

*Jones Lang LaSalle
Incorporated*

Vendor Due Diligence



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Our Cover: Located at the heart of BKC, Mumbai’s new financial nerve centre, The Capital is an iconic development that showcases an everlasting and contemporary façade, while its interiors feature a rich palette of colors and textures. Designed around the innovative idea of Cybertecture, it merges both modern architecture and technology to create something that is extremely commanding and imaginative. From above in an architecturally-modeled ‘Valley,’ The Capital welcomes its visitors to a lobby that is three stories tall. The most visually striking feature, a rounded, glass enclosed space known as ‘the Egg,’ aside from becoming an idiosyncratic symbol of advancement, offers a magnificent view of the park and the city beyond. Aside from its attention grabbing design, The Capital fulfills all of the functions and tasks expected of an international financial center, and acts as a hub for culture and information.

The Capital incorporates many cutting-edge systems and features: Automated parking; Stunningly designed grand-arrival lobby; Sky lobby with Cafes; Gymnasium; a High-end Restaurant and Affordable restaurants; Intelligent Elevator-System; State-of-the-art Security Surveillance; Intelligent Integrated Building Management System, etc. The Capital’s forward thinking design is intended to reduce life-cycle costs and improve staff productivity. (Details from: <https://thewadhwaigroup.com>).

Overview

JLL provides a network of thousands of qualified service providers, suppliers, and contractors (our “vendors”) for the benefit of our clients. To ensure a high level of service to our clients through this vendor network, JLL has created this Vendor Due Diligence and Compliance Program, which embraces JLL’s Core Values of Teamwork, Ethics and Excellence and is an important element in our overall corporate sustainability effort known as Building a Better Tomorrow.

Teamwork.

JLL fosters an atmosphere of teamwork and collaboration with our vendor partners through the Program. Using our online vendor portal and third-party administrator resources, JLL provides our vendors with automated reminders and prompts, as well as one-on-one guidance and training as needed, to help lead the vendors through the Program successfully. In return, vendors buy in to the Program and trust that it will lead to better outcomes for all involved parties: the vendors, JLL, and our clients.



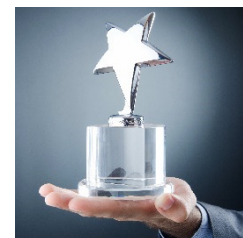
Ethics.

JLL seeks out vendor partners that treat clients, employees and the general public in a fair and professionally responsible manner. Further, we believe that emphasizing ethical conduct is the most effective way to avoid the legal, regulatory, reputational, and financial risks that JLL and our clients work hard to avoid. Through the Program, we highlight and reinforce the strong commitment to ethical behavior shared by JLL, our clients and our vendors, and include specific requirements for documentation of ethical business practices.



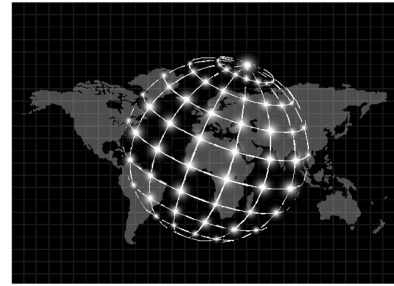
Excellence.

The Program helps JLL ensure that all vendors meet or exceed baseline expectations in several key categories to mitigate risks to themselves, JLL, and our clients. These include professional standards, quality control, and safety awareness and procedures. By avoiding and proactively managing these risks, JLL and our vendor partners can focus on delivering the highest quality of performance that our clients have come to expect.



A Global Framework for a Local, Risk Based Approach

JLL implements our Vendor Due Diligence and Compliance Program globally to ensure consistent expectations and results for JLL's vendors and clients, regardless of where services are provided. JLL also recognizes that regulatory environments, risk profiles and documentation methods often vary widely from location to location and has designed the Program to be flexible enough to accommodate local differences while retaining its global perspective.



JLL operates the Program as a global framework to guide all of our vendor relationships, reflecting JLL's worldwide guiding business principles. Since JLL regularly engages large, high volume vendors that also operate globally, this approach has the added benefit of streamlining due diligence and contracting processes for those important vendors, providing better outcomes for our clients. For local and/or national vendors, the global framework establishes a benchmark for due diligence and compliance, providing JLL and our clients with a consistent approach to vendor relationships regardless of location.

While we operate in an increasingly globalized world, JLL engages the vast majority of its vendors at the local level. Vendor risk potential is a function of multiple factors that vary depending on the details of each individual engagement, including location, the particular traits of JLL's client, and the vendor's specific scope of services. JLL tailors the Program to properly fit the variables of each individual vendor assignment and to account for applicable local concerns, risks, regulations and procedures. While the general areas of inquiry listed in the Appendix remain uniform, different weights may be applied to, and distinct methods of substantiation may be accepted for, these inquiries depending on the details of each engagement. This local, risk-based approach allows JLL to allocate resources efficiently and to maximize the overall impact of the Program for our clients.

Phased Execution

The Vendor Due Diligence and Compliance Program is built upon a technology platform that allows real-time communication and information sharing between our vendors, our third party independent compliance administrator, JLL's internal sourcing experts, and our individual client account teams. The platform includes a proprietary vendor portal used to facilitate this communication. Through the online portal and/or through direct communication between JLL and vendor personnel, we conduct the Program in phases over the course of the JLL-vendor relationship.

Initial Registration and Assessment.

Prior to any specific work assignment, vendors must meet JLL's basic eligibility requirements, as verified by JLL or our independent third party administrators. Vendors submit information on a standard template questionnaire, preferably through the online JLL vendor registration and clearinghouse portal. The portal provides information directly to JLL

Strategic Sourcing and allows efficient dissemination of vendor information to all client accounts. In locations or under circumstances in which access to the online portal is not possible, JLL works with vendors to collect the same information using hard copy questionnaires. JLL's clearinghouse partner provides an independent review and verification of the information supplied by each vendor.

Successful registration also triggers an initial risk assessment of each vendor. This baseline risk assessment of each vendor considers factors such as: service/industry category, size of the vendor, regulatory landscape, potential access to client assets, and possible impact on critical infrastructure. JLL uses the baseline assessment to drive and direct our due diligence procedures, as tailored to the individual vendor. JLL's typical areas of inquiry for due diligence are listed in the Appendix.

By prescreening vendors, JLL maintains a stable of generally qualified vendors available to our clients at all times and streamlines the contracting process by undertaking due diligence prior to requesting bids for any specific opportunities.

Pre-Contract Formation.

Prior to entering a contract for the benefit of any JLL client, we confirm JLL's initial registration eligibility requirements and we also verify any additional or more rigorous client specified eligibility requirements. Further, during the pre-contracting process, we address any compliance issues relating to the vendor's specific scope of work, the vendor's employees performing the work, or locations where the work is to be performed. Depending on the nature of the specific inquiry, verification will be provided by JLL Strategic Sourcing, JLL Legal Services, our clearinghouse partner, or a third-party designated by the client.

Depending on location, sophistication of the vendor, and service category, JLL may provide training to the vendor regarding contractual, legal and ethical obligations, environmental health and safety procedures, or other specific requirements. We also require verification of any training the vendor performs for its employees.

Continuous.

The Program does not end once we have engaged the vendor. JLL vendors have ongoing compliance and reporting duties over the entire course of the vendor's business relationship with JLL. Depending on the specific category of inquiry, vendors must confirm compliance or provide documentation of compliance at preset intervals and/or have an obligation to report all status changes or potential violations of the Program's requirements.

Simultaneously, we retain the right to monitor our vendors to satisfy ourselves that they remain in compliance with the Program. Ongoing due diligence actions may be performed by JLL or our third party administrator at various defined intervals, or at any time upon written notice to the vendor.

Audit.

Finally, we maintain the ability to audit our vendors for contractual and legal compliance at any time over the life of the JLL-vendor relationship. Depending on the circumstances and type of inquiry, we may use internal audit resources or external audit firms. Audits can have as narrow or broad of a mandate as necessitated by the circumstances and can include:

- Financial audits focusing on billing accuracy, invoicing procedures and backup documentation to ensure JLL's clients are being properly charged for services rendered.
- Operational audits of a vendors' performance of its work with regard to its agreed-upon scope of work and performance indicators.
- Compliance audits to confirm that a vendor is following through on its regulatory, legal and ethical obligations.

Additionally, we may perform audits upon suspicion of changed circumstances or noncompliance, at the request of a client, at preselected intervals, or at random. We are continually striving to establish a more pro-active and consistent, risk-based audit program.



Appendix - Areas of Due Diligence Inquiry

We have identified the following aspects of due diligence inquiry that we will pursue through the Vendor Due Diligence and Compliance Program. The timing and extent of due diligence activities and documentation requirements varies by location, circumstances, client, and category of vendor, and will be tailored based upon our risk assessment of each vendor.

General Company Information

JLL uses an independent third-party administrator to verify the accuracy of a vendor's company information, such as DUNS number, Taxpayer ID, legal entity organization, and operational capacity.

External Information Sources

We are regularly developing outside information sources to use in order to conduct external due diligence where appropriate. These include, as examples: LexisNexis, the US Securities and Exchange Commission, and EcoVadis. We also may use outside investigative sources such as Control Risks, Kroll, Exiger and similar firms in limited cases.

Financial Viability and Creditworthiness

We investigate the financial viability, creditworthiness, and if applicable, the bonding capacity of our vendors to ensure their ability to perform obligations over the life of a contract or vendor relationship. Vendor supplied information is verified by JLL's independent third party administrator through a search of public and private records.

