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SituaAMC Vendor Code of Conduct

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INTRODUCTION

OUR MISSION

At SitusAMC, our mission is to transform the real estate finance industry by providing comprehensive, sustainable solutions that drive operational efficiency and enhance market agility for our clients, focusing on powerful opportunities through innovative service offerings and expertise. Aligning with this mission ensures that we conduct ourselves with the utmost integrity as we deliver high-value products and services while following all applicable laws, rules, regulations and standards of business conduct. We have an obligation to practice our craft with integrity and to uphold SitusAMC's reputation for ethical conduct. We are ultimately defined by the choices we make and the actions we take, and our customers, shareholders, and business partners expect honest and ethical conduct from us each and every day. We are committed to upholding the highest standards of integrity and professionalism in all aspects of our business operations and relationships. To preserve the confidence of our clients, we avoid any appearance of misconduct or impropriety and hold ourselves accountable to the highest ethical principles. We expect our partners and third parties we work with to share this commitment to ethical excellence.

PURPOSE

SitusAMC seeks to conduct business with reputable vendors, consultants, agents, contractors, temporary workers and other third parties (together, "**Vendors**") who are committed to the same high ethical standards to which we are committed. All Vendors and their employees or representatives must adhere to this Vendor Code of Conduct (the "**Code**") and must implement systems, procedures and controls (as applicable) to ensure compliance with applicable laws, rules, regulations and the principles set forth in this Code. This includes, without limitation, policies, training, monitoring and auditing mechanisms designed to provide ongoing improvement and assurance of its effectiveness. SitusAMC reserves the right to require any Vendor provide a certification of its compliance to this Code.

This Code does not create an employment relationship between SitusAMC and any Vendor, and nothing in this Code shall be construed as doing so. This Code contains general requirements applicable to all Vendors. Specific Vendor agreements may include provisions addressing issues similar to those found in this Code, but nothing in this Code

supersedes any provision in any agreement between SitusAMC and any Vendor. If there is a conflict or inconsistency between this Code and any provision of any Vendor agreement, the conflict or inconsistency will be resolved by giving precedence to the provision contained in the applicable Vendor agreement. As a general matter, SitusAMC expects our Vendors to comply with this Code.

FUNDAMENTAL EXPECTATIONS

The highest standard of integrity is always expected from Vendors in their interactions with on or behalf of SitusAMC. Vendors must act responsibly and ensure that no abusive, exploitative, or unlawful practices occur with respect to their own internal operations or those of their agents, representatives, or subcontractors. Vendors are responsible for educating and training their employees and subcontractors and ensuring that subcontractors maintain consistent compliance with this Code and applicable laws, rules, and regulations. SitusAMC reserves the right to monitor, review and verify compliance with this Code and may take appropriate action as required in its sole discretion, up to and including terminating its business relationship with any Vendor who fails to comply with this Code. Additionally, Vendors must maintain accurate records and provide transparency, upon SitusAMC's request, to demonstrate its compliance with this Code.

REPORTING CONCERNS

Vendors must promptly report any actual or suspected violations of this Code or any applicable law, rule, regulation, or policy related to work performed for, or services provided to, SitusAMC (each, a "**Violation**"). Reports should be made to compliancegov@situsamc.com or through other designated reporting channels with internal SitusAMC contacts.

Reports may be submitted confidentially, and where permitted by law, reports may be submitted anonymously. Vendors are expected to provide their employees and subcontractors with access to an internal channel for raising issues or concerns, or reporting Violations, confidentially and anonymously without the fear of retaliation. SitusAMC strictly prohibits retaliation against any individual who, in good faith, reports an actual or potential Violation. Vendors must also prohibit retaliation against a person who has made a report in good faith.

