

COVID-19 Crisis:

Potential Ethical Issues

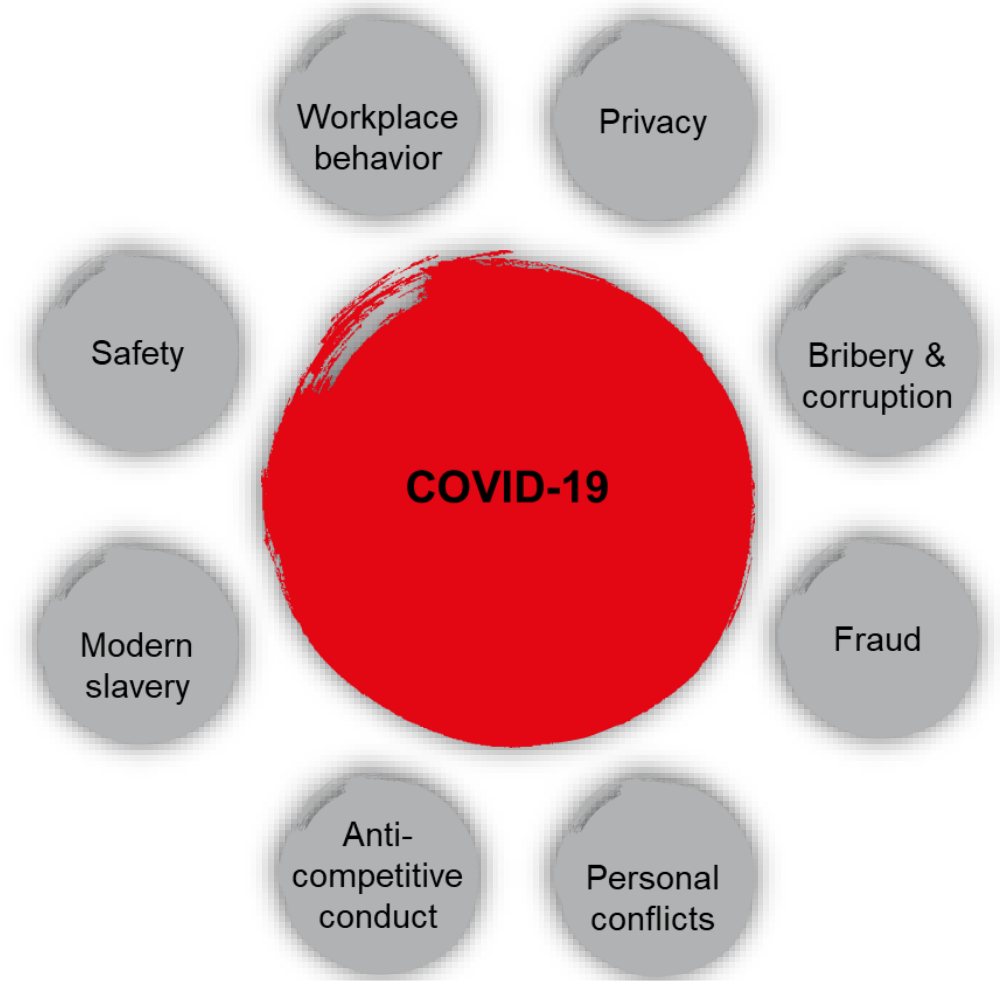
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COVID-19: Potential Ethical issues

As businesses adapt to the impacts of the COVID-19 pandemic, “business as usual” is anything but, and when faced with unprecedented operational challenges, employees may be tempted to skip usual compliance protocols and act outside of our Code of Business Ethics (“Code”). **Now is a good time to place extra focus on ethical culture** and remind your colleagues that at JLL, each one of us needs to maintain the highest ethical standards, do the right thing and adhere to our Code—every day. We can support you there.

The attached slides can be shared with your teams to flag potential ethics issues that may come up as we work together to work through, and recover from this crisis.



