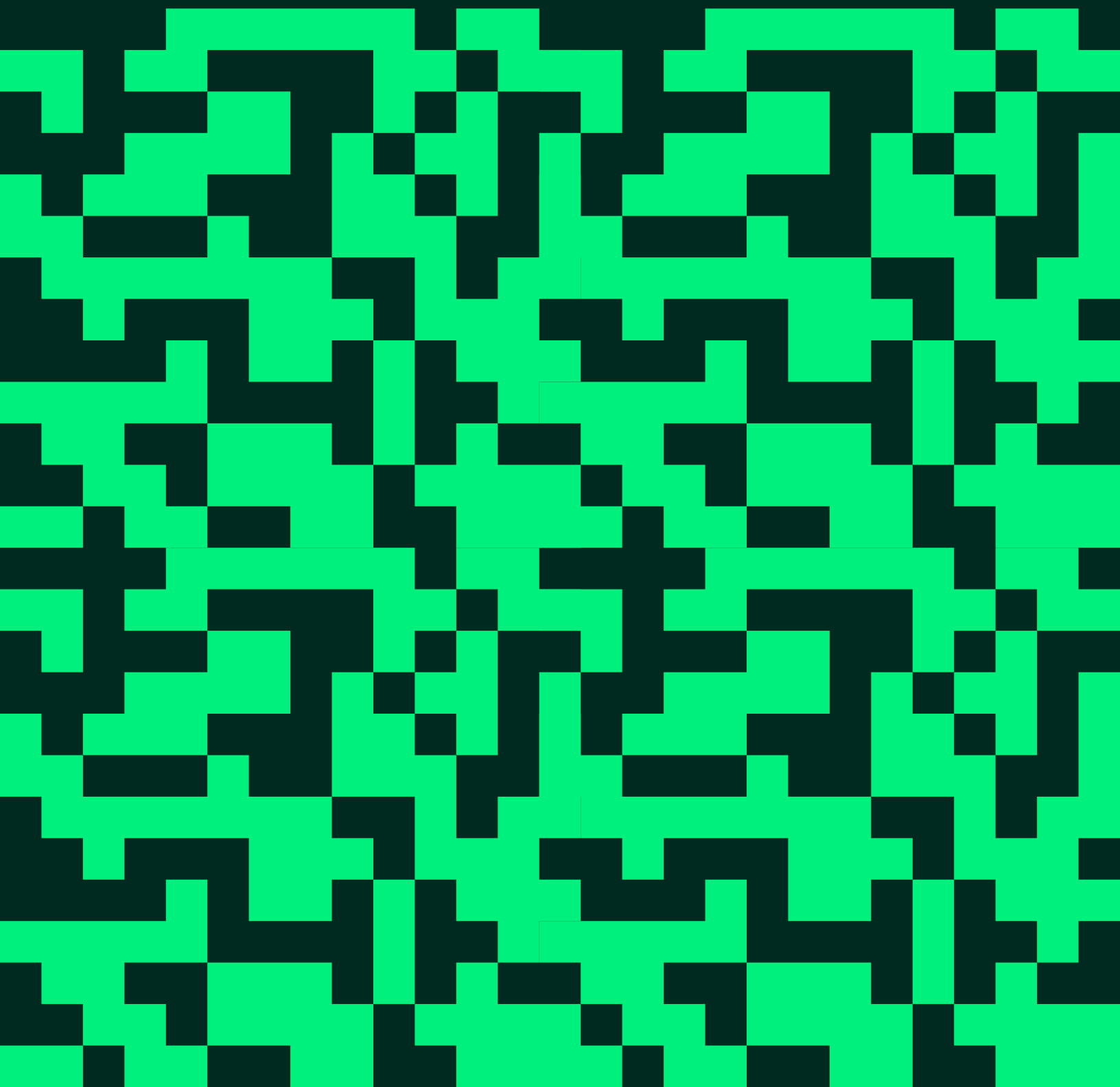


# Suppliers and Business Partner Code of Conduct

May 2024

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# Introduction

Phoenix Infrastructure LLC, known as “Centersquare” or the “Company,” along with its affiliates, is committed to operating responsibly. At Centersquare, our approach to business is as important to us as our products and services. We engage only with contractors, consultants, channel partners, brokers, suppliers, and business partners—including their subcontractors, agents, and representatives (collectively “Suppliers”)—who comply with applicable laws and adhere to the standards of business conduct outlined in our Supplier and Business Partner Code of Conduct (“Supplier Code”). Centersquare expects Suppliers, their employees, sub-Suppliers, and any other associated parties providing supplies or services to Centersquare to comply with all relevant laws and the standards detailed in this Code.