Governmental Sanctions

It is of the utmost importance to JLL to protect our clients and ourselves from potential liability and reputational harm related to doing business with any parties that have been barred or restricted by any government authority. To minimize this risk, we screen every JLL vendor through an independent third-party administrator (currently Accelus) against database of hundreds of independent lists of sanctioned or restricted companies and individuals generated by government entities around the world, such as the Office of Foreign Asset Controls in the US and similar bodies in the European Union, UN Security Council, etc.

- Any "hits" from this daily search are sent to JLL Legal for follow up and, if necessary, investigation
- Vendors are flagged such that no Purchase Order or payment can be sent to any violator.

Occupational Health and Safety

JLL conducts a review of vendor Health and Safety Manuals through its independent third-party administrator based upon standards set by JLL and/or our client to ensure that vendors satisfy certain minimum requirements.

Insurance

Both JLL and applicable client requirements for minimum insurance coverages, amounts and endorsements are verified by an independent third-party administrator, using each vendor's current Certificate of Insurance.

- Noncompliant certificates are flagged, and the vendor is notified that a corrective action is necessary.
- Automatic warnings and reminders issued prior to expiration of current certificate.

Operational Compliance

Each vendor must warrant that it possesses and will maintain all licenses, approvals or permits applicable to its scope of work and provide documentation immediately upon request, as applicable. Any other work scope or activity specific concerns are evaluated by JLL Sourcing, Legal Services and/or Risk Management prior to entering a contract.



Vendor Employees

To minimize risks from having vendor employees located at our client sites and from potential co-employment issues both to JLL and our clients, we seek a balance of transparency into a vendor's relationship with its employees while maintaining a clear line of demarcation between the vendor's responsibilities and our own. We require our vendors to certify and document that their employees:

- Maintain the legal eligibility to work in the locations in which services are to be provided; and
- Pass any background checks administered by the vendor, according to the standards of JLL and/or our client, as allowed under applicable law. These checks may include criminal convictions, previous work and education history, drug testing, and other inquiries. JLL Vendor Code of Conduct

Each vendor must agree to comply with, and disclose violations of, the JLL Vendor Code of Conduct, available in multiple languages at: <http://www.jll.com/vendor-and-supplier-information>.


- Establishes obligations with respect to the following subjects:
 - Legal and Regulatory Compliance
 - Business Practices and Employment Practices
 - Environmental Sustainability Practices
 - Compliance with the clients' codes of conduct, as applicable
 - Business Continuity and Crisis Management
 - Audits of Internal Controls
 - Cooperation with Investigations
 - Reporting of Questionable Behavior or Possible Violations
- Bans any retaliation or retribution for good faith reports of potential violations of the Vendor Code of Conduct

Ethical Attestations

In its contract, each vendor must represent and warrant the truth of specific ethical compliance statements, and agrees to an on-going duty to disclose any exceptions or violations to those statements. The JLL Legal Services team investigates and evaluates any exceptions or violations disclosed by a vendor, with further action taken as necessary.

The vendor must make the following statements:

- a) It is our policy to not violate any anti-bribery or anti-corruption laws, and we have never had a significant violation of any anti-bribery or anti-corruption laws, rules or regulations in the jurisdictions in which we operate.
- b) It is our policy to not violate any anti-money laundering (AML) laws, and we have never had a significant violation of any applicable AML laws in the jurisdictions in which we operate.
- c) We have not been the subject of any government indictment, nor have we had any fines, penalties or settlement agreements with any government agency in the past 5 years that resulted in material financial costs to our company or affected our ability to conduct business operations.
- d) It is our policy to conduct our business ethically, and to uphold standards of fair business dealings, competition, and customer privacy.
- e) It is our policy to uphold standards of equal opportunity and anti-discrimination. We have never had a discrimination claim that involved a significant percentage of our employees or resulted in significant fines, penalties, or settlement amounts. It is our policy to support and respect the protection of human rights. We do not use, or engage in, any of the following: forced or compulsory labor, child labor, physical abuse, withholding of identity papers, or retaliation in any form. We have satisfactory labor relations, including with respect to working hours, wages, benefits and humane treatment.
- f) It is our policy to provide a safe and healthy work environment to our employees, and we have a health and safety program that is appropriate for our services. We have not had a violation of any health or safety laws, rules or regulations in the jurisdictions within which we operate in the past 5 years that resulted in a significant financial cost to our company or affected our ability to conduct business operations.



g) It is our policy to uphold principals of environmental responsibility, and in our operations we seek to minimize adverse effects on the community, environment, and natural resources. We have not had a violation of any environmental laws, rules or regulations in the past 5 years that resulted in a material financial cost to our company or affected our ability to conduct business operations.

Client Specified Standards

In addition to all of the topics covered by the Program, we have the ability to adapt our areas of inquiry to meet the requirements of any particular industry, client or location.

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