



# Vendor Code of