

ALLIED

Supplier Code of Conduct

October 2024

Supplier Code of Conduct

OVERVIEW

Allied Properties Real Estate Investment Trust (“Allied”) is committed to conducting business in a fair and ethical manner and complying with the laws and regulations of the jurisdictions in which we operate. We expect the same from our suppliers and require all new and existing suppliers to comply with this Supplier Code of Conduct (the “Supplier Code”).

Suppliers include all those who supply goods or services to Allied, such as consultants, agents, contractors, brokers and other third parties (collectively, “Suppliers”). The Supplier Code is not to be read in lieu of Allied’s contractual agreements with its Suppliers but is in addition to those agreements’ terms and conditions. Where such requirements conflict, Suppliers should comply with the highest standard.

PURPOSE

The Supplier Code sets out the principles, standards and behaviors our Suppliers must follow in conducting their business. In addition, Suppliers must conduct business in compliance with the applicable laws and regulations in the jurisdictions in which they operate for all their activities. Suppliers are responsible for any breaches of this Supplier Code including those by their employees, contractors, agents, sub-contractors, sub-agents, and all other business partners who are engaged to provide goods or services to Allied on the Suppliers’ behalf (collectively, “Suppliers Representatives”).

CONFLICTS OF INTEREST

Suppliers must exercise reasonable care and diligence to prevent any actions that could result in an actual, potential, or perceived conflict of interest between their interest and the interest of Allied. Suppliers are required to disclose any actual or potential conflict of interest that they may have to their Allied representative before conducting business with Allied or upon becoming aware of the conflict. Any transactions that create an actual or potential conflict of interest should not be entered.

FRAUD, ANTI-BRIBERY, CORRUPTION, AND MONEY LAUNDERING

Suppliers and Suppliers Representatives cannot offer bribes, kickbacks, or any other incentive to any person or organization with whom they deal with on behalf of Allied. Allied does not participate in corruption, money laundering, terrorist financing, or other corrupt business practices.

Suppliers must comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations in the jurisdictions in which they operate. Suppliers must not engage in fraud, which is an intentional act of deception, forgery, lying or concealment of material facts.

Deceptive or unfair practices are prohibited, including but not limited to, rigging bids, fixing prices, or providing (directly or indirectly) anything of material value with an intention to obtain an unfair business advantage.

GIFTS AND ENTERTAINMENT

Suppliers should not give gifts or entertainment that appear as an attempt to influence a business decision, create an obligation to do something in return, or as a personal reward for making a business decision. Gifts may include services, favors, discounts, or any other item of value. Gifts or entertainment should:

- Not be lavish.
- Be infrequent (less than twice a year).
- Be lawful and appropriate to foster a business relationship.
- Not be given during a tendering process by a Supplier that is part of the process.

Gifts or entertainment given to Allied and its representatives are governed by Allied's Code of Business Conduct. Allied representatives may only accept gifts with a value of less than \$100. If an Allied representative receives tickets for an event from a Supplier and does not attend the event with the Supplier, this is considered a gift, and the \$100 limit applies. If Suppliers are unsure as to whether a gift or entertainment complies with Allied's policies, they should consult with their Allied representative.

Suppliers are expected to maintain a record of any gifts or entertainment given to Allied or its representatives. Allied may request a copy of this record from the Supplier from time to time.

FAIR LABOUR PRACTICES

We expect Suppliers to treat people with dignity and to respect their human rights. Suppliers must be in compliance with all employment laws and regulations in the jurisdictions in which they operate. Suppliers must be able to demonstrate the following in their workplaces:

- Full compliance with wage laws, including those relating to wages, working hours, overtime, and benefits.
- Prohibited use of child labour and all forms of forced labour, including bonded labour, indentured labour, prison labour, military labour, modern forms of slavery and any form of human trafficking.
- A workplace free of harassment, intimidation, discrimination, violence, or disruptive conditions from internal and/or external threats. Discrimination includes that related to race, color, family status, national or ethnic origin, citizenship, sex, age, marital status, pregnancy, political affiliation, union membership, gender identity, disability, social status, creed, religion, sexual orientation, or any other personal characteristic prohibited by law or regulation.
- Prohibited retaliation or retribution taken against any individual who, in good faith, has reported a concern, questionable behavior, or potential violation.

HEALTH AND SAFETY

Suppliers are expected to provide a healthy and safe work environment and to comply with all applicable health and safety laws and regulations in the jurisdictions in which they operate.

Suppliers should:

- Recognize the specific hazards relevant to their operations.
- Take reasonable steps to prevent workplace accidents and injuries by providing training and access to information on health and safety and hazard prevention.
- Ensure that Supplier Representatives are qualified and equipped to perform activities safely.
- Provide adequate resources and training to ensure that their employees understand and appropriately apply safety standards and procedures.
- Have a clear process to report all injuries and accidents as required under the local laws and regulations and for reporting such incidents to Allied.