Ethics Moment – Ethical Dilemmas

In times of disruption, you may feel under increased pressure to win or retain clients, to cut corners and make up for lost time and revenues. **Our Code provides clear boundaries, and will help you understand and assess the choices you face.** We realize these choices can be tough. When faced with a dilemma, ask yourself:

- *Are my actions consistent with JLL's Code and our policies and procedures?*
- *What would I tell a friend or a member of my family to do?*
- *What might others think of my actions?*
- *How might my actions look if it were in the news or on social media?*

If you are uncomfortable with any of the answers, you should seek advice before acting – talk to your Manager, an Ethics Officer or to Legal & Compliance.



In every country where you work, you should comply with the applicable laws, rules and regulations. When deciding whether to apply the laws, rules and regulations of a country or the principles of our Code, use whichever is the stricter.

Ethics Moment – Workplace Behavior

How you behave matters, and never more so than in a time of crisis. At JLL, we create and sustain a robust ethical culture that is built on **respect, trust and good behavior**. Ethical conduct and decisions are expected of each and every employee. These practices are part of our business and a key factor in our success.

Values-based conduct should always be consistent with JLL's values:

- *Ethics*
- *Fairness*
- *Dignity*
- *Individual Rights*
- *Transparency*
- *Honesty*
- *Equality*
- *Diversity & Inclusion*
- *Integrity*
- *Responsibility*



Abusive, harassing or offensive conduct, whether verbal, physical or visual is unacceptable and simply not tolerated at JLL.

Ethics Moment – Privacy & Data Security

Personal information matters. At JLL, we collect personal information responsibly, ethically and accurately. We keep it safe and it is your responsibility to ensure we always do the right thing by collecting, using, and sharing information only when warranted, and deleting the information after an appropriate period of time.

So think privacy! You don't want to damage JLL's reputation or lose client trust and future work. JLL employees must ensure that our client and employee personal data is kept private and protected at all times from disclosure to unauthorized parties.

Best Practices

1. LOCK IT - when you leave work stations, laptops, cell phones or other devices unattended
2. Use hard to decipher passwords, change them regularly
3. Always encrypt email messages, including attachments, when sending user credentials or other sensitive data;
4. Do back up data on a regular basis;
5. Please shred/dispose securely all personal and sensitive personal information when no longer required;
6. Proper authorization or security protections are required before copying or forwarding confidential information to third parties



Resources

- [Global Privacy Policy](#)
- [Privacy Commitment](#)
- [Information Security Incident Response Policy](#)
- [Managing Sensitive Information on Mobile Devices and Removable Media](#)
- [Information Technology Use Policy](#)
- [Data Protection & Privacy Connect site](#)

Ethics Moment – Bribery & Corruption

At JLL, we do not tolerate bribery or corruption of any kind. **We expect our employees, suppliers, and third parties to conduct business with integrity everywhere, even in challenging environments.** JLL wins clients because we offer excellent services and provide our clients with extraordinary value—not because we pay bribes.

Key Takeaways

- Cash payments are not the only thing that can be considered a bribe. Bribes can also be made through other types of benefit e.g. paid or unpaid employment, charitable donations, lavish gifts, entertainment or travel
- Bribery includes **facilitation payments**, which are small customary amounts paid to government employees to speed up routine business activities, such as issuing permits
- What you might intend as a thoughtful gift, gesture, or hospitality might be considered an illegal bribe.



Bribery means giving, offering or promising anything of value to gain an improper business advantage.

Ethics Moment – Fraud Awareness

We must keep accurate records which are truthful, honest, complete and timely. You must take steps to protect JLL's assets and resources at all times to ensure proper and appropriate use.

JLL policy strictly prohibits fraudulent practices, and our financial and accounting controls are designed to ensure that we do not mislead shareholders, legislators, authorities or the public about our financial status.

What should I look for?

Keep an eye out for anything that doesn't seem right, such as a sudden increase in orders from a particular vendor, an abnormal number of expense items, supplies or any unusual financial transactions. Additionally, watch out for deals that are being pushed through where red flags indicating money laundering or fraud schemes may be ignored or engaged in.

Watch for employee "Red Flags" for fraud, such as employee lifestyle changes, behavioral changes, high employee turnover, or a refusal to take vacation or sick leave.



What should I do if I suspect fraud?

