



Corporate Governance and Compliance Policy

# **Whistleblower and Non-Retaliation Policy**

# Our commitment

Jones Lang LaSalle Incorporated (including its majority-owned subsidiaries and LaSalle Investment Management, (“JLL”, the “Company” or “we”) is committed to maintaining the highest ethical standards and to engaging in practices that enhance the welfare, safety, and well-being of our employees, business partners, and wider communities. We encourage reporting of any action that appears to be in violation of our Code of Ethics (the “Code”) or a Company policy.

JLL is also committed to compliance with all applicable laws and regulations that protect persons that act as “Whistleblowers” by reporting any breaches of laws or regulations in connection to JLL and its business operations.

## Purpose

The purpose of this policy is to reaffirm JLL’s commitment to comply with whistleblowing laws

- i. to encourage a “speak up” culture within JLL by setting out reasonable standards to manage our mechanisms for reporting and investigating reports and;
- ii. to ensure effective protection from possible negative consequences, such as acts of retaliation towards any person who has reported an activity that has occurred in a work-related context and that they reasonably believe is wrongful or unlawful.

**\* Note:** *Our Australian business entities have their own whistleblowing policy to comply with local laws and obligations. If you are based in Australia, please click [here](#) to read about how to make your report.*

# Key terms

For the purposes of this Policy, the following definitions apply:

- **“JLL Restricted Information”** means information that if disclosed by JLL to unauthorized parties (outside of or within JLL), could notably disrupt JLL’s operations, significantly impact our competitive advantage, damage our reputation or result in financial loss<sup>1</sup>;
- **“JLL Confidential Information”** means highly sensitive information proprietary to JLL or JLL’s clients that could seriously damage the Company if such information was lost or made public<sup>2</sup>;
- **“NAVEX”** NAVEX Global, Inc. is an independent service provider that delivers anonymous and secure Whistleblower reporting services to JLL;
- **“Personal work-related grievances”** concern behavior that affects the Reporter personally, but does not implicate JLL or its business operations;
- **“Public disclosure”** means to make information on wrongful or unlawful activity available in the public domain. Public disclosures can only be made under limited circumstances determined by applicable laws and following specific criteria;
- **“Relevant authority”** means any local authority or government agency, including its officials, charged with the enforcement of any laws and/or designated to receive reports in accordance with local whistleblowing laws;
- **“Retaliation”** means any direct or indirect action which occurs in JLL’s work-related context that causes or may cause unjustified detriment to the Reporter. Possible forms of retaliation may be: involuntary termination, separation or demotion; negative unjustified performance review; shunning; etc.;
- **“Whistleblower”, “reporting person” or “reporter”** is any person listed under *“Who can report under this policy”* section below who reports any wrongful or unlawful activity and is qualified for protection under this policy;
- **“Work-related context”** means current or past work activities developed either from a JLL office location, at a client site, home office or any other remote working location, through which, potential Reporters acquire information on wrongful or unlawful activities taking place in connection to JLL and within which those persons could suffer retaliation if they reported such information;
- **“Wrongful or unlawful activity”** means any activity within JLL’s work-related context that violates applicable law, the Code or a Company policy.

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<sup>1</sup> This term shall have the same meaning given by Corporate Policy 27- Information Classification.

<sup>2</sup> This term shall have the same meaning given by Corporate Policy 27- Information Classification.

# Scope

## Who can report under this policy?

This Policy applies to, and provides protection from retaliation for, any person reporting any activity they reasonably believe to be wrongful or unlawful, who is or has been, without limitation, any of the following with respect to JLL:

- employees, the self-employed, volunteers, trainees, directors, officers, non-executive members and shareholders;
- those whose work-based relationship has yet to begin, such as through pre-contractual negotiations; or
- third parties (e.g. clients, contractors, suppliers or consultants including their employees), visitors, or facilitators that assist those who speak up (e.g. colleagues or relatives who could be affected by a disclosure).

## What kind of conduct or activity can be reportable under this policy?

JLL encourages you to report any conduct or activity that has occurred in a work-related context that you reasonably believe is wrongful or unlawful. This conduct or activity may be, without limitation:

- illegal activity in breach of law, regulation or industry norms related to our operations and activities;
- improper or misleading accounting or financial reporting practices;
- fraud, theft or financial abuse including bribery and corruption practices;
- activity in breach of money laundering and terrorist financing laws;
- unfair competition and insider trading practices;
- behaviour that poses a serious risk to the health and safety of any person at the workplace or to public health, public safety or the environment in connection with our business operations;

- breach of data protection and IT security laws;
- unethical behaviour including violence, discrimination or sexual harassment; or
- any other kind of misconduct or breach of: our Code, internal policies, laws and regulations.