AUDITS AND INSPECTIONS

SitusAMC reserves the right, on reasonable prior notice to a Vendor, to audit a Vendor's records relating to its compliance with this Code and to investigate any complaints or Violations in connection therewith. If any Vendor fails to reasonably cooperate with SitusAMC regarding any such audits or inspections, SitusAMC reserves the right to take appropriate action as required in its sole discretion, up to and including terminating its business relationship with any such Vendor.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Vendors are required to fully comply with all laws, rules and regulations applicable to their countries of operation and countries where SitusAMC operates.

GLOBAL REACH WITH LOCAL IMPACT

FOSTERING BELONGING

SitusAMC expects Vendors to uphold the principles outlined in this Code and to promote ethical conduct throughout their operations and engagements. Vendors are encouraged to foster an inclusive workplace culture where every individual feels valued and empowered to perform their best. Where practical, Vendors should also support initiatives that align their employees with the unique needs of the communities in which SitusAMC operates.

NON-DISCRIMINATION AND HARASSMENT

Respectful relationships are essential to SitusAMC's culture, and we believe in treating everyone fairly and respectfully. While harassment can take different forms, it creates a hostile or intimidating work environment. SitusAMC prioritizes safety and well-being, and we do not tolerate discrimination. Vendors are expected to comply with all applicable laws, rules, and regulations concerning equal employment opportunity and preventing discrimination in hiring and employment practices. This includes, without limitation, fostering a workplace environment that is free from discrimination, harassment, and prohibiting conduct regarding an individual's protected characteristics, including but not limited to race, color, sex, sexual orientation, age, religion, national origin, disability or veteran status. Vendors are encouraged to reinforce their commitment to non-discrimination and harassment by:

- Maintaining clear policies, regular training, and accessible reporting mechanisms for harassment, intimidation, bullying, or other negative or inappropriate treatment in the workplace;
- Ensuring employment practices are fair and that everyone has an opportunity to obtain or develop their careers based on merit; and
- Maintaining the principles of equal employment and opportunities and adherence to all laws relating to non-discrimination and fair employment practices.

NON-RETALIATION

SitusAMC is committed to fostering a culture of compliance and ethical behavior and therefore promotes an environment where Vendors and their employees feel comfortable

speaking up. We understand speaking up is not always easy to do – it takes courage and commitment. Vendors and their employees should be able to report concerns without the fear of retaliation from SitusAMC. If any Vendor employee believes, suspects or has knowledge of behavior that is inconsistent with or in violation of this Code in any respect, they are required to voice their concerns. Speaking up is both your right and your responsibility. Remaining silent about possible misconduct may worsen a situation and decrease (or negatively impact) client trust in SitusAMC's ability to properly acknowledge and address issues.

SitusAMC does not tolerate retaliation against any Vendor's employee or subcontractor who, in good faith, brings a complaint or report of suspected inappropriate conduct to its attention. SitusAMC also prohibits any Vendor from retaliating against anyone who reports concerns in good faith.

WORKPLACE HEALTH, SAFETY AND SECURITY

Vendors are expected to comply with all applicable health and safety laws, rules, regulations, and standards, as well as all SitusAMC health, safety and security policies and procedures (whether they concern accident or disease protection). We expect our Vendors to abstain from using, possessing, or distributing alcohol or drugs (whether illegal drugs or legal controlled substances, unless prescribed by a properly licensed physician) while conducting business with SitusAMC or its clients.

COMPENSATION, WORKING HOURS AND CONDITIONS

Vendors are expected to receive compensation in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Vendor's employees should be able to earn fair wages, as determined by applicable law. All wages and benefits should be paid in a regular and timely manner. Vendors should also provide adequate working conditions in compliance with health and safety laws, regulations, standards, codes, policies, and procedures.

