



# Crombie's Service Partner Code of Conduct

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## Introduction

Crombie invests in real estate that enriches local communities and enables long-term sustainable growth. As one of the country's leading owners, operators, and developers of quality real estate, Crombie's portfolio primarily includes grocery anchored retail, retail-related industrial, and mixed-use residential properties in Canada's top urban and suburban markets. Crombie is committed to our sustainability journey and to continuously increasing the transparency and accountability of our disclosures.

Our mission is to deliver sustainable value creation for our stakeholders through owning, operating, and developing high-quality grocery anchored shopping centres, freestanding stores, retail-related industrial fulfillment/ distribution centres and mixed-use developments primarily in Canada's top urban, suburban, and growth-oriented markets.

Crombie is built on high performance, an entrepreneurial vision, and a commitment to collaboration. Our values guide our behaviour to ensure that we collectively achieve our goals and deliver results:

- Embody Integrity
- Care Passionately
- Deliver Excellence Together
- Empower One Another
- Outperform Expectations

We live these values; they're not just words, they're actions. Though our roots are Atlantic Canadian, our values are universal. We demonstrate our commitment to them every day, in everything we do.

## Purpose

This Service Partner Code of Conduct (the "Code") applies to those who supply goods and services and includes all consultants, agents, retainers, brokers, and other third-parties (collectively, "Service Partners") who conduct business with Crombie.

Service Partners are critical to our success and for Crombie to provide superior service in a responsible manner. We understand that Service Partners are independent entities; however, the business practices and actions of a Service Partner may significantly impact and/or reflect upon Crombie, our reputation, and our brand, which is one of our most important assets. As a result, Crombie requires Service Partners to comply with this Code. This Code sets forth Crombie's fundamental ethical and business conduct principles for our Service Partners. This Code is not intended to be an exhaustive list of all principles to be followed by Service Partners, but rather a high-level overview of those fundamental principles. These principles speak to the commitment Crombie makes to our tenants, our drive to deliver innovative business solutions and relationships built on partnerships, trust, integrity, and personal responsibility.

## Application and Acceptance

By entering into any standard terms and conditions or other contractual agreements with Crombie (the “Governing Terms”), Service Partners are accepting the terms of this Code (as amended from time to time) and affirming compliance with its requirements. This Code is not to be read in lieu of, but in addition to, Service Partners’ obligations as set out in the Governing Terms.

Service Partners are responsible for ensuring their directors, officers, employees, agents, representatives, suppliers, contractors, subcontractors, sub-agents, and other business partners (collectively, the “Related Parties”) understand and comply with the requirements set out in this Code. Service Partners are responsible for any breaches of this Code including those by the Related Parties. Service Partners will promptly notify Crombie, in writing, of any known or suspected violation of the Code, including without limitation, illegal activities or human rights abuse. Any reference to “Workers” within this Code means the Service Partners’ workers and Related Parties’ workers. All references in this Code to “Laws” means all applicable laws, regulations, directives, rules, decrees, and governmental orders.

## Business Practices

Service Partners shall conduct their business interactions and activities with integrity and in accordance with obligations under the Governing Terms. In addition to those obligations, Service Partners shall:

1. **Fraud, Anti-Bribery, Corruption, and Anti-Money Laundering** – Service Partners shall not engage in fraud, including theft of assets and misrepresentation of facts. Service Partners shall adopt a zero-tolerance approach to bribery, corruption and money-laundering and comply with all applicable anti-bribery, anti-corruption, and anti-money laundering Laws in the jurisdiction in which they operate.
2. **Corporate Misconduct** – Service Partners must disclose to Crombie any government sanction, embargo, or restriction in any jurisdiction applying to Service Partner and/or any of its supply chains.
3. **Compliance with Professional Standards** – Crombie expects Service Partners to provide their services in compliance with their own applicable professional standards, including requirements established by any organization (such as licensing commissions) regulating their activities.
4. **Maintenance of Records** – Service Partners are expected to create and maintain complete and accurate records to ensure accountability, and not alter or omit any record to conceal or misrepresent the information, event or transaction documented. Records must be retained and disposed of in accordance with Laws.
5. **Data Privacy** – Service Partners must comply with Privacy Laws and must use information obtained for its intended lawful use. The information obtained must be properly protected and

kept confidential. Service Partners must have safeguards in place ensuring that confidential, proprietary, and personal information is protected from unauthorized access and disclosure and is handled with appropriate technical, and to ensure organizational measures adhere to an appropriate level of security to prevent a data breach. Service Partners must immediately notify Crombie if it has experienced a data breach regardless of the Service Partner's assessment of the impact or risk of such breach.

