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# VENDOR CODE OF CONDUCT

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APRIL 2022

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## 1.0 INTRODUCTION

### 1.1 Purpose

The Logistics Property Company, LLC (on behalf of itself and its affiliates, "LPC") Vendor Code of Conduct ("Code") sets forth the minimum standards that we expect that companies that provide goods or services as well as manufacturers or resellers of such goods or services (inclusive of such companies' employees, agents and subcontractors, "Vendors") to comply with. Acceptance of this Code via written documentation is part of the Vendor qualification.

Our Code should be read in conjunction with, and becomes part of, the agreement which governs the working relationship between LPC and the Vendor (the "Agreement").

In the event of a conflict between our Code and the Agreement, the Agreement shall prevail unless otherwise expressly provided for in the Agreement or as otherwise required by law. Our Code does not lower or replace existing applicable standards or the terms of the Agreement.

### 1.2 Commitments

We recognize the importance of positively contributing to the social, economic and environmental wellbeing of the business communities that we are part of. We believe our mutual commitments to operate in accordance with the business community expectations of businesses conduct create a more sustainable value for all our stakeholders. LPC will work collaboratively with our Vendors to foster a relationship that aligns with the standards in this Code and the interests of our stakeholders.

LPC is committed to:

- Lawful, ethical and sustainable business practices.
- Upholding human rights; and the highest workplace standards.

We expect all our Vendors to share in our commitments and adhere to these standards. Continually review this Code and communicate the Code with their employees and supply chain; and notify LPC of any breaches or material shortcomings in relation to the Code, report any potential violations committed by subcontractors, and reasonably seek to address, remediate and prevent the recurrence of these issues.

## 2.0 FAIR CONDUCT OF BUSINESS

Vendors must comply with all applicable laws and regulations. Vendors must train and monitor their staff, subcontractors and agents to a level appropriate to comply with this Code and any such laws and regulations.

### 2.1 Resources and Assets of LPC

Vendors must protect and use LPC assets responsibly, with due care and only when and for authorized business-related purposes. LPC assets include financial assets, physical assets, technology and systems (including telephones, email systems and other electronic communication devices), intellectual property rights (including names and logos), and information (including personal data) relating to LPC (e.g. products, services, customers, systems people).

## **2.2 Bribery and Corruption**

Vendors must not engage in active or passive bribery or corruption. Specific clauses in the agreement will regulate further details.

## **2.3 Conflicts of Interest**

Vendors must disclose all actual or potential conflicts of interest due to either business or personal relationships with LPC management or staff including representatives working on behalf of LPC, LPC's customers, other Vendor(s), business associates, or competitors of the LPC.

Vendors must compete fairly and in line with relevant anti-trust laws in the market place. Vendors must therefore calculate, quote and submit price(s) and/fees contained in any bid, proposal or invoice independently without collusion, consultation, communication or agreement with any other competing Vendor.

## **2.4 Confidential Information Data**

Vendors must strictly limit and safeguard the confidential information belonging to LPC and any third parties, including any information created, received or learned by Vendors while engaged for or on behalf of third parties.

## **2.5 Data Privacy**

Vendors must only process personal data on behalf of LPC by means of a written agreement that sets forth among other requirements, the Vendor's obligations under the LPC Privacy Policy, including, but not limited to, onward transfers; the appointment of sub-processors; rights to, confidentiality, return, and destruction of personal data; technical and organizational security measures; breach notification obligations; data subject rights; and data privacy audits.

## **2.6 Prevention of Money Laundering, Terrorist Financing, Sanction Breaches or Illegal Activities**

LPC is fully committed to the international fight against money laundering and the financing of terrorism as well as to the compliance with applicable sanction regimes. Vendors must not engage in, support or tolerate any activity in connection with LPC that infringes or circumvents applicable laws against money laundering or terror financing, applicable sanctions or which otherwise could be interpreted as illegal activity. Additionally, Vendors must not engage with persons, countries or organizations sanctioned by the United Nations Security Council or any respective local government nor shall Vendors associate themselves with criminal activities.

## **2.7 Respect for Human Rights & Non-Discrimination**

LPC respects and supports compliance with internationally recognized human rights as stipulated in its Human Rights Approach. LPC expects every Vendor to play a constructive role in helping to promote respect for human rights through their actions and by engaging with the governments of the countries in which they operate.

