

Vendor Code of Conduct

Updated: October 2020

PURPOSE

At Century, we aim to conduct our business operations at the highest level of ethical standards. We expect our vendors—including business partners, suppliers and trade partners—to understand and act in accordance with all applicable laws, rules, and regulations, as well as to abide by our workplace policy standards. This includes our Conduct and Ethics Policy Statement, our Environmental, Social and Governance (ESG) Policy Statement, our Human Rights Policy Statement, our Commitment to Diversity and Inclusion Policy Statement.

We seek to partner with vendors that conduct their businesses with a set of ethical standards comparable to our own and vendors who share our same commitment to workplace health and safety, global human rights and the environment. Our suppliers shall commit to providing a safe workplace and hold standards of employment that respect the rights of their employees under country and international labor laws and/or the Vendor Code of Conduct below. Additionally, we expect our business partners to hold their vendors, business partners, suppliers and trade partners to the standards and practices covered by our Vendor Code of Conduct. The Vendor Code of Conduct is based on internationally accepted labor standards and guidance, including the International Labour Organization's (ILO) core conventions, the Universal Declaration of Human Rights, and the United Nations (UN) Guiding Principles on Business and Human Rights.

BUSINESS CONDUCT PRINCIPLES

ETHICAL BUSINESS STANDARDS

Century is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect our vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

HEALTH & SAFETY

Century is fully committed to providing a workplace that prevents injury and ill-health. Our policies are outlined in our <u>Commitment to Workplace Health & Safety Statement</u> and we expect all our vendors to: provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, take adequate steps to prevent accidents and injury to health at work—including providing workers with appropriate workplace health and safety information and training—and aspire to achieve similar safety goals.

FAIR COMPENSATION, EMPLOYMENT TERMS & WORKING HOURS

The workers of our vendors should be compensated fairly and provided reasonable employment terms. Workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week under applicable law or applicable collective bargaining or other agreements. Workers shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law or applicable collective bargaining or other agreements, which may include, for example, holidays, maternity/parental leave, family care leave and sick leave.

NO CHILD LABOR

Century does not tolerate any form of child labor in our supply chain. We are committed to the elimination of the "worst forms of child labor," as defined by ILO Convention 138 & 182. Century expects our vendors to prevent child labor in their operations and encourages our vendors to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. When employing workers over the age of 15 (or 14 where the law of the country permits) and under the age of 18, vendors must ensure that such employment is in accordance with the relevant law and must provide adequate protection against any conditions that may be hazardous to the health and safety of young workers.

NO HUMAN TRAFFICKING OR FORCED LABOR

Century does not tolerate any form of abusive or illegal labor in our supply chain or any form of forced labor, such as slavery, debt bondage or human trafficking. Century requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited, including but not limited to any form of prison, slave, bonded or forced indentured labor.

FAIR TREATMENT AND NO DISCRIMINATION OR HARASSMENT

Century does not tolerate any discrimination, harassment or form of disparate treatment in the workplace of our supply chain. The workers of our vendors should be treated with respect and dignity at all times. They should not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment, and any other form of inappropriate behavior or abuse. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to all workers of our vendors.

DIVERSITY AND INCLUSION

Century is committed to diversity and inclusion and expects its vendors to share this commitment.

FREEDOM OF ASSOCIATION & RIGHTS TO COLLECTIVE BARGAINING

Century requires vendors to recognize the principles of freedom of association and collective bargaining. Vendors should be aligned with the International Labour Organization and its core conventions: No. 87, the Freedom of Association and Protection of the Right to Organize Convention, and No. 98, the Right to Organize and Collective Bargaining Convention.

ENVIRONMENT

Century's environmental policies are outlined in our Environmental, Social and Governance (ESG) Statement and we expect and encourage all vendors to achieve similar goals and adhere to similar environmental efforts. Vendors are expected to operate in an environmentally responsible manner and strive, as far as practical, to manage and minimize negative environmental impact, including use of energy, greenhouse gas emissions, water, biodiversity, waste, hazardous materials and other natural resources. We encourage vendors to reduce waste across their supply chains, improve the environmental impact of their activities and make an effort to reduce their carbon footprint. Vendors should obtain and maintain all necessary environmental permits or registrations and comply with environmental laws at all times. Vendors should monitor and manage their own environmental risks. Vendors should comply with all local, state, and federal hazardous substance laws and provide appropriate training to their employees on how to safely dispose of hazardous waste. Vendors must maintain best practices and high standards when it comes to avoiding the release of pollutants and other hazardous materials into the water system and comply with all water-related regulations and laws.

For questions related to our Vendor Code of Conduct, please email ESG@centurycommunities.com.