



VENDOR CODE OF ETHIC

OVERVIEW

SoCo Management, Inc. ("SoCo"), is dedicated to conducting our business consistent with the highest standards of business ethics. We have established Company standards for ethical business practices and regulatory compliance. Our Code of Conduct is applicable to all of our employees, directors and officers, each of whom has a personal responsibility to uphold our standards.

Similarly, we expect our vendors, as well as their employees, agents and subcontractors (collectively referred to as "Vendors"), to embrace our commitment to integrity and personal responsibility by complying with this Vendor Code of Business Conduct and Ethics (this "Vendor Code") at all times while conducting business with or on behalf of SoCo and or clients. To the extent this Vendor Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations; our Vendors should strive to adhere to these higher standards.

SEEKING HELP AND INFORMATION

This Vendor Code is not intended to be a comprehensive rulebook and cannot address every situation that Vendors may face. If there are any doubts about whether an action is consistent with this Vendor Code or SoCo's ethical standards, Vendors are encouraged to contact SoCo directly (staff@socomanage.com).

COMPLIANCE WITH LAWS AND REGULATIONS

All Vendors must conduct their business activities with or on behalf of SoCo in compliance with applicable laws and regulations, and must, without limitation:

- **Antitrust:** Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which Vendors conduct business. Vendors should promote free and fair competition in the marketplace and avoid business practices that have the purpose or effect of limiting competition, such as bid rigging, price fixing, cover pricing or market sharing.
- **Anti-Corruption:** Avoid bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector, including directors, officers and employees.
- **Licensing/Permits:** Obtain all required licenses or permits to conduct business activities.
- **Privacy:** Comply with all laws and regulations regarding the privacy of information and data protection both in paper form and electronically

BUSINESS PRACTICES AND ETHICS

All Vendors must conduct their business consistent with the highest standards of business ethics and in compliance with their own applicable professional standards, and must, without limitation:

- **Business Records:** Accurately record and report all business and financial information and comply with all applicable standards, laws and regulations concerning the completion, accuracy and retention of such records and reports.
- **Confidential Information:** Safeguard all non-public information of SoCo or third parties with which SoCo conducts business, which might be of use to competitors or, if disclosed, harmful to SoCo or such third parties, unless disclosure is authorized or legally mandated, and then only in compliance with applicable confidentiality agreements and procedures.
- **Conflicts of Interest:** Avoid any private interest that might influence, or appear to influence, the ability to act in the interests of SoCo's clients or that makes it difficult to conduct the Company's business objectively and

effectively. Vendors should immediately report any such actual or potential conflict of interest to the Company's General Counsel or the Whistleblower Hotline; the Company's General Counsel will determine whether a conflict of interest exists and, if so, how best to address it.

- **Fair Dealing:** Deal fairly in all relationships and avoid taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair-dealing practice.

- **Gifts and Entertainment:** Avoid gifts and entertainment that might compromise, or appear to compromise, the ability of the recipient to make objective and fair business decisions or that could be viewed as an inducement to or reward for any particular business decision.

LABOR PRACTICES AND HUMAN RIGHTS

SoCo pursues fair employment practices in every aspect of its business. All Vendors must conduct their employment practices in compliance with all applicable labor laws and regulations, and must, without limitation:

- **Anti-Discrimination and Diversity:** Cooperate with SoCo's commitment to provide equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. We encourage our Vendors to foster diversity within their work force and provide an inclusive and nondiscriminatory working environment in which all employees are valued and empowered to succeed. We believe that diversity in our work force is a valuable asset that supports different ideas, perspectives, and beliefs.

- **Anti-Harassment:** Avoid harassment in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words or the display in the workplace of sexually suggestive objects or pictures.

- **Prevention of Underage Labor:** Comply with all applicable minimum age laws or regulations and not use child labor. Vendors may not employ anyone under the age of 15, the minimum age for employment in the applicable location or the age for completing compulsory education in that location, whichever is higher. SoCo only supports the development of legitimate workplace apprenticeship programs for the educational benefit of young people and will not do business with those who abuse such systems. Children under the age of 18 are prohibited from doing work likely to jeopardize their health, safety or morals.

- **Non-Retaliation:** Prohibit retaliation against any Vendor or SoCo employee who, in good faith, seeks help or reports known or suspected violations of this Vendor Code.

- **Supplier Diversity:** Proactively identify local and diverse suppliers who can support business operations effectively and promote strategic objectives with high quality goods and services, innovation, competitive pricing, reliability and customer focus. We desire to promote an environment that provides sourcing opportunities to a wide range of local and diverse business types because we believe these partnerships contribute to the development of the communities that host our properties.

HEALTH AND SAFETY

SoCo is committed to maintaining a healthy and safe work environment. All Vendors are expected to integrate sound health and safety management practices into all aspects of their business, and must, without limitation:

- **Alcohol and Drugs:** Prohibit the use of alcoholic beverages, except at sanctioned events, and prohibit the possession, use, distribution or sale of illegal drugs and other controlled substances under all circumstances while on duty or on the premises of SoCo or SoCo client.

- **Violence and Weapons:** Prohibit weapons of any kind on SoCo client property, and not tolerate violence or threats of violence in, or related to, the work environment. The only exception to this policy applies to law enforcement and security personnel who are legally authorized to carry weapons and are contracted by the SoCo client to do so.

- **Working Conditions:** Provide a safe and healthy work environment and fully comply with all safety and health laws, regulations and practices including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing.

ENVIRONMENTAL SUSTAINABILITY

SoCo is committed to sustainability and the protection of the environment. Our commitment to sustainable environmental, social and corporate governance practices is important central to our business model. Vendors are encouraged to share our commitment by meeting or exceeding the requirements of applicable environmental laws and regulations and promoting sustainable business practices. At a minimum, our vendors are expected to, without limitation:

- **Environmental Permits:** Obtain, maintain and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- **Hazardous Materials:** Identify and manage substances that pose a threat to the environment if released.
- **Resource Reduction:** Endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes and by recycling, re-using or substituting materials.