for targeted assessments, if required
- Work with supply partners to identify and mitigate alleged or potential human rights incidents
- Engage supply partners to remediate any identified concerns, with a focus on protecting and supporting affected individuals

Ethics & Compliance provides support and advice across the entire organization and helps develop and implement global modern slavery practices, policies and statements.

Ethics & Compliance also oversees the monitoring of [Ethics Everywhere Helpline](#) reports and tracks training for JLL and supply partner employees, including completion of JLL’s Modern Slavery Express Training and Combating Modern Slavery training. Ethics & Compliance facilitated the review and consultation of our practices and this Statement with representatives of the reporting entities and our business lines and teams, including the Committee.

Our higher risk business lines and functions follow guidance from Sourcing & Procurement, Sustainability, and Ethics & Compliance to ensure their businesses are aware of modern slavery legislation and follow JLL’s policies and procedures accordingly. The business lines reach out to their local Sourcing & Procurement or Ethics & Compliance team members with questions and/or for direction. JLL employees and supply chain partners are also empowered to raise issues as part of our [Ethics Everywhere program](#).

The JLL Global Executive Board reviewed and approved this Modern Slavery Statement. The Australian Board of Directors reviewed and approved it in accordance with the Australian Act, and the Canadian Board of Directors reviewed and approved it in accordance with the Canadian Act.

Policies and procedures

JLL maintains global policies and procedures that outline human rights and modern slavery expectations and requirements for our operations and supply chains.

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 and JLL’s [Global Responsible Procurement Policy](#).

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The Responsible Procurement Policy sets out how we expect supply partners to contribute to our sustainability objectives, client sustainability and legislative requirements, and how we work with supply partners to manage sustainability risk and improve their performance over time.

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 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.

We engage with stakeholders to develop and implement our human rights policies and procedures. We work closely with supply chain partners and their respective supply chain to integrate modern slavery identification and mitigation into their operations. We also collaborate with clients on modern slavery mitigation programs.

We communicate our human rights policies and procedures to our employees and supply partners in several ways:

- **Code of Ethics and Policies:** JLL's **Code of Ethics**, **Human Rights Policy**, and **Vendor Code of Conduct** clearly outline what we expect from our employees, supply partners, and their supply partners regarding human rights
- **Supply Partner Onboarding:** During the onboarding and qualification process of new supply partners, we assess risk and supply partner practices by asking environmental and social questions, and we require supply partners to confirm their compliance with our **Vendor Code of Conduct**
- **Training and Awareness Programs:** We use training programs for our employees and supply partner employees to increase awareness around modern slavery

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

- An all-company message to announce the publication of our Statement
- Worldwide communications to our Legal & Compliance teams, our Ethics Liaisons, and business lines to raise awareness of modern slavery
- A review of our modern slavery intranet site, ensuring its content remains up-to-date and relevant for our employees

Our modern slavery and human rights policies and procedures align with:



United Nations guiding principles on business and human rights



Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises



International Labour Organization (ILO) labour standards

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We include modern slavery contractual obligations for our supply partners, including a commitment to abide by our global [Human Rights Policy](#) and our [Vendor Code of Conduct](#).

In 2025, JLL re-published our [Vendor Code of Conduct](#). While the core commitments remain consistent, the updated version includes enhanced language and structure that bring greater specificity and clarity to the document. The updated Code also places a stronger emphasis on proactive identification and remediation of human rights violations.

We register which supply partners confirm that they have policies related to human rights and modern slavery in place and we request copies. This occurs during the onboarding and qualification process where we assess risk and supply partner practices by asking environmental and social questions.

Risk management

In 2025, JLL assessed supply chain risks, including modern slavery concerns, using IntegrityNext. Supply partners were selected based on environmental and social risk factors and representation across our global operations and business lines. The assessment evaluated key issues including forced labor, child labor, and working conditions. Results provided increased transparency, helped prioritize potential risk areas, and identified supply partners for further collaboration. We plan to continue and deepen our process each year.

Since our previous statement, we have strengthened our understanding of modern slavery risks in our supply chain by deepening our risk management approach. JLL has obtained self-assessments from over 1,760 supply partners via IntegrityNext since we started this initiative in 2024.

