

VENDOR CODE OF CONDUCT

Columbia Property Trust 2019

Introduction

The Columbia Property Trust (CXP) Vendor Code of Conduct (“Code”) describes CXPs’ expectations of how its vendors conduct business. All vendors engaged in providing products and services to CXP are expected to embrace this commitment to integrity by complying with the Code and communicating, and enforcing the Code provisions throughout their organization and across their supply chain, including to sub-vendors and subcontractors.

We require that our vendors understand the requirements of this Code, operate in accordance with the expectations outlined in this Code and comply, at a minimum, with all applicable laws, rules, regulations and standards within the geographies in which they operate. In instances where standards outlined in the Code differ from local laws, vendors must respect these standards within the framework of the applicable local laws. Vendors must be open and cooperative with the regulators and comply with the global and local jurisdictional requirements. This document summarizes the firm’s expectations from vendors, sub-vendors and their staff.

Vendor Code of Conduct:

1.0 Ethical Business Practices

CXP is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect our vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

1.1 Anti-Bribery

CXP does not tolerate corruption or bribery in any form and we expect our vendors to fully comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act.

1.2 Privacy and Data Protection

We expect our vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of CXP. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the vendor, individuals whose personal information may be implicated, and CXP. In addition, vendors must comply with all applicable privacy / data protection and information security laws and regulations.

1.3 Grievance Mechanism

We expect our vendors to have a process through which workers can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers, and should ensure the protection of whistleblowers.

2.0 Labor and Human Rights

We expect our vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture. We expect our vendors to have similar policies and practices that apply to all workers, suppliers, and their supply chains, including migrant and temporary workers, and address the following topics 2.1 to 2.6:

2.1 Wages and Benefits

Vendors must 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. CXP encourages vendors to work toward improving standards of living and quality of life for their employees and communities.

2.2 Working Hours

Workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Workers shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include, for example, holidays, maternity/parental leave, family care leave and sick leave.

2.3 Slavery, Forced Labor and Human Trafficking

CXP does not tolerate slavery, forced labor, or human trafficking in any form and CXP will not knowingly work with vendors who engage in these practices or permit their subcontractors to engage in these practices. We expect our vendors to fully comply with requirements of applicable slavery, forced labor and human trafficking laws.

All work must be performed under and in accordance with contracts that have been entered into voluntarily. Vendors must not use involuntary labor of any kind, including prison labor, debt bondage, or forced labor by governments. Vendors must not engage in practices associated with forced labor. Additionally, vendors must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

2.4 Child Labor

Vendors must not employ child labor, and should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment. Such measures include age verification systems, training for managers, and communicating with sub-vendors and suppliers on child labor issues.

2.5 Freedom of Association

CXP expects vendors to respect workers' rights to freedom of association by meeting or exceeding the relevant requirements of local law.

2.6 Inclusion and Non-Discrimination

Workers should be treated with respect and dignity at all times. CXP requires vendors to comply with all applicable laws regarding discrimination in hiring and employment practices. CXP expects vendors to maintain a workplace free of discrimination, harassment, victimization, and any other form of inappropriate behavior or abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status.

3.0 Vendor Diversity and Inclusion

CXP believes that diversity is a social and economic imperative and looks to vendors to share this commitment in their operations and within their supply chain. Vendors are expected to take

proactive steps to provide a full spectrum of businesses – based on the ownership structure (for example, women owned, locally owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

4.0 Environmental Stewardship

Environmental stewardship is an important aspect of how CXP operates our business. CXP encourages our vendors to adhere to similar environmental efforts as appropriate to their businesses and aligned with best practices locally and globally. This includes implementing processes to identify and manage risks and opportunities related to the environment and water.

4.1 Energy and Emissions

CXP encourages our vendors to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their suppliers. Vendors are encouraged to establish greenhouse gas (GHG) emission reduction targets. If requested by CXP, we encourage vendors to disclose energy and emissions management policies and performance.

4.2 Water

Vendors are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Vendors are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

4.3 Waste

Vendors are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste, and in particular hazardous waste, must be managed in a responsible manner. Chemicals and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling or reuse and disposal. All workers who handle waste and hazardous wastes must be properly trained on how to deal with substances and the potential hazards the material presents to the worker and environment if mismanaged or released. Vendors must only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws and best management practices.

4.4 Material Restrictions and Handling

All materials used by vendors must comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling, and disposal.

5.0 Management Systems and Governance

CXP encourages vendors to institute effective management systems that utilize the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

Summary

This Code sets forth CXP's expectations for current and future vendors. CXP expects all new and existing vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labor rights, vendor diversity and inclusion and environmental areas.

Any facts or circumstances which are likely to lead to any vendor's inability to meet the requirements and expectations of this Code should be reported immediately to its CXP relationship manager.

We expect our vendors to join us in our commitment to transparency and disclosure. If requested, vendors are expected to provide details and data about their performance on the topics included in this Code to the firm or to other entities.

If a vendor is found to be in violation of the requirements of this Code, CXP will expect that vendor to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure by a vendor to do so may lead to review or termination of our relationship.

CXP is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time.

The contents of this Code are additional to and do not in any way affect or prejudice any of CXP's rights and remedies under the relevant contracts with each vendor, if any. In the event of any non-compliance to the requirements of this Code or breach of contract, CXP reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant contract and/or local laws and regulations.

The failure or omission by CXP to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any vendor, the provisions of that contract will prevail.