



Vendor Code of Conduct

Hiffman National (“Hiffman”) prides itself in being “Trusted to do what we say we will do.” To Hiffman, success means doing business and supporting partners in ways that build a healthy and sustainable environment, engage employees and partners, and support a safe community. As part of our commitment to our clients, employees and community, we expect our partners to support and adhere to the policies listed below. We believe these standards offer our employees, clients, and tenants the peace of mind that all vendors we select and work with are also “Trusted to do what they say they will do.”

Ethics

All vendors (the “Company”) are expected to conduct business ethically and comply with applicable federal, state, and local laws and regulations.

No Harassment – Company shall foster and promote a safe and inclusive work environment free of any type of harassment. Employees should have an outlet to report harassment anonymously, and Company shall prohibit any acts that are or could be construed as retaliation or punishment toward someone reporting harassment.

Unethical Practices – Corruption, bribery, and other similar unethical practices will not be conducted or tolerated by Company. If such practices are witnessed, Company is expected to report such incidents to Hiffman’s Director of Property Management Operations at MgmtOps@hiffman.com.

Privacy and Data Protection – Company should have appropriate data protection and security measures in place so sensitive information from all parties is protected. If Company experiences a data breach, Company is expected to notify all impacted parties, immediately.

Gift Policy - A gift is defined to include anything of value that a Hiffman employee receives from a Company. Gifts and entertainment must not influence, or give the appearance of influencing, any persons’ judgment or raise any questions of impropriety. The frequency, value, and the form of the gift or entertainment should all be considered in evaluating the appropriateness of the gift or entertainment. While it is preferred that gifts are presented in the form of a charitable contribution to Hiffman’s selected philanthropy for a given year, if Company should desire to provide a gift to a Hiffman National employee, the monetary value of the gift shall not exceed \$100.

Labor Practices

Company is expected to conduct business in compliance with applicable federal, state, and local labor laws and regulations.

Compensation & Benefits – Employees of Company shall receive fair pay and benefits in line with the local market.

No Discrimination – Company will not participate in or tolerate discrimination against anyone for their race, ethnicity, sex, gender expression, age, and/or other legally protected classification. Company should also work to identify and avoid unconscious bias against protected classes in its business practices.

Voluntary Work – Hiffman does not tolerate slavery or human trafficking and expects Company to uphold that standard as well. Company must not engage in the employment of child labor or use any involuntary labor, including forced, indentured, bonded, prison, or uncompensated labor.



Environment

When available, Company is expected to take efforts to reduce their impact on the environment.

Waste Disposal – Company shall dispose of waste, chemicals, and hazardous materials in compliance with all federal, state and local laws.

Use sustainable practices and products – Company is expected to be mindful of its business practices, make efforts to reduce consumption and the Company’s carbon footprint, where feasible. Company should also stay informed with the latest sustainable practices and products in their respective industry and use those products and methods unless they are not reasonably priced, not available, or do not meet reasonable performance standards.

Company is not expected to immediately be 100% compliant with this Environment Section and will be granted a grace period of one year to obtain compliance.

Application and Enforcement

This Vendor Code of Conduct (this “Code”) is applicable to all vendors contracting with Hiffman and its clients. Company shall ensure its own sub-contractors, employees, personnel, agents, principals, contractors and/or representatives (if any) comply with the principles of this Code.

Depending on the circumstances and the gravity of a violation of this Code, failure to adhere to this Code will be a basis for Hiffman to terminate the services of the Company. Hiffman may, at its sole discretion, give time to the Company to remedy any failure to comply with this Code. If any such failure cannot be remedied within thirty (30) days, or such other period required by Hiffman, then Hiffman has the right to terminate the services of Company.