



Vendor Code of Conduct

Contents

Introduction	03
Who we are	04
Why this Code	04
What we believe in	05
What we need from you	06
How we can help you	07
Speaking Up	07
Valuing people, communities and the environment	08
Doing business with integrity	12
Safeguarding JLL assets, information and interests	16
Complying with applicable laws and contracts	18
Glossary of terms	20



Introduction

At JLL, we recognize that you – our **supply partners** – are core to our ability to deliver world-class commercial real estate services. Indeed, our growth over the years is due in large part to your contribution. In this Code, we outline how we can continue working together by ensuring you meet our ethical expectations and minimum environmental, social and governance standards.

Thank you for the work you do and the professional service you provide to JLL and our clients.



Michael Raphael
*Global Chief
Procurement Officer, JLL*



Who we are

For over 250 years we've been at the heart of real estate, bringing a broad spectrum of ideas and perspectives to investors and businesses worldwide, guided by our purpose of shaping the future of real estate for a better world.

This purpose is central to everything we do - we use

our insights to drive our clients' businesses, support their workforces and help communities thrive. We use our skills, technology and data to power smarter and more sustainable buildings, and help our clients develop strategies and pursue investments that deliver long-term value and sustainable growth.

Why this Code: Purpose and scope

The JLL team goes beyond our employees - it extends to all [supply partners](#) that help us to deliver on our promise to our clients. We developed this Code for you, our [supply partners](#), to set out our business conduct and ethical expectations of you as well as your employees, agents and sub-contractors (collectively, "[supply partners](#)").

All [supply partners](#) must comply with this Code while conducting business for or on behalf of JLL. Our compliance expectations include implementing policies, procedures and training as well as taking preventative and remedial action to avoid and correct gaps.

What we believe in

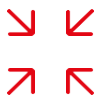
Three core values shape our culture and define who we are: teamwork, ethics and excellence.

These values underpin our commitment to our clients, to our communities and to each other. They provide direction for all we do.



We believe in teamwork – we collaborate in order to succeed.

Working as one team we achieve our common goals and share mutual successes. We unite across locations and businesses to build world-class teams offering first-class service.



We believe in ethics – we act honestly and responsibly.

Ethical business practices guide our actions, define who we are and how we behave. We act with honesty and [integrity](#) to build trust and foster inclusive, responsible and lasting relationships.



We believe in excellence – we strive to be exceptional.

We want to grow and do better for our clients and ourselves. That’s why we are committed to excellence, and to always seeking new and innovative ways to achieve our goals.



What we need from you

Values, words and actions build culture. At JLL, we embrace our values and hold ourselves to the highest standards and expect our [supply partners](#) to adhere to the same standards. This means:



Valuing people, communities and the environment

- Prioritizing health, safety and wellness
- Promoting inclusion and belonging and developing worker capability
- Respecting [human rights](#) and treating all people with dignity, respect and fairness
- Operating sustainably and with care for the environment



Doing business with integrity

- Acting with [integrity](#) to avoid all forms of [bribery](#) and corruption
- Competing fairly for JLL's business
- Avoiding insider trading
- Complying with [trade sanctions](#) and export controls
- Identifying, disclosing and managing conflicts of interest
- Minimizing the risk of [money laundering](#) and financial crime



Complying with these JLL policies concerning vendors and cited industry codes

- [Responsible Business Alliance Code of Conduct](#)
- JLL's [Global Sustainable Sourcing & Procurement Policy](#)



Safeguarding assets, information and interests

- Maintaining confidentiality and protecting the physical and [intellectual property](#) of JLL and our clients.
- Respecting individuals' privacy rights and safeguarding personal information
- Acting in the best interests of JLL and our clients
- Complying with all laws regarding political contributions and lobbying



Complying with applicable laws and contracts

- Obeying all applicable laws
- Cooperating with all investigations and/or audits commenced by or on behalf of JLL or our client
- Notifying JLL of breaches of law or contract
- Obtaining and maintaining appropriate licenses
- Understanding and adhering to contractual obligations



How we can help you

We work with you because we have faith in the goods/services you supply and in your [integrity](#). But in business we understand things are not always simple. If you have any concerns about this Code or would like to talk further about our requirements, please contact your JLL representative. We want to work with you to have a mutually beneficial relationship.

