



## **BentallGreenOak (Canada) Limited Partnership Vendor Code of Conduct**

BentallGreenOak (Canada) Limited Partnership (“BGO”) is committed to the highest standards of business ethics and integrity. As a fiduciary to our clients, our reputation as an ethical and trustworthy company is our most important asset. We’re transparent with our business dealings. We’re rigorous about our governance practices. And we’re committed to creating a diverse and inclusive workplace where our employees, clients, stakeholders, and communities can thrive. BGO has developed this Vendor Code of Conduct (“Vendor Code”) for contractors, suppliers, consultants and service providers (each a “Vendor”) hired by BGO for its real estate management business that reflects these standards and ethics. We strive to create Vendor relationships that are mutually helpful and foster fair and open competition.

This Vendor Code outlines certain minimum expectations that BGO has for its Vendors. If there is a professional or supplementary code, local policy, law or regulation that applies to a Vendor and conflicts with this Vendor Code, the Vendor must comply with the most restrictive requirements applicable to the situation. If a Vendor has its own code of conduct that meets the requirements of BGO’s Vendor Code, the Vendor may instead comply, at a minimum, with its own code of conduct.

BGO expects Vendors to:

- maintain the highest standard of professionalism, honesty and integrity in their interactions with BGO;
- self-monitor their compliance with this Vendor Code; and
- use commercially reasonable efforts to ensure that their employees, agents and contractors understand and comply with this Vendor Code.

### **Ethical Business Dealings**

#### **Act in Compliance with Laws, Policies and Procedures**

BGO expects Vendors to conduct their business:

- ethically and responsibly;
- in compliance with all applicable laws and regulatory requirements; and
- in compliance with this Vendor Code

#### **Anti-Corruption and Anti-Bribery**

BGO expects Vendors to follow all laws and regulatory requirements regarding bribery and corruption. Vendors must not engage in any form of corruption. This includes bribes, kickbacks, facilitation payments and extortion.



### **Anti-Money Laundering**

Vendors must not engage - directly or indirectly - in any form of money laundering. They must not conduct business that violates the anti-money laundering laws. This includes accepting, concealing, converting and/or transferring any funds obtained from criminal activities, including terrorist financing.

### **Anti-Trust and Fair Competition**

Vendors must not conduct business for BGO that isn't compliant with anti-trust and fair competition laws in the jurisdictions they operate.

### **Conflicts of Interest**

Vendors must avoid circumstances, situations, or relationships that could improperly influence business decisions. Vendors must disclose relationships, associations or activities that could improperly influence business decisions.

### **Fraud Prevention**

Vendors must not participate in or condone any form of fraudulent business activities. This includes, for example:

- alteration, forgery or falsification of company documents or information;
- misuse or removal of records;
- misappropriation of company assets; and,
- theft or embezzlement.

### **Gifts and Entertainment**

BGO expects that Vendors won't offer any BGO employee gifts, entertainment or any other advantage that could lead to improper advantage or preferential treatment, or that may influence, or appear to influence, BGO's ability to make objective business decisions. Vendors, together with BGO employees, should ensure requisite approvals are obtained with respect to gifts and entertainment. Gifts, entertainment, and advantages of the nature described above that are received from a Vendor may result in BGO ending the relationship with the Vendor.

## **Privacy, Confidentiality, and Corporate Property**

### **Privacy and Confidentiality**

BGO expects Vendors to comply with all laws and regulatory requirements regarding privacy and information security requirements. Those include appropriate access to and/or handling of the confidential information of BGO and its clients ("Confidential Information"), including personal information. Vendors must safeguard and not use or disclose Confidential Information without permission from BGO. We expect Vendors to have adequate controls in place with respect to information security. They need to effectively and properly take care of the authorized collection, use, retention, destruction, maintenance, access and disclosure of Confidential Information.



### **Corporate Property**

Vendors may have access to BGO's intellectual and physical property and that of BGO's clients ("BGO Corporate Property"). They must use BGO Corporate Property in a responsible manner, solely for authorized business purposes. BGO Corporate Property includes, for example, hardware, software, websites, e-mail, telecommunications, internet access, records, documents, supplies and intellectual property. Vendors must return all BGO Corporate Property at the end of a project. They can't use BGO's name, trademark, or logos without BGO's consent.

## **Labour and Human Rights**

### **Employment Practices and Working Conditions**

BGO expects Vendors to comply with all applicable wage laws, labour laws and regulations governing employee compensation and working hours.

### **Fair Wages**

Vendors should pay workers fair wages and provide fair benefits as evidenced by payroll and employee records. What constitutes "fair wages", and "fair benefits" depends on the wages and benefits paid on comparable real estate projects, based upon local market factors that include the nature of the project (e.g., residential or commercial; public or private), comparable job or trade classifications, local wage practices, employment laws, prevailing wages, labour market conditions and the scope and complexity of services provided and other relevant factors.

### **Modern Slavery and Forced Labour**

Vendors should not engage in or condone any form of modern slavery and forced labour, including human trafficking-related activities. Vendors should not use, or practice forced labour. That includes work or services extracted under the threat of penalty. BGO will not tolerate the use of child or forced labour.

### **Respect, Discrimination, and Harassment**

BGO expects Vendors to provide a respectful, inclusive, and healthy work environment, free from unlawful harassment and discrimination. Discrimination or harassment based on any status protected under any applicable law is prohibited. BGO aims to partner with Vendors that share our commitment to maintaining and fostering a culture that promotes equity, diversity, and inclusion.

### **Health and Safety**

BGO expects Vendors to provide adequate and safe working conditions. They must comply with applicable health and safety laws.

### **Environmental, Social and Governance ("ESG") Practices**

Sustainability is a priority for BGO and is essential to our overall business success. Our ESG plan forges our commitment to be a responsibly managed business. We are client-focused, financially, and environmentally resilient, and sustainable for the long term. BGO expects Vendors to support this commitment and the priority we place on sustainability.



## Vendor Code Compliance and Monitoring

BGO expects Vendors to comply with this Vendor Code. Periodically BGO may require a Vendor to confirm that they meet BGO's requirements. BGO reserves the right to monitor and audit a Vendor's compliance with this Vendor Code, including by self-assessment questionnaires. Any material noncompliance with this Vendor Code may result in BGO ending a relationship with a Vendor.

## Client Approval

BGO advises and manages real estate properties on behalf of various property owners with differing interests. BGO's operational control over these properties can be limited and as a result the implementation of this Vendor Code may be subject to client approval.

**Last Updated: November 20, 2024**