



## **Vendor and Supplier Code of Conduct**

The Meridian Group and its affiliates (TMG) is committed to ethical business conduct, consistent with our Code of Ethics. TMG values our vender and supplier (Service Provider) relationships and is committed to working with our Service Providers to achieve TMG's business objectives. A Service Provider's performance and adherence to high business standards is an important and integral part of the business value chain for us, and therefore important to our decision to hire and retain our Service Providers. TMG promotes and expects the application of high legal, ethical, environmental, and employee-related standards within our own business and among our Service Providers.

While we understand that Service Providers are independent entities, we believe that our Service Providers' business practices can reflect on us. Accordingly, we ask our Service Providers to adhere to our Vendor and Supplier Code of Conduct set forth below.

### **ETHICAL BUSINESS PRACTICES**

Business integrity and compliance with applicable laws is expected from our Service Providers in all our business dealings. Each Service Provider is expected to consistently implement and maintain the ethical and professional standards set forth in this Code of Conduct while conducting its business with us or on our behalf, including full compliance with all applicable laws and regulations.

- **Conflicts of Interest:** Service Providers should avoid conflicts of interests and situations that give the appearance of a conflict of interest.
- Anti-Corruption, Anti-Bribery and Anti-Money Laundering: Service Providers must comply with all applicable laws relating to anti-corruption, anti-bribery, and anti-money laundering.
- **Competition and Antitrust Laws:** Service Providers must not engage in any illegal anti-competitive conduct, unfair market practices, or deceptive trade practices.
- **Insider Trading:** Service Providers may not, directly or indirectly, trade securities, including our securities, if they are in possession of material nonpublic information in regard to such securities or its issuer or doing so would otherwise violate any applicable laws.
- Gifts and Entertainment: When conducting business with TMG, Service Providers may, for legitimate
  business purposes, occasionally offer gifts and entertainment to, and accept them from, TMG partners,
  officers, or employees. With certain limited exceptions, such as nominal gifts, promotional items or
  courtesies that are unsolicited, lawful and infrequent, Service Providers should never offer or provide,
  directly or indirectly, gifts, services, loans or other things of value including, but not limited to, cash, money,
  bribes and kickbacks, to a TMG partner, officer, employee, vendor, supplier, business partner or customer.

### **HUMAN RIGHTS AND SOCIAL SUSTAINABILITY**

We strive to respect and promote human rights in accordance with the United Nation's Guiding Principles on Business and Human Rights. We expect our Service Providers to also treat people with respect and dignity when interacting with or for TMG, but also within their own business. TMG expects Service Providers to abide by the following:

- Freedom from Forced or Bonded Labor and Human Trafficking: Workers shall be free to leave their
  employment at any time (subject to reasonable prior notice periods) and shall not be subject to any
  coercion or restriction through, for example, the holding of original copies of employee passports, identity
  documents or monetary deposits. There shall not be any use of bonded or slave labor. Work must be
  undertaken for fair compensation and should not be undertaken to repay a debt incurred.
- **Recruitment Agencies:** Where recruitment agencies/brokers are used by the Service Provider, appropriate due diligence and ongoing management should be undertaken to ensure that risks of worker exploitation, such as debt bondage, are effectively mitigated.
- Child Labor: Service Providers should not employ child labor and must take the necessary preventative
  measures to ensure they do not employ anyone under the applicable legal minimum age of employment.



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- **No Harsh or Inhumane Treatment:** Service Providers should prohibit abuse, threat of abuse, and sexual or other harassment or intimidation. Service Providers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labor practices can be anonymously raised, without fear of retribution.
- Subcontracting: Where a Service Provider uses subcontracting to support the execution of its services for TMG, the Service Provider shall confirm that the subcontractor meets the minimum expectations set out in this Section.

### **EMPLOYMENT PRACTICES**

We require that our Service Providers practice non-discriminatory practices in hiring and in the workplace. We expect our Service Providers to provide safe working conditions with the goal of protecting the health and safety of their employees.

- **Non-Discrimination in Hiring and the Workplace:** Service Providers are expected to comply with all applicable laws regarding non-discrimination in hiring and in the workplace.
- **Inclusiveness:** Service Providers are expected to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender, or gender identity/expression
- **Labor Laws:** Service Providers are expected to comply fully with wage-, workhour-, overtime-, and benefit-related laws applicable to their employees.
- Wages and Benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce of the Service Provider, and Service Provider employees should receive clear information on their wages, with no unfair deductions from wages as a disciplinary measure.
- Health and Safety Laws: Service Providers are expected to comply with applicable health and safety laws
  and regulations in alignment with TMG's internal Health and Safety Policy to the extent shared with the
  Service Provider.

### **ENVIRONMENT**

TMG recognizes that environmental responsibility is integral to a sustainable profitable business model. In manufacturing operations and construction, Service Providers should strive to minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of its and TMG's employees and the public. This is in alignment with TMG's Environmental, Social, And Governance Policy Statements which have been shared with its Service Providers. In addition, Service Providers are expected to adhere to the following:

- Environmental Laws, Permits and Reporting: Service Providers are expected to comply with all applicable environmental laws and obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.
- Resource Efficiency and Clean Energy: Throughout their operations, Service Providers will work to
  reduce the unnecessary consumption of resources, including raw materials, energy, and water. Service
  Providers are encouraged to track, document, and minimize energy consumption and greenhouse gas
  emissions and seek ways to improve energy efficiency and use less environmentally harmful sources of
  energy.
- Hazardous and Restricted Substances: Service Providers will identify and manage chemicals and other
  materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal
  in accordance with all applicable laws. Service Providers will identify, monitor, control, treat, and reduce
  hazardous air emissions, wastewater, and waste generated from its operations. Service Providers will
  adhere to TMG's requirements restricting or limiting use of specific substances or materials, including
  labeling for recycling or disposal.
- Waste Mitigation | Wastewater, Solid Waste and Stormwater Management: Service Providers are expected to work to reduce or eliminate waste of all types. Where waste cannot be eliminated, Service Providers will manage and control all waste streams to comply with applicable laws and regulations, and in



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an environmentally responsible and secure way; this includes, but is not limited to, preventing illegal discharges and spills from entering storm drains, and treating as required prior to discharge or disposal of all wastewater and solid waste from operations, industrial processes, and sanitation facilities.

- **Environmental Data:** Service Providers shall work with TMG when asked to identify and record all emissions, releases and wastes occurring during operations performed for or on behalf of TMG.
- Environmental Products: Service Providers should strive to use and provide sustainability-certified
  materials, products, supplies, and services that align with industry best practices to reduce both adverse
  environmental and human health impacts.

### **COMPLIANCE**

Service Provider Acknowledgement

We expect our Service Providers to share this Code of Conduct with their employees and representatives. Service Providers may consult with TMG on any matter of concern related to actual or potential noncompliance, and any concerns or suspected violations of this Code of Conduct should be sent to TMG directly at KC Mahan, kcmahan@tmgre.com. Failure of a Service Provider to comply with TMG's Service Provider and Supplier Code of Conduct may result in termination of our entire relationship or of one or more agreements with a non-compliant Service Provider for cause at TMG's election, without TMG incurring any premium, penalty, or other termination payment.

# Name: Signature: Date: