

Vendor Code of Ethics



INTRODUCTION

Integrity is one of Transwestern's guiding principles and a hallmark of our success. Maintaining ethical practices is essential to honor the trust our clients place in us and ensure continued high performance. In furtherance of this objective, it is imperative that the actions of our vendors also reflect these values.

ETHICAL CONDUCT AND COMPLIANCE

As vendors engaged by Transwestern, you are expected to conduct your business according to the principles of honesty, integrity, fairness, and respect for others. Vendors must comply not only with all applicable laws and regulations but also adhere to the ethical standards set forth in this Code of Ethics.

VENDOR RESPONSIBILITIES

- **Client-Specific Requirements:** When assigned to client sites, vendors must familiarize themselves with and adhere to each client's specific vendor code of ethics (if any). These standards may be stricter than those outlined here and could include provisions such as zero tolerance for gift acceptance.
- **Conflict of Interest:** Vendors must avoid any conflicts of interest with their duties at Transwestern. Any potential conflicts must be disclosed and approved in writing by Transwestern's compliance officer and legal department.
- **Confidentiality:** Vendors must safeguard and never disclose proprietary or confidential information obtained through their engagements with Transwestern.
- **Laborer Trafficking:** Vendors are strictly prohibited from engaging in human trafficking-related activities.

GIFTS AND FAVORS

Vendors should not give or receive gifts or favors that could influence or appear to influence their decision-making or actions regarding Transwestern business.

REPORTING AND NON-RETALIATION

Vendors must promptly report any ethical concerns or violations they observe in their dealings with Transwestern or its clients. Transwestern strictly prohibits retaliation against anyone who reports a concern in good faith. Please direct any ethical concerns or suspected violations of this Code of Ethics to the following confidential 24 hour hotline or website:

Transwestern Ethics Hotline (24/7 call support): (833) 960-1605 / Spanish-speaking (800) 216-1288

Transwestern Ethics Website: (online submission): www.lighthouse-services.com/transwestern

All allegations will be investigated. To the extent possible, consistent with conducting an investigation, confidentiality will be maintained concerning the report made and the related investigation.

ACKNOWLEDGMENT

By beginning an engagement with Transwestern or Transwestern on behalf of its clients, you are acknowledging receipt and acknowledgement of the contents of this Code of Ethics and commit to adhere to its provisions during your engagement with Transwestern.

Any violation of the Vendor Code of Ethics may result in termination from the Transwestern assignment, and the imposition of criminal or civil penalties under state or federal law.

Transwestern values its relationships with vendors who play a crucial role in our operations. Ensuring all parties adhere to these ethical standards protects our reputation supports our commitment to provide exemplary property management services on behalf of our clients.