**Vendor Code of Conduct**

**Purpose and Scope**

This Vendor Code of Conduct (“Code”) sets out the principles and expectations as to how organizations, including their representatives, employees, and subcontractors (together “Vendors”), who supply goods and services to Boardwalk REIT, its subsidiaries, or affiliates (“Boardwalk”) are to conduct business with and deal with Boardwalk.

Our values are built on providing a caring environment and, in doing so, continuing to build a rich family culture that is every bit as caring, passionate, and vibrant as the communities we create. Boardwalk is built on four pillars which we call our Golden Foundation: treat others as you would like to be treated, be good, love community, and have fun. Our promise is to serve and provide our Resident Members with quality rental communities. To that end, we believe in collaborating with like-minded and innovative organizations. At Boardwalk, we are dedicated to conducting business with our partners’ best interests at heart and under applicable laws and regulations.

Our organization, and all our employees, are accountable and have a duty to comply with applicable laws and regulations and are expected to behave responsibly and ethically. We expect Vendors to comply with this Code and to operate in accordance with values comparable to ours, and in a manner which is consistent with prudent business practices. Where there is a conflict between the language in the Code and the Conditions of Contract between Boardwalk and the Vendor, it is understood that the terms in the executed contract will apply.

**Business Ethics and Integrity**

Compliance with Laws - In all their activities, Vendors must ensure they conduct business in compliance with the applicable laws, rules, and regulations of the jurisdictions in which they operate.

Conflicts of Interest - In their relationship with our employees, Vendors must not try to gain improper advantage or preferential treatment for other relationships they may have with us.

Gifts and Entertainment - The nature of any gifts or entertainment must not, by their quality, quantity or timing, be used by Vendors to gain improper advantage or preferential treatment from Boardwalk employees.

Anti-bribery and Anti-corruption - Vendors must not engage directly or indirectly in any activities that would put Boardwalk at risk of violating anti-bribery and anti-corruption laws.

Taxation - Vendors must comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. Vendors must not participate in tax evasion or facilitate tax evasion by others. Specifically, we expect our Vendors to have contracts, policies, systems, and /or procedures in place to ensure that all who act for them or on their behalf, also comply with such obligations.

**Environmental Product Standards**

Vendors must have the appropriate management policies and procedures in place to minimize material environmental impacts and comply with all environmental laws. Vendors are also expected to support Boardwalk’s efforts to reduce our adverse environmental impacts, where appropriate.

**Health and Safety**

We expect Vendors to provide healthy and safe workplaces and comply with all relevant health and safety legislation. Vendors are also expected to provide all their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace.

**Human Rights**

Respect and Diversity - Vendors must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact, including respect for differences such as gender, gender identity, gender expression, race, colour, age, disability, sexual orientation, ethnic origin, and religion. Vendors must not tolerate harassment, discrimination, violence, retaliation and other disrespectful or inappropriate behaviour.

Vendors must respect the dignity of their own employees and others, adhere to principles of diversity and maintain a respectful workplace. At Boardwalk, we strive to have an inclusive supply chain. Boardwalk expects its Vendors to embrace an inclusive supply chain by affording equality of opportunity to businesses owned by women, Indigenous people, minorities/visible minorities, members of the LGBT community, people with disabilities, veterans, and service-disabled veterans.

**Employment Practices Labor Standards and Working Conditions**

Vendors must abide by applicable employment standards, labour, non-discrimination, and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, we expect Vendors to be committed to non-discrimination principles and not to operate in a way that unfairly differentiates between individuals.

Vendors must be able to demonstrate that, in their workplaces:

* Child, forced, or compulsory labor is not used.
* Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law.
* Retaliation for speaking up/whistle blowing is prohibited and employees are free to raise concerns without fear of reprisal.
* Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been conducted to ensure the integrity and good character of the Vendor’s employees.
* Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

**Privacy and Information Security**

Non-Public Information and Information Barriers - In their dealings with Boardwalk, if Vendors become aware of non-public information about Boardwalk or our clients, we expect Vendors to have in place policies and procedures for the proper handling and use of that information (such as information barriers). These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of non-public information.

Privacy and Information Security - Vendors must comply with Boardwalk’s published Global Privacy Notice (<https://www.bwalk.com/en-ca/privacy-policy/>) and must use information obtained through their relationship with Boardwalk only in accordance with Boardwalk instructions and strictly for the purpose for which it was provided. Vendors must process and store information as agreed with Boardwalk and have appropriate privacy / data protection and information security policies and procedures in place to protect personal and confidential information. Vendors must notify Boardwalk immediately of any actual or suspected privacy breaches, security breaches, or losses of our information. Further, Vendors must assist Boardwalk in managing any consequences arising from such events.

Information Hold - Vendors must not destroy Boardwalk data that may be relevant to actual or anticipated legal or regulatory proceeding of which the Vendor becomes aware or for which they receive notification. Vendors must take reasonable measures and maintain adequate internal data maintenance policies to ensure proper compliance with their obligations to Boardwalk.

Encryption: In their dealings with Boardwalk, Vendors must protect Boardwalk information throughout all stages of the information life cycle, including creation/collection, storage, use, transmission, transporting, archiving, and destruction and use suitable methods of encryption where required.

Access Administration - Vendors must have policies and procedures in place to approve, grant, remove, deactivate, and periodically review access to Boardwalk information and services to ensure that the level of access is appropriate and remove unnecessary access without undue delay.

**Monitoring and Reporting of Violation**

Monitoring and Reporting of Violation - Boardwalk maintains the right to monitor a Vendor’s compliance to the Code and audit a Vendor’s control environment. Boardwalk will be entitled to request information from its Vendor as to their compliance with the principles of this Code of Conduct.

Any person with reason to believe that the spirit or principles of this Code are not being respected by a Boardwalk Vendor is asked to report to: BusinessConduct@bwalk.com. The reporting of a violation of the Code may lead to an evaluation and an investigation by Boardwalk if warranted. Failure to comply with this Code may result in termination of a Vendor’s relationship with Boardwalk.

Vendors Operating in Canada - In addition to acknowledging the Code, Boardwalk’s expectation is that Vendors who operate their business and provide services within Canada will support our commitment to Canadian jobs and prosperity and meet the following requirements.

* Vendors will not make any application, written or otherwise to any government body on behalf of Boardwalk, without Boardwalk’s approval.
* Vendors will notify Boardwalk immediately if they have been found in breach of any Canadian Human Rights, employment standards (legal and regulatory) or immigration laws.
* Vendors will not implement any material change to the way services are provided to Boardwalk that has an impact on the Vendor’s employees, without consulting Boardwalk to ensure there is no breach of our policies and the Code.
* Vendors, by their action and in collaboration with Boardwalk will continue to create investment and jobs in Canada in the provision of services to Boardwalk.

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| Organization/ Company |  |
| Representative Name |  |
| Representative Signature |  |
| Date Signed |  |