To keep it simple—report it! If ignored, a little fraud can soon grow into **BIG** one. Talk to your manager, contact the Regional Ethics Officer directly for advice, call the 24-hour Global Ethics Helpline at 1-877-540-5066, or complete a report online at <https://jll.ethicspoint.com>.

Ethics Moment – Conflicts of Interest

Sometimes, your personal life and interests can put you in an awkward position or interfere with the decisions you make at work. There may also be situations where the interests of a JLL business conflict with, or appear to conflict with the interests of a client.

These situations are known as conflicts of interest and are a normal part of a dynamic and diverse company such as JLL.

It is important that you are open and honest about these conflicts so we can manage them and ensure we make decisions in the best interest of JLL and our clients.



Examples

Personal interests override or compete with the best interests of an organization

- You have a private business on the side that competes with and diverts business away from JLL
- You received an expensive gift or other personal benefit from a vendor for giving them business
- You award a supplier contract to a business owned by family members or a friend

When JLL as a corporation has an interest that conflicts with the interest of a client

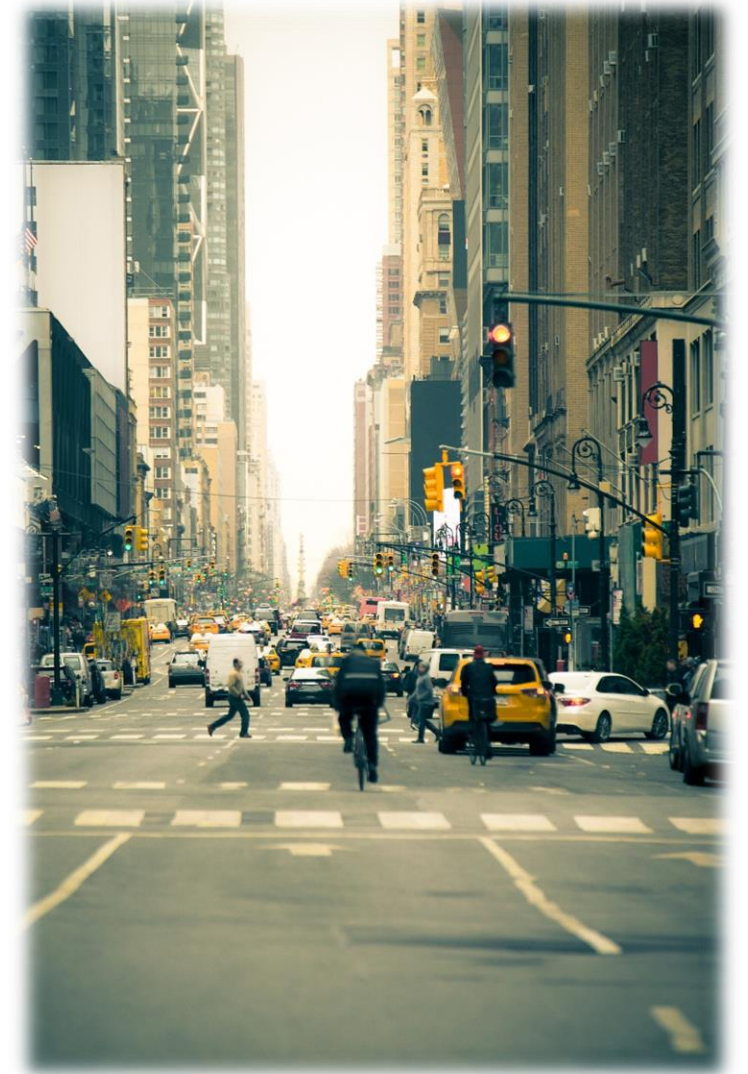
- JLL receives instructions to negotiate a lease on behalf of a tenant, when we are the exclusive agent for the landlord as well

Disclose any possible conflict of interest.
Talk to your manager or an Ethics Officer so they can evaluate the possible conflicts and manage them if necessary.

Ethics Moment – Anti-Competitive Conduct

At JLL, we compete fairly and are committed to sustaining our business over the long term. While compliance with the Code may sometimes place the firm in a less competitive position, we are focused on the greater long-term value rather than any benefit that may be gained by compromising our integrity in the short term. By upholding the highest standards of integrity in our business practices and carefully selecting the clients and others with whom we do business, we will help foster a fair and competitive marketplace.