## Personal work-related grievances

Personal work-related grievances do not qualify for protection under applicable Whistleblower laws or this policy. Personal work-related grievances must be raised under JLL's applicable Human Resources policies and procedures.

Examples include:

- an interpersonal conflict between the Reporter and another person, or
- a decision relating to employment or engagement, such as a transfer, promotion, or disciplinary action of the Reporter.

## When can I make a report under this policy?

Before making a report, you should satisfy yourself that you reasonably and honestly believe that the conduct reported constituted a wrongful or unlawful activity.

However, a Whistleblower does not need to prove their allegations to be entitled to protection under this policy. All reasonable and good faith reporting can still qualify for protection under this policy even if the disclosure turns out to be unsubstantiated. If this happens, you will not be subject to a penalty but, you must not make a report that you know is not true or is misleading. This may be a breach of our principles of business practices and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

# Reporting channels

## How can I make a whistleblowing report?

You can contact JLL's independent, anonymous, and secure Whistleblower service delivered by NAVEX. The service is available in multiple languages, 24 hours a day, 365 days a year, through these channels:



### Helpline

Call our **Ethics Worldwide Helpline** (+1 877 540 5066) or local numbers [here](#).



### Online

Access via <https://jll.ethicspoint.com>

JLL recommends using the Helpline or Online channels to make your report. While those are our preferred channels, you can also make a report directly to other eligible recipients, including:

- Your Manager or any Senior Leader
- Human Resources
- Legal, Ethics & Compliance
- An Ethics Officer
- Chief Ethics & Compliance Officer
- Global Chief Legal Officer
- Chair of the Board

If you make a report directly to any of the listed people, they will forward the report to JLL's Whistleblower service delivered by NAVEX for action under this Policy.

We encourage you to consider the use of any of the mentioned channels to report. We would rather hear your concerns directly so that we can address them promptly. If you make a report using any of the channels:

- i. You are contributing to an **earlier** and more **effective response** to the issue;
- ii. You can remain **anonymous**;
- iii. You are assured that confidentiality will be maintained- i.e. your identity won't be disclosed to anyone beyond the authorized staff members who receive and follow up on reports, without your explicit consent;
- iv. You are assured that **all reported matters will be investigated** professionally and treated consistently.

## Can I report externally?

Yes. Whilst JLL prefers you to raise a concern directly with the Company through any of the mentioned JLL internal channels, you may choose not to use any of them and to report externally the wrongful or unlawful activity directly to a relevant authority without involving JLL in the process. You should know that this kind of reporting is also protected under this policy.

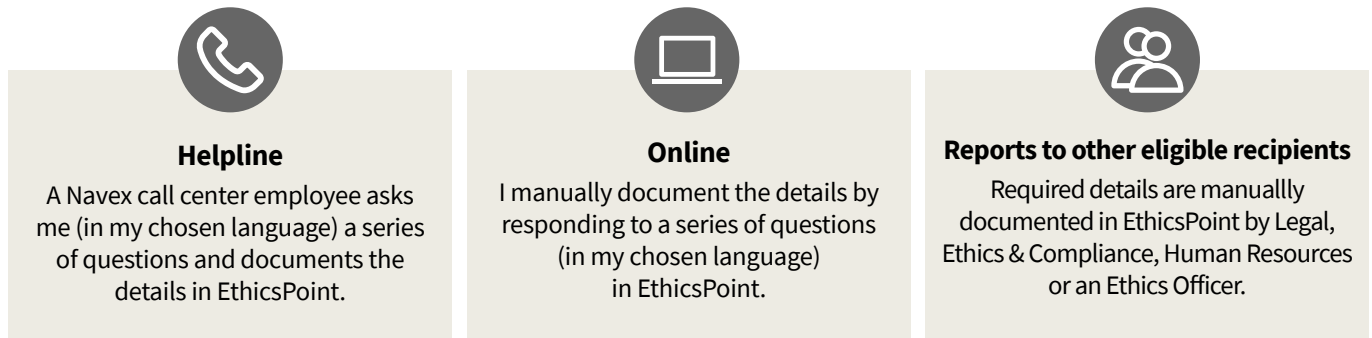
You may also be able to make a public disclosure through the media or other means such as online platforms or social media. Public disclosures are also protected under this policy provided that any criteria established in applicable laws to make such disclosures are met.