HUMAN RIGHTS IN THE WORKPLACE

Vendors must respect and uphold fundamental human rights in all aspects of their operations. Under no circumstances should any member of a Vendor's workforce be subjected to forced labor, bonded or indentured labor, involuntary servitude, or any form of modern slavery or human trafficking (including, without limitation, trafficking, debt

bondage/bonded labor, forced labor, and child labor). Vendors are required to comply with all applicable laws regarding minimum employment age (as defined by the laws of their respective country of operation). Child labor is strictly prohibited in all respects. To ensure compliance, Vendors must maintain accurate, official, and verifiable documentation confirming the age of all workers. Vendors are also expected to implement robust policies and controls to prevent exploitation and to monitor their supply chains for any indicators of human trafficking or forced labor.

POLITICAL ACTIVITIES AND LOBBYING

Vendors are prohibited from making any political contributions of any form and from lobbying government entities or officials on behalf of SitusAMC without express written pre-approval from SitusAMC.

SUSTAINABILITY

SitusAMC guides our approach to sustainability and how we seek to meet our client's evolving expectations. As part of this stewardship, SitusAMC believes that taking care of our clients and employees also means taking care of the communities where we work and live. This includes conservation and helping our communities be more environmentally friendly. SitusAMC is also committed to operational excellence, which includes wisely using and conserving our shared natural resources while pursuing efficient and environmentally friendly operations.

ENVIRONMENTAL RESPONSIBILITY FOR VENDORS

SitusAMC requests that our Vendors join us in our commitment to being responsible environmental stewards, including compliance with all applicable environmental laws, regulations, policies, procedures and industry requirements. Vendors are expected to manage their operations as good stewards of our shared communities while avoiding, minimizing and mitigating negative impacts to the environment and/or community when possible. Vendors are also encouraged to use resources responsibly (reducing, reusing, and recycling), minimize their respective environmental footprint, and to implement systems designed to reduce emissions, increase energy efficiency, reduce water consumption and increase waste diversion from landfills.

BUSINESS CONTINUITY

Vendors are expected to proactively manage business continuity risks and ensure the availability of their products and services during an unexpected event. Vendors must maintain comprehensive disaster recovery and business continuity plans designed to ensure that they can continue to meet their obligations to SitusAMC with minimal disruption in the event of an emergency or impact to operations. Any such plan should also have adequate contingency procedures to restore essential services promptly in the event of emergencies such as natural disasters, cyber incidents, or significant operational disruptions. We expect Vendors to regularly test and implement updates to ensure all such plans remain effective and aligned with evolving risks. SitusAMC may request evidence of these plans and reserves the right to review Vendor preparedness as part of ongoing risk management efforts.

ETHICAL BUSINESS PRACTICES

CONFLICTS OF INTEREST

Ethical business practices and relationships are of paramount importance to SitusAMC. Vendors are expected to avoid both actual and potential conflicts of interest. This includes, without limitation, circumstances in which their personal interests influence, or appear to influence, any Vendor's ability to act in the best interest of SitusAMC and its clients. Even the suggestion or the appearance of a conflict of interest can contribute to the erosion of trust, which is why it is important to recognize all possible conflicts of interest and strictly avoid them.

Vendors must not develop any relationship with a SitusAMC executive or employee, whether financial or otherwise, which might conflict, or appear to conflict, with such person's obligation to act in the best interest of SitusAMC. We expect our Vendors to disclose in writing any actual or potential conflicts between their personal, professional or commercial interests and the interests of SitusAMC or its clients prior to initiating any relationship with SitusAMC, or as soon as becoming aware of such conflict. Any such disclosures should be made to compliancegov@situsamc.com.

GIFTS AND ENTERTAINMENT

In any business relationship, Vendors are expected to ensure that the offering, giving or accepting of all gifts, entertainment or anything of value is: (1) permitted by laws, rules, or regulations; (2) does not violate the rules and standards of the recipient's organization; (3) is consistent with reasonable marketplace norms and customs; (4) has a valid business purpose; and (5) will not adversely impact SitusAMC's reputation. Vendors are expected to use good judgement and discretion to avoid even the appearance of impropriety or obligation.