Supply partner self-assessments include modern slavery topics alongside other labor risk areas. This effort has enabled us to identify priority areas of our supply chain to focus our efforts, and we will continue to:

- 1 Expand the number of supply partners evaluated for industry and country risk

- 2 Expand supply partner self-assessments in 2026

- 3 Assign actions to high-risk supply partners

The Committee works closely with all business lines and functions (including Sourcing & Procurement) to assess the modern slavery risks in JLL supply chains and operations.

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.

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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

JLL's Global Responsible Procurement Strategy provides a framework to guide engagement with direct and indirect supply partners across all procurement categories. Risk and human rights are a key focus of this strategy and intend to safeguard clients and JLL from regulatory violations and reputational damage by monitoring and mitigating human rights risks. Sourcing & Procurement:

- Screens supply partners against environmental and social questions during onboarding via JLL's supply partner onboarding platform, Aravo. Aravo was launched in 2024, and the onboarding questionnaire contains globally applicable modern slavery due diligence questions. Any identified risks are reviewed and assessed to determine whether onboarding proceeds
- Monitors ongoing supply partner risks through IntegrityNext
- Engages supply partners to help remediate any identified concerns

JLL's position is that supply partner relationships will be suspended or terminated where remediation cannot be achieved.

JLL identifies and assesses modern slavery risks across multiple levels of our operations and supply chain to address potential problems effectively. The following methods are used to identify these risks:

- **Audits and Assessments:** As outlined in our [Vendor Code of Conduct](#), we require our supply partners to comply with the [Responsible Business Alliance Code of Conduct](#) and JLL's [Global Responsible Procurement Policy](#). These focus on labor compliance including modern slavery and human trafficking
- **Supply Partners Self-Assessment Tools:** We track supply partners' responses through platforms like Aravo and IntegrityNext to identify risks related to modern slavery
- **Digital and Industry Tools:** The use of platforms, such as Sphera, help monitor supply partners for issues related to human rights and modern slavery risk factors
- **Engagement and Monitoring Systems:** Ethics & Compliance and Sourcing & Procurement track modern slavery and related regulatory requirements in collaboration with other business lines, and update procedures as needed to maintain alignment. This includes due diligence procedures, IntegrityNext risk assessments, and training programs

Highest Priority Risks

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. JLL works with both internal and external stakeholders to identify, understand, and prioritize modern slavery risks.

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JLL works with both internal and external stakeholders to identify, understand, and prioritize modern slavery risks. This engagement includes several organized activities and collaborations:

- The Committee meetings help different business lines and functions work together and improve the understanding and reduction of modern slavery risks within the organization.
- Senior management from our high-risk business lines meet regularly with Sourcing & Procurement, Sustainability, and Ethics & Compliance to discuss and review modern slavery initiatives, demonstrating top-level commitment.
- JLL maintains engagement with supply partners through its Supplier Relationship Management and Supplier Performance Management approaches. This engagement includes interaction with preferred supply partners to increase awareness and establish controls to reduce modern slavery risks. This is done through regular communication, training for supply partner employees, assessing risk and assigning corrective action plans where needed, and setting clear expectations through our Responsible Procurement Requirements for Suppliers.
- JLL's Client Sourcing Teams maintain contact with both operational teams and supply partners, positioning them to monitor and respond to worker feedback.

Since our previous statement, we have strengthened supply partner engagement through three key initiatives. First, we conducted a series of webinars for preferred partners and developed a Risk & Modern Slavery Toolkit with the aim of supporting our preferred supply partners to drive alignment in service of meeting client and JLL goals. Second, we expanded the rollout of Modern Slavery Express Training to reach more employees across our supply partner organizations. Finally, Aravo has enabled us to screen supply partners for environmental and social risk, including modern slavery, during supply partner onboarding, strengthening our due diligence at the point of engagement.

Our forward strategy for 2026 focuses on deepening our impact with supply partner assessments and training. JLL will increase supply partner assessments on risk and human rights issues, including modern slavery, through IntegrityNext. This enhanced platform approach will strengthen our overall risk management capabilities. JLL is also committed to delivering higher completion rates of Modern Slavery Express Training across our supply chain.

Due diligence and remediation

Due diligence

Supply partner onboarding processes include risk screening and supply partners are required to confirm compliance with JLL's Vendor Code of Conduct. Any identified risks are reviewed and assessed to determine whether the onboarding proceeds.

Procurement decision and mitigation strategies are also informed by external risk assessment tools to develop an understanding of spend categories and countries with heightened risks, including countries identified in the [Global Slavery Index](#). The output of this assessment feeds into corrective action plans where modern slavery risks have been identified.

