



*Achieve
Ambitions*

Jones Lang LaSalle Incorporated

Modern Slavery and Human Trafficking

01 April 2017



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Introduction

As a company that carries out a portion of its business in the United Kingdom, Jones Lang LaSalle Incorporated and its subsidiaries (“JLL”) approves and issues this Modern Slavery and Human Trafficking Statement under Section 54(1) of the UK Modern Slavery Act 2015 (MSA). JLL carries on business in the UK through its UK based affiliates, including Jones Lang LaSalle Limited and LaSalle Investment Management, but our responsibilities and commitment to uphold the principles of the Modern Slavery Act extends across all of our operations.

As one of the world’s leading professional services firms, 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 and wider communities. JLL respects and supports human rights principles as defined by the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and has been a signatory to the United Nations Global Compact since 2009. JLL works to ensure that we do not violate these human rights principles through our business operations and activities.

Our commitment to human rights extends to ensuring there is transparency in our own business and in our approach to preventing modern slavery from occurring anywhere in our supply chain. We therefore expect



all of our contractors, suppliers and other business partners to embrace JLL’s Core Values of Teamwork, Ethics and Excellence. Our contracting processes highlight and reinforce JLL’s strong commitment to ethical behavior by including specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children. Further, we expect that our suppliers will hold their own suppliers to the same high standards.

As a global company, we recognize the many challenges in managing and monitoring a complex supply chain. We continue to review our approach to human rights and modern slavery issues within our business and our supply chains and believe that we have identified some important focus areas and initiatives to build on in the future.

About JLL

JLL is a Fortune 500 professional services and investment management firm specializing in real estate. We offer integrated services worldwide to clients seeking increased value by owning, occupying, developing, or investing in real estate. Globally, JLL's 77,000 employees serve clients in more than 80 countries, and we are an industry leader in property and corporate facility management services. In FY 2016, JLL's consolidated revenue exceeded \$6.8 billion.

JLL's human rights and anti-slavery program forms part of Building a Better Tomorrow, our sustainability leadership agenda. Building a Better Tomorrow is about creating spaces, buildings and cities where everyone can thrive. By thinking and acting sustainably we strive to do just that for our employees, clients, shareholders and communities.

JLL has been recognized by Ethisphere for ten consecutive years as one of the World's Most Ethical Companies. The company has achieved a perfect score on the Human Rights Campaign Foundation's Corporate Equality Index, and has been named to CR Magazine's 100 Best Corporate Citizens.

A list of JLL's offices appears on pages 14 and 15 in our [Annual Report](#). Our services and operations span three geographic business segments: the Americas; Europe, the Middle East and Africa; and Asia Pacific. Within this vast global network, JLL's activities range from those having relatively low risk with regard to modern slavery, such as within LaSalle Investment Management, and activities that present more risk. For example, JLL procures a significant amount of goods and services on behalf of our clients, whose properties we manage. Among these business partners are suppliers in sectors identified as higher risk for modern slavery practices: construction, janitorial, landscaping and ground maintenance, food and drink, and security services. In general, JLL's policies and procedures are designed to identify unethical business partners before we engage them and to monitor our suppliers to make sure they maintain ethical standards that match JLL's.



Our Policies on Slavery and Human Trafficking

JLL has a zero-tolerance approach to modern slavery and we are committed to strengthening and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chain. We also are committed to ensuring compliance with any applicable modern slavery laws, including the UK's Modern Slavery Act 2015.

Our policy on slavery and human trafficking is part of our corporate [Code of Business Ethics](#) as well as our [Vendor Code of Conduct](#), both of which have been published in multiple languages on our public website. These documents set forth our zero-tolerance policy, and explicitly forbid child labor, human trafficking, debt bondage, forced or slave labor of any kind, inhumane conditions, substandard wages, and physical abuse or discipline. In addition, the Codes provide options for reporting violations or potential violations which are available to

employees and to our suppliers, such as calling JLL's Global Ethics Helpline or using JLL's ethics reports website, contacting one of JLL's Ethics Officers, or sending a letter to JLL's Global General Counsel and Chief Ethics Officer.

JLL also has a Corporate Governance Policy devoted to Vendor Due Diligence Guidelines that prohibits doing business with suppliers engaging in illegal practices or any questionable practices that may result in credit, reputation, or litigation issues for JLL.