- **Always deal fairly** with customers, suppliers and competitors
- **Comply with applicable antitrust and fair competition laws**, including those that relate to price discrimination, price fixing, restraint of trade, market allocation schemes and monopolies
- **Never agree with a competitor to:**
 - Fix prices, rates, or any other term or condition of sale
 - Divide a market by allocating customers, territories, services or supplies
 - Disclose commercial sensitive and/or confidential information such as pricing, capacity, supply levels and forecasts
 - Refuse to do business with a customer, supplier or third party
 - Not solicit or “poach” each other’s employees



Ethics Moment – Modern Slavery

At JLL, we believe in, and are committed to Global Human Rights. We do not tolerate any form of slavery or forced labor in our operations or in the operations of our suppliers. We must be alert for red flag

The terms “modern slavery” and “human trafficking” cover a broad range of crimes, including subjecting people to forced labor and transporting people for the purpose of exploiting them in illegal ways for personal or commercial gain.

SIGNS THAT MAY INDICATE MODERN SLAVERY



Workers whose employers withhold identity papers or restrict their movement



Abusive working or living conditions



Workers who owe a debt to their employer for travel or accommodations.



Contractors or vendors who offer prices that cannot be sustainable unless modern slavery is present



An employee from one of our suppliers seems to be too young to be working.

Ethics Moment – Health & Safety

As the impacts of Coronavirus continue, JLL is working hard to protect the health and well-being of our employees and proactively serve the needs of our clients.

Employees must follow all health and safety rules and practices, and be alert for potential health or safety issues at all times. Ignoring the extra work necessary to ensure the safety of our employees or cutting corners to reduce costs is not acceptable.



Safeguarding Health and Preventing Accidents & Injury

- Observe all governmental and JLL health and safety rules
- Be sure you understand and follow all procedures related to your job tasks, including any new guidance issued in relation to coronavirus
- To protect yourself from safety hazards, always wear all of the required personal protective equipment
- Be alert to actual or potential hazards or unsafe conditions or behaviors and promptly report them

Covid-related Resources:

[JLL Coronavirus Resource Center](#)

Ethics Moment – Social Media

While we recognize that the use of social media is routine, and interwoven into our lives, all JLL employees have a duty to protect JLL's reputation, both on-line and off-line.

Before you tweet, share, or like on social media, remember that when you are communicating your personal opinion, if your audience can associate you with JLL, you are representing JLL, whether you intended to or not.

Social Media Do's

Do: Act sensibly. You are accountable for your actions and everything you write.

Do: Exercise good judgment. Don't write anything that is defamatory, obscene, libelous, threatening or harassing to others.

Do: Bear in mind that our computer systems are to be used for **business** purposes. Social networks and online communications should not interfere with your job at JLL.



Social Media Don'ts

Don't: Disclose information that is confidential or proprietary to JLL or to our clients.

Don't: Use the JLL logo or masthead, or those of any of our businesses for personal reasons.

Don't: Start up your own official or unofficial JLL site

Don't: Host your personal media pages on JLL owned or leased properties.

Ethics Everywhere



If you have a concern or see something that doesn't look right, don't ignore it, speak up! Whether in lockdown or normal operations, all employees have a responsibility to tell us if you think someone may not be following JLL's Code. You can ask a question or raise a concern in a number of ways, including talking to your Manager, an Ethics Officer or contacting JLL's Global Helpline.

All Ethics information and links can be found on our Ethics Everywhere site on Connect.

- Visit the [Ethics Everywhere](#) site , which offers a range of materials to help you act with integrity, such as our [Code of Ethics and Vendor Code of Conduct](#).
- Take a look at our [Ethics Everywhere Annual Report](#)
- Contact our [Ethics Officers](#) to report problems or ask questions.
- Remember, it is JLL's policy that any form of retaliation against a person reporting a matter in good faith will not be tolerated.

Call our Global Helpline at +1 877 540 5066 or send in a written report to <https://jll.ethicspoint.com>. Both are managed by an outside provider and are available 24/7 in all major languages. All reports are highly confidential and may be made anonymously. We investigate all allegations.