Supply partner engagement by on-account Client Sourcing Teams provides additional insights, allowing for real-time identification and escalation of risks. Modern slavery impacts are recorded, and governance processes are in place to allow for the application of appropriate mitigation measures. JLL engages relevant internal teams and the affected supply partners to investigate and design corrective actions. These actions are captured in JLL's Supplier Corrective Action Plan, and their implementation is monitored through scheduled follow-ups.

JLL has built due diligence processes into its operations that specifically address human rights risks, including modern slavery.

These involve risk assessments and external assessment platforms (e.g. IntegrityNext) that help monitor compliance.

JLL collaborated with two clients, one a leading global technology company and the other a financial services company, to conduct a responsible procurement risk assessment of their supply chain, with a particular emphasis on modern slavery risks. Recognizing the critical importance of understanding responsible procurement performance across their supply chain, the clients sought to identify and mitigate potential human rights violations, including forced labor, child labor, and substandard working conditions.

The assessment encompassed a thorough evaluation of JLL-managed supply partners. For the global technology company, this included 285 supply partners (representing 72% of the client's JLL-managed supply partners) across 13 countries. For the financial services client, this included 38 supply partners (representing 61% of the client's JLL managed supply partners) across one country.

To address this challenge, JLL utilized IntegrityNext as the technological solution. The approach incorporated a multi-faceted assessment methodology that combined geographic and industry-specific risk factors, evaluating 13 environmental and social key risk areas to provide a holistic view of the supply chain's profile.

The analysis resulted in a report that provided actionable insights into the client's supply chain responsible procurement risks, highlighting specific areas of concern related to forced labor, child labor, and working conditions. JLL delivered a risk-based supply partner mapping that enabled the client to prioritize sustainability efforts effectively. Additionally, the engagement included tailored recommendations for performance improvement and risk mitigation, empowering JLL to enhance the overall sustainability of the client's supply chain and strengthen our joint commitment to responsible procurement practices.

- 1 We have implemented due diligence processes, including modern slavery contractual obligations for supply partners and regular risk assessments. Examples of this are the use of IntegrityNext and Sphera. Sphera contains 6,019 of JLL's worldwide high-use supply partners and clients, which allows monitoring of numerous issues, including human rights.
- 2 We have developed training programs for JLL and supply partner employees to raise awareness and improve identification of modern slavery risks.
- 3 We have incorporated modern slavery as one of six focus areas in Sourcing & Procurement's Global Responsible Procurement Strategy.
- 4 We engage with clients to promote ethical conduct and raise awareness about modern slavery risks in our shared supply chains.
- 5 We have a Modern Slavery Committee to oversee our efforts and continuously improve our approach.
- 6 During supply partner onboarding, we screen and evaluate supply partners for sustainability risks; any identified risk is reviewed and qualified to determine whether the supply partner will be onboarded or not.

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, methodologies, reporting, or steps we have put in place internally or with our supply partners.

We activated 3,474 supply partners across our EMEA and LATAM regions as we continued to roll out Aravo in 2025. Aravo contains a global standard due diligence questionnaire with modern slavery and human rights questions. Supply partner responses help improve our visibility into potential supply chain risks, enable more consistent risk assessment across regions, and inform our supply partner qualification process globally.

Remediation

JLL maintains a global framework of grievance mechanisms and remediation processes to address actual or potential negative impacts on its workforce. These mechanisms are designed to provide all employees and supply chain workers with the ability to raise concerns, receive fair treatment, and access appropriate remediation without fear of retaliation.

Our employees can raise concerns or ask ethics-related questions through multiple channels, including their manager, Human Resources, an Ethics Officer, senior leadership, Legal or Ethics & Compliance. They can also submit concerns (including on an anonymous basis) through JLL's 24-hour [Ethics Everywhere Helpline](#) or ask questions via the JLL AskEthics chatbot.

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.

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All modern slavery concerns raised through our grievance channels are managed through a structured, globally consistent process. When a concern is reported, it is reviewed and assigned to a case manager. Case managers are members of Human Resources, Legal, Ethics & Compliance, or other specialist investigators, and are assigned based on the geographic location and type of concern raised.

The case manager investigates the concern, reviews evidence, and interviews involved parties. Confidentiality is maintained to the extent possible, and reporters can receive status updates via a unique report key and password. Upon closure, reporters are notified, although specific details may be limited to protect the integrity of the investigation.

