

## CBL PROPERTIES VENDOR CODE OF CONDUCT

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### I. Overview

CBL Properties (“CBL”) is committed to being responsible civic members, doing our part to enrich our communities and make a positive impact on the economy, society, and the environment. We have established Company standards for ethical business practices and regulatory compliance. Our Code of Conduct is applicable to all of our employees, directors and officers, each of whom has a personal responsibility to uphold our standards. Similarly, we expect our vendors, service providers, contractors and consultants, as well as their employees, agents and subcontractors (collectively referred to as “Vendors”), to support our commitment to integrity and personal responsibility by complying with CBL’s Vendor Code of Conduct (“VCOC”) at all times while conducting business with or on behalf of the Company. To the extent the Vendor Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, our Vendors should strive to adhere to these higher standards.

### II. Compliance with CBL’s VCOC and Additional Information

CBL’s VCOC is a general statement of social and ethical responsibility and may not cover every situation a Vendor may face. When questions, doubts, or concerns regarding this VCOC or a possible violation arises, Vendors can seek guidance from CBL’s ESG Team or Compliance Officer.

### III. Reporting Suspected Violations

Suspected violations can be reported to CBL’s EthicsPoint Hotline by submitting a report [here](#) using company name “CBL & Associates Properties, Inc.” or call the EthicsPoint hotline at 866.816.3258. CBL expects Vendors to self-monitor but should be able to reasonably demonstrate compliance with this VCOC upon CBL’s request. If a Vendor is non-compliant, CBL reserves the right to take appropriate actions up to and including contract termination.

### IV. Legal and Regulatory Compliance Practices

Vendors are expected to conduct business in full compliance with laws and regulations applicable to their business. This includes compliance with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release of such materials. Nothing in this VCOC grants additional rights or expectations to a Vendor or alters the Company’s contractual or legal rights or obligations. CBL reserves the right to modify this VCOC at any time in its sole discretion, without prior notice.

### V. Confidentiality and Data Protection

Vendors may be entrusted with proprietary and personal information regarding CBL’s business or personnel. Vendors should uphold all legal obligations and otherwise ensure protection of all sensitive information,

including confidential, proprietary, and personal information. Information should not be used for any purpose beyond the scope of the business arrangement with CBL without prior authorization.

Vendors should also ensure that information remains private by implementing and maintaining adequate cybersecurity measures and complying with all applicable laws and regulations to mitigate risk of a data breach.

## VI. Environmental Policies

CBL is committed to being a good environmental steward, setting achievable goals to reduce waste as well as energy and water consumption while evaluating tools and practices that allow it to continue to improve building efficiencies of assets.

Vendors are encouraged and expected to reduce their environmental impact and undertake reasonable sustainability initiatives within their own businesses and spheres of influence. CBL expects its vendors to share our commitment to sustainability by meeting or exceeding the requirements of environmental laws and regulations and promoting acceptable levels of energy consumption, water use and waste management. From time-to-time Vendors may be asked to provide non-proprietary data related to the environmental impact of goods and services supplied to CBL, to assist us in meeting our objectives of protecting the environment while lowering operating costs and improving the efficiency of our portfolio. If requested, Vendors will be expected to deliver such data in a timely, accurate, and complete manner to show compliance with applicable environmental standards and environmental product standards.

## VII. Labor Policies, Human Rights and Social Policies

CBL believes that social responsibility comprises good corporate citizenship, as well as consideration of the impact our properties and operations have on the communities in which they are located. We seek to foster an environment of respectful engagement and diversity that encourages the development of all team members.

Vendors are expected to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture. Specifically, but without limiting the foregoing, CBL expects Vendors to adhere to the following standards:

- **Wages and Benefits:** Vendors will comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. CBL encourages Vendors to work toward improving standards of living and quality of life for their employees and communities.
- **Freedom of Association and Collective Bargaining:** Vendors should respect employees' rights to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. If employees should become represented by a legally recognized union, we encourage vendors to establish a constructive dialogue with the freely chosen representative of their employees and bargaining in good faith with such representatives.
- **Child Labor:** Vendors should adhere to minimum age provisions of applicable laws and regulations. Vendors may not employ an individual under the age of 16 unless such employment is allowed by and undertaken in accordance with applicable law and ethical practice.

