



## **LXP Industrial Trust Supplier Code of Conduct**

LXP operates its business in accordance with the highest ethical standards and in compliance with all laws and regulations. LXP expects its vendors, suppliers, and their representatives to do the same. This Supplier Code of Conduct describes the standards to which LXP requires its suppliers to adhere, including throughout their supply chain, in their facilities and in their operations. Suppliers will not discriminate against any person because of their race, color, gender, religion, ethnicity or national origin, age, disability or other medical condition, sexual orientation, gender identity, genetic information, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable national or local law.

### **Business:**

- Abide by the highest standards of ethics and in accordance with law, including compliance with anti-corruption, anti-bribery, and anti-money-laundering laws;
- Upkeep confidentiality and integrity of data and IT/OT systems;
- Prohibit insider trading, whether direct or indirect; and
- Maintain ethical financial and accounting practices, including auditing and reporting.

### **People:**

- Respect and advocate for fundamental human rights, including:
  - Prohibit the use of modern slavery, child labor and human trafficking;
    - Suppliers will not engage in, or support the use of, child labor, and suppliers shall comply with all applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. Additionally, young workers may not be required to perform work which may be hazardous to their health, safety or morals
    - Suppliers will not utilize or source products or services from entities associated with forced, bonded, indentured, involuntary or exploitative prison, trafficked or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving or employing persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary and workers shall be free to terminate their employment at any time.
  - Maintain fair labor standards and working inclusions;
    - Suppliers must respect workers' rights to freedom of association and collective bargaining in compliance with existing local laws and without discrimination, intimidation or harassment as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working

- conditions and management practices without fear of discrimination, intimidation or harassment.
  - Suppliers must comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits. Suppliers will not require employees to work more than the maximum number of hours permitted under applicable laws or no more than 60 hours per week, whichever is stricter. Workers should not work longer than six consecutive days without at least one day off.
- Maintain adequate occupational health and safety standards;
  - Suppliers will not require employees to work more than the maximum number of hours permitted under applicable laws or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.
  - Suppliers must respect workers' rights to freedom of association and collective bargaining in compliance with existing local laws and without discrimination, intimidation or harassment as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or harassment.
- Conduct business with health and well-being in mind;
- Maintain human health-based product standards;
- Prohibit discrimination, harassment, and abuse;
  - Suppliers must treat all workers with dignity and respect. Suppliers must not subject workers to, or threaten to subject workers to, harsh and inhumane treatment, including but not limited to corporal punishment, mental or physical coercion or verbal abuse, sexual harassment or sexual abuse. Disciplinary policies and procedures related to this requirement shall be clearly communicated to workers.
- Provide a workplace of mutual respect and inclusivity; and
- Provide acceptable living conditions.
  - Suppliers who provide residential facilities for their employees must also provide safe and healthy facilities. Supplier-provided facilities must meet the host country's housing and safety standards. There shall be no unreasonable restrictions on entering, exiting or movement within company-provided facilities. Suppliers will take reasonable efforts to ensure that their own suppliers comply with this requirement.

**Environment:**

- Adhere to laws and regulations regarding usage and restriction of specific substances and appropriate labeling;
- Handle chemicals and hazardous materials appropriately; identify and manage in accordance with local regulations;
- Implement processes to minimize and properly dispose of waste;
- Endeavor to minimize the environmental impact of operations, including in products, facilities, and services; and
- Responsibly source materials, paying attention to material usage, land of origin, and production standards.

**Data Privacy and Security:**

- Protect the privacy of individuals and the security of confidential assets and information in accordance with applicable laws.
- Design and maintain processes to provide appropriate protections for confidential assets and information.
- Immediately inform LXP of any data breach involving its confidential assets or information.

Questions or concerns may be directed to [esg@lxp.com](mailto:esg@lxp.com).