

## SL GREEN'S VENDOR CODE OF CONDUCT

SL Green Realty Corp is committed to dealing fairly with its tenants, contractors, real estate brokers/agents, partners/joint ventures, lenders, customers, suppliers, competitors, employees, and other third parties. An important part of adhering to this commitment is selecting and working with suppliers that maintain transparency and comply with all applicable standards and regulations regarding ethics, environmental, and social issues. This Vendor Code of Conduct is intended to outline the fundamental expectations of suppliers in regard to SL Green's primary procurement values: ethics, environmental standards, human rights, and health and safety.

This Vendor Code of Conduct was developed with special consideration of the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the New York City Human Rights Law.

SL Green Realty Corp is focused primarily in New York City and is Manhattan's largest office landlord. Due to the location of our operations, SL Green is subject to unique New York State and City laws and regulations; for example, the New York City Human Rights Law. This requires that 100% of our supplier contracts must be compliant with all local laws and regulations, as well as complying with applicable federal regulations.

SL Green depends on a diverse pool of vendors to provide products and services that are critical to the growth and success of our enterprise. For example, cleaning vendors, pest management contractors, maintenance staff, waste haulers, water tower maintenance contractors, and several other types of third-party contractors are employed at SL Green buildings.

We recognize that a significant portion of our business' impacts could occur in our supply chain and we are committed to partnering with our vendors to manage and control material risks in this area in the interests of our employees, tenants, and communities. Guided by the policies outlined presented here, we work with our vendors on a variety of issues within the supply chain, including, but not limited to, responsible sourcing, selection of building materials, office products and equipment, systematic engagement with contractors at work sites, compliance with all federal regulations, and reporting on environmental performance.

**Governance and Oversight:** The SL Green's ESG Team oversees the overall supply chain and its compliance with this Vendor Code of Conduct. Performance of suppliers, vendors, and contractors is reported by the ESG Team and reviewed by Edward V. Piccinich, the Chief Operating Officer (COO), on a regular basis.

Driven from the top of the organization, company-wide corporate responsibility is executed across all departments internally, and externally to our partners, tenants, and suppliers. Our commitment to ongoing and open communication with stakeholders ensures we achieve our collective vision of model corporate citizenship.

*See more details on company-wide responsibility for environmental policies below under Section 2.*

## COMPLIANCE WITH THE VENDOR CODE OF CONDUCT

This Code is drafted broadly. In that respect, it is SL Green's intent to exceed the minimum requirements of the law and industry practice. We believe that mere compliance with the law is not sufficient to attain the highest ethical standards. Good judgment and great care must also be exercised to comply with the spirit of the law and of this Code. Suppliers are required to comply with provisions laid out in this Code, in alignment with our Corporate Sustainability Policy and Corporate Code of Ethics. *See also SL Green's [Environmental Policy](#) on page 4 of the EMS Manual.*

SL Green intends to enforce the provisions of this Code. Violations could lead to sanctions, including dismissal in the case of a contractor, as well as, in some cases, civil and criminal liability.

**Audits and Due Diligence:** SL Green has implemented a due diligence process to ensure our suppliers are in compliance with our corporate policies and with regulations. We do this by engaging a third party to perform annual assessments and audits on our suppliers to ensure there are no violations.

A comprehensive audit is conducted for our critical suppliers, identified by amount of annual spend, through the EcoVadis platform on an annual basis. The audit covers various areas that are discussed below in this Code of Conduct including: environment, labor, human rights, ethics, and suppliers' procurement practices. This due diligence process also identified what actual or potential issues may occur in our supply chain. There is a mandatory comprehensive assessment required of all SL Green's Critical Tier 1 Suppliers.

**Critical Suppliers:** SL Green has identified our "critical suppliers" as those whose spend is over a defined threshold value (accounting for 60% of current annual spend) and where SL Green displays a level of dependency.