Speaking up

If you have an ethics concern or suspect any violation of this Code, our policies or the law, please speak up so that we can take action to address the problem. We encourage you to work with your primary JLL contact to resolve any concern, but if you are uncomfortable speaking directly with someone in JLL, you can call our [Ethics Everywhere Helpline](#) or use our online reporting tool – both are managed by an independent company and enable you to raise concerns confidentially. They are available 24/7 in more than 165 languages and in most countries, you can choose whether you want to remain anonymous.

JLL's [Whistleblower and Non Retaliation Policy](#) details our commitment to transparency, how to report a suspected matter and the process we follow to manage a matter. JLL will not tolerate any [retaliation](#) against an individual who raises a concern or reports a possible violation of this Code.

You must:

- Ensure that your workers and other stakeholders are aware that they may raise concerns and how to raise them
- Ensure that no one retaliates against your workers if they raise a concern or complaint, cooperate with an investigation or refuse to do something that violates this Code or the law

Valuing people, communities and the environment

Health and safety

Health and safety are central to everything we do at JLL. There is no substitute for prioritizing the safety and wellness of people and ensuring safe and healthy workplaces.

You must:

- Follow all JLL and client health and safety policies, rules and obligations (including JLL’s [Global Health, Safety and Environment Policy](#)), and comply with all applicable health and safety laws
- Complete a competent hazard and risk identification assessment for the relevant site before providing services or delivering goods to JLL or our client
- Develop and implement processes and procedures to ensure that you deliver all services or goods in a manner that does not expose any person or property to personal injury, death or property damage
- Investigate immediately and notify JLL of all incidents on a JLL or client site that result in severe or serious injury, death or environmental damage
- Implement procedures to correct circumstances that led to severe or serious injury, death or environmental damage on a JLL or client site
- Ensure your workers are appropriately skilled, licensed and trained to deliver services or goods safely, and provide JLL with appropriate evidence upon request



Inclusion and belonging

We believe an inclusive environment is one where everyone succeeds. That’s why we’re committed to creating a culture of belonging where we welcome everyone and respect and value all individuals. Treating everyone with respect and in a non-discriminatory way is an important part of our own Code of Ethics and we expect our [supply partners](#) to share this commitment.

You must:

- Not discriminate against any person within your workforce, or anyone you work with
- Comply with all legislative requirements relating to [discrimination](#)
- Treat people with kindness, courtesy and politeness
- Offer equal opportunities and make hiring decisions that fully comply with employment law
- Embrace inclusivity and champion broad perspectives to improve the relationships you have with all stakeholders
- Explore business opportunities to grow and develop commercial relationships and widen your supply chain





Human rights and forced labor

JLL is a strong advocate for [human rights](#) as laid down in [The Universal Declaration of Human Rights](#). We respect and protect [human rights](#) for everyone without [discrimination](#). We will not tolerate [human rights](#) violations of any kind in our operations or supply chain.

You must:

- Comply with our [Human Rights Policy](#)
- Ensure you:
 - Are capable of identifying ethical and human rights violations
 - Investigate any potential [human rights](#) violations in a timely manner
 - Immediately correct any substantiated human rights violations
 - Keep JLL fully apprised of all potential and substantiated [human rights](#) violations
 - Do not employ children, and obtain JLL’s prior consent before engaging any person under the age of 16
 - Do not permit forced labor of any type (including [modern slavery](#), prison labor, bonded labor and indentured labor) in your operations and all tiers of your supply chain
 - Are willing and able to respond to JLL requests for information to complete our legislative disclosure requirements

Working conditions

It is important that we treat all people fairly and with respect and dignity while at work. You must investigate any allegation of inappropriate behavior or a breach of labor laws and take appropriate action.

You must:

- Ensure that your workers treat others in a professional, respectful and fair manner
- Implement policies and procedures to identify and protect workers from [harassment](#), bullying and intimidation
- Comply with minimum legislative requirements on pay and wages, time off (including for illness/disability and vacation), maximum working hours and rest periods, employment conditions and termination of employment
- Permit, and in no way restrict, the freedom of workers to join, not join or leave a union or worker association

Sustainable procurement

To help achieve our [purpose](#), we partner with our stakeholders to drive impactful and sustainable change. We do this by embedding sustainability into everything we do. As a JLL supply partner, we expect you to contribute to all relevant JLL and client initiatives aimed at managing sustainability risk and improving sustainability performance. If you are unsure how you can improve your sustainability practices, please contact us.

