



## 1.0 Preamble

JLL (“Jones Lang LaSalle” or “Company” has developed this Corporate Social Responsibility (CSR) Policy in consonance with the CSR Policy framework enshrined in the section-135 of Companies Act, 2013 (Act) and in accordance with the Companies (CSR Policy) Rules, 2014 (Rules) notified by Ministry of Corporate Affairs, Government of India and Guidelines on Corporate Social Responsibility and Sustainability for Central Public Sector Enterprises issued by Department of Public Enterprises, Government of India (DPE Guidelines, 2014) which are effective from 1st April 2014. It shall apply to all CSR Projects / Programmes undertaken by JLL (including its subsidiaries, associates, affiliates, group companies, sister concerns, holding companies (collectively “Affiliates”), which are mandated with the CSR expenditure obligation as per the section 135 of the Companies Act, 2013 under the provisions of the Companies Act, 2013 read with the Companies CSR Rules, 2014, as amended from time to time) as per liberal interpretation of activities listed in Schedule-VII of the Act, within the geographical limits of India alone, preferably towards the benefit of marginalized, disadvantaged, poor and deprived sections of the community and the environment.

Any point not covered by this Policy would be interpreted in accordance with the existing Companies (CSR Policy) Rules and DPE Guidelines, 2014, with the former taking precedence over the later in case of any conflict.

## 2.0 Vision and Objective Statement

JLL aspires to be a responsible Corporate Citizen, by contributing to nation building through CSR Projects/ Programmes, in true letter and spirit, as enshrined in the Act.

The main objective of the Company’s CSR policy is:

- To lay down guidelines to make CSR a key business process for sustainable development of the society.
- To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities.
- To generate goodwill and recognition among all stake holders of the company.
- To encourage employees to contribute to societal well being by engaging them in CSR activities.

## 3.0 Focus Areas

In accordance with the requirements under Companies Act 2013, JLL CSR activities, amongst others will focus on:

- Child Welfare & Reducing Child Mortality
- Women Empowerment

- Ensuring Environmental Sustainability
- Employment enhancing vocational skills
- Disaster relief programs

#### **4.0 Budget**

4.1 The Board of JLL will ensure that in each financial Year (FY), at least two percent of the average net profit (calculated as per Section 198 of the Act) accrued during the three immediately preceding Financial Years is spent on CSR activities / projects / programs. (read together with clause 4.2)

4.2 In the event that the amount indicated in para 4.1 above is not spent in its entirety in that Financial Year, the reasons thereof will be outlined as per section 134 (3) (o) of the Act and will be shared with all the stakeholders through the Annual Report.

4.3 Activities and projects will be identified and the budget allocation for such projects / programmes / activities shall be made by the CSR Committee in the beginning of each financial year after considering the CSR budget for that year.

4.4 In an event where JLL makes any surplus or profit from pursuing the CSR projects / programmes, these will not form part of the business profit but will, instead, be carried forward to the following year(s) as part of either the CSR corpus or as a supplement to the CSR budget over and above the prescribed allocation.

4.5 For all contributions received from other companies / sources towards the CSR Corpus / Budget, JLL will claim CSR expenditure only for funds that are provided from its own resources.

4.6 No amount out of CSR funds / budget shall be contributed to any political party, directly or indirectly.

4.7 Contribution to Corpus of a Trust/ society/ section 8 companies etc. will be made only (a) when they are created exclusively for undertaking CSR activities or (b) where the corpus is created exclusively for a purpose directly relatable to a subjects covered in Schedule VII of the Act.

#### **5.0 Planning and Implementation**

5.1 JLL shall give preference to well defined operating principles during the planning stage for the identification and implementation of its CSR Projects / Programmes in order to ensure optimal utilisation of the CSR budget.

5.2 JLL shall endeavour to understand the **stakeholder expectations** through a structured engagement process and communication strategy and shall leverage this understanding for betterment of all the stakeholders.

5.3 Implementation of the CSR projects or programs shall be through in-house CSR team or Building a Better Tomorrow Foundation, a trust set-up by JLL. JLL may also implement its CSR initiatives through any trust, society or company established under section-8 of Companies Act, 2013 (erstwhile section-25 of Companies Act, 1956).