Based on company segment, location, and size, customized scorecards are generated for each supplier. These scorecards evaluate overall ESG performance, which falls under four categories (Environment, Labor & Human Rights, Ethics, and Sustainable Procurement). Each supplier's assessment is scored by our comprehensive third-party assessor, EcoVadis, and suppliers that score between 0-24 on a 100-point scale are considered "high risk."

**Corrective Action:** SL Green expects suppliers to identify, correct, and monitor the continued compliance of its activities and to report any serious breaches of contracts, internal codes, applicable laws and regulations, and this Vendor Code of Conduct.

SL Green leverages the above EcoVadis scores to evaluate suppliers' ESG performance and communicate ESG expectations to suppliers. Where instances of non-compliance are identified, SL Green works with these suppliers to formulate corrective action plans to address identified issues and establish monitoring mechanisms. Suppliers are reevaluated for continued use in SL Green's portfolio. We reserve the right to terminate or suspend any agreements and relationships with vendors that are unable to comply with our expectations for ethics, environmental, and social performance, or that demonstrate disregard for our corporate policies.

**Reporting a Concern:** SL Green's Board Audit Committee has established procedures for the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters, and the confidential and anonymous submission of concerns regarding questionable accounting or auditing matters. Any such communications may be made anonymously. SL Green's Whistleblower Policy is available to suppliers, customers and other third

parties in English and includes a substantive non-retaliation clause. *For more information on our whistleblower program and reporting a concern, please see our [Code of Ethics](#).*

#### **SECTION 1: BUSINESS ETHICS**

*We expect our vendors to comply with SL Green's corporate [Code of Ethics](#), in addition to the topics listed here:*

- a. Fair Competition Policy:** SL Green is committed to dealing fairly with its tenants, contractors, real estate brokers/agents, partners, lenders, customers, suppliers, competitors, employees, and other third parties. *More information on SL Green's policy on anti-competitiveness can be found in the Code of Ethics under "Fair Dealing".*
- b. Anti-Bribery/Anti-Corruption:** Suppliers must not directly or indirectly violate any applicable law, rule, regulation, or order relating to anti-bribery or anti-corruption (governmental or commercial), or otherwise use any unlawful or improper means of obtaining business or any improper advantage. Suppliers must use reasonable efforts to obtain appropriate anti-corruption covenants, representations, and warranties from all service providers or subcontractors. Suppliers are expected to cooperate with any compliance audit or investigation required by SL Green.
- c. Confidentiality:** Any information obtained by a supplier or its employees in the performance of an agreement shall be deemed to be confidential and proprietary information. Suppliers are expected to hold such information in strict confidence and not to disclose such information to third parties or to use such information for any purpose whatsoever other than what is outlined in the project contract.
- d. Cybersecurity:** If a supplier uses or has access to SL Green's computers, databases, networks, or other similar systems used for the storage or transmission of electronic data and information, or electronically stores any of SL Green's information or data, then the supplier is expected to fully comply with SL Green's cybersecurity requirements as outlined in the supplier's contract. In relation to SL Green's data and systems, these suppliers are expected to:
  - *establish and maintain safeguards against the destruction, loss, or alteration of data*
  - *establish and maintain safeguards against the unauthorized access to such data and systems;*  
*and*
  - *establish and maintain network and internet security procedures, protocols, security gateways firewalls with respect to such data and systems in accordance with best commercial practices*

Contractors are to provide continual assessment and re-assessment of the risks to the security of SL Green's data and systems, as well as, the appropriate protection against such risks. Contractors should provide this risk assessments through:

- *identification of internal and external threats that could result in a security breach*
- *assessment of the likelihood and potential damage of such threats, considering the sensitivity of SL Green's data; and*
- *assessment of the sufficiency of contractor's own policies, procedures, and information systems of and its agents and contractors, and other arrangements in place, to control risks*

## SECTION 2: ENVIRONMENTAL SUPPLY CHAIN MANAGEMENT

SL Green's operations are supported by an extensive supply chain that sources materials and services for our business and tenants. Suppliers are strategically evaluated to ensure they are held accountable for upholding SL Green's standards of environmental performance and achieve the supply chain goals of sourcing LEED-compliant, recycled, responsibly-sourced, and nontoxic materials.