You must:

- Comply with applicable environmental sustainability laws
- Actively reduce the carbon footprint of your products or services, and provide energy and resource efficient options
- Demonstrate the climate resilience of your operations, goods and services
- Reduce waste and the lifecycle impacts of your product or service
- Handle and dispose of hazardous waste materials responsibly
- Report, upon request, data relevant to JLL’s [Science Based Targets](#)
- Set your own sustainability or carbon emission reduction goals



Doing business with integrity

Avoiding bribery and corruption

We do not give or accept bribes in any circumstances, anywhere we operate. There are no exceptions, regardless of local culture or market practice. [Bribery](#) harms our clients and business partners, undermines trust in the marketplace and damages our communities.

You must:

- Not promise, offer or pay anything of value (including gifts, hospitality, charitable donations, travel or employment) to anyone (including a JLL employee, client, [supply partner](#) or [government official](#)) to influence the other party's action or decision in order to promote JLL's business interests or to gain any unfair advantage
- Implement effective policies and procedures to prevent actual or the perception of [bribery](#) and corruption (including policies against offering or accepting kickbacks or other incentives to secure business or influence a decision)
- Comply with all applicable anti-corruption laws wherever you do business
- Not make "[facilitation](#)" [payments](#) (also known as "kickbacks" or "grease payments") to speed up government processes or secure government work, even if this is considered normal business practice
- Perform due diligence checks on third parties you work with to ensure you work only with business partners who do not engage in [bribery](#) or corruption
- Not agree to hidden arrangements, commissions, fees or rebates intended to secure business, influence a decision or provide an unfair business advantage
- Immediately report to JLL if someone offers or asks you for a bribe



Competing fairly

We deal fairly with our clients, [supply partners](#), competitors and employees and expect our [supply partners](#) to do the same. This includes respecting competitive bidding processes and avoiding arrangements that limit competition, such as collaborating with competitors on pricing or market allocation.

You must:

- Comply with applicable [antitrust and fair competition](#) laws
- Deal fairly with JLL and our clients, as well as with your suppliers, competitors and employees
- Refrain from manipulation, concealment, disparagement, abuse of privileged information, misrepresentation of material facts or any other unfair practice to take advantage of others
- Engage only in accurate and truthful marketing and advertising
- Respect competitive bidding processes
- Respect others' confidentiality and [intellectual property](#) rights, and seek authorization before using [confidential information](#) belonging to a competitor or third party
- Not use JLL or client [confidential information](#) or [intellectual property](#) for non-JLL purposes
- Respect confidentiality, even when you are no longer a JLL supply partner

Confidentiality

During the course of your relationship with JLL and our clients, you will receive information that may be commercially sensitive or not publicly available. That information may extend to the existence of a transaction, the parties involved in that transaction and the timeframes related to that transaction. It is critical that you maintain the confidentiality of any such information.

You must:

- **Implement policies and procedures to identify and maintain the confidentiality of information**
- **Only disclose [confidential information](#):**
 - To people within your organization with a need to know the information and only after they have signed a Non-Disclosure Agreement
 - To third parties if legally compelled, provided that you first notify JLL and give JLL a reasonable opportunity to respond or challenge the request for disclosure
 - That you can establish was in your possession, or later entered your possession, through no breach of your confidentiality obligations
- Immediately notify JLL or the client if you suspect an unauthorized disclosure of [confidential information](#)
- Respect the [intellectual property](#) rights and [confidential information](#) of others, and not use third-party [confidential information](#) or copyrighted materials such as software, source code, leasing information or images without authorization
- Not use JLL or client assets, resources or [confidential information](#) for personal activities or gain
- Not identify a company as a client of JLL unless you are authorized to do so and not share [confidential information](#) about our clients or JLL on [social media](#)

Economic sanctions and trade restrictions

It is important to comply with local and international trade controls, economic sanctions and embargoes that prohibit doing business with certain countries, governments, entities and individuals. Some laws and regulations also govern how we can distribute services and technology across borders and use them internationally.