JLL's [Code of Ethics](#) explicitly prohibits retaliation against individuals who raise a concern, participate in an investigation, or refuse to violate policies or the law. The Code affirms that retaliation will result in disciplinary action, up to and including termination and legal proceedings. This commitment is supported by our [Whistleblower and Non-retaliation Policy](#).

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. [Ethics Everywhere](#) is a program of training, communications and resources on topics covered in our Code of Ethics.

JLL's [Whistleblower and Non-retaliation Policy](#) applies equally to supply chain workers, reinforcing protections against retaliation for individuals who raise concerns, cooperate with investigations, or refuse to participate in actions that contravene JLL's standards or the law.

All supply partners are required to adhere to our [Vendor Code of Conduct](#) during onboarding and it includes a dedicated section on "Speaking Up" to support awareness and accessibility of grievance mechanisms.

Supply partners are contractually obliged to inform their employees about available reporting channels and to confirm that no retaliation occurs if workers raise concerns, cooperate with investigations, or decline to engage in actions that breach JLL's standards or the law.

Supply partners are also encouraged to acknowledge and align with our [Responsible Procurement Requirements for Suppliers](#). This is a supplementary document to the [Vendor Code of Conduct](#) and reinforces our commitment to responsible procurement practices, including for human rights and modern slavery.

We request that our preferred supply partners complete JLL's Modern Slavery Express Training. This approach has helped us to raise awareness within our supply partner organizations and to more deeply collaborate with our supply partners around modern slavery risk identification and mitigation.

Using IntegrityNext, we identified and worked with 43 high-risk supply partners to support their ability to more fully provide a complete response to the assessment and improve their organization's approach. Some of these improvements required action around human rights and modern slavery topics (e.g. supply partner policy updates), while others covered broader environmental and social risk areas. The goal was to help supply partners improve their overall risk management approach for environmental and social topics.

In 2026, we will expand this program by assigning targeted actions to high-risk preferred supply partners within IntegrityNext. Each action is tailored to address the specific risks identified in that supply partner's assessment. This approach will help supply partners remediate areas of concern and improve their assessment result on IntegrityNext.

Training

JLL provides Combating Modern Slavery training for JLL employees and Modern Slavery Express Training for JLL and supply partner employees. All preferred supply partner employees are expected to complete Modern Slavery Express Training, which covers labor rights and modern slavery, risk mitigation, and reporting channels.

Our Modern Slavery Express Training is available online in 14 languages: Arabic, Chinese Simplified, Chinese Traditional, English, French, German, Indonesian, Italian, Japanese, Malay, Portuguese, Polish, Spanish, and Thai. It was developed internally by Ethics & Compliance in collaboration with the Committee. It is mobile-friendly, concise, and designed for accessibility and scalability.

In 2025, JLL employees completed more than 2,120 modern slavery training sessions and more than 1,040 supply partner employees completed JLL's Modern Slavery Express Training. We will continue to expand this training to additional supply partners and JLL employees in the coming year.

In 2026, we will again include a module on modern slavery in our mandatory Code of Ethics certification and training campaign.

JLL delivers modern slavery training through modules, designed for JLL and supply partner employees.

Supply partner training resources

In 2025, we delivered a series of webinars for our preferred supply partners around responsible procurement including one dedicated to risk and modern slavery. We provided a Risk & Modern Slavery Toolkit with the aim of supporting our preferred supply partners to drive alignment in service of meeting client and JLL goals.

Responsible procurement toolkits

JLL provides guidance documents for our preferred partners covering modern slavery definitions, risk assessment frameworks, policy development templates, and links to industry resources and external tools.

Maturity models

We collaborate with supply partners on assessment frameworks that enable supply partners to benchmark their modern slavery programs across six criteria—governance, policies, statements, risk assessment, implementation, and training. From there, we require our supply partners to acknowledge our Responsible Procurement Requirements for Suppliers that establish clear expectations for the supply chain, while providing the foundation for JLL/Supplier Responsible Procurement Roadmaps as a framework for joint implementation.

Modern slavery express training

JLL deploys this module to supply partner employees via multiple digital platforms covering fundamental concepts of modern slavery, risk indicators, and reporting mechanisms through JLL's Ethics Everywhere Helpline.