We are in the process of implementing a separate corporate governance policy addressing Anti-Slavery and Human Trafficking. This policy will apply to all JLL employees and to suppliers and other third-party business associates worldwide. It identifies specific prohibited activities, and includes mechanisms for employees to report violations or potential violations of the policy.



Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, JLL is doing the following:

- Building a global procurement policy and risk management framework to incorporate Modern Slavery Act (MSA) compliance as we prequalify and monitor our suppliers over time. Currently, JLL performs due diligence for modern slavery using a risk-based approach, typically for suppliers servicing the Corporate Solutions business, which is the business most likely to engage third parties in high-risk sectors. Increasingly throughout our global operations, these suppliers must attest in a pre-engagement questionnaire and in their contract with JLL that they do not engage in any of the activities comprising modern slavery, and must renew that attestation annually. It is expected that the policy and risk management framework in due course will help us to expand our Vendor Due Diligence and Compliance Program globally through a technology platform that allows real-time communication and information sharing between suppliers, JLL's third-party independent compliance administrator, JLL's internal sourcing experts, and our individual client account teams.
- Requiring our suppliers to comply with all applicable modern slavery and labour laws and to comply with our own [Vendor Code of Conduct](#), which sets forth explicitly JLL's expectation that suppliers will act in accordance with human rights principles in employment and provides mechanisms for suppliers to report suspicions or incidents of breach, including through our Ethics Helpline which is available on a 24 hour basis in all major languages.
- Strengthening the ethics clause of our EMEA vendor contract templates by including a warranty specifically referring to the principles of the MSA.
- Enhancing our Global Vendor Onboarding Initiative by building additional due diligence steps into JLL's procurement process, including, for example, subscribing to EcoVadis's Corporate Social Responsibility database.
- Incorporating into our due diligence technology platform data from [Walk Free Foundation's Global Slavery Index](#) to help us identify high-risk geographies and sectors within our supply chain. We are working in collaboration with the Walk Free Foundation to identify ways to raise awareness of modern slavery and best practices in our procurement and audit functions and at all levels of our supply chains, particularly in service lines and countries that present a greater risk of modern slavery.
- Incorporating MSA questions into JLL's Global Internal Audit Vendor Questionnaire, and working with our Internal Audit Group to develop audit procedures designed to identify potential non-compliance by suppliers.
- Adopting the Electronic Industry Citizenship Coalition's Code, which incorporates labor standards prohibiting modern slavery and human trafficking, enterprise wide.
- Developing an MSA Risk Assessment to examine all business lines for risk of modern slavery.
- Strengthening our Global Human Resources policies to ensure we have adequate internal procedures to uphold fair labor practices.
- Encouraging our businesses, through our Vendor Due Diligence Policy, to work with enterprises that share JLL's values, and to develop and maintain supplier relationships that are consistent with protecting JLL's overall interests.

Slavery and Human Trafficking Risks in JLL’s Business

We operate in over 80 countries around the world, including countries identified in the Global Slavery Index 2016 as having the highest proportion of their populations in modern slavery: India, Bangladesh, Russia, Colombia, Egypt, Turkey, and Thailand. In providing real estate services, JLL may engage suppliers in some sectors in which modern slavery is prevalent, including construction, janitorial, landscaping and ground maintenance, hospitality, and security services. JLL assesses and manages these risks through its zero-tolerance policy and the due-diligence processes identified above.

Our Effectiveness in Combatting Slavery and Human Trafficking

JLL’s processes for engaging suppliers, as outlined above, are aimed at identifying and avoiding business associations with suppliers that engage in slavery and human trafficking practices, and our

suppliers have ongoing compliance and reporting duties during the entire course of their business relationship with JLL. Through our ability to audit suppliers for contractual and legal compliance, we can investigate changed circumstances or suspected noncompliance. Although we are not aware of non-compliance situations in the past or in our current supply chain, we recognize that our current approach may not be effective in all cases. Accordingly, we are committed to a journey of continued improvement.

Internally, JLL focuses on its extensive global “Ethics Everywhere” program to foster a culture of ethical behavior that encompasses awareness of and adherence to basic human rights principles. We are working towards incorporating specific anti-slavery and anti-human-trafficking content into our ethics training for employees and for suppliers in high risk sectors and geographies.

Board of Directors Approval

Under section 54(6)(a) of the Modern Slavery Act 2015, JLL’s Board of Directors approves this Statement.

Sheila A. Penrose

Chairman of the Board

Christian Ulbrich

Global Chief Executive Officer

Jones Lang LaSalle Incorporated