You must:

- Review all business opportunities to ensure compliance with trade restrictions, particularly when a transaction involves providing services or technology across international borders
- Complete a thorough due diligence review (including sanctions screening) of your clients and vendors before entering into a new business relationship and at regular intervals during a business relationship
- Avoid business with any country, government, [entity](#), organization or individual where sanctions or trade restrictions prohibit doing so

Gifts and entertainment

Use good judgement when exchanging business courtesies. [Gifts and entertainment](#) can be viewed as bribes depending on the recipient, the nature and amount of the gift or entertainment, why you're giving it and when you're giving it.

You must:

- Comply with gift and entertainment laws of the jurisdictions where you do business
- Avoid [gifts and entertainment](#) that create a feeling of obligation or appear to be a bribe or [conflict of interest](#)
- Avoid giving or offering gifts or entertainment to any JLL employee or representative that exceeds modest value or JLL limits or violates this Code
- Never offer gifts or entertainment to [government officials](#) or their employees for or on JLL's behalf
- Avoid gift or entertainment items, activities or venues that could be viewed as distasteful or offensive
- Never ask for gifts or entertainment from business partners, and never ask someone to offer a gift or entertainment on behalf of JLL or our client



Insider trading

While working with JLL, you may become aware of material information about JLL, our clients or other companies we do business with that is not known to the public (“material non-public information”), such as details of mergers or acquisitions, unannounced changes in executive leadership, strategic business plans and outcomes of lawsuits or the threat of a lawsuit. Sharing material non-public information with anyone may violate insider trading laws.

You must:

- Contact JLL (on JLLInvestorRelations@jll.com) if you have queries regarding what is or is not material non-public information
- Keep material non-public information secure and not discuss or share it with anyone else, including a partner, family member, friend or broker
- Ensure none of your organization’s employees or associates use or share material non-public information for financial or other personal benefit
- Report immediately to JLL if you suspect or know that anyone in or associated with your organization has used material non-public information for financial or other personal benefit

Money laundering and financial crime

We do not wish to be associated with anyone involved in any financial crime, including [money laundering](#), [terrorist financing](#) or tax evasion, and we will report suspicious transactions to the relevant authorities. Accordingly, we expect our [supply partners](#) to act responsibly to minimize the risk of [money laundering](#) across our operations.

You must:

- Never knowingly participate in, or facilitate, [money laundering](#) or financial crime of any kind
- Have due diligence policies and processes in place to know your material business partners and reduce the chance that you, JLL, or our client will inadvertently assist in [money laundering](#)
- Conduct your business transactions with [integrity](#), transparency and accountability to protect the reputation of JLL and our clients
- Refresh due diligence checks if there is a change in one of the parties to a transaction
- Immediately report to JLL anything suspicious that might indicate that a person or business partner is involved in [money laundering](#) or a financial crime
- Prepare timely, accurate and complete financial records
- Follow and comply with generally accepted accounting standards and principles
- Never agree to “off-the-book” arrangements
- Act transparently in engagements with JLL and our clients, and ensure documents and records accurately reflect the actual economics of a transaction

Safeguarding JLL assets, information and interests

Privacy and information security

Our clients, business partners and employees trust that we handle their personal information and data responsibly and in accordance with applicable privacy and information security laws. You must safeguard all personal information shared with you and respect individual privacy rights. Remember that your privacy responsibilities include physical and electronic data, soft and hard copy documents, emails and messages.

You must:

- Collect and use personal information only as needed to fulfil your legitimate business and legal obligations
- Comply with JLL Data Protection Addendum if you process personal information on JLL’s behalf, unless JLL agrees in writing to using other data protection protocols
- Honor privacy choices and use personal information only for the purposes communicated and intended
- Minimize and anonymize personal information where feasible and retain it no longer than necessary
- Implement appropriate technical and organizational measures to protect against personal information and data loss and use systems and email responsibly
- Secure physical and electronic data by using strong passwords and never sharing them with others
- Understand and follow JLL’s privacy, information security and data breach policies and procedures
- Share and provide access only to those who need the information to do their job
- Immediately report any suspected or actual data breach



Conflicts of interest

We believe that it is vital for all organizations to establish a framework to proactively identify, disclose and manage conflicting interests to avoid problems. A failure to identify or disclose conflicts may breach law or professional standards, and potentially damage people’s trust in JLL, jeopardizing existing and future business opportunities and undermining our values.