SitusAMC employees are not allowed to accept: (1) lavish, frequent or extravagant gifts or entertainment; or (2) gifts or entertainment that could be considered or perceived to be quid pro quo for past, pending, future or anticipated business. SitusAMC employees are also generally required to receive written approval in order to accept gifts from a single source valued at more than \$100 USD per instance. Furthermore, gifts received by SitusAMC employees may not be in the form of cash, cash equivalents or gift cards.

Certain SitusAMC employees may not accept gifts or any other form of consideration from an individual or entity doing business or seeking to do business with SitusAMC. In addition, SitusAMC's Vendors must never offer an incentive to SitusAMC's employee family or friends to obtain, retain or influence SitusAMC business in any respect. SitusAMC employees may not accept gifts or entertainment from Vendors that are in active contract negotiations with SitusAMC or if the employee is responsible for evaluating the Vendor's performance. Vendors must never offer gifts, favors or entertainment to SitusAMC employees that would violate this Code.

CONFIDENTIAL INFORMATION

Vendors must take extreme care (including the implementation of proper security measures) in the appropriate use and protection of all sensitive information, including confidential, proprietary and personal information of SitusAMC, its regulators, employees and clients in accordance with applicable laws, rules, regulations, prevailing industry practices and contract terms, and prevent its disclosure, dissemination, publication, theft, damage, unauthorized or inappropriate use. All Vendors must notify SitusAMC in writing immediately upon becoming aware of an actual or potential breach of their systems used to process SitusAMC data or a real breach or misuse of SitusAMC client, employee or proprietary data. Upon SitusAMC's request or as otherwise required in any agreement between SitusAMC and any applicable Vendor, Vendors must also promptly: (1) return all physical and electronic materials containing SitusAMC's confidential information to SitusAMC via a secure method using media required by SitusAMC; and/or (2) permanently destroy or delete SitusAMC's confidential information and promptly certify the destruction or deletion in writing to SitusAMC.

INTELLECTUAL PROPERTY RIGHTS

Vendors must respect and protect all intellectual property rights belonging to SitusAMC and its affiliates, including without limitation, all patents, trademarks, copyrights, trade secrets, processes, technology, client information, proprietary information and any other SitusAMC brand assets ("**SitusAMC IP**"). Vendors are prohibited from using, reproducing, or otherwise exploiting SitusAMC's name, logo, or any SitusAMC IP without the prior written consent of SitusAMC in each instance. All work product, data, and materials created by a Vendor for SitusAMC must be handled in accordance with the applicable terms of any agreement between SitusAMC and such Vendor. Vendors are expected to

implement safeguards to prevent unauthorized access, misuse, or infringement of SitusAMC IP and to promptly report any suspected violations of such.

DATA PRIVACY AND SECURITY

Strong information security and privacy practices are critical to protecting SitusAMC and the trust our clients and business partners place in us. Vendors must safeguard all personal, confidential, and proprietary information obtained through their relationship with SitusAMC. This includes compliance with all applicable data protection laws, rules, and regulations, such as those governing the collection, storage, processing, and transfer of personal data (including all laws, rules, and regulations governing any cross-border or international transfers). Vendors are expected to implement robust security systems and measures to prevent unauthorized access, disclosure, alteration, or loss of data. Any suspected or actual data breach must be reported to SitusAMC immediately through designated channels, and Vendors must thoroughly cooperate with all aspects of any investigation related to any such incident. Vendors must use SitusAMC information solely for legitimate business purposes and never share it without proper authorization. Additionally, Vendors must maintain appropriate policies, employee training, and technical controls to ensure ongoing compliance with the terms of this Code and protection of SitusAMC information.

