

Title: Human Rights Policy

Effective Date:

February 11, 2022

Scope and Purpose**1.1 Scope**

This Policy applies to JLL Inc. and all majority-owned subsidiaries as well as all JLL directors, officers, employees and contractors. It also applies to all persons working on our behalf in any capacity, including agency workers, seconded workers, volunteers, interns, agents, external consultants, third-party representatives and business partners and suppliers.

1.2 Purpose

Our Human Rights Policy represents our commitment to engaging in practices that enhance the welfare, safety and well-being of our employees, business partners and wider communities. We respect and support human rights principles as set out in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and rights at work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and have adopted the Responsible Business Alliance Code of Conduct. Additionally, through our global commitment to the most relevant of the [Sustainable Development Goals](#), we support the advancement of human rights for all people.

Principles and Rules

As a responsible business, JLL's purpose is to shape the future of real estate for a better world. We respect and promote human rights. Everyone is entitled to these rights without discrimination. They should not be violated for any reason. Respecting human rights is fundamental to our values, ethics and our [global sustainability program](#).

2.1 Executive Summary

- We will not tolerate human rights violations of any kind
- We are committed to implementing effective systems and controls to prevent violations from occurring anywhere in our business or supply chains
- We are committed to protecting human rights by providing awareness training to our employees and exploring practicable methods for training our contractors

2.2 Forced Labor and Child Labor

We strive to prevent the following behavior anywhere in our business or supply chain:

- Forced labor, whether in the form of trafficking of any kind, slavery, indentured labor, bonded labor or prison labor
- Confiscating, retaining or withholding worker identity documents or other valuable items, including work permits and travel documentation to bind workers to employment or restrict their freedom of movement
- Charging workers fees for recruitment, including costs associated with travel, processing official documents and work visas in both home and host countries
- Requiring workers to lodge deposits or security payments
- Failure to comply with minimum working age laws and requirements, including the general use of child labor
- Imposing compulsory overtime hours for workers, except as permitted by applicable law.

2.3 Unacceptable Working Conditions and Safety Risk

We will not permit these activities in our business or supply chain:

- Paying workers below just and favorable wage rates and subjecting them to inhumane conditions
- Requiring workers to work more than the maximum hours of daily labor set by national or applicable local laws and forcing workers to work overtime for insufficient compensation
- Unreasonably exposing workers to threats to their health, safety and security
- Engaging in physical discipline or abuse, intimidation, sexual, gender-based or other harassment and verbal abuse

2.4 Discrimination and Prejudice

We do not permit the following in our business or supply chain:

- Discriminating against individuals or vulnerable segments of society (including minority groups), whether that discrimination is based on race, color, gender, sexual orientation, religion, disability or otherwise
- Mistreating or limiting the rights of minority groups, including women

2.5 Freedom of Association

We do not prevent workers from freely joining or participating in a workers' association or union in accordance with national or local laws.

2.6 Escalation

We have due diligence process focused on identifying ethical and human rights violations. In the event we identify conduct that is contrary to our ethical and human rights commitments, we will work with all relevant stakeholders to rectify the situation immediately and take action aimed at preventing future violations.

For more information about how we are fighting Modern Slavery and human rights violations in our supply chain, please refer to our [Modern Slavery Statement](#).

Guidance

For questions or further information regarding this policy, contact your Manager or the policy Owner.

Reporting Potential Misconduct / Non-Retaliation

If you have a concern, suspect or witness behaviors that are inconsistent with our Code, policies or the law, please speak up so that we can take action to address the problem. We take every reported concern seriously. There are multiple channels for reporting a concern, including to your manager, an [Ethics Officer](#), through our [Ethics Helpline](#) by calling our toll-free numbers (e.g., +1 877 540 5066) or by filing an online report (<https://jll.ethicspoint.com>). Calls to the Helpline or online reports may be made anonymously. We do not tolerate any form of retaliation against anyone who raises a concern, makes a complaint they believe is legitimate, cooperates with an ethics investigation or refuses to do something that violates our Code, policies or the law.

Policy Breaches

Breaches of this Policy may lead to disciplinary and other actions up to and including termination of employment.

Responsibilities and Implementation

Every JLL manager must implement this Policy within relevant areas of functional responsibility, lead by example and guide employees in complying with the Policy.

This Policy is issued and administered by the Global Chief Legal Officer and will be reviewed and updated at least biannually.

Legal Restriction on the Application of this Policy in Particular Countries

We intend this Policy to apply to JLL on a world-wide basis. If a provision of this Policy would violate an applicable law or regulation within a particular country, however, then we will consider the provision void and of no force or effect as to our employees or operations within that country.

Restriction on Posting Company Policies

To ensure reliance on the official version of JLL policies, do not copy, reproduce or post on any JLL website without prior approval of Global Legal & Compliance. The official version of this Policy is located on the Global Policy Portal.