



Responsible Vendor Code of Conduct

For the purposes of this document, the terms we, us, our, or Amica refer to Amica Senior Lifestyles. The terms you, your or vendor refers to any partner, vendor, contractor, sponsor, volunteer, supplier or agent contracting directly with Amica and/or any of its affiliates in relation to the investment, development, management and operation of premium, private-pay retirement residences for seniors. Partner also refers to any joint venture partner of Amica or any investments managed by Amica.

Purpose and Scope

Amica Senior Lifestyles is firmly committed to conducting business with integrity and in compliance with all applicable laws. We foster a culture of growth, compassion, excellence, teamwork, and trust, and every aspect of our company values guide our decision-making and interactions with our residents, partners, vendors, and with one another. As a leading developer, owner and operator of premium, private-pay retirement residences, Amica seeks to promote the highest standards for ethical and honest business conduct. Amica requires that all vendors comply with this Vendor Code of Conduct (the "Code").

This Code sets out Amica's fundamental expectation and requirements of ethical and business conduct by its vendors and any of their employees or representatives when working with Amica and its team members and partners. These requirements are in addition to any standards that may be set out in agreements with such vendors. We expect those doing business with Amica to operate at a high standard of ethics and integrity consistent with prudent business practice and we expect to be held to that same standard by our vendors. In our business we are committed to:

- Conducting ourselves with honesty, integrity, and accountability
- Fairness and consideration in all dealings
- Professionalism in our relationships
- Respecting the rights and dignity of all individuals in every interaction
- Complying in all respect with applicable laws

Amica expects those doing business with Amica to operate and govern themselves with similar values.

Compliance with Laws and Quality Assurance

All vendors will conduct business and provide goods and/or services (whether purchased, manufactured, or delivered) in compliance with all applicable, laws, regulations and any applicable Amica-specific policies that have been shared with you.

Anti-Bribery / Corruption

All vendors must compete for our business solely based on the merits of their products and services. Amica is committed to conducting our business in accordance with all applicable laws relating to anti-corruption and anti-bribery laws in Canada and abroad. Vendors will not offer, promise, authorize, or provide, directly or indirectly, anything of value (including, without limitation, business gifts or courtesies) with the intention or effect of inducing anyone to provide an unfair business advantage or treatment.

Anti-Money Laundering

Money laundering is strictly prohibited. The laws in Canada require Amica to report suspicious activity. If a vendor suspects a transaction in which it is involved has indicators of money laundering, please notify us immediately, either through your Amica representative, at legal@amica.ca or through our third party ethics reporting process at www.clearviewconnects.com.

Conflicts of Interest

Vendors will avoid creating situations of actual or perceived conflicts of interest when doing business with Amica, and any instances involving actual or perceived conflicts involving vendors and/or Amica will be promptly reported to us, either through your Amica representative or at legal@amica.ca.

Honest and Fair Dealing

Vendors will not engage in any anti-competitive or deceptive practices for any reason, whether on behalf of the vendor, Amica or others. Vendors must behave ethically, fairly, and honestly in all dealings.

Protection of the Environment

Vendors are expected to comply with all environmental laws and regulations, to operate in an environmentally responsible manner, and to minimize negative environmental impact of its operations, products and services as much as possible.

Information Security and Records Maintenance

All vendors are expected to fiercely protect any confidential, proprietary, or personal information that it handles or otherwise uses by implementing appropriate organizational and technological security measures to manage risks, including, without limitation, the risk of accidental or unlawful destruction, loss, alteration,

unauthorized disclosure of, or access to such information (each, a “Breach”). We expect our vendors to ensure that all parties with whom they interact maintain and adhere to the same level of security.

Any Breach or reasonable suspicion of Breach must be reported to Amica without delay. Vendors will make any information reasonably requested by Amica available to us so that we may assist in the investigation and remediation of any Breach and ensure compliance with all obligations under applicable laws.

Vendors are expected to maintain records that accurately record all business information in accordance with applicable laws. Vendors are expected to maintain adequate internal records consistent with all obligations owed to us.

Privacy

All vendors will comply with all applicable privacy laws and will ensure their actions (or omission to act) do not result in non-compliance by us. Vendor must immediately notify Amica if it has reason to believe that any of our information has been compromised.

Confidentiality

Amica’s proprietary or confidential information shall not be disclosed to others or used for vendors’ own purposes at any time.

Amica Property

Vendors will at all times protect Amica’s physical and intellectual assets, including any of our equipment, property, software or supplies, when authorized for use by us.

Work Conditions

Labour

Vendors will adhere to all applicable laws in the jurisdictions in which they operate and must be committed to respecting the rights and dignity of all people. The standards in this Code apply to all workers, including, without limitation, temporary, student, contract, direct employees or any other type of worker of the vendor.

Applicable labour standards include:

- Not engaging in the unlawful employment or exploitation of children in the workplace;
- Respecting the free choice of all persons and strictly prohibiting forced or illegal labour for any employees or workers; and
- Compliance with all laws dealing with the wages that it pays to its employees and the hours that they work.

Health & Safety

Vendors will provide a safe and secure workplace for all of its employees and meet or exceed all requirements under applicable health and safety standard laws. Vendors will ensure compliance with this commitment in every location in which it operates.

Commitment to Equity, Inclusion & Diversity

Amica expects the highest standards of equity, inclusion and diversity in its business and dealings, and expects vendors to proactively invest in same. All vendors will ensure that their workplaces are free from harassment and discrimination, whether based on status, race, religion, origin, gender, sexual orientation, gender identity, age, disability or on any other basis unrelated to job requirements and/or protected by applicable laws. Vendors will provide work environments that foster inclusivity with equal opportunities and fair treatment for all persons.

Amica Compliance Verification

Amica does not assume any duty to monitor or ensure compliance with the Code. Vendor acknowledges and agrees that it is solely responsible for full compliance with the Code. Nevertheless, Amica may, upon reasonable request, assess and monitor the adherence to this Code by Vendor. In the case of any noncompliance with this Code, Vendor shall promptly notify Amica where such noncompliance is material and take all steps to immediately remedy the situation and to meet the standards of the Code in a diligent manner. Subject to the contractual agreement that governs our relationship, Amica may take remedial action and/or terminate our relationship in the event of any noncompliance with this Code.

Reporting & Questions

For any questions or concerns with this Code, including its application to specific circumstances in connection with your relationship with us, please reach out to your Amica representative or email legal@amica.ca.

Any vendor or person who believes that noncompliance with this Code has occurred may report the relevant information to legal@amica.ca or through our third party ethics reporting process at www.clearviewconnects.com. This Amica ethics reporting process is operated by an independent third party which provides a confidential and anonymous communication channel for reporting concerns.