Vendors must provide a workplace free of hard and/or inhumane or discriminatory treatment or threat thereof, including any sexual harassment, sexual abuse, corporal punishment or other enforcement measures that compromise the individual's physical or mental integrity. LPC further expects that all Vendors will reach beyond this and actively ensure that these modern slavery practices do not occur within their business.

Please also refer to section 4. Reference Standards.

## **2.8 Freedom of Association and Collective Bargaining**

Vendors must respect workers' rights to freedom of association and collective bargaining in accordance with applicable local laws and regulations. LPC expects suppliers to respect the rights of workers to freely associate, collectively bargain and join or not join trade unions and other legitimate associations. We encourage Vendors to cultivate open communications and direct engagement between workers and management to facilitate an effective resolution of workplace issues.

## **2.9 Fair Labor Practices**

Vendors must respect International Labor Organization (ILO) standards against child labor. Vendors must not use any form of forced labor or human trafficking of involuntary labor through threat, force, fraudulent claims or other coercion. Vendors must comply with all applicable labor laws including as to compensation and working hours.

Vendors must provide a non-violent and safe work environment, free of threats, intimidation and physical harm, that also supports accident prevention and minimizes exposure to health risks.

## **2.10 Environmental Protection & Sustainability**

Vendors must comply with all applicable laws and regulations, and, where appropriate, establish sustainability policies and environmental management practices that encourage environmental stewardship by their supply chain. Vendors are expected to take steps to proactively assess risk scenarios and apply controls to eliminate or mitigate environmental risks and adhere to LPC's environmental standards and procedures on all LPC projects.

In light of LPC's environmental commitments, which support the transition to a low-carbon energy market, vendors are encouraged to use power from renewable sources wherever possible.

## **2.11 Workplace Health & Safety**

LPC is committed to a zero harm, incident-free workplace. In keeping with this commitment, Vendors are expected to take steps to proactively assess risk scenarios and apply controls to eliminate or mitigate health and safety risks, adhere to LPC's workplace health and safety standards and procedures on all LPC projects, follow any LPC workplace health and safety directives while on any LPC job site or premises, stop any tasks that are, or may become, unsafe, and deny any worker from undertaking any tasks if such worker's job performance is in any way impaired by drugs legal or illegal, alcohol, or other substances, and report any incidents occurring on any LPC job site premises of LPC.

## **2.12 Working Hours**

The Vendor undertakes to comply with the maximum working hours as defined in the country in question or in the absence of such laws and provisions, to comply with a working week of an average of 48 hours and to grant employees one day off per week.

The Vendor recognizes that overtime shall be voluntary and that a maximum of twelve hours of overtime per week must not be exceeded.

## **2.13 Compensation**

The Vendor undertakes to compensate its employees appropriately and to pay the defined minimum wage applicable in the country in question and to comply with all local wage and tariff agreements. In the absence of such agreements, the Vendor undertakes to compensate employees sufficiently such that their basic needs are covered.

No reduction in compensation may be made for disciplinary reasons.

## 2.14 Licenses & Registration

Vendors must obtain the appropriate registrations and licenses from the relevant regulatory bodies prior to conducting any form of business in connection with LPC. In case Vendors are aware that proceedings are started to limit, withdraw or otherwise alter the license, they must proactively inform their LPC contact in writing.

## 2.15 Addressing Misconduct

Vendors must promptly inform their LPC contact or LPC's compliance function in writing to [compliance@logisticspropco.com](mailto:compliance@logisticspropco.com) if they, acting in good faith, reasonably believe that anybody working for or on behalf of LPC has committed an illegal act or any act against the ethical standards set forth in this document that causes, or is likely to cause, harm to people or property or an act that is a known or suspected violation of this Code. The obligation to report covers acts or omissions observed throughout the supply chain that violate or potentially violate the requirements of this Code.

## 2.16 Confidentiality, Data Protection and Cyber Security

Vendors must keep their relationship with LPC, including the existence of the Agreement, confidential unless disclosure is expressly permitted in writing (see section 1.1. Purpose), ensure appropriate safeguards to protect LPC sensitive information against loss, theft, destruction or unauthorized access, use, alteration or disclosure, and ensure appropriate cyber security measures within their information assets and resources to appropriately manage the risk of internal and external cyber threats.