Our supply partner training is promoted through regular relationship management sessions, where category management and responsible procurement teams track completion progress and address implementation barriers. Completion is mandatory for preferred supply partner employees who service JLL accounts.

JLL recognizes that some of our more vulnerable supply partner employees may not be able to access online training – for example, those who do not have access to a digital device. For respondents requiring offline access, alternative delivery methods include printed materials and live in-person training sessions known as “toolbox talks” may be utilized by supply partners or our staff to support more comprehensive coverage of vulnerable workforce segments.

Internal training materials

Our employee training program integrates modern slavery content across multiple touchpoints to ensure organization-wide awareness. JLL employees access the training through our learning management system, with mandatory completion requirements integrated into JLL's Code of Ethics certification and training process.

Annual code of ethics training

Our mandatory company-wide certification and training is conducted annually. The 2026 training will incorporate our bi-annual modern slavery module to reinforce our policy commitments.

Modern slavery express training

The same training module deployed to supply partners is delivered to our employees, ensuring consistent messaging and shared understanding of modern slavery risks and reporting protocols.

Responsible Procurement Champions Program

The Responsible Procurement Champions network enhances capabilities for Sourcing & Procurement colleagues who directly manage supply partner relationships or on-account delivery. The output is delivery of a client roadmap that addresses net zero, responsible procurement standards, social programs (except the US), and risk and human rights. Within the Champions Program, we conduct specialized training, featuring “Risk” and “Human Rights” as two of ten modules delivered to build risk identification and supply partner engagement capabilities.

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JLL uses a number of training resources and tools:

- **Supplier Relationship Management sessions:** Regular engagement sessions provide our preferred supply partners with direct access to responsible procurement resources to meet client requirements, ensure legislative compliance, and receive tailored guidance on integrating modern slavery requirements into supply partner organizations' business practices. These sessions create a structured forum for supply partners to raise concerns, seek clarification on compliance expectations, and collaborate on practical solutions for complex supply chain scenarios including mitigating and managing modern slavery risks.
- **Responsible procurement webinar:** This allows us to share modern slavery knowledge and collaborate with our preferred supply partners to increase awareness of issues related to human rights and modern slavery.
- **Risk & Modern Slavery Toolkit:** This helps to support our preferred supply partners to drive alignment in service of meeting client and JLL goals.
- **IntegrityNext:** Selected supply partners (preferred partners and additional supply partners based on risk) receive invitations to complete environmental and social risk assessments through IntegrityNext at no cost. IntegrityNext provides structured questionnaires on human rights and labor standards, environment, ethics and compliance, and supply chain and product responsibility. The results from the assessments enable systematic identification of modern slavery risks and subsequent generation of collaborative improvement plans.
- **Cm3:** For Property Management supply partner employees in Australia, we continued providing Modern Slavery Awareness training through Cm3, a supply partner prequalification and management tool. In 2025, more than 30,930 supply partner employees completed the Modern Slavery Awareness training.
- **Modern Slavery Incident Management Process:** Clear operational protocols providing employees with step-by-step guidance on identifying suspected modern slavery incidents, escalation procedures, investigation processes, and remediation approaches.
- **Standard templates:** JLL standard templates requiring supply partner compliance with our Vendor Code of Conduct, Human Rights Policy, and modern slavery legislation, ensuring consistent integration of human rights protections across all procurement activities.

We continued to make improvements to our AskEthics chatbot and our chatbot for standard responses to client questionnaires, which include information on our approach to modern slavery and human rights.

Assessing our effectiveness

We are committed to continuous improvement and annually assess the effectiveness of our program to identify opportunities to increase impact. Our assessment activities include:

- Collaborating with Ethics & Compliance, which includes modern slavery subject matter experts and regional representatives who meet regularly to review our global response and local implementation of policies, procedures, risk assessments, and education programs
- Reviewing and updating policies, due diligence procedures, and risk assessment processes to reflect changes in our clients, locations, services, supply partners, and external factors such as geopolitical risk and regulatory developments
- Holding regular committee meetings
- Engaging with senior management from Real Estate Management Services, Sourcing & Procurement, Sustainability, Human Resources, and Legal & Compliance
- Monitoring supply partner responses to modern slavery questions through Aravo and IntegrityNext
- Tracking key metrics including Code of Ethics certification completion rates, education session attendance, Ethics Helpline reports and outcomes, supply partner prequalification questionnaire completion

