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Jones Lang LaSalle Incorporated

Anti-bribery and anti-corruption compliance program



JLL's Anti-bribery and Anti-Corruption Compliance Program

Bribery and corruption are global issues that have serious consequences for societies, economies, and individuals. Corruption erodes trust, weakens good governance, hampers economic development, distorts fair competition, and undermines justice and human rights.

As a leading global commercial real estate services company, JLL Inc (and its majority-owned subsidiaries) is committed to conducting business with integrity, transparency, and in compliance with all applicable laws and regulations. As part of our commitment to promoting ethical practices, we have established an Anti-Bribery and Anti-Corruption Program designed to prevent bribery and corruption in all aspects of our operations.

The Program is guided by international standards, including the OECD Anti-Bribery Convention, the United Nations Convention Against Corruption (UNCAC), the UK Bribery Act, the U.S. Foreign Corrupt Practices Act, and other relevant anti-bribery legislation. We believe that by implementing effective anti-bribery and anti-corruption measures, we not only protect our stakeholders but also contribute to the overall integrity of the global business ecosystem.

Features of JLL's Anti-bribery and Anti-Corruption Compliance Program

1

Our Code of Ethics and Anti-Bribery and Anti-Corruption policy provides a framework for our anti-bribery and corruption program, and explicitly prohibits offering, giving, or accepting bribes or engaging in corruption practices anywhere we operate. Our Code of Ethics and policy apply to anyone who works at JLL, including our directors, officers, employees, and contractors. Breaches of our Code and related policies may result in disciplinary action, up to and including dismissal. Each year our employees are trained on, and certify to, compliance with the Code of Ethics.

2

We include anti-bribery and anti-corruption obligations in our supply partner contracts, including a commitment to abide by our Vendor Code of Conduct. The Vendor Code of Conduct requires our supply partners to comply with all applicable anti-bribery and anti-corruption laws and refrain from engaging in bribery or corruption, regardless of local culture or market practice. We require that they implement effective policies and procedures to prevent actual or perceived bribery or corruption.

3

Our Intranet sites contain business-oriented tools designed to help our employees prevent bribery and corruption, and spot and report potential bribery or corruption situations. These tools include: Risk Management guidelines for detecting potential bribery or corruption situations, performing due diligence for third party intermediaries, uncovering risks in mergers and acquisitions, and implementing controls for gifts and entertainment, charitable giving and political donations, and financial disclosure systems for appropriate roles ; an Anti-Bribery Manual covering potential bribery risks, how to spot them, and actions to prevent or report potential violations including external reporting mechanisms; and a Manager's toolkit to facilitate training on bribery and corruption and conflicts of interest.

4

We conduct regular training sessions and awareness programs in person and through our Learning Management System, to educate our employees on the risks of bribery and corruption, relevant laws, and the importance of reporting any suspicious activities. We have specific modules on anti-bribery and anti-corruption, conflicts of interest, fraud, and gifts and entertainment. Our Learning Management System allows us to track completion rates.

5

We review, identify, and assess bribery and corruption risks across our business operations. This includes conducting due diligence on employees, clients, vendors, and third-party business partners in line with our codes, policies, and guidelines.

Anti-bribery and anti-corruption compliance program

6

Our program includes internal controls and procedures to prevent and detect potential instances of bribery and corruption. These cover areas such as conflicts of interest, financial transactions, gift and entertainment policies, procurement processes, and interactions with government officials, as well as restrictions on political contributions to prevent potential corruption or undue influence.

7

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 and our policies or the law. It is confidential, and available 24 hours a day, 7 days a week, and reports can be made anonymously in multiple languages tailored to local requirements. We maintain open channels of communication and actively cooperate with law enforcement agencies and relevant authorities where needed to support any investigation of any corruption-related issues.

8

Our Whistleblower and Non-Retaliation Policy encourages speaking up by addressing the challenges of remediating illegal activities while protecting victims. We do not tolerate any form of retaliation against anyone who reports a concern or complaint, cooperates with an investigation, or refuses to do something that violates our Code of Ethics, policies, or the law.



JLL periodically reviews its Anti-bribery and Anti-corruption compliance program to evaluate its effectiveness and address emerging risks and lessons learned, including from internal ethics investigations and published enforcement actions issues relating to other companies.



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About JLL

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 \$23.4 billion and operations in over 80 countries around the world, our more than 112,000 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. For further information, visit [jll.com](https://www.jll.com).