You may want to seek external advice before you make any such disclosure to understand the criteria and choose the way you want to report.

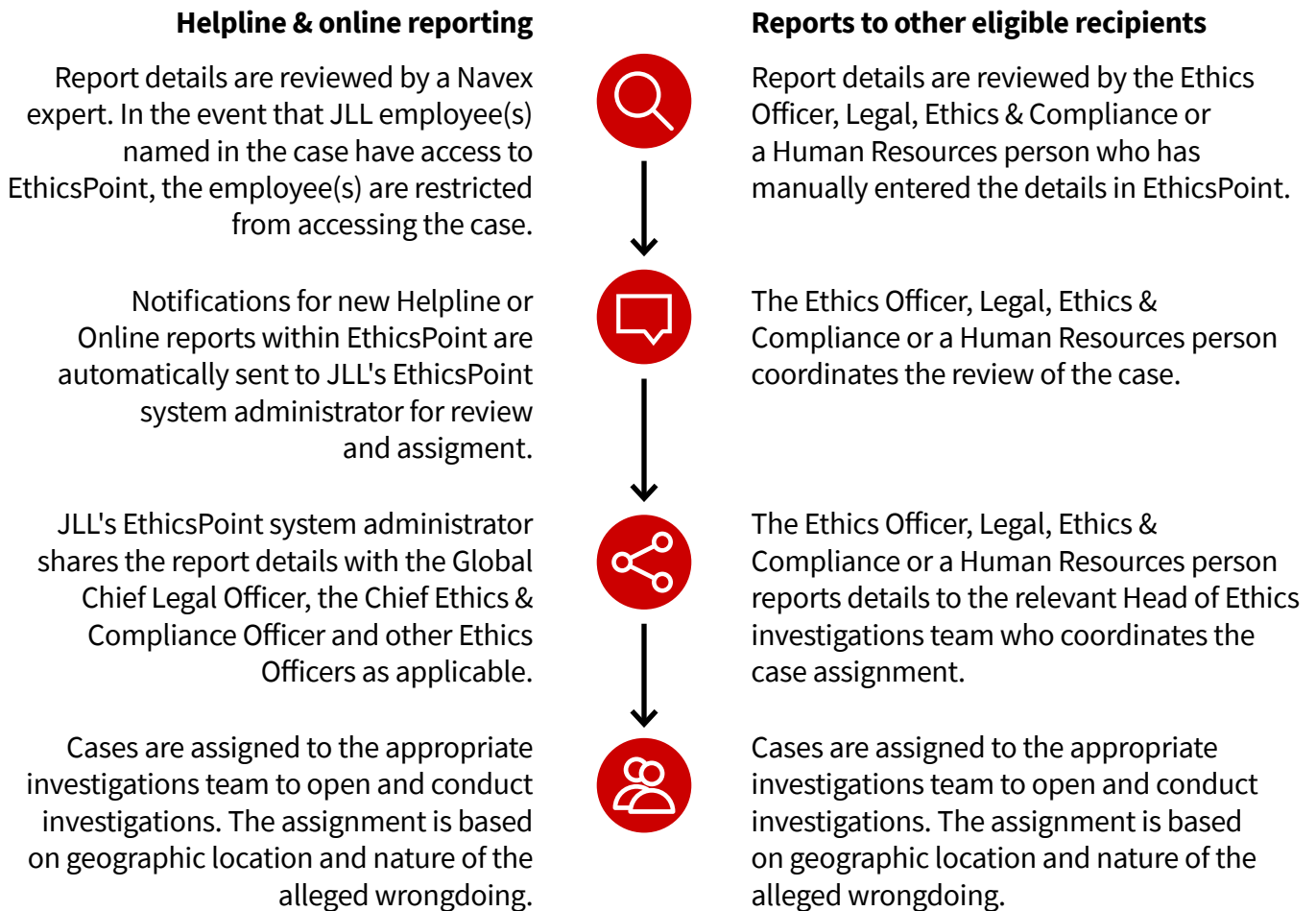
# Treatment of internal reporting and investigation process

## How will my report be reviewed?

### I have different options to report internally:



### Steps following my reporting:



**All reports are taken seriously and thoroughly investigated.**



## Can I remain anonymous when using JLL reporting channels?

Yes. JLL believes everyone should be able to report anonymously and we commit to protecting Reporter's identities where they choose to remain anonymous. However, anonymous reports may make it more difficult for us to thoroughly investigate the issue. Therefore, providing as much information as possible, will help us understand and successfully resolve your issue.

