



# Rexford Industrial Realty Supplier Code of Conduct

Rexford Industrial Realty, Inc.'s ("Rexford") core values guide and shape the way we do business, including with our suppliers and partners. In line with these values, we strive to develop relationships with our suppliers by engaging productively and prioritizing integrity. This Code of Supplier Business Conduct and Ethics ("Code") represents another way we are working to promote fair and ethical conduct throughout our value chain.

## **Purpose and Expectations**

This Code contains general guidelines for the standards to which we hold our suppliers. Suppliers include vendors, subcontractors, consultants, and all representatives. We depend on our suppliers to operate in alignment with our minimum standards and expectations of how to operate ethically, outlined in this Code. We expect our suppliers and their representatives to adhere and self-monitor their compliance with this Code.

## **Honest, Ethical, and Legal Conduct**

### **Compliance with Laws**

In conducting business consistent with the highest standards of business ethics, Rexford suppliers are expected to also comply with all applicable federal and local laws.

### **Anti-Corruption, Anti-Bribery, Anti-Money Laundering**

Rexford suppliers must not make any improper payments and must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Organization for Economic Co-operation and Development ("OECD") Convention on Anti-Bribery, and other applicable local anti-bribery laws and international anti-bribery standards (collectively, the "Anti-Bribery Regulations").

### **Competition and Antitrust laws**

In maintaining fair competition and business practices, Rexford suppliers must comply with all antitrust, monopoly, and competition or cartel laws specific to their country, state of locality in which they operate. U.S. antitrust laws forbid actions such as price fixing, limitations of supply, allocation of business, boycott, and tying, and suppliers within U.S. boundaries must adhere to these laws.

### **Insider Trading**

Suppliers may not directly or indirectly trade securities, including Rexford's securities, if they are made aware of material non-public information. Information is "material" if a reasonable

investor would consider it important in a decision to buy, hold or sell securities. Information is “non-public” if it has not been made generally available to the public by means of a press release or other means of widespread distribution.

### **Conflict of Interest**

Suppliers should avoid conflicts of interests and situations that give the appearance of conflicts of interest. Suppliers must not seek to create conflicts of interest for Rexford, its directors, executives, employees, contractors, or agents. Conflicts of interest can include suppliers engaged in outside employment, improper personal benefits, financial interests, loans of other financial transactions, service on boards and committees, and actions of family members.

### **Gifts and Entertainment**

When doing business with Rexford, suppliers may, for legitimate business purposes, occasionally, offer gifts and entertainment to, and accept them from Rexford employees in accordance with Rexford’s Gifts and Entertainment policies within the Rexford Code of Business Ethics and Conduct. Gifts and entertainment should never be used to gain an improper advantage and should never be offered to any U.S., state, local, or foreign government employees.

### **Human Rights**

As outlined in Rexford’s Human Rights Policy, suppliers are required to comply with our policy by committing to respecting basic human rights, freedoms, and standards of treatment regarded as belonging to all people.

### **Employment Practices**

#### **Employment Practices – Freely Chosen Employment**

Rexford pursues fair employment practices in all aspects of its business. Non-discriminatory practices coupled with humane working conditions that protect worker health and safety are expected of all suppliers.

#### **Child Labor**

Rexford prohibits the exploitation of children and use of illegal child labor as outlined in its Human Rights Policy, which is applicable to all suppliers. Workers must be no younger than the minimum age of employment under applicable law.

#### **Labor and Wage Laws**

Suppliers must comply with all applicable wage, workhour, overtime, and benefit laws.

#### **Harassment, Discrimination, and Fair Treatment**

All individuals should have equal opportunity and fair treatment, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or other characteristic protected by law at supplier companies.

## **Safe and Healthy Work Environment**

Safe and healthy work environments are rooted in compliance with applicable safety and health laws and regulations and suppliers are expected to comply accordingly. Threats, threatening behavior or acts of violence against employees, visitors, guests, or other individuals are not tolerated by Rexford, and suppliers should apply this same standard.

## **Grievance Mechanisms**

Suppliers should adopt grievance mechanisms by which their employees can raise good-faith workplace concerns without fear of retaliation.

## **Confidentiality and Data protection**

### **Confidential and Proprietary Information**

Confidential information includes all non-public information that might be of use to competitors, or if disclosed harmful to Rexford or its customers. Suppliers must safeguard all confidential information except when disclosure is authorized or legally mandated. Suppliers are encouraged to be particularly careful when in public places if discussing information related to Rexford or its customers.

### **Intellectual Property**

Suppliers must maintain the integrity and confidentiality of intellectual property and comply with all intellectual property ownership rights.

### **Records Retention**

To ensure accountability, suppliers are expected to create and maintain complete and accurate records and to retain and delete records in accordance with applicable law.

### **Data Privacy Laws**

Suppliers are expected to comply with all applicable federal and state data protection, privacy and information security laws and regulations. In addition, suppliers must implement and maintain data protection practices.

### **Data Breaches**

Suppliers should promptly notify Rexford if there is reason to believe that any confidential information that they are handling on behalf of Rexford has been destroyed, lost, altered, accessed or disclosed by an unauthorized third party.

## **Environment**

Rexford recognizes the importance of environmental sustainability and of taking action regarding climate change as it is impactful to the sustainable development of local communities. Rexford actively manages its greenhouse gas emissions, energy consumption, water consumption, waste management, environmental compliance, and sustainable procurement and building materials sourcing, as stated in the Environment and Climate Change Policy and encourages suppliers to do the same.

**Environmental Laws and Permits**

Suppliers must comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, wastewater discharges, and regulated substances while maintaining all required environmental permits and registrations.

**Environmental Product and Process Standards**

Suppliers are encouraged to not only utilize but provide materials, products, and services that are aligned with sustainability certifications and best practices.

**Supplier Grievance Process**

Suppliers are expected to provide a confidential and secure mechanism for employees to raise grievances. Suppliers who believe our employees or anyone acting on our behalf has engaged in illegal conduct or inconsistent with our ESG policies should report the matter to their Rexford representative. All grievances received are taken seriously, independently considered, and thoroughly investigated.

Written Grievances: Any person may submit a written grievance to our general counsel at [dlanzer@rexfordindustrial.com](mailto:dlanzer@rexfordindustrial.com) or mail it to the following address:

Rexford Industrial Realty, Inc.  
11620 Wilshire Boulevard  
Suite 1000  
Los Angeles, California 90025  
Attn: General Counsel

**No Creation of Third-Party Rights**

This Code does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. For example, no employees or representatives of a supplier shall have any rights against Rexford by virtue of this Code, nor shall they have any rights to cause Rexford to enforce any provisions of this Code, the decision with respect to any such actions being reserved by Rexford in its sole discretion.

**Contact**

Questions, concerns or grievances may be directed to Rexford's general counsel David Lanzer at [dlanzer@rexfordindustrial.com](mailto:dlanzer@rexfordindustrial.com).

This Policy was approved and made effective by the Rexford Board of Directors on December 24, 2021.