- **Equal Opportunity and Anti-Discrimination/Harassment:** CBL believes that employment and advancement should be based solely on a person’s ability and not personal characteristics. Vendors are expected to maintain a workplace free of unlawful discrimination and/or harassment, disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind, including discrimination based on race, color, ethnicity, religion, national origin, gender, gender identity, age, pregnancy, disability, sexual orientation, veteran status, marital or familial status or any other status protected under local, state or federal laws.
- **Diversity:** We encourage our Vendors to foster diversity within their work force and provide an inclusive and nondiscriminatory working environment in which all employees are valued and empowered to succeed. We believe that diversity in our workforce is a valuable asset that supports different ideas, perspectives, and beliefs.
- **Health and Safety:** Vendors should maintain a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and/or external threats. Vendor employees must be treated with respect and dignity and not subjected to verbal, physical, sexual, or psychological abuse or harassment. Vendors should comply with applicable safety and health laws and regulations, as well as maintain a productive work environment by addressing and remediating identified risks to employees.
- **Health and Well-Being:** CBL has invested in the health and well-being of its employees through ongoing corporate wellness programs; including a focus on physical, mental, emotional, and financial well-being. We prioritize overall wellness and giving back to our communities and organize activities throughout the year to help better the lives of those in our communities. It is expected that Vendors share a similar commitment to the overall health and well-being of their employees.
- **Non-Retaliation:** CBL prohibits retaliation against any Vendor or CBL employee who, in good faith, seeks help or reports known or suspected violations of the Vendor Code.
- **Voluntary Labor:** Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor or prison labor by Vendors is prohibited. Also prohibited is support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims or other coercion. Workers must not be required to surrender any government-issued identification, passports or work permits, or to post any other “deposits,” as a condition of employment, and must be permitted to terminate their employment in accordance with applicable laws and regulations without unlawful penalty.

## VIII. Governance Policies

CBL believes that we should embrace corporate responsibility, promoting a culture of accountability, fairness, and transparency.

- **Financial Responsibility/Accurate Records:** Vendors are expected to accurately record, maintain, and report business records, including financial accounting, quality reports, time records, expense reports, and any required submissions to regulatory authorities.
- **Code of Conduct:** CBL has implemented a Business Ethics and Code of Conduct policy by which all employees must adhere. Vendors are encouraged to have similar management systems in place to support compliance with laws, regulations, and this VCOC.
- **Anti-Corruption and Anti-Bribery:** Vendors must comply with all applicable anti-corruption and anti-money laundering laws of any jurisdiction in which they operate, including the U.S. Foreign Corrupt Practices Act (“FCPA”). Vendors must not, directly or indirectly, engage in “bribery” or “corruption”, which is defined to

include any activity to offer, promise, authorize, pay or provide any benefits, advantages, payments or anything of value (including travel, gifts, hospitality, expenses, and charitable donations) to any official, employee or agent of any government, government agency, political party, public international organization, candidate for political office or any other applicable person for the purpose of improperly inducing such individual to misuse his or her position in any respect. The Company also prohibits payments to individual government officials (as opposed to government agencies), public employees, and agents to secure or expedite the performance of a routine or necessary governmental action to which the payer has legal or other entitlement (i.e., so-called “facilitating payments”). Vendors should be honest, direct, and truthful in all discussions with regulatory agency representatives and government officials. Furthermore, Vendors are also expected to comply with Section VI of the Company’s Code of Conduct, which prohibits any vendor from providing and any Company employee or Director (or any employee or Director family member) from receiving bribes, kickbacks, rebates, or other payments, regardless of form) in relation to their position with the Company.

- **Antitrust:** We expect all Vendors to comply with applicable antitrust and fair competition laws. Unethical business practices such as improper exchange of competitive information, price fixing, bid rigging, or improper market allocation are prohibited.
- **Conflicts of Interest and Fair Dealing:** Vendors should avoid offering gifts, favors or benefits that are intended (or could appear) to influence CBL’s employees to act in their personal interest ahead of the Company’s best interest. Vendors must avoid unfair dealing.
- **Laws/Regulations:** Vendors are expected to adhere to all laws and regulations in the industries in which they operate. Vendors are expected to obtain and maintain all required licenses and permits to conduct business in applicable jurisdictions.
- **Reporting (Whistleblower):** CBL maintains a process to allow employees, vendors and other third parties to report allegations of mistreatment, discrimination, abuse, violations of law, violations of this VCOC, or ethical violations confidentially and anonymously. Vendors are expected to maintain a similar process. This includes conducting a prompt and thorough investigation of any such report and taking the appropriate corrective action. No retaliation against any employee or CBL employee who reports in good faith any potential violation under this VCOC shall be permitted.