

*Jones Lang LaSalle Incorporated*

Anti-Corruption Compliance Program



## JLL's Anti-Corruption Compliance Program

JLL aims to prevent bribery and corruption in all of our businesses, wherever we do business. The framework for our anti-corruption program incorporates guidance from the U.S. Department of Justice and other international standards to effect compliance with anti-bribery laws and to detect potential violations. This framework is supported by business processes and procedures designed to minimize the risk of bribery and corruption.

### Features of JLL's Anti-Corruption Program

1. A Code of Business Ethics including a clear policy against making and taking bribes, as well as prohibiting facilitation payments of any kind. Our Vendor Code of Conduct similarly prohibits bribery of any kind. JLL is firmly committed to ethical behavior in all of its business practices.
2. A Global Corporate Governance Anti-Bribery Policy addressing JLL's commitment to integrity and transparency through a robust anti-bribery and corruption program, and Risk Management Guidelines on detecting potential bribery situations, performing due diligence for third-party intermediaries, uncovering risks in mergers and acquisitions, and implementing controls for gifts and entertainment, charitable giving and finance-related roles.
3. Intranet sites containing business-oriented tools designed to help our employees prevent bribery or spot and report potential bribery situations. These tools include an Anti-Bribery Manual covering potential bribery risks, how to spot them, and actions to prevent or report potential violations; and a Manager's toolkit to facilitate training on bribery and conflicts of interest.
4. Contract clauses for vendors and suppliers to warrant that they have a policy to comply with anti-bribery / corruption laws and have had no significant violations of such laws.
5. JLL's Ethics Everywhere Global Curriculum, available to all employees through JLL's learning management system, which includes training modules on anti-bribery / corruption, conflicts of interest, fraud and gifts.
6. A Global Internal Audit team that operates a risk-based anti-bribery work program incorporating questionnaires, interviews and testing protocols as part of its regular audit procedures for JLL business lines and country operations.
7. Focus on improper risk associated with mergers and acquisitions.
8. Training for new employees, including employees joining JLL after an acquisition, concerning what it means to work at a publicly traded company, which includes the importance of complying with anti-bribery laws. New joiners also have access to training modules on bribery risk in JLL's learning management system.
9. Multiple options for JLL employees and others to report actual or potential violations of our Code of Business Ethics or any anti-corruption laws. These options include reporting to managers, the Chief Ethics and Compliance Officer or a regional Ethics Officer; making an anonymous report by calling our 24-hour Ethics Worldwide Helpline; or submitting an anonymous written report online to our third-party ethics vendor. JLL prohibits retaliation, retribution or harassment against any employee who in good faith asks questions or raises concerns.

JLL periodically reviews its Anti-Corruption Compliance Program to evaluate its effectiveness and to implement necessary changes.