Number of JLL Sourcing & Procurement employees completing modern slavery training (Modern Slavery Express Training and Combating Modern Slavery):

FY25 performance: 1,160 sessions

Number of trainings completed by supply partners in 2025:

1,040

Number of supply partners completing environmental and social risk assessments:

More than 1,700 supply partners

Supply partner engagement specific to responsible procurement:

- 62% of engaged supply partners across the Americas and EMEA completed JLL/Supplier Responsible Procurement Roadmaps
- We are committed to working with 100% of our preferred supply partners to deliver compliance and value related to responsible procurement

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JLL has not set time-bound or quantitative external targets to manage impacts associated with human and labor rights in its supply chain. Instead, individual actions, outcomes, and objectives aimed at mitigating and managing the impact are integrated into our supply partner engagement processes and sustainability risk management strategy, led by the Responsible Procurement Team in coordination with Sourcing & Procurement leadership. We use key metrics such as training completion rates and supply partner response rates to sustainability risk assessments to track the effectiveness of our actions to manage environmental and social risk in our supply chain, including modern slavery.

In 2025, more than 1,700 supply partners completed risk assessments on IntegrityNext. Additionally, JLL concluded a pilot program to assign improvement plans within IntegrityNext, testing processes for identifying high-risk supply partners and developing targeted and collaborative improvement plans.

For 2026, JLL aims to increase the adoption of Modern Slavery Express Training by preferred supply partners and issue improvement plans to all high-risk preferred supply partners within IntegrityNext. JLL also plans to continue and deepen our IntegrityNext assessment process annually.

Complying with new legislation

Germany

Since 2024, JLL Germany continued its alignment with the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) (LkSG) which applies 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 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.

Norway

In Norway the Act Relating to Enterprises' Transparency and Work on Fundamental Human Rights and Decent Working Conditions (Transparency Act) (Lov om virksomheters Åpenhet og arbeid med gunnleggende menneskerettigheter og anstendige arbeidsforhold (Å pensloven)) is in effect and requires that JLL publish a Norwegian-language statement

regarding its supply chain risk and relevant due diligence measures mitigating such risks. This local report will be available on the website of JLL Sweden.

Canada

In 2025, JLL Canada continued its 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 bi-annually. Supply partners in Canada are subject to contractual clauses requiring adherence to JLL's Vendor Code of Conduct and obligating them 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. JLL Canada maintained supply partner onboarding processes through Aravo, with additional supply partners undergoing vetting through Avetta or ISNet for client-specific requirements, ensuring consistent due diligence across our supply chain. These processes remained in effect throughout 2025, reinforcing our ongoing commitment to preventing modern slavery in our operations and supply chain.

Looking ahead

Our focused activities for the next reporting period include:

- 1 Enhance employee participation in the Speaking Up Campaign through targeted communications that build capability to recognize and report modern slavery indicators within our operations and supply chains.
- 2 Continue to deepen our engagement with our preferred supply partners on our Responsible Procurement Requirements for Suppliers, which establish clear expectations for the supply chain. Our deepened engagement includes assessing the maturity of supply partners' own modern slavery program and establishing JLL/Supplier Responsible Procurement Roadmaps as a framework for joint implementation.
- 3 Ensure preferred supply partners and their relevant employees complete our Modern Slavery Express Training.
- 4 Leverage IntegrityNext to identify preferred supply partners with high-risk scores and assign them improvement plans to address key risk areas.
- 5 Strengthening the membership of our Committee to have representatives from all of our higher risk business lines and teams to increase engagement and awareness.
- 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



Christian Ulbrich
Global Chief Executive Officer

About JLL

JLL (NYSE:JLL) is a leading global commercial real estate services and investment management company with annual revenue of \$26.1 billion, operations in over 80 countries and a global workforce of more than 113,000 as of December 31, 2025. For over 200 years, clients have trusted JLL, a Fortune 500® company, to help them confidently buy, build, occupy, manage and invest across a variety of industries and property types, including office, industrial, hotel, multi-family, retail and data center properties. 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 WAY. Powered by rich global datasets and leading technology capabilities, we provide coordinated, end-to-end delivery of real estate services for a broad range of global clients who represent a wide variety of industries. Through LaSalle Investment Management, we invest for clients on a global basis in both private assets and publicly traded real estate securities. For further information, visit [jll.com](https://www.jll.com).