## Centersquare expects the following (without limitation) from its Suppliers

### Anti-Bribery and Anti-Corruption

- Suppliers shall not engage in corrupt practices, including extortion, fraud, impersonation, false declarations, bribery, money laundering, or involvement with terrorist or organized crime organizations or activities.
- Suppliers shall not offer, provide, or accept bribes, kickbacks, illegal political contributions, improper payments, or anything of value, directly or indirectly, to or from Centersquare representatives, customers, government officials, or third parties to obtain an improper business advantage. This includes a prohibition on “facilitation” payments of any kind.
- Suppliers shall have a written anti-corruption/anti-bribery policy that includes an annual review of such policy.

### Anti-Money Laundering and Sanctions

- Suppliers shall take measures to prevent money laundering, financing of terrorism, or any activity that violates sanctions or export restrictions.
- Suppliers shall comply with all applicable trade restrictions and sanctions laws. They shall not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or the subject of applicable trade sanctions.
- Suppliers shall promptly apprise Centersquare in the event either they or any related company (including parent companies) have been (i) named or listed as the target of any economic, trade, or otherwise (ii) banned or blocked pursuant to any laws that are enforced or administered by any governmental agency.

### Business Continuity and Disaster Recovery

- Suppliers shall have adequate business continuity and disaster recovery plans designed in accordance with industry standards to maintain continuity of services to a reasonable degree after an event that results in an interruption or suspension of services. Upon request by Centersquare, Suppliers shall disclose in reasonable detail and discuss the elements of their business continuity plans.

### Child Labor

- Suppliers shall adhere to the International Labor Organization’s age-related standards.
- Suppliers shall ensure that no underage labor has been used to produce, provide or distribute their goods or services.

### Conflict of Interest

- Suppliers shall not enter business relationships or transactions with Centersquare personnel in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety.
- Suppliers shall disclose to Centersquare and avoid or appropriately manage any actual or potential conflicts of interest arising from personal or business relationships. This includes offering compensation, employment opportunities, or other benefits to Centersquare employees or other Centersquare representatives.
- Suppliers shall report potential or actual conflicts, including any ownership or beneficial interest held by a government official. Reports shall be sent to Centersquare’s Legal Office at [legal@centersquaredc.com](mailto:legal@centersquaredc.com).

# Introduction (cont.)

## Conflict Minerals

- Suppliers shall ensure that the products they manufacture or contract to manufacture do not contain Conflict Minerals within the meaning of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Suppliers shall comply with any applicable laws and regulations regarding conflict minerals and assist Centersquare in meeting its obligations under applicable laws and regulations.
- Suppliers shall support Centersquare's efforts to conduct due diligence regarding any use of conflict minerals in our supply chain. This includes identifying products in their supply chain that contain conflict minerals and validating the country of origin of these minerals.

## Cybersecurity

- Suppliers shall take reasonable steps to minimize potential cybersecurity risks, such as conducting periodic cybersecurity assessments and/or establishing and updating their business continuity and cybersecurity continuity plans. These plans should specify security controls, communication plans, and robust recovery procedures.

## Data Protection and Information Security

- Suppliers shall comply with all applicable laws and regulations, including data protection, privacy, and security.
- Suppliers shall safeguard Centersquare Confidential Information according to an industry-recognized information security framework and provide their information security policy upon request.
- Suppliers shall implement appropriate safeguards to protect Centersquare Confidential Information and immediately notify Centersquare of any privacy or security breaches that could impact Centersquare Confidential Information.

## Environmental Impact

- Suppliers shall be sensitive to their impact on the environment (including but not limited to air emissions, water discharge, toxic substances, and hazardous waste disposal) and local communities.
- Suppliers shall comply with applicable environmental laws and standards within its facilities.
- Suppliers shall use care in handling hazardous materials, operating processes, or equipment that use hazardous materials to prevent unplanned workplace or environment releases.

## Export Controls and Economic Sanctions

- Suppliers shall adhere to all applicable laws and regulations pertaining to the exportation and importation of goods and related technical data of domestic and foreign origin. The information provided must be accurate and complete if export licenses or authorizations are required.

## Forced Labor, Human Trafficking, and Slavery

- Suppliers shall not use any form of forced labor, including prison, indentured, bonded, military, slave, or any other forms of forced labor.
- Suppliers shall not participate in the recruitment, transportation, transfer, harboring, or receipt of any persons using threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for exploitation.
- Suppliers shall not retain an employee's government-issued identification, passports, or work permits as a condition of employment and shall allow employees to resign at any time.

## Freedom of Association and Collective Bargaining

- Suppliers shall adhere to applicable laws regarding the right to affiliate with lawful organizations without interference.

## Health and Safety

- Suppliers shall provide and maintain safe, healthy working and housing environments (if housing is provided) to prevent accidents and injury.
- Suppliers shall comply with applicable laws, directives, and regulations to minimize occupational hazards, ensuring reasonable access to sanitary facilities, fire exits, potable water, adequate lighting, and ventilation.
- Suppliers shall minimize employee exposure to potential safety hazards by identifying, assessing, and mitigating risks and implementing appropriate plans and procedures.
- Suppliers shall implement measures to prevent worker injuries, including adequate training, personal protective equipment, and safeguards against infectious diseases.
- Suppliers shall maintain systems for workers to report health and safety hazards and incidents.
- Suppliers shall promptly inform Centersquare of any significant health or safety incidents while performing services for or delivering goods to Centersquare or its customers.