SL Green's procurement policy is guided by external standards, including FSC (Forest Stewardship Council), ENERGY STAR, and Green Seal.

SL Green's environmental policies, including those related to vendors and procurement processes, are available to employees throughout our organization. The facility managers and chief engineers of each of our properties are stewards of our corporate strategy in this area, and work closely with tenants, vendors, and other stakeholders to meet our goals for recycled, responsibly-sourced and non-toxic content and procedures.

- a. **Performance:** SL Green is committed to driving resource efficiency through systematically considering prospective suppliers' environmental performance during the procurement process and the contract period. Vendors that are not compliant are re-evaluated for use in our portfolio.

SL Green seeks to partner with its vendors in order to improve environmental performance and ensure that they are in compliance with the company's sustainability goals. Our facility managers and chief engineers collaborate with tenants and vendors to meet our objectives for having environmentally preferable materials and/or products.

SL Green reserves the right to terminate or suspend any agreements and relationships with a vendor that is unable to comply with our expectations for environmental performance or demonstrates repeated or serious disregard for these expectations.

- b. **Certification and Standards:** SL Green aims to reduce the exposure of building occupants and maintenance personnel to potentially hazardous chemical, biological, and particle contaminants which could adversely impact air quality, health, building finishes, building systems, and the environment. External certification is a cornerstone of our procurement policy, which seeks to purchase products and services that adhere to a variety of standards, including: LEED, Forest Stewardship Council (FSC), ENERGY STAR, Green Seal, and the CRI Green Label.

SL Green's goal is to have 50% or more of the materials that are supplied by our vendors covered by external certification to ensure responsible sourcing practices. This ensures that our suppliers are upholding the same environmental, social, and governance standards that we implement internally.

- c. **Regulatory Compliance:** SL Green and its properties are subject to a wide range of environmental codes and regulations. We are committed to selecting and working with suppliers that exemplify transparency and comply with all applicable federal, state, and municipal standards and regulations regarding environmental issues in all of the jurisdictions where they operate. Environmental compliance is required in all of our vendor contracts and we seek to implement and to ensure this compliance through regular engagement and monitoring.
- d. **Engagement:** SL Green is committed to engaging with non-governmental organizations (NGOs) and industry peers to raise awareness and address environmental issues within the real estate development and management supply chain. We believe that this dialogue and collaboration allows us to share and

learn best practices and advance the sustainability and long-term viability of our business and properties.

We have been widely recognized for our participation and contribution to these organization, including:

- U.S. Green Building Council - Gold Level Membership
- Urban Green Council - Board Member; Supporter of HQ2050 Westchester Green Business Council - Member (NY)
- Real Estate Board Of New York - Board Member; Sustainability Committee; Management Committee

- e. **Green Procurement Policy:** SL Green aims to minimize and reduce negative environmental impacts through our sustainable procurement practices. Our green procurement policy is guided by external standards, including Forest Stewardship Council (FSC), ENERGY STAR, Green Seal, and the CRI Green Label. Our vendors are encouraged to actively reduce their environmental impact and should have their own sustainable procurement policy in place.

SL Green seeks to minimize the negative impacts of site management through a wide range of requirements and practices; some of which include:

- using Green Seal Certified products for 100% of cleaning chemicals
- using no-VOC or low-VOC products for 100% of paints and sealants
- using human powered or low-impact tools for 100% of events
- requiring that 100% of purchased lamps average 70 picograms mg per lumen-hour or less

**Local Procurement:** 100% of post-consumer and rapidly renewable materials are examples of SL Green's sustainable purchases. We strive to source materials that have been harvested, processed, or extracted within 500 miles of a project or property.

