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# Vendor Code of Conduct

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**invitation**homes™

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# INTRODUCTION BUSINESS PRACTICES

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## INTRODUCTION

At Invitation Homes Inc. (“Invitation Homes” or the “Company”), we are committed to our mission statement, “Together with you, we make a house a home.” How we carry out that mission on a daily basis is reflected in our Company’s core values: Unshakable Integrity, Genuine Care, Continuous Excellence, and Standout Citizenship. All Invitation Homes associates, regardless of location or position in the Company, have an obligation to follow the Company’s Code of Business Conduct and Ethics and act with integrity and in full compliance with the laws and regulations that govern our business activities. Everyone who works at or with Invitation Homes should feel confident about our high ethical standards, our honesty, and our integrity. This Vendor Code of Conduct (the “Code”) is an extension of our values to Company vendors and serves to highlight our commitment to ethical business practices and regulatory compliance.

Invitation Homes expects its vendors to share and embrace the letter and spirit of our commitment to integrity. A “vendor” is any firm or individual that is engaged by Invitation Homes to provide a product or service to Invitation Homes or any of its clients. Vendors include but are not limited to the following:

Rehab general contractors and subcontractors, suppliers of goods or services, real estate brokers and salespeople, consultants, etc. While vendors are independent entities, their actions may significantly impact Invitation Homes’ reputation and brand. Because of this, Invitation Homes expects all vendors and their employees, agents and subcontractors (their representatives) to adhere to this Code of while conducting business with and/or on behalf of Invitation Homes. All vendors should educate their representatives to ensure that they understand and comply with this Code.

No code can cover all policies or laws, so if you have questions about any of the information in this code, or what is expected of you, please email [vendordisclosure@invitationhomes.com](mailto:vendor disclosure@invitationhomes.com).

## BUSINESS PRACTICES

Vendors of Invitation Homes and their representatives shall conduct their business interactions and activities with integrity and in accordance with their obligations under their specific agreements with the Company. In addition to those obligations, all our vendors shall adhere to the business practices set forth in this code.

# CONFLICT OF INTEREST

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## GIFT GIVING POLICY

Vendors are required to avoid actions that may result in conflicts of interest. Vendors shall use good judgment, discretion and moderation when offering gifts or entertainment to employees of Invitation Homes. In doing so, the vendor and/or its representatives will refrain from giving Company employees unduly lavish gifts or entertainment, airline tickets, cash, gift cards, hotel accommodations, electronics, etc. or extending gratuities or special favors or gifts, under circumstances which might reasonably be interpreted as an attempt to influence such employees in the performance of their duties for the Company (other than the exchange of normal business courtesies such as reasonable and moderate meals that are consistent with regular business practice, advertising or promotional materials and other small gifts, which are of nominal value (less than \$200.00)). In any event, no vendor may ever offer a bribe, kickback, bartering arrangement for goods and services, and/or any other incentive to a Company employee to obtain or retain Invitation Homes' business. This includes improving, upgrading, or investing time or materials in a Company-owned home in which an Invitation Homes' employee is a tenant, without following Invitation Homes' approval procedures.

## APPEARANCE OF IMPROPRIETY

Vendors shall avoid the appearance of or actual conflicts of interests. When a vendor or vendor representative has a relationship with a Company employee, or a

Company employee's spouse, domestic partner, or other family member or relative, the vendor must disclose the relationship and obtain Company approval prior to contract negotiations. If the vendor becomes aware of a conflict after the commencement of services, the vendor must immediately inform a disinterested member of Company management. In addition, vendors and their representatives shall not deal directly or indirectly with any Invitation Homes employee who holds, or whose spouse, domestic partner or other family member or relative holds a significant financial interest in the vendor. Interacting with such an employee, or spouse, domestic partner or other family member or relative of such an employee, in the course of negotiating or performing the vendor agreement, is also prohibited.

## DISCLOSURE OF CONFLICT

Vendors are required to immediately disclose any positions or actions of actual or potential conflicts of interest to [vendordisclosure@invitationhomes.com](mailto:vendordisclosure@invitationhomes.com). This includes disclosure of any relationships described above, material financial interest they or members of their family have in (as an owner/shareholder, partner, investor, employee, or consultant), or any affiliation with (as an officer, director, or employee of) any business, organization, or entity which is a competitor of Invitation Homes, or which has or proposes to have a business relationship with the Company, even if the vendor believes all appropriate actions have been taken to avoid or safeguard against a conflict of interest.

# BUSINESS CONDUCT AND ETHICS

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## CONFIDENTIAL INFORMATION, SECURITY AND PRIVACY

Confidential information means all non-public data of Invitation Homes, including: business plans, marketing plans, team member personal information, resident personal information and intellectual property. Vendors may not outsource, disclose, share or use this information outside the requirements defined in their contractual or nondisclosure agreement with Invitation Homes.

Unauthorized disclosures could harm Invitation Homes, breach the vendor contract or even be illegal. Vendors shall provide their services in compliance with the highest applicable professional standards governing their contractual obligations, including requirements established by any organizations that regulate their activities. Vendors shall comply with all Invitation Homes' requirements for maintenance of passwords, confidentiality, security and privacy procedures as a condition of receiving access to the Invitation Homes internal corporate network, all systems and all buildings. All data stored or transmitted on Company-owned or -leased equipment is to be considered private and is the property of Invitation Homes. Invitation Homes may monitor all uses of its corporate networks and all systems (including email and other social media platforms) and/or access all data stored or transmitted using the Company network. To avoid compromising any potential confidentiality, a Vendor may speak to the press on Invitation Homes' behalf only if the Vendor and/or representative is expressly authorized in writing to do so by one of the Company communications professionals.