## 2.17 Grievance Mechanisms

Vendors shall put in place grievance mechanisms to enable their employees, suppliers and other stakeholders to raise concerns regarding human and/or labor rights issues related to their organization and/or their supply chain.

Furthermore, any stakeholders of LPC can raise human rights related concerns to LPC's compliance function in writing to [compliance@logisticspropco.com](mailto:compliance@logisticspropco.com).

## 3.0 ABOUT COMPLIANCE WITH THIS CODE

Vendors must maintain accurate and appropriate records to demonstrate compliance with applicable laws and regulations and this Code. Record creation, retention and disposal obligations should be revisited with the Vendor's dedicated contact at LPC, at a minimum, once every three years.

Vendors must promptly inform LPC when any situation develops that causes Vendor, or could cause Vendor (including their subcontractors), to operate in violation of this Code. Contact is either their LPC contact or to LPC's compliance function in writing to [compliance@logisticspropco.com](mailto:compliance@logisticspropco.com)

Vendors must have processes in place that allow the timely remediation of any deficiencies or non-compliance with this Code as identified by LPC, inspections, audits or otherwise brought to the Vendor's attention.

Vendors are expected to self-monitor and demonstrate their compliance with this Code. LPC will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported any questionable behavior or a possible violation of this Code.

## 4.0 REFERENCE STANDARDS WHICH ARE SUPPORTED FROM WITHIN LPC

LPC expects vendors to commit on respecting human rights in line with:

- United Nations (UN) Guiding Principles for Human Rights and as set out by the Labor Standards of the International Labor Organization (ILO)
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- UN Global Compact (UNGC)

## ANNEX

Environmental, social and governance (ESG) questions integrated in the registration and screening process as a prerequisite to sourcing and contracting into the LPC procurement system.

### Environment

- Does your company comply with all applicable environmental regulations?
- Does your company track, report and manage your use of energy, water and waste?
- Does your company have an ESG policy?

### Forced-labor

- Does your company have an internal policy or process ensuring that there is no use of forced or bonded labor, compulsory work, the exploitation of vulnerable persons and/or the trafficking of persons?
- Does your company ensure that your direct suppliers have an internal policy or process in place to manage material risks related to forced or bonded labor, compulsory work, the exploitation of vulnerable persons and/or the trafficking of persons in their operations and supply chains?

### Complaint process (grievance mechanism) regarding human rights concerns

- Has your company put in place a formal complaint process (grievance mechanism) available to individuals, workers and other stakeholders to raise any human or labor rights related concerns arising from your business activities and operations, and such activities from your suppliers?
- Does your company ensure that your direct suppliers have a formal complaint process (grievance mechanism) in place for individuals, workers and other stakeholders to raise any human or labor rights related concerns arising from their business activities and operations?

### Workplace Health & Safety Policy

- Does your company have an workplace health and safety policy in place?

### Whistleblowing Mechanism

- Does your company have a whistleblowing system in place, which ensures adequate whistleblower protection and is available to all staff and suppliers?

### Minimum Wage and Working Time

- Does your company ensure that employees are receiving at least the required minimum wage and complying with applicable working time regulations?
- Does your company ensure that your direct suppliers are complying with applicable working time and minimum wage regulations?

### Contractual Clauses

- Does your company have contractual terms and conditions with your suppliers, which specifically enable you to terminate business relationships with suppliers involved in human and labor rights abuses such as the use of slavery, servitude, forced or compulsory labor, and human trafficking?



## Code of Conduct

- Does your company have a Code of Conduct?
- Does your company have an inclusion and diversity policy?
- Does your company carry out internal audits and/or internal controls to ensure that breaches to your company's Code of Conduct and/or human rights abuses are not occurring within your organization?

## Freedom of association and right to collective bargaining

- Does your company have a policy in place to ensure the freedom of association (i.e. trade unions) and the right to collective bargaining are being upheld?
- Does your company ensure that direct suppliers have a policies in place to ensure the freedom of association (i.e. trade unions) and the right to collective bargaining are being upheld in their organization?

## AMENDMENTS AND UPDATES

Version	Date	Reason for and Extent of Changes
1.0	04.18.2022	Original