6. Protection of Assets – Service Partners are expected to protect and responsibly use the physical and intellectual assets of Crombie, including their property, supplies and equipment.
7. Conflict of Interest – Service Partners must avoid all conflicts of interest or situations giving the appearance of a conflict of interest when doing business with Crombie. Service Partners must report to Crombie any instances involving real or apparent conflicts of interest between the interest of Service Partners and those of Crombie, such as a direct personal or financial interest in a business decision or vendor selection.
8. Gifts and Entertainment – Service Partners shall use good judgment, discretion and moderation when offering gifts or entertainment to Crombie employees. Gifts or entertainment given or received by Crombie employees must be permitted by Law and the Crombie business code of conduct. Service Partners may not offer a bribe, kick-back, or incentive to a Crombie employee in order to obtain or retain their business or appear to attempt to influence a business decision.

## Health and Safety

We require Service Partners to provide a safe workplace and to practice the following:

1. Compliance with Laws - Crombie expects Service Partners to comply with health and safety standards and Laws, as well as industry requirements, for the jurisdiction where the work is occurring.
2. Exposure to Safety Hazards – Service Partners are expected to control exposure to safety hazards by their Workers through proper administrative controls, preventative maintenance, and safe work procedures. Where hazards cannot be adequately controlled by these means, Service Partners must provide workers, at no cost, proper training and personal protective equipment.
3. Emergency Plans and Procedures – Service Partners are expected to maintain appropriate emergency plans and response procedures to prepare for and respond to accidents, health problems and foreseeable emergency situations.

4. Alcohol and Drugs – No Worker shall consume illegal drugs, alcohol or recreational cannabis before or while working on a Crombie site.
5. Performance of Activities – Service Partners are expected to ensure that Workers are qualified and equipped to perform activities safely.
6. Weapons – No Worker shall be in possession of a weapon of any kind when at a Crombie owned, leased, or managed property, unless otherwise stipulated in the Governing Terms.
7. Violence and Harassment – No Worker shall engage in or condone, any form of violence or harassment, while performing any work, with or on behalf of Crombie, or when at a Crombie owned, leased or managed property;

### Labour and Employment Standards

Crombie requires Service Partners to proactively support the protection of human rights. Service Partners must follow all applicable Laws in the jurisdiction in which it operates and be committed to the value of, and respect for, all people. We require Service Partners to provide a safe workplace and commit to practice the following:

1. Provide a workforce free of harassment and unlawful discrimination;
2. Not engage in or condone the unlawful employment or exploitation of children in the workplace;
3. Respect the free choice of all persons and strictly prohibiting forced, compulsory, or prison labour for any employees;
4. Proactive support and invest in equality, diversity, and inclusion;
5. Prohibit unauthorized weapons while on Crombie owned, leased or managed properties;
6. Prohibit the use, possession, distribution, and sale of illegal drugs while on Crombie owned, leased, or managed properties;
7. Comply with all Laws dealing with wages paid to employees and the hours they work;
8. Respect the rights of employees and comply with Laws concerning freedom of association and collective bargaining; and

9. Maintain an internal process to allow employees to confidentially and anonymously report allegations of mistreatment, discrimination, abuse, violations of laws, violations of this Service Partner's Code, or other ethical violations.
  
10. Crombie requires Service Partners to comply with and abide by the requirements set out in the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This includes without limitation:
  - Ensuring no forced labour or child labour is used at any point in the Service Partner's supply chain.
  - If required by the act, filing a report in the prescribed format, by the specified date and to the proper authority.

### Environment and Sustainability

Crombie requires Service Partners to minimize the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public by fostering sustainable practices and complying with applicable environmental laws and regulations. The expectations of Service Partners is a commitment to reducing their consumption of resources and seeking ways to improve energy efficiency and use cleaner sources of energy. Service Partners are also expected to support Crombie's efforts to reduce carbon emissions and the transition to net-zero, as described in Crombie's ESG report, which is published and available for review or download at the following link: <https://www.crombie.ca/esg/> . Service Partners are encouraged to integrate environmental sustainability into company policies and business practices and to create internal processes to track, record and reduce their energy consumption and greenhouse gas emissions.

### Monitoring and Compliance of this Code

Service Partners shall keep all information necessary to document their compliance with the Service Partner's Code. By providing goods and/or services to Crombie, the Service Partner covenants and agrees to comply with this Code, as well as all applicable laws in the jurisdiction in which they operate. Crombie reserves the right to audit the Service Partner's operations, including without limitation their supply chain and subcontractors, and is entitled to request information from the Service Partner in reference to monitoring their compliance with this Code. Failure to comply with this Code may result in the termination of the Service Partner's relationship with Crombie.



## Reporting of Questionable Behaviour or Violations of this Code

Crombie expects Service Partners to report in a timely manner any known violations of this Service Partner's Code.

Reports can be made to Crombie's Ethics Line:

- By phone, toll-free, 24 hours a day at 1-833-408-8301. You do not have to give your name. This line is operated by an independent, third-party organization.
- By mail:
  - ClearView Strategic Partners  
PO Box 11017, Toronto, ON M1E 1N0  
Attention: Crombie
- Online through ClearView's secure website: [clearviewconnects.com](https://clearviewconnects.com)

Calls to the Ethics Line are not traced and are handled in a confidential manner. You may provide your name if you wish. You will receive a report number, which is the only identification you will need to call back about your concern.