You must:

- Avoid situations where any [conflict of interest](#), whether involving your organization or your workers, might influence or appear to influence decisions
- Act in the best interests of JLL and our clients and disclose to JLL all potential and actual conflicts as soon as possible
- Manage potential conflicts transparently and carefully, and in accordance with JLL’s requirements
- Maintain an up-to-date record of any disclosures and actions agreed to

Representing JLL

Because you are a JLL supply partner, third parties may view you as representing JLL. Accordingly, you and your workers must at all times act in JLL’s and our clients’ best interests. Importantly, this involves understanding our relevant strategic goals and priorities and delivering goods or services in a way that promotes those objectives. Additionally, as JLL’s representative, it is important that your workers do not behave in a manner that may damage JLL’s or our clients’ reputations.

If for some reason you are unable to act in JLL’s or our clients’ best interests, you must notify us immediately.

You must:

- **Implement procedures and processes to ensure your workers, while working for JLL or our client:**
 - Do not work while intoxicated
 - Do not possess or have control over a firearm or other weapon, unless previously agreed by JLL in writing
 - Do not engage in any behavior that is violent, aggressive, intimidating or harassing
 - Conduct careful due diligence to ensure you source goods and services from responsible third parties
- Ensure that any third parties you engage to assist in supplying or delivering goods or services to JLL or our client comply with this Code
- Monitor the performance of all third parties you engage to assist in supplying or delivering goods or services to JLL or our client and, where needed, take corrective action

Political contributions and lobbying activities

We expect you to comply with all laws concerning political contributions and lobbying activities and not make political contributions or donations in JLL’s name.

Complying with applicable laws and contracts

Ethics

Our commitment to ethical conduct underpins everything we do at JLL. We maintain our commitment to ethics through our [Ethics Everywhere](#) program, and we demand the same commitment and conduct from our [supply partners](#). You play an important role in enhancing and safeguarding our ethical culture.

You must:

- Promptly document and escalate to JLL all ethics violations or concerns via our online ethics platform ([Ethics Point](#)) or JLL’s [Ethics Everywhere Helpline](#) (+18775405066)
- Foster a culture of trust, [integrity](#) and honesty in your organization
- Help your workers understand that living our ethical values and doing business the right way are the only ways to achieve success
- Cooperate with any ethics investigation JLL or our client undertakes
- Promote high standards of animal welfare whenever animals are brought into or housed on JLL or client premises, and ensure they are treated humanely and in compliance with animal welfare regulations

Business continuity and crisis management

You are key to the services JLL provides to our clients. To ensure we are able to fulfill our commitment to clients, we expect our [supply partners](#) to have adequate business continuity plans in place to facilitate continuous service in the aftermath of an operational crisis, such as natural disasters, equipment malfunctions, power failures, terrorist acts, cyberattacks, etc. At JLL’s request, you must disclose the elements of your business continuity plans and information security systems and controls in reasonable detail.



Audits and inspections

While we expect our [supply partners](#) to self-monitor and demonstrate their compliance with this Code, we or our client may conduct inspections or audits to confirm compliance. This may include on-site inspections of your facilities or reviewing information and evidence including books, records, certifications, permits and other documentation. [Supply partners](#) who behave in a manner that is unlawful or inconsistent with this Code or JLL policy risk termination of their business relationship with JLL and/or our clients.

You must:

- Cooperate fully with all audits and inspections, whether conducted by JLL, our client or a third-party representative of either JLL or the client
- Not destroy, hide or fail to disclose key information
- Not present information in a manner that misrepresents the truth

Organizational and worker capability

The success of this Code depends on you and your people possessing capability to deliver on our expectations. Standards and best practices continually evolve, and we expect that you continually educate and train your workers on key topics.