# Introduction (cont.)

## Insurance

- Suppliers shall maintain all required insurance coverage needed to provide services to Centersquare and will provide documents to Centersquare as proof of insurance coverage upon request.

## Intellectual Property and Confidentiality

- Suppliers shall protect and respect Centersquare's intellectual property and confidential information, including personal data, from misuse, theft, fraud, or improper disclosure and comply with all applicable data privacy and intellectual property laws.
- Suppliers shall exercise utmost caution when handling, discussing, or transmitting sensitive data that could harm Centersquare, its employees, or customers. Any unauthorized use of Centersquare's intellectual property or data should be reported to Centersquare.

## No Publicity

- Suppliers shall not use any of Centersquare's or its affiliates' names, marks, or other proprietary trademarks in any public or promotional materials without the prior written consent of Centersquare.

## Non-discrimination

- Suppliers shall ensure that employment is based solely on a person's ability and not personal characteristics.
- Suppliers shall maintain a workplace free of unlawful discrimination based on race, gender, sexual orientation, age, pregnancy, disability, ethnicity, religious belief, or any other basis protected by applicable law.
- Suppliers shall ensure that employees are not subject to verbal, physical, sexual, or psychological abuse or any other form of mental or physical coercion and shall be treated with respect and dignity.

## Responsible Sourcing

- Suppliers shall take reasonable steps to ensure that products and services are procured from ethical sources and that sub-Suppliers are aware of and comply with the principles in this Supplier Code.

## Wages and Benefits

- Suppliers shall have a system to verify and accurately record payroll, deductions, and the hours worked by legally authorized employees.
- Suppliers shall comply with all applicable wage and compensation requirements defined under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other compensation and employee benefit elements.

## Whistleblower Protections

- Suppliers shall provide necessary training to ensure personnel have the required skills and certifications.
- Suppliers shall maintain a workplace free from discrimination and harassment based on race, gender, sexual orientation, age, pregnancy, disability, ethnicity, religious belief, or any other basis protected by applicable law.
- Suppliers shall have procedures to protect the confidentiality and anonymity of employee whistleblowers, ensuring a communication process for raising concerns without fear of retaliation. Retaliation against any employee or third party who reports or participates in investigating an actual or potential violation is strictly prohibited.

## Working Hours

- The working hours of Suppliers' employees must comply with all applicable laws and regulations.

# Compliance with this Code of Conduct

Suppliers shall ensure that their personnel, contractors, agents, and other representatives understand and comply with this Code. We expect our Suppliers to share our commitment to at least the minimum standards and principles in this Code and have their internal policies and procedures to support and monitor their compliance with such a commitment. Centersquare reserves the right to monitor, assess and audit all Suppliers according to this Code. Where incorporated into any contract, this Code will survive the contractual term. This Code is subject to modification at any time.

## **Centersquare expects that Suppliers will:**

- Maintain all appropriate licenses, permits, and other regulatory authorizations and requirements necessary to conduct the activities for which they have been hired by Centersquare.
- Promptly notify Centersquare as soon as it becomes aware of any actual or suspected breach of this Code. The contents of this Code are additional to and do not affect or prejudice any of Centersquare's rights and remedies under the relevant agreements with each Supplier, if any. In the event of any non-compliance with the requirements of this Code or breach of agreement, Centersquare reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant agreement and/or local laws and regulations. The failure or omission by Centersquare to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights.
- Cooperate with Centersquare to ensure its compliance with applicable laws and regulations. This includes responding to Centersquare's reasonable requests for information, maintaining adequate documentation of compliance programs, and obtaining compliance certifications as reasonably requested.
- Where there is a conflict between applicable laws/regulations and this Code, the strictest standard consistent with applicable laws/regulations shall apply.

# Reporting a Concern

All Suppliers and Suppliers Representatives must ensure that their subcontractors comply with this Code by monitoring, preventing, remediating, and/or reporting any actual or potential violations.

Centersquare expects Suppliers to report to Centersquare any violations of this Code or applicable laws or regulations, including actions or omissions by Centersquare employees or contractors, representatives, or other Suppliers, in a timely manner. You are encouraged to provide as much accurate and relevant information as possible to facilitate a thorough investigation to ensure our continued ethical business relationship. No retaliation will be tolerated toward anyone who, in good faith, reports an actual or potential violation of this Code.

Centersquare's Reporting Helpline allows anonymous reporting of unethical, illegal, or unsafe behavior. It is available toll-free 24/7. Report concerns about violations via Web [centersquaredc.ethicspoint.com](https://centersquaredc.ethicspoint.com) or by telephone

Global 1-844-238-8764

Canada 1-855-350-9393; 1-(844) 238-8764 French

United Kingdom 0-800-89-0011