

## Key things you need to know about JLL's Whistleblower Process

At JLL we encourage a safe speak-up culture where you can raise any concerns with confidence and without fear of retaliation. Our **Global Whistleblower & Non-Retaliation Policy** lays out JLL's commitment to the highest ethical standards that enhance the welfare, safety, and wellbeing of our employees, client and communities.

### Reporting Channels

In compliance with the **Public Interest Disclosure Act 1998**, JLL has implemented different reporting channels where you can report any concerns or actions related to money laundering & financial crime, fraud, bribery & corruption practices, breach of data protection, discrimination, harassment, etc., that you honestly believe to be inconsistent with our Code of Ethics, a company policy or the law:

- Our **Ethics Everywhere Helpline**: a platform (where you can report by dialing in a local **telephone number** or by submitting an **online written report**), managed by an independent third party, available 24/7 in multiple languages, that supports anonymous reporting and confidential case management.
- **Postal mail**: 30 Warwick Street, London, W1B 5NH, United Kingdom, **FAO the Head of Ethics & Compliance, 'Confidential'**
- You can also make a report through a **face-to-face meeting** for which the request must be directed through one of the mentioned reporting channels.

Using JLL's internal reporting channels brings many advantages to the process, including:

A prompt, proactive & effective response

Anonymity & confidentiality are maintained

All reports are reviewed professionally & treated consistently

### What are your protections?



#### Confidentiality

All reporting is done confidentially. The reporter's identity and report details will be confidential and only shared with a limited number of people on a strict need-to-know basis for the purpose of handling reports.



#### Anonymity

JLL commits to protecting reporters' identities. Our Ethics Everywhere Helpline is managed by an independent third party and you may choose to remain anonymous.



#### Non-Retaliation

We are committed to fighting all forms of retaliation. We will not take any adverse action, including harassment, discrimination, suspension or termination, against anyone raising a concern or reporting any wrongdoing. Individuals who engage in retaliation will be subject to disciplinary action by JLL, up to and including termination of employment. Retaliatory actions that violate the law could also subject the individual to legal liability.



#### Data Privacy

We process your personal information in a secure and responsible manner in line with **JLL's Global Privacy and Data Protection Policy**. We take reasonable steps to make sure that personal information is processed with the purpose for which it was collected, accurate, complete and otherwise reliable with regards to its intended use.

### What happens after you have submitted a report?

**01**

#### Acknowledgment of your report

We'll acknowledge receipt of your message generally within 48h or 7 days at most. If you report a concern through our Ethics Everywhere Helpline, you will receive a report key (a unique number) and password to follow up on your report.

**02**

#### Case Manager assigned

Each report is reviewed carefully. Helpline and online reports go to JLL's Ethics Case Management team, who reviews the report based on the location and type of concern before assigning it to a case manager who will get in touch.

**03**

#### Investigation

Treat you with respect. They will review evidence and interview people involved.  
Your identity will be kept confidential to the extent possible, consistent with the need to conduct a proper investigation and any duty to report misconduct externally.  
If you report anonymously, you should use your report key to follow up on updates and respond to additional questions to assist the investigation.

**04**

#### Outcome

Based on the evidence, the case manager will issue their recommendations where appropriate. If a concern is substantiated, appropriate action will be taken. We'll communicate follow-up information and feedback as soon as practicable within a reasonable timeframe, always in compliance with applicable laws and will notify you when the matter is resolved. Response time depends on the nature and seriousness of the allegations. To protect confidentiality, we may not share details of the outcome or report.



For more detailed information, please read our [Global Whistleblower & Non-Retaliation Policy](#)