



BGIS Global Integrated Solutions US LLC

BGIS Supplier Code of Conduct

Author: Strategic Sourcing



December 2022

Purpose

At BGIS Global Integrated Solutions US LLC and its related companies (collectively referred to as “BGIS”), we are committed to a policy of fair dealing and integrity in the conduct of all aspect of our business. As a recognized leader in the provision of Real Estate Management Services, our core values must be reflected in our actions and behavior. Each of us has personal responsibility to uphold and extend our standards of ethical behavior.

Consistent with our Company’s Ethics Policy and Code of Business Conduct, the Supplier Code of Conduct has been developed to establish a minimum set of requirements to current and potential suppliers. These principles speak to the commitments we make to our clients, our drive to deliver innovation business solutions and relationships built on partnerships, trust, integrity, and personal responsibility. These principles establish the ethics and standards required for engaging in business with BGIS.

BGIS expects its suppliers to fully comply with these principles, as they in turn apply them to their own employees, agents, affiliates, suppliers, and sub-contractors that they work with in delivery of goods and services for BGIS and or BGIS clients.

Standard Practice

A formal agreement and any related counterparts between BGIS and suppliers contain detailed terms and conditions addressing many of the topics within this Supplier Conduct Principles. The various parts of this Supplier Code of Conduct may be in addition to the formal agreement - should there be any conflicts, the terms and conditions of the formal agreement and any related counterparts will govern.

Communication

Suppliers must make the BGIS’ Supplier Code of Conduct and other relevant / required information available to employees in their local languages. Supplier will provide translations.

Suppliers must implement open lines of dialogue/communication between employees and management to champion resolution of issues and improve overall working conditions.

Ethics and Integrity

BGIS suppliers play a key role in our continuous growth and success. In order to avoid any conflict of interest and to keep business relationships on a professional basis, the following will be adhered to:

1. BGIS expects its suppliers to provide a quality product or service for which they will be fairly paid.
2. In selecting suppliers, BGIS will ensure all competition is conducted in an open, consistent, and transparent manner.

3. No BGIS employee is to ask for anything of value from a supplier. Gifts from a supplier such as tickets to athletic events, concerts, personal travel, or any type of personal item are discouraged by our business practices and must be declared.
4. If any BGIS employee is offered or accepts an item of value from a supplier, the employee is to report it to the appropriate BGIS Management Team Member.
5. If any BGIS employee engages in any type of unethical behavior such as requesting anything of value from the supplier, the supplier is requested to report the incident to www.ethicspoint.com or call 1-866-384-4277.

BGIS suppliers must strictly adhere to and comply with all laws and regulations related to bribery, corruption, and prohibited business practices.

Unless disclosure is authorized or legally mandated, our suppliers are expected to properly disclose and protect business information, customer information, and intellectual property rights in accordance with applicable requirements and prevailing industry practices and protect supplier and employee confidentiality.

Labor

Suppliers are expected to uphold the human rights of workers, and treat them with dignity and respect and:

- 1) Prohibit the use of forced, bonded, indentured, or involuntary prison labor.
- 2) Allow workers to leave employment upon reasonable notice and not require workers to hand over government-issued identification, passports or work permits as a condition of employment.
- 3) Prohibit child labor. The use of workplace apprenticeship programs, which comply with all applicable laws and regulations, is encouraged.
- 4) Set work hours to comply with local law and legislated employment standards. Where there are no local laws, our suppliers are expected to refrain from requiring, except in emergency or unusual situations, work in excess of six consecutive days without a rest day away from work.
- 5) Comply with applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Employees receive at least the minimum wage required by law or the prevailing industry wages; whichever is higher. Workers receive full details regarding deductions for taxes, benefits, etc. Wages are not deducted for disciplinary purposes and are paid in cash, cheque or by direct deposit.
- 6) Maintain workplaces free of unlawful discrimination and harassment in all of its forms, including that related to race, color, ancestry, creed (religion), place of origin, ethnic origin, citizenship, sex (including pregnancy, gender identity), sexual orientation, age, marital status, family status, disability, receipt of public assistance, union membership, and

conviction for which a pardon has been granted. This applies to recruitment, salary, benefits, advancement, discipline, termination, and retirement.

- 7) Respect voluntary freedom of association, including the right to organize and bargain collectively in a manner that is legally compliant. Workers' representatives are not subject to discrimination and have access to workplaces necessary to carry out their respective functions. Where worker representation and collective bargaining are restricted by law, efforts should be made to facilitate open communication and direct engagement between workers and management as alternative ways of ensuring the workers' rights, needs and views are considered and acted upon appropriately and in good faith.

Modern Slavery

BGIS is committed to preventing modern slavery in its operations and supply chains, including all forms of forced labour, and expects the same of its suppliers.

BGIS suppliers are expected to regularly investigate their labour practices to satisfy itself that there is no modern slavery or forced labour is used anywhere in its business and its supply chains.

At any time, BGIS may request supporting documentation and information from our suppliers, demonstrating that they have monitored, assessed, and addressed risks identified relating to modern slavery and forced labour and have performed appropriate due diligence to prevent modern slavery and forced labour.

Suppliers must notify BGIS immediately following any confirmed instances of modern slavery or forced labour in their business or supply chains, and the actions undertaken by the supplier to remedy the issue(s).

forced labour means labor or service provided or offered to be provided by a person under circumstances that

- (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labor or service; or
- (b) constitute forced or compulsory labor as defined in article 2 of the Forced Labor Convention, 1930, adopted in Geneva on June 28, 1930.