If you wish to remain anonymous when calling our Helpline or for online reports, you will be assigned a Report Key, which will allow you to log back in to EthicsPoint to provide additional information or documentation and receive and respond to questions from the investigations team.

In all events, JLL will investigate every report and ensures that all reported matters will be treated fairly and investigated regardless of whether the identity of the Reporter is known or unknown.

## Confidentiality when using JLL reporting channels

JLL shall keep the matter and the identity of the Reporter as confidential as possible. That means that the issue and the identity of the Reporter, as well as cooperating witnesses, will be disclosed only on a need- to- know basis or when otherwise required to be disclosed by applicable laws.

## Who will be conducting the investigation?

JLL will determine the appropriate person or team to conduct the investigation depending on the geographic location and nature of the alleged wrongdoing. Typically, the Ethics Officer will involve the investigations team who will lead the investigation process, relying upon local Legal & Compliance teams and other subject-matter experts (such as internal audit, IT, or Human Resources personnel) to provide support where necessary. Under certain circumstances, JLL may engage outside counsel or an external investigation firm.

## What does an investigation look like and how are reporters kept updated on developments?

While the steps taken for the investigation will depend on each individual circumstance and the nature and scope of the allegations, all investigations will be conducted in a fair, objective and independent manner.

The nature and seriousness of the allegations will determine the response time. A response and follow- up shall be communicated to the Reporter as soon as practicable in compliance with applicable laws.

You will find in [Appendix A](#) a flowchart with detailed steps likely to be taken in the investigations process from receipt of a report to case closure for whistleblowing cases.

## What might happen to an individual found to have incurred wrongdoing?

If the investigation reveals any employee wrongdoing or unlawful activity, a critical next step is to take adequate disciplinary measures. This could include a verbal or written reminder of Company policy, a formal verbal or written warning regarding behavior, termination of employment, or referral to law enforcement in accordance with local laws which may involve the obligation for JLL to report the wrongdoing or unlawful activity to the relevant authority. Disciplinary actions could extend beyond the actual wrongdoer to include those who knew or should have known of some aspect of wrongdoing or unlawful activity.

## Retention of reports and investigations records

Copies of all reports, investigations information and resolution will be maintained in accordance with JLL's Corporate Policy 10 - Document and Records Management and Retention Schedule.

## Non-Retaliation

JLL does not tolerate any form of retaliation and will comply with all laws that prevent retaliation against employees for exercising their lawful rights under applicable law. JLL will not take any adverse action, including harassment, discrimination, suspension or termination against an employee who raises a concern, reports conduct they reasonably believe to be wrongful or unlawful, cooperates in an investigation or refuses to do something that violates our Code, policies or the law.

In addition, and in accordance with applicable laws in certain jurisdictions- such as the U.S. Defend Trades Secret Act- JLL will not prevent any person, whether or not an employee, from disclosing information, including JLL restricted and/or confidential information, to a relevant authority, either directly or indirectly, or to a lawyer, when the purpose of disclosing the restricted and/or confidential information is the reporting or investigation of a suspected violation of the law, provided that the information disclosed was necessary to reveal the violation. Further, the Reporter shall not be prevented from disclosing JLL restricted and /or confidential information in a complaint (made under seal in the U.S. or under similar confidential treatment in other jurisdictions) where such disclosure was necessary to reveal the violation subject of the whistleblowing report. Without limitation, JLL will not require any reporting person to sign a confidentiality agreement regarding the alleged wrongdoing or unlawful activity, or any agreement that would prohibit reporting an alleged wrongdoing or unlawful activity.

Individuals who are found to have engaged in retaliation will be subject to disciplinary action by JLL, up to and including termination of employment. Retaliatory actions taken in violation of law could also subject the individual to legal liability.

If you believe that you are suffering retaliation you should report it to us, and we will take appropriate steps in accordance with this and JLL's other policies.

## Administration of policy

The Global Chief Legal Officer is the issuer and owner of this Policy, in consultation with the Chief Executive Officer. The Policy shall be subject to periodic review and revision by the Global Chief Legal Officer as necessary or appropriate and in periodic consultation with the Chief Executive Officer.