ARTIFICIAL INTELLIGENCE

SitusAMC's Vendor AI Policy can be found [here](#). We expect our Vendors to uphold the principles in our customer commitment statement and to comply with the requirements of our Vendor AI Policy. Vendors further must ensure that any use of AI in connection with its relationship with SitusAMC is responsible, ethical, and transparent. AI systems should be designed and operated in a manner that prioritizes fairness, accountability, transparency, and security, avoiding bias or discriminatory outcomes. Vendors are expected to comply with all applicable laws, rules, regulations and industry best practices and align their AI governance frameworks with recognized standards such as the NIST AI Risk Management Framework. This includes implementing controls for data integrity, explainability, and continuous monitoring of AI systems to mitigate risks. Vendors must disclose any AI-driven processes used in delivering products or services (or any output associated therewith) to SitusAMC and promptly report any incidents or risks associated with AI systems. Additionally, Vendors should maintain clear documentation of AI models,

training data sources, and decision-making processes to support transparency and auditability.

FAIR COMPETITION AND ANTITRUST

Fair competition is based on honest interactions. Vendors are a very important part of our business. We expect them to provide us with the best service, deliver the best products and materials, and provide us with the best value. We treat our Vendors fairly by using a transparent procurement process and maintaining integrity with their information. We do not abuse our relationship with our Vendors to gain an undue advantage. Our procurement practices encourage, and do not restrain fair trade. Vendors are expected to conduct their business in full compliance with all applicable antitrust and anti-competition laws and regulations. Engaging in practices that restrict fair trade – such as price fixing, bid rigging, market allocation, or collusion with competitors – is strictly prohibited. Vendors are expected to compete honestly and transparently, ensuring that all dealings with SitusAMC and other parties are free from anti-competitive behavior. Any agreements or actions that could improperly influence market conditions or limit competition must be avoided. Vendors must also protect competitively sensitive or confidential information.

All Vendors are expected to refrain from all forms of illegal or improper activity, including misrepresentation, extortion, embezzlement or insider trading.

ANTI-BRIBERY AND CORRUPTION

SitusAMC has a zero-tolerance policy for bribery or corruption. Vendors must perform their activities related to SitusAMC's business and operations in compliance with all applicable federal and state anti-bribery and anti-corruption laws.

Under no circumstances may a Vendor, or any of its employees, agents or representatives offer, accept, pay, promise to pay, authorize, transfer, solicit or arrange for the payment of anything of value (including but not limited to gifts, entertainment, lodging, travel, charitable or political contributions and employment offers), to or from any person, including a government official, on behalf of themselves or SitusAMC, whether directly or indirectly, to obtain, to retain business or to improperly influence a business decision.

Vendors must never encourage, allow, or even appear to encourage or allow others to engage in any form of bribery on behalf of themselves or SitusAMC. This prohibition includes small payments, often known as facilitation payments, intended to expedite or secure the performance of an action.

Vendors must also have in place adequate policies and procedures designed to effectively prevent bribery and corruption and must notify SitusAMC of any alleged, potential, suspected or actual breach of any law, rule, regulation or this Code.

INTERNAL AND EXTERNAL FRAUD

SitusAMC maintains a strict zero-tolerance policy for any and all forms of fraud, whether internal or external. Strong internal and external fraud risk management governance and oversight is critical to controlling SitusAMC's exposure to fraud. SitusAMC upholds the highest standard of ethics and professional conduct and ensures that all business dealings and individual employee conduct reflects adequate judgement, common sense, and is consistent with SitusAMC's values.

Vendors and their employees at all levels are responsible for reporting concerns, suspicious activity or instances of fraud. SitusAMC reserves the right to investigate all allegations of fraudulent activity and take appropriate action, including termination of the business relationship and referral to law enforcement, where applicable.

CONCLUSION

At SitusAMC, we are committed to conducting business with integrity, respect and responsibility. As a critical component of our business, we appreciate Vendor commitment to uphold our standards and principles, and we continue to expect Vendors to uphold the highest ethical, environmental, and social business practices and standards outlined in this Code. Compliance with this Code is essential to maintaining a strong and sustainable partnership. By working together, we can foster a responsible and ethical supply chain that benefits our businesses, communities and the environment.