## PROTECTION OF ASSETS

Vendors shall protect and responsibly use both the physical and intellectual assets of Invitation Homes, including its property, supplies and equipment, when authorized by the Company to use such assets. Vendors shall use information technology and systems provided by Invitation Homes (including email and any social media platforms) only for authorized Company business-related purposes. Invitation Homes strictly prohibits vendors and their representatives from using Company-provided technology and systems to create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate and/or send any false, derogatory or malicious communications using Company-provided information, assets and systems. Vendors shall comply with the intellectual property ownership rights of Invitation Homes and others, including but not limited to copyrights, patents, trademarks and trade secrets. Vendors shall use software, hardware and content only in accordance with their associated license or terms of use.

# BUSINESS CONDUCT AND ETHICS

## **BUSINESS INTEGRITY; COMPLIANCE WITH ANTI-CORRUPTION LAWS**

Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Vendors must not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, or applicable anti-corruption laws or regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Vendors should not offer or accept bribes or other means to obtain an undue or improper advantage. Vendors must uphold fair business standards in advertising, sales, and competition.

## **WHISTLEBLOWER PROTECTION AND ANONYMOUS COMPLAINTS**

Vendors must create programs to ensure the protection of vendor and worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the Invitation Homes Vendor Code of Conduct. Vendors will provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

## **COMMUNITY ENGAGEMENT**

Vendors are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.



# ENVIRONMENT, HEALTH AND SAFETY

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## OCCUPATIONAL INJURY PREVENTION

Vendors must eliminate physical hazards when possible. Vendors must provide workers with a safe and healthy work environment. They should take proactive measures that support accident prevention and minimize health risk exposure. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

## EMERGENCY PREVENTION, PREPAREDNESS AND RESPONSE

Vendors must anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

## HAZARDOUS SUBSTANCES AND RESTRICTIONS

Vendors must comply with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances. To ensure safe handling and disposal, vendors should identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

## SOLID WASTE MANAGEMENT

Vendors must manage and dispose of non-hazardous solid waste generated from their operations as required by applicable laws and regulations.

## POLLUTION PREVENTION AND RESOURCE REDUCTION

Vendors must endeavor to reduce or eliminate solid waste, wastewater and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing or substituting materials.

# LABOR AND HUMAN RIGHTS

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## ANTIDISCRIMINATION

Vendors must not discriminate against any worker based on race, color, religion, creed, gender, pregnancy or related medical conditions, age (as defined by federal and state law), national origin or ancestry, physical or mental disability, genetic information or any other protected characteristic and/or classification protected by local, state or federal laws, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination.

## HARASSMENT

Vendors must treat all workers with respect and dignity. Vendors must follow policies prohibiting harassment against any employee based on race, age, color, religion, gender, national origin, ancestry, mental or physical disability, medical condition, U.S. veteran status, marital status, sexual orientation or any other basis protected by federal, state or local law or ordinance. They may not subject workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, vendors must provide an environment that allows employees to raise concerns without fear of retaliation. Where it is allowed by law, vendors should have a system that allows employees to anonymously report their concerns.

## HIRING AND EMPLOYMENT PRACTICES

Vendors' hiring practices must include verification of workers' legal rights to work in the country and ensure

that all mandatory documents, such as work permits, are available. Invitation Homes' vendors are expected to support diversity and equal opportunity in their workplaces.

## NO FORCED LABOR OR HUMAN TRAFFICKING

We condemn forced labor and human trafficking and will not knowingly work with vendors who engage in these practices. All workers have the right to engage in work willfully, without surrendering identification and without the payment of fees. Workers have the right to freedom of movement and our vendors must ensure it is afforded to them. Suppliers must also procure their raw materials and/or components solely from sources that do not utilize forced labor or engage in human trafficking.

## NO UNDERAGE LABOR

We do not tolerate the use of underage labor and will not knowingly work with vendors that utilize underage workers. Vendors must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work.

## WAGES

Vendors must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live.

# FINANCIAL RESPONSIBILITY

## DOCUMENTATION AND RECORDS

The Company's financial information and statements are prepared in compliance with generally accepted accounting principles and statutory accounting practices and procedures for regulatory purposes. As a financially responsible organization, we are committed to ensuring that all internal and external financial records are maintained by using effective internal controls, including procedures to protect the Company's assets. It is our expectation that our vendor partners will exercise a similar commitment to financial responsibility, including but not limited to:

- Honestly and accurately recording and reporting all business information and complying with all applicable laws regarding their permitting, completion and accuracy; and,
- Creating, retaining and disposing of business records in full compliance with all applicable legal and regulatory requirements.



# ACKNOWLEDGMENT STATEMENT

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I understand that Invitation Homes expects all vendors and vendor employees, agents and subcontractors (their representatives) to adhere to the Company's Vendor Code of Conduct while they are conducting business with and/or on behalf of Invitation Homes.

As the \_\_\_\_\_(title) of \_\_\_\_\_(company name), I \_\_\_\_\_(name) fully understand and agree that I will abide by the policies referenced. I am aware that failure to comply with the policies outlined in the Vendor Code of Conduct may result in the Company's termination of the business relationship with the vendor.

## ACKNOWLEDGMENT AND SIGNATURE

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_

COMPANY: \_\_\_\_\_ DATE: \_\_\_\_\_