You must:

- Ensure all of your workers are aware of, and appropriately trained on, the obligations described in this Code
- Build worker capability through informal and formal training
- Ensure workers have appropriate qualifications and licenses at all times, and only perform services aligned with those qualifications and licenses
- Supervise all work your workers perform on JLL or client sites



Glossary of terms

Antitrust and fair competition laws

Antitrust laws (also referred to as competition, cartel or monopoly laws) aim to promote healthy and fair competition and prohibit competitors from agreeing on pricing, carving up markets and engaging in other market abuse. These laws protect consumers from predatory business practices and ensure that fair competition exists in an open-market economy.

Bribery

Bribery is the act of offering, giving, promising, asking, agreeing, receiving or soliciting something of value for the purpose of influencing an action.

Confidential information

Confidential information is any information that is not publicly known and should not be disclosed to the public. It includes proprietary business information, non-public financial information, client and supplier lists, business plans and projections, government service-related data and personal health data.

Conflict of interest

A conflict of interest occurs when a person or organization has competing interests or loyalties because of their duties to more than one person or organization. Fulfilling their duties to one party could impair their ability to perform their duties for the other party.

Discrimination

Discrimination refers to unfair or unequal treatment of individuals or groups based on certain characteristics such as age, disability, race, national origin, gender, religion or sexual orientation.

Entity

Commercial entity means any corporation, partnership, limited partnership, proprietorship, sole proprietorship, firm, enterprise, franchise or association that performs a commercial activity in a particular jurisdiction. It has a legal existence separately identifiable from the individual owner of the business.

Ethics Everywhere Helpline

The Ethics Everywhere Helpline is available 24/7 in more than 160 languages, and in most countries you can choose whether you want to remain anonymous.

Facilitation payments

Small payments (also called ‘speed’ or ‘grease’ payments) made to secure or expedite the performance of a routine or necessary action, such as to obtain a permit or license.

Gifts and entertainment

Business courtesies such as offering or providing items of any value, experiences, travel expenses, charitable contributions and hospitality.

Government official

A government official is defined broadly and includes government employees, anyone acting on behalf of a government, employees of a state-owned business, employees of public international organizations, elected officials and political candidates, customs or tax officials, military personnel and family members of a person mentioned above.

Harassment and bullying

Harassment is unwanted conduct that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Bullying is a type of harassment that most often relies on psychological tactics to control or dominate the target, using power or position to coerce others by fear or to oppress them by force or threat.

Human rights

Human rights are the basic freedoms that belong to everyone in the world, regardless of race, sex, nationality, ethnicity, language, religion or any other status. Human rights include the right to freedom from slavery and torture, freedom of opinion and expression, the right to work and education and many more. JLL promotes human rights as defined by the International Bill of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. Everyone is entitled to these rights without discrimination.

Integrity

Behaving in a fair, ethical and honorable way. Being honest and embracing ethical principles consistently and without compromise to build trust. Integrity means doing the right thing, even when no one is watching.

Intellectual property

Intellectual property refers to ownership of an idea or design by the person who developed it. Copyright, patents, designs and trademarks are legal ways to protect intellectual property. Examples include:

- Acquisition and divestiture plans
- Internal financial information
- Proprietary technology and software
- Proprietary research and data
- JLL or our client information, including pricing information, profit and loss models, prospects, requests for proposals and legal documentation
- Client lists and portfolio and property information of JLL or our client
- Information and databases owned by JLL or our client
- Business strategies and models
- New product and marketing concepts
- Litigation strategies and information
- Processes, trade secrets, business know-how and best practices that are intended to provide competitive advantages
- Risk management and insurance information

Modern slavery

Modern slavery involves exploiting vulnerable individuals for profit. It is a crime and a violation of fundamental human rights. It takes various forms, such as servitude, forced and compulsory labor, child labor, debt bondage and human trafficking.

Money laundering

Money laundering is an illegal process which involves converting money or assets obtained through criminal activity, such as drug trafficking or [terrorist financing](#), into assets that appear legitimate.

Retaliation

Retaliation occurs when adverse action is taken against a person and can take many forms, including deliberate exclusion from opportunities or promotion, harassment, intimidation, microaggressions, unjustified negative performance reviews or termination of employment. Regardless of tenure or job position, retaliatory behaviors are never acceptable and anyone who engages in any of these behaviors will be subject to disciplinary action up to and including termination of employment.