**Office Supplies & Products:** SL Green believes that sustainable office supplies and products help to facilitate a safer, healthier, and more productive environment for our employees. Office products are purchased through our green procurement process, which prioritizes spending on products that are environmentally-sound and socially beneficial wherever possible. As part of our commitment to obtain sustainable office supplies, we are working to eliminate single-use plastic in corporate offices.

- f. **Sustainable Purchasing Policy:** This policy applies to all ongoing consumable and durable good purchases within each SL Green building and provides guidelines for sustainable purchasing in the following operational areas: Property Management Office, Tenant Operations, Building Maintenance, and Construction. SL Green has established sustainability criteria and green procurement targets, laid out in the Sustainable Purchasing Policy, for materials purchases in the below categories, aligning with LEED credit requirements:

- **Ongoing Consumables:** 60% must meet sustainability purchasing criteria.
- **Durable Goods:** (Furniture & Electric-Powered Equipment) 40% must meet sustainability purchasing criteria.
- **Facility Alterations and Additions:** 50% must meet sustainability purchasing criteria.
- **Food:** 25% must meet sustainability purchasing criteria.

### **SECTION 3: SOCIAL SUPPLY CHAIN MANAGEMENT – LABOR & HUMAN RIGHTS**

SL Green is committed to reducing social risks throughout the supply chain, including poor working conditions, the use of child or forced labor, and the absence of a living, fair, and minimum wage. SL Green expects vendors and third-party contractors to maintain and enforce high standards on human rights and labor practices surrounding environmental health and safety and business ethics and responsibility. All contracts stipulate that 100% of new and existing suppliers must be compliant with all local, state, and federal laws, including the New York City Human Rights Law.

**Due Diligence:** SL Green has implemented a due diligence process as part of our commitment to human rights. This framework allows us to meet our human rights commitments by proactively identifying where human rights issues may occur in both our own operations and our suppliers. SL Green's due diligence framework is guided by the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the New York City Human Rights Law. These multilateral frameworks were used to identify several key human rights issues in our supply chain such as forced and child labor, freedom of association, and non-discrimination.

We do this by engaging a third party to perform assessments on our suppliers to ensure there are no violations of human or labor rights. This assessment covers various groups at risk of human rights abuses including, but not limited to, children, indigenous groups, migrant laborers, and racial and ethnic minorities.

The results of this assessment are then reviewed and used to refine our due diligence process to better identify and mitigate human rights risks in an iterative process.

- a. Child and Forced Labor:** SL Green is opposed to child and forced labor in any form, including among suppliers. SL Green adheres to the conventions of the International Labor Organization principles in these areas, including C183 – Minimum Age Convention, C182 Worst Forms of Child Labour Convention and P029 – Protocol of 2014 to the Forced Labor Convention.
- b. Non-discrimination:** Suppliers are expected to provide equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status or other characteristic protected by law. This policy of non-discrimination should govern all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits.
- c. Remuneration / Fair Wage:** SL Green is committed to providing a fair wage and equal remuneration to all company employees. This extends to suppliers of SL Green, who are expected to pay all of their employees in accordance with union agreements (as applicable), the labor laws of the State of New York and all other governmental regulations.

SL Green reserves the right to request evidence from the supplier to ensure that the supplier has properly paid subcontractors and material and equipment suppliers with respect to amounts paid by SL Green to the supplier for subcontracted work.

- d. Working hours:** The hours during which work may be performed may be restricted and variable, based upon the requirements of governmental authorities, building management, the supplier's contract with SL Green, and the nature of the work. All overtime work hours are taken on a voluntary basis. Eligible workers are compensated for voluntary work hours designated as overtime.

- e. **Freedom of Association:** SL Green respects the freedom of association, and suppliers are required to comply with all applicable labor and employment laws, regulations, and policies related to freedom of association and collective bargaining. SL Green adheres to the conventions of the International Labor Organization, including C087 – Freedom of Association and Protection of the Right to Organise.

#### SECTION 4: SUPPLIER HEALTH & SAFETY

SL Green is committed to protecting, and aims to improve, the health, safety and well-being of our employees, tenants, vendors, and communities through active engagement, education, and deployment of various programs and resources. For SL Green, this begins with the design of our properties, which include one-of-a-kind amenities and state-of-the-art features that significantly improve the quality of life for our tenants and their employees.

- a. **Accident Prevention:** Suppliers are expected to take every precaution against injuries to persons or damage to property. A supplier must ensure that all of its employees are made aware of all applicable safety, fire and health requirements and regulations. Suppliers should not permit a hazardous, unsafe, unhealthy, or environmentally unsound condition to exist.
- b. **Safety Standards & Compliance:** As part of SL Green’s Standard Operating Procedure, 100% of construction sites are inspected at minimum twice a month by a third-party Site Safety Consultant (SSC) to monitor, inspect, and report on project safety throughout the portfolio. An SSC inspector will check that all NYC and OSHA related safety standards are followed. Among other portfolio data, including vendor compliance are collected and a monthly report is submitted for review by the Site Safety committee.
- The Site Safety committee meets quarterly to discuss safety trends in the portfolio and new rules and regulations released by the New York City’s Department of Buildings (DOB). The committee is made up of the Senior Vice President of Security & Life Safety, Senior Vice President of Engineering, Senior Vice President of Operations, Vice Presidents of Construction, Assistant Project Manager as program coordinator, and Site Safety Consultants.
- c. **Hazardous Materials:** SL Green is focused on the health and safety of all building occupants – this means minimizing any potential exposure to hazardous chemical, biological, and particulate contaminants that could adversely impact indoor air quality and environmental conditions. Suppliers must obey all governmental rules, regulations, codes or directions regarding the disturbance, handling, and disposal of any hazardous materials.
- d. **Cleaning:** Cleaning is a large part of the supply chain for our buildings. We implement a green cleaning plan for SLG properties that minimizes exposure to hazardous chemicals and reduces the risk of injury and health. Our efforts to improve indoor air quality and implement a green cleaning program also reduce health and safety risks for building occupants. *SL Green’s Green Cleaning Policy can be found [here](#).*
- e. **Security:** Suppliers are responsible for the on-premises safety of tenants, visitors, and agents and employees of contractors and subcontractors. Suppliers are expected to provide on-site security in accordance with the project contract. Contracted security personnel are expected to uphold the highest standards of human rights procedures which are instituted through required training covering ethics, workplace violence, incident investigation, crime prevention, patrol and observation techniques, and safety policies.



## **SECTION 5: OTHER**

- a. **Fair Trade:** Fair Trade is not relevant to SL Green's business.
- b. **Punctuality:** To maintain a safe and productive work environment, SL Green expects vendors to be reliable and punctual for scheduled work. Tardiness places a burden on supported events and is disruptive. SL Green reserves the right to terminate or suspend any agreements and relationships with a vendor that is unable to comply with our expectations for punctuality.
- c. **Conduct:** Vendors are expected to maintain high standards of conduct, cooperation, and efficiency in their work. Any conduct that interferes with the support of an event, is offensive, or is dangerous will not be tolerated. Every vendor should perform their job duties in accordance with generally accepted standards of conduct that a reasonable person would be expected to use in a public workplace, regardless of whether these standards are expressly set forth in policy.
- d. **Personal Appearance:** Dress, grooming and personal cleanliness should be maintained at a high standard. Vendors are expected to appear neat and clean, and to dress according to the requirements of the support. Clean clothing free of holes, tears or other signs of wear are expected. Clothing with offensive or inappropriate designs or stamps is not allowed. A business formal dress code is required.