Health and Safety

Our suppliers are expected to provide health and safety and safe workplaces and comply with relevant health and safety laws. Ensuring safe working environments and undertaking activities using safe working practices is a fundamental requirement for BGIS' suppliers. We expect our suppliers to practice the following:

- 1) To follow the applicable regulations for the jurisdiction where the work is occurring, BGIS polices as outlined in the Contractor Safety Handbook, as well as any additional documented policies and work procedures as may be prescribed by BGIS' clients with regards to working within their properties.
- 2) Control worker exposure to potential safety hazards (i.e., electrical and other energy sources, chemical, fire, heat, vehicles, asbestos, and fall hazards) through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures. Where hazards cannot be adequately controlled by these means, provide workers at no cost as appropriate the proper training, personal protective equipment and ensure proper maintenance of equipment.
- 3) Workers are not to be disciplined for raising safety concerns.
- 4) Exchange of information about risk prior to work commencement and understanding how risks will be managed.
- 5) Operate a system of specific authorization (i.e., asbestos, permit to work, restricted access, working at height) for high-hazard tasks.
- 6) Maintain appropriate emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training, drills, appropriate fire detection, fire detection and suppression equipment, adequate exit facilities, and recovery plans.
- 7) Manage, track and report occupational injuries and illnesses, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate and implement corrective actions to eliminate their causes; and e) facilitate safe and early return of workers to work. All injuries related to work that is occurring on behalf of BGIS, will be reported to BGIS.
- 8) While providing services to BGIS, BGIS clients and while attending any BGIS related corporate or industry events, supplier's workers must not be impaired from the use of alcohol, drugs (including cannabis and cannabis related products), and/or the negative effects of medications or any other substance that could cause impairment.
- 9) All contractors must abide by any COVID-19 requirements for the site they provide services for. This may include physical distancing, facial coverings, completion of daily Self-Assessment for symptoms, travel history and any close contact with those who have COVID-19. In addition, some BGIS clients have identified specific requirements for vaccinations or alternatives such as Rapid Antigen Screening. Requirements of this type are identified in communications from BGIS Strategic Sourcing.

Environment and Sustainability

We expect suppliers to minimize the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public as well as ensuring the following:

- 1) Institute a complete and effective environmental management system (i.e., written policies, processes, and requirements for environmental protection and pollution prevention source or reduction) that is in accordance with the relevant laws, regulations, and standards.
- 2) Conduct regular environmental audits to confirm that its operations are environmentally responsible and are conducted in accordance with applicable laws, regulations, and standards.
- 3) Adhere to applicable laws regarding prohibition or restriction of specific substances, materials, and waste.
- 4) Adhere to, collaborate with, and participate in BGIS or BGIS' clients' environmental programs, training, performance reporting and other related initiatives.
- 5) Taking voluntary initiatives to reduce environmental impacts. These include efforts to improve energy efficiency, control greenhouse gas emissions, recycle materials, phase out use of toxic substances, conduct life-cycle assessments of products where permissible, and promote "greening of the supply chain".

Our suppliers are expected to be aware of the BGIS Environment Policy which aligns with the ISO 14001 International Standard. BGIS' objectives, targets and environmental performance are continuously monitored and reported yearly through our Corporate Social Responsibility Report.

Protecting Information

Our suppliers must comply with published Privacy laws and regulations and must use information obtained for its intended lawful use. The information obtained must be stored as agreed with BGIS and/or BGIS client. Supplier must have safeguards in place ensuring the information is protected from unauthorized access and disclosure, including access to such information by those employees with a legitimate business purpose.

Inside Information

Our suppliers must have effective policies and procedures that meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of inside information.

Record Keeping

Suppliers must retain and maintain accurate internal records to ensure proper compliance with its obligations to BGIS or BGIS' clients. This responsibility prohibits false or misleading records, as well as any other misrepresentations or omissions.

Supplier shall not destroy any records that may be required for any pending legal or regulatory proceeding of which the supplier becomes aware of.

BGIS Links

Report concerns or misconduct: 1-866-384-4277 or www.ethicspoint.com

[Corporate Social Responsibility Reports](#)

[Health and Safety Policy](#)

[Environmental Policy](#)

[Quality Policy](#)

[BGIS Health, Safety & Environment Handbook](#)

Strategic Sourcing: procurement@bgis.com

Document History

Version 1.0: Created October, 2013. BGIS reserves the right to modify

Version 2.0: Modified May, 2015 the new company name in accordance with the rebranding requirements to Brookfield Global Integrated Solutions Canada US LLC

Version 3.0: Modified June 1, 2017 with the new company name in accordance with the rebranding requirements to BGIS Global Integrated Solutions US LLC

Version 4.0: Modified on February 20, 2017; insertion of the IT security section of the suppliers

Version 5.0: Modified on November 5, 2019; provided link to the BGIS Global Quality Policy

Version 6.0 Modified on December 7, 2019; updated links to Health and Safety, Environmental & Quality policies

Version 7.0 Modified on October 26, 2021; updated Health and Safety section with COVID-19 related requirements.

Version 8.0 Modified on December 19, 2022; updated to include Modern Slavery Statement and update the Environment and Sustainability section.

John Castelhana, Vice-President, Strategic Sourcing North America is the owner of this Supplier Code of Conduct