Social media

Social media is computer-based technology that facilitates sharing ideas and information through virtual networks such as blogs, chat rooms and online forums. Social media channels include, for example, Facebook, Weibo, LinkedIn, Instagram, TikTok and Pinterest.

Supply partners

Vendors, suppliers or other providers of goods and services.

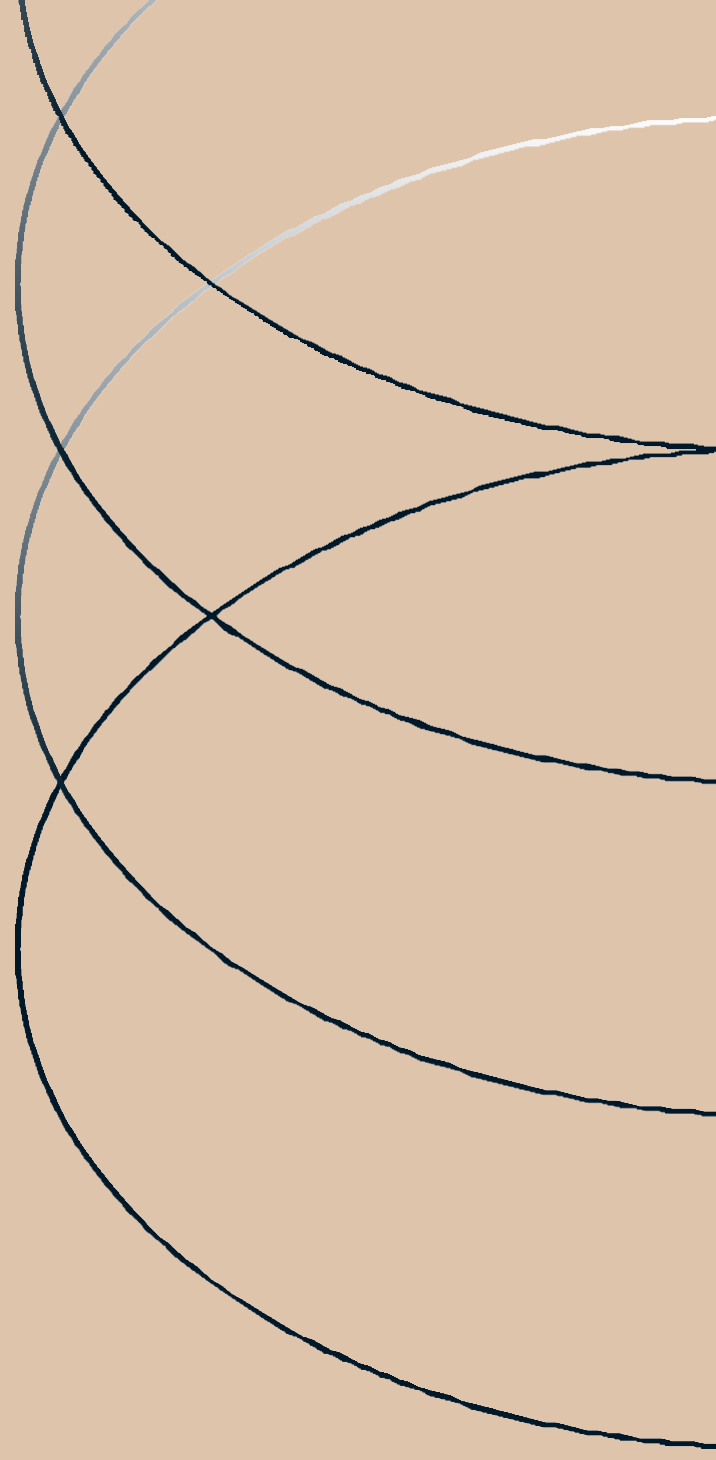
Terrorist financing

Terrorist financing is connected to money laundering and involves using money or assets, whether legitimate or obtained through criminal activity, to fund terrorist activities or groups.

Trade and economic sanctions or restrictions

Trade and economic sanctions are political restrictions targeting countries, entities and individuals deemed to be threats to national or international peace and security. The goals of sanctions are to force designated countries, entities and individuals to alter behavior by cutting off access to economic activity.





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).