## Legal restrictions on the application of this policy in particular countries

We intend this Policy to apply to JLL globally. However, if a provision of this Policy would violate an applicable local law or regulation, then that provision will be void and of no force or effect as to our employees or operations within that country or location.

JLL may have country or local-level policies in place designed to meet local obligations and such policies will apply in lieu of the voided provision of this policy.

This Policy shall not affect either the application of local law relating to any of the following:

- a. The protection of classified information;
- b. The protection of legal and medical professional privilege;
- c. The secrecy of judicial deliberations;
- d. Rules on criminal procedure.

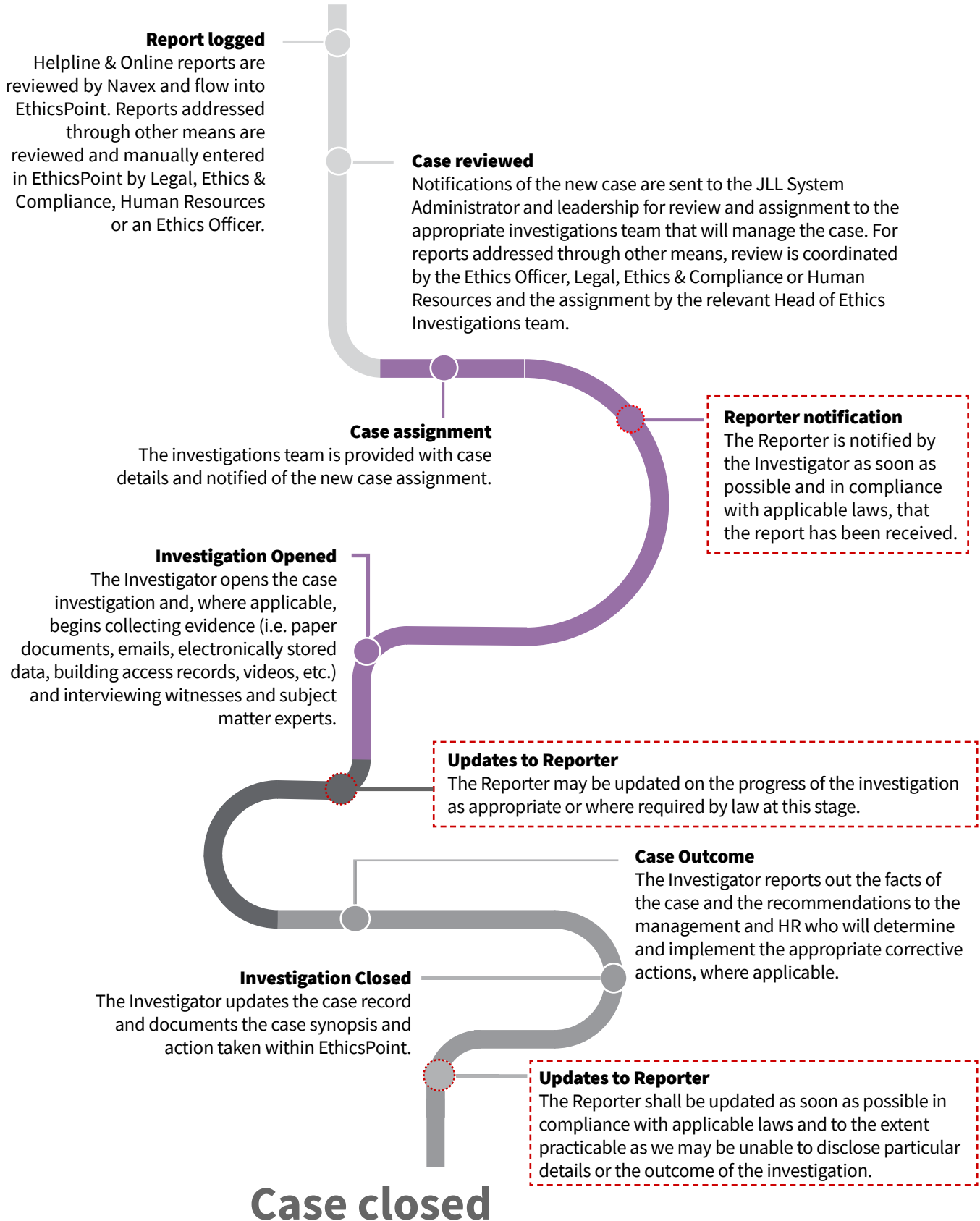
### Issuance and revision history

**Date:** April 2021



# Appendix A

## Case opened



## Case closed