ENVIRONMENTAL RESPONSIBILITY

Allied is committed to the protection of the environment by minimizing the negative environmental impact of our business activities. We expect our Suppliers to align with this commitment, to make their own efforts in support of Allied's efforts to transition to net-zero carbon and to comply with applicable environmental laws and regulations in the jurisdictions in which they operate. We encourage our Suppliers to:

- Demonstrate a commitment to limiting the organization's environmental impact, such as publicly disclosing energy, water, waste and/or greenhouse gas reduction targets and progress.
- Take an active role to consider the future impacts of climate change on the organization's operations.

SOCIAL RESPONSIBILITY

Allied aims to support the communities where we operate and is committed to fostering a culture that advances equity, diversity, and inclusion ("EDI") throughout our business. We expect Suppliers to:

- Demonstrate a commitment to corporate responsibility for social and ethical matters, including a commitment to EDI.
- Engage with communities by respecting local identities, cultures, and heritage.

COMPANY ASSETS

Suppliers shall responsibly use and protect Allied's physical and intellectual assets from loss, damage, misuse, or theft, when authorized by Allied to use such assets. These assets include property, supplies, and equipment.

DRUGS AND ALCOHOL

Suppliers must prohibit the use, possession, and sale of illegal drugs while on any Allied properties. Supplier Representatives must not be impaired from the use of alcohol, drugs (including cannabis and cannabis-related products), or any substance (medically

prescribed or otherwise) that could cause impairment while providing services to Allied.

RECORD KEEPING

Suppliers shall maintain accurate and complete books and records in accordance with applicable laws and regulatory requirements. Suppliers shall not destroy books or records that may be relevant to legal or regulatory proceedings.

BUSINESS CONTINUITY PLANNING

Suppliers must develop, maintain, and test their business continuity and disaster recovery plans in accordance with applicable laws, industry standards, and contractual requirements.

INSIDER TRADING

Suppliers in possession of Allied's non-public information shall not trade Allied securities or share the non-public information with other parties who may use it to trade in Allied securities.

REPORTING VIOLATIONS

Any Supplier or Supplier Representative that believes a violation or possible violation of applicable laws or regulations, this Supplier Code or other Allied policies has occurred should report the relevant information to Allied's Compliance Officer, Anne Miatello, at (416) 977-7923 or amiatello@alliedreit.com, or through the Allied Ethics Hotline, which is operated by an independent third party and provides a secure, confidential and, if desired, anonymous communication channel for reporting concerns.

- Link: Allied Ethics Hotline (EN)
Ligne directe Éthique (FR)
- Toll-free number: 1 (877) 883-3933

All reports are investigated under the supervision of Allied's Compliance Officer.

MONITORING COMPLIANCE

We expect Suppliers to comply with our Supplier Code and to ensure that Supplier Representatives are educated and trained so that they understand and comply with this Supplier Code. Furthermore, Suppliers who outsource activities in connection with Allied must monitor the outsourcing engagement to ensure compliance with this Supplier Code. Suppliers should report any violations of the Supplier Code as set out above.

Allied reserves the right to verify our Suppliers' compliance with the Supplier Code and to require Suppliers to periodically confirm in writing that they meet the expectations of this Supplier Code from time to time.

For any instance of observed non-compliance with the Supplier Code, Suppliers must take all reasonable measures to immediately rectify the situation to meet the Supplier Code standards.

If a Supplier fails to take appropriate corrective action or fails to comply with this Supplier Code, Allied may, in its sole discretion and without any further obligation to the Supplier,

suspend or terminate, in whole or in part, the Supplier's relationship with Allied.

EXTERNAL COMMUNICATION

Suppliers must obtain prior written permission from Allied before publicly discussing, endorsing, reviewing, referencing, or otherwise publicly commenting on or promoting Allied or its business, properties, services, representatives, or brand.

CONFIDENTIALITY, PRIVACY, AND INFORMATION SECURITY

The confidentiality, privacy, and security of Allied's information, including personal information of our tenants, users, customers, and employees must be protected, and our Suppliers must maintain appropriate policies and procedures to prevent unauthorized use or disclosure. Confidential information is information that has not been publicly disclosed. Examples include, but are not limited to, employee personal information, business marketing and site plans, and engineering designs.

Suppliers must use information obtained through their relationship with Allied only in accordance with Allied instructions and strictly for the purpose for which it was provided.

Suppliers must process and store information as agreed with Allied. Suppliers should securely destroy or anonymize personal information when it's no longer needed.

Suppliers must notify Allied immediately of any actual or suspected unauthorized disclosure, confidentiality breach, privacy breach, security breach, or loss of Allied information. Further, Suppliers must assist Allied in managing any consequences arising from such events.