

CODE OF VENDOR CONDUCT

Duke Realty Corporation, together with its affiliates and subsidiaries (collectively “Duke Realty,” “we,” “us,” or “our”), is committed to fair and ethical business conduct, consistent with its Code of Business Ethics. We understand that vendors, suppliers, subcontractors, and consultants (each a “Vendor” and collectively, the “Vendors”) are independent entities, but our Vendors’ business practices and actions can also reflect on us. We therefore depend on our Vendors to operate according to this Code. This Code of Vendor Conduct (the “Code”) sets forth Duke Realty’s expectations regarding how our Vendors conduct their business. We do not intend this Code to be an all-inclusive list, but rather minimum standards of how to operate ethically.

Ethical Business Practices and Legal and Regulatory Compliance

Each Vendor, while conducting business on our behalf, must maintain ethical and professional standards and conduct its business in full compliance with all laws and regulations applicable to such Vendor.

- **Anti-Corruption, Anti-Bribery, and Anti-Money Laundering.** Vendors must comply with all applicable laws relating to anti-corruption, anti-bribery, anti-money laundering, and the prevention of fraud and other financial crimes.
- **Competition and Antitrust laws.** Vendors must not engage in any illegal anti-competitive conduct, unfair market practices, or deceptive trade practices.
- **Insider Trading.** Vendors may not, directly or indirectly, trade securities, including our securities, if they are in possession of material nonpublic information.
- **Conflicts of Interest.** Vendors should avoid conflicts of interests and situations that give the appearance of conflicts of interest.
- **Gifts and Entertainment.** When doing business with Duke Realty, Vendors may, for legitimate business purposes, occasionally offer gifts and entertainment to, and accept them from, Duke Realty associates, in accordance with Duke Realty’s Gifts and Entertainment Policy. The Duke Realty Gifts and Entertainment Policy can be found in the Duke Realty Code of Business Ethics. However, gifts and entertainment should never be used to gain an improper advantage. Bribes, kickbacks, and similar payments are strictly prohibited.

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

Human Rights

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights, consistent with our Human Rights Policy. We expect our Vendors to also treat people with respect and dignity.

- **Slavery, Forced Labor, and Human Trafficking.** We do not tolerate slavery, forced labor, or human trafficking in any form and do not knowingly work with any Vendors who engage in such practices.
- **Child Labor.** Vendors should not employ child labor and must take the necessary preventative measures to ensure they do not employ anyone under the applicable legal minimum age of employment.

Employment Practices

We encourage Vendors to practice non-discriminatory practices in hiring and in the workplace as well as to provide humane working conditions and protect the health and safety of their employees.

- **Non-Discrimination in Hiring.** Vendors must comply with all applicable laws regarding discrimination in hiring.
- **Non-Discrimination in the Workplace.** Vendors should work to maintain workplaces that are free from discrimination or harassment on the basis of race, religion, color, national origin, ethnicity, sex, sexual orientation, gender identity, gender expression, age, disability, veteran status, marital status, genetic information, or any characteristic protected by law.
- **Fair Treatment.** Vendors should not tolerate harassment, disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.
- **Labor laws.** Vendors must comply fully with applicable wage, workhour, overtime, and benefits laws.
- **Health and Safety Laws.** Vendors must also comply with applicable health and safety laws and regulations.

Confidentiality and Data Protection

Vendors must protect the confidential, proprietary, and personal information that they handle.

- **Confidential Information.** Vendors must safeguard and not disclose any information, including our information, that has been labeled as confidential or that a reasonable person would think is confidential.
- **Intellectual property rights.** Vendors must respect intellectual property rights.
- **Data privacy laws.** Vendors must comply with all applicable data protection, privacy, and information security laws and regulations.
- **Data breach.** Vendors should promptly notify us if they reasonably believe that any confidential information, including personal information, they are handling for us has been destroyed, lost, altered, accessed, or disclosed by an unauthorized third party.
- **Records retention.** We also expect Vendors to create and maintain complete and accurate records to ensure accountability. Vendors must retain and delete records in accordance with applicable law.

Environment

Environmental stewardship is an important aspect of how we operate our business. We expect Vendors to conduct their operations in a way that minimizes their impact on natural resources.

- **Environmental laws.** Vendors must comply with all applicable environmental laws.
- **Environmental permits.** Vendors must maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- **Regulated substances.** Vendors must comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content, or handling of specific substances.
- **Energy and water usage.** Vendors should strive to reduce energy and water consumption and implement waste minimization programs.

- **Environmental product and process standards.** Vendors should strive to use and provide sustainability-certified materials, products, supplies, and services that align with industry best practices to reduce both adverse environmental and human health impacts.

Compliance

We expect our Vendors to share this Code with their employees and representatives and ensure that they understand and adhere to it. Vendors should self-monitor their compliance, as well as compliance by their employees and representatives, with this Code. Vendors should consult with Duke Realty's legal counsel on any matter related to actual or potential noncompliance. If we discover that a Vendor fails to report a known or suspected violation of this Code to us, we may terminate our relationship with such Vendor.

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 Vendor shall have any rights against Duke Realty by virtue of this Code, nor shall they have any rights to cause Duke Realty to enforce any provisions of this Code, the decision with respect to any such actions being reserved by Duke Realty in its sole discretion.

This Code was made effective on December 14, 2020.