5.4 JLL will endeavour at all times to build and develop the skills of its CSR team and enhance level of CSR awareness within the organization through periodic employee engagement activities and other mailers.

5.5 JLL will lay emphasis on the sustainability of its projects/programmes to ensure they remain relevant and viable even upon disengagement at the end of the project period.

5.6 Before engaging with any NGO or any Section 8 company, JLL will do a thorough background check of the NGO with the help of the basic checklist. In addition, JLL will have discussions with the NGO's regarding the suggested CSR activity to understand the quality of work and the impact created by such NGO's in providing those services.

5.7 The activities are analysed from various aspects such as whether the same falls under JLL focus areas, budgetary aspects, NGO / organisation through which the activities are carried out etc.

5.8 Once the due diligence is accrued out, the suggested CSR activity is proposed to the CSR workgroup for suggestion and approval.

5.9 On approval from the CSR workgroup, the amount is contributed towards carrying out the CSR activities.

## **6.0 Monitoring and Evaluation**

6.1 A comprehensive Monitoring mechanism will be devised by JLL to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all Projects / Programmes are duly implemented as budgeted. This will be done on the basis of the following:

- i. Allocation of a required budget for setting up and running the monitoring system;
- ii. Release of funds only against verified utilisations.

6.2 The CSR Committee will be responsible for monitoring approved projects / programmes.

6.3 The monitoring system devised by JLL will include:

- i. Field visits to Project / Programme sites by designated teams;
- ii. Comprehensive documentation / compilation of the required reports;
- iii. Timely interaction with beneficiary communities to obtain feedback;
- iv. Monitoring of timely fund utilization to ensure that Projects / Programmes as budgeted are actually being carried out and/or
- v. Any other activity that the CSR Committee may deem necessary in the larger interest of its CSR initiatives.

## **7.0 Impact Assessment / Evaluation of CSR:**

7.1 In order to assess the impact of its CSR Projects and Programmes, maximize outcomes and build-in sustainability, scalability and replicability, JLL shall undertake the following activities:

- i. Ensure that the projects / programmes undergo concurrent and final evaluation;
- ii. Engage credible third parties to undertake evaluation of all or selected projects / programmes, only in case required

## **8.0 Documentation**

JLL will endeavour at all times to put in place, for all projects / programmes, an effective documentation process. Wherever possible, Base line data shall be collected before start of the project. In addition, Project completion report documenting the key project parameters, implementation process, and deliverables envisaged and the outcome achieved along with end line data and the suggestions / recommendations for scalability and replicability of the project may be developed wherever feasible.

## **9.0 Accounting and Auditing**

JLL will follow the Accounting and Auditing Guidance Note / Standards duly approved by the Ministry of Corporate Affairs, Government of India.

## **10.0 Disclosure**

JLL shall comply with Section 135 (2), 135 (4) (1) and 134 (3) (o) of the Act thereby ensuring that it makes a full disclosure of its CSR Policy, Strategy, Projects / Programmes, Activities, monitoring

mechanism, Implementing Agencies, Expenditure details as well as the composition of the CSR Committee of the Board.

## **11. Reporting**

On approval of the CSR policy or any amendments thereof, the contents of the policy shall be included in the Boards' report and the same shall be displayed on the web site of the company. At the end of each financial year, JLL will make a full report of its CSR projects / programmes undertaken during the previous year in the format prescribed for the "Annual Report on CSR Activities to be included in the Board's Report" in the Companies (CSR Policy) Rules, which is in consonance with section 134(3)(o) of the Act.

### **Amendments to the CSR Policy**

The Committee shall review this CSR Policy on periodic basis and shall update it as necessary or appropriate (subject to the approval of the Board, if required) to ensure that it reflects CSR requirements as well as the current interests of the Company and relevant shareholders.

### **Management Commitment:**

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity cornerstone of our CSR and compassion, characterized by a willingness to build a society that works for everyone. This is the policy.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.