



ALTUS GROUP LIMITED
GLOBAL BUSINESS PARTNER CODE OF CONDUCT

1. SCOPE

This policy establishes a code of conduct for current and potential suppliers and business partners (collectively, "Business Partner") of Altus Group Limited, including its subsidiaries and affiliates (collectively, "Altus Group").

2. INTENT

Altus Group is committed to conducting its business in an ethical, legal and socially responsible manner. Altus Group expects its Business Partners to share this commitment and, therefore, has established this Business Partner Code of Conduct. Although there may be different legal and cultural environments applicable to its Business Partners, they must meet the following minimum requirements to do business with Altus Group.

3. BUSINESS PARTNER CODE OF CONDUCT

(a) Compliance with Laws, Regulations and Published Standards

Business Partners must comply with all applicable laws, codes or regulations of the countries, provinces/states and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labour practices. In addition, Business Partners must require their suppliers (including temporary labour agencies) to do the same.

(b) Ethical Business Practices

Business Partners must conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. In particular, Business Partners are expected to conform to these requirements in each of the following areas:

- (i) *Fair Trade Practices.* Business Partners shall not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of antitrust laws.
- (ii) *Bribery, Kickbacks and Fraud.* No funds or assets of the Business Partners shall be paid, loaned or otherwise disbursed as bribes, "kickbacks", or other payments designed to influence or compromise the conduct of Altus Group, its employees or representatives.
- (iii) *Foreign Corrupt Practices Act.* While laws and customs vary throughout the world, Business Partners must comply with foreign legal requirements and United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to government officials, foreign political parties, party officials, or candidates for office for the purposes of obtaining or retaining business.

(c) Altus Group Policies and Procedures

Business Partners must comply with the Altus Group's published policies and procedures, including, but not limited to, the Conflict of Interest, Procurement Relationships and other relevant provisions of the Altus Group Code of Ethics & Business Conduct, which can be found at: <https://www.altusgroup.com/en-gb/legal/code-of-business-conduct-and-ethics>.

(d) Intellectual Property Rights.

Business Partners must respect the intellectual property rights of others, including Altus Group, its customers and business partners. Business Partners must take appropriate steps to safeguard and maintain confidential and proprietary information of Altus Group, its customers and business partners, and shall use such information only for the purposes specified for use in writing by Altus Group. Business Partners shall observe and respect all Altus Group patents, trademarks and copyrights and comply with all requirements as to their use as established by Altus Group. Business Partners will not transmit confidential or proprietary information of Altus Group, its customers or business partners via the internet unless such information is encrypted accordance with minimum standards established by Altus Group.

(e) Environmental Practices

Business Partners must comply with all environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, among other things, the following items:

- (i) Obtaining and maintaining environmental permits and timely filing of required reports
- (ii) Proper handling and disposition of hazardous materials
- (iii) Monitoring, controlling and treating discharges generated from operations

(f) Occupational Health and Safety Practices

Business Partners must provide their workers with a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of the Business Partners and where required by law, must maintain suitable workers' compensation insurance. Among other things, Business Partners must provide their workers:

- (i) Occupational health and safety training
- (ii) A system for injury and illness reporting
- (iii) Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.
- (iv) Medical treatment and/or compensation to injured/ill workers arising as a result of working for the Business Partner.
- (v) Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.
- (vi) Workers are to be provided clean and safe facilities including clean toilet facilities, access to potable water and sanitary food preparation and storage facilities.
- (vii) Worker dormitories provided by the Business Partners are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

(g) Labour Practices

Altus Group expects its Business Partners to adopt sound labour practices and treat their workers fairly in accordance with applicable laws and regulations. In addition, Business Partners must comply with the following standards:

- (i) *Freely Chosen Employment.* Business Partners shall not use any forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise.
- (ii) *No Child Labour.* Business Partners must comply with local minimum working age laws and requirements and not employ child labour.
- (iii) *Minimum Wages.* Business Partners must provide wages for regular and overtime work and benefits that meet or exceed legal requirements.
- (iv) *Working Hours.* Business Partners must not require workers to work more than the maximum hours of daily labour set by local laws.
- (v) *No Harsh, Inhumane Treatment or Abuse.* Business Partners must treat each employee with dignity and respect. In no event must Business Partner's workers be subject to threats of violence, physical punishment, confinement or other form of physical, sexual, psychological or verbal harassment or abuse.
- (vi) *No Discrimination.* Altus Group employees, Business Partner employees, and service users have the right to respectful treatment. Business Partners are prohibited from discrimination, harassment or victimization at any time.
- (vii) *Human Rights.* Business Partners must both with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of all applicable modern slavery legislation and ensuring that there is no modern slavery or human trafficking in any part of their business or their supply chain. Business Partners must have robust means of ensuring that the subcontractors in their supply chain also comply with these laws.
- (viii) *Freedom of Association.* Business Partners must recognize and respect the rights of its workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining in accordance with local labour laws and established practices.

(h) Export Sanctions/Terrorism Activities

Business Partners must abide by all applicable in-force economic sanctions or trade embargoes.

Business Partners must not directly or indirectly engage in or support any terrorist activity.

No Business Partner nor any of its affiliates, nor any officer or director of the Business Partner or any of their affiliates, can be included on any lists of terrorists or terrorist organizations compiled by any applicable government or any other national or international body.

(i) Solicitations by Business Partners

All Business Partners shall comply with all guidelines issued by Altus Group relating to access to Altus Group facilities, offices and departments, and employees. No Business Partner will use any Altus Group system, including its electronic mail system and internet site, for purpose of sending unsolicited electronic mail messages to the Altus Group community.

Business Partners must receive prior written authorization from Altus Group management to hold trade shows, demonstrate products, utilize Altus Group's resources or make unsolicited calls on Altus Group departments.

(j) Monitoring and Compliance

Business Partners must conduct audits and inspections to ensure their compliance with this Business

Partner Code of Conduct and applicable legal requirements. If a Business Partner identifies areas of non-compliance, it agrees to notify Altus Group immediately and disclose the area of non-compliance as well as remediation plans and timeline for Altus Group approval.

Altus Group or its representatives may engage in monitoring activities to confirm Business Partner's compliance to this Business Partner Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess Business Partner's performance. Business Partner agrees to fully cooperate with any such monitoring activities.

Altus Group reserves the right (in addition to all other legal and contractual rights) to disqualify any potential Business Partner and terminate relationships with any current Business Partner found to be in violation of this Business Partner Code of Conduct, without liability to Altus Group.

4. APPLICATION/EXCLUSIONS

This Business Partner Code of Conduct is a general statement of Altus Group's expectations with respect to Business Partners. This Policy should not be read in lieu of but in addition to any Business Partner obligations as set forth in any (i) request for proposal or other solicitation, or (ii) agreements by and between Altus Group and the Business Partner. In the event of a conflict between this Policy and any Altus Group solicitation document or applicable agreement, the terms of the solicitation document or applicable agreement shall apply.

Altus Group may amend this Business Partner Code of Conduct from time to time upon written notice to the Business Partner and the Business Partner must agree with all such amendments within the time period specified by Altus Group in writing.

No exclusions are applicable to this policy.

IN WITNESS WHEREOF, the undersigned have caused this Business Partner Code of Conduct to be executed by their authorized officers as of the date and year first written above.

BUSINESS PARTNER:_____

By:_____

Name:_____

Title:_____

Date:_____