Responsible Contracting Policy

(Real Estate Management)

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Epic

Introduction

Epic Investment Services, through its real estate management business, ("Epic") is committed to maintaining high ethical standards and to working with responsible partners in its delivery of services.

Through the Responsible Contracting Policy (the "Policy") contained herein, Epic aims to promote ethics, integrity, good governance and fair working conditions for workers providing services, such as construction, maintenance, operations, and other related services, to the properties managed by Epic for its clients ("Clients") that own those properties.

A "Responsible Contractor" is a contractor, subcontractor or service provider who pays workers fair wages and provides fair benefits as evidenced by payroll and employee records and pursues health and safety for all workers. What constitutes fair wage and benefit depends on the wages and benefits paid for comparable work, based on local market factors including the nature of the project, comparable job or trade classification and the scope and complexity of the service provided. At a minimum, Responsible Contractors comply with all jurisdictional labour laws and all other applicable laws.

Epic's Approach and Policy Requirements

Epic's approach to the Policy recognizes and affirms Epic's fiduciary obligations of prudence, loyalty and the pursuit of superior rates of return for Clients with respect to Epic's activities, which includes only working with contractors that abide by this Policy including the definition of Responsible Contractor.

1. **Duty of loyalty, prudence, and risk-adjusted returns.** Assets shall be managed for benefit of Clients in conformity with all applicable laws and Epic's contractual obligations. Epic and its staff and advisors shall exercise all reasonable care, diligence, skill and prudence appropriate to the task, and all services will be provided in a manner that produces a competitive risk-adjusted return.

2. **Competitive Bidding.** Epic aims to promote fair competition in selecting third-party contractors or service providers to provide construction, maintenance, operations, and other related services. In accordance with Epic's procurement policies, contractors and their subcontractors and service providers will be selected through a competitive bidding and selection process.

3. **Ethics and Integrity.** Epic expects Responsible Contractors to operate with a high standard of ethics, integrity, and governance across all areas of execution of the scope of work and services provided to Epic and its Clients. Responsible Contractors have a moral obligation and an implied duty at law to be faithful to Epic, to not knowingly jeopardize the interests or reputation of the contractor, Epic or its Clients.

4. **Applicable Law.** Responsible Contractors shall abide by all required applicable laws or regulations, including, but not limited to, those relating to labour relations, occupational health and safety, insurance, environmental, bribery and corruption, and privacy.

5. **Communication.** Responsible Contractors shall communicate the Policy and responsibilities described within it to employees, agents and subcontractors.

6. **Accuracy and Maintenance of Records.** Responsible Contractors shall maintain accurate business records in accordance with best practices and all applicable laws. Responsible Contractors shall also maintain suitable internal records to demonstrate compliance with the Policy and obligations to Epic. Responsible Contractors shall take all appropriate and necessary protections to protect customer and employee information in compliance with laws and in accordance with industry best practices for physical security and data or cyber security.

7. **Work Environment.** Further to the definition of Responsible Contractor above, which addresses fair wages and benefits, Responsible Contractors shall provide a work environment that is healthy and safe and is free of harassment or discrimination. Epic expects that Responsible Contractors do not discriminate based on race, gender, gender identity, sexual orientation, ethnicity, nationality, religion, age, disability, or marital status.

Enforcement, Monitoring and Administration

1. Contractors and service providers shall undergo a pre-qualification and ongoing compliance process conducted by Epic or its agent, which shall include an acknowledgement of adherence to the Policy.

2. All requests for proposal or invitations to bid, as required by Epic's procurement policies, shall include the Policy.

3. Epic's standard form of contract shall include reference to the Policy.

4. Epic will take reasonable steps to investigate valid complaints it receives relating to the failure of any contractor or service provider to comply with this policy. If a contractor, service provider or other person needs to report a concern confidentially, Epic has contracted an independent service provider, XPERA, to manage reports through a confidential service called ConfidenceLine. This service is available 24/7, in both English and French. To report a matter confidentially or anonymously, an individual may contact the ConfidenceLine at 1-800-661-9675 or www.epic.confidenceline.net. ConfidenceLine then creates an anonymous external report that is referred to Epic's CEO and COO, depending on the circumstances, which is then investigated in accordance with an established set of procedures. Any report should include details that are as specific as possible to permit adequate investigation of the concern or conduct reported.

5. A contractor or service provider performing services for Epic that fails to abide by the terms of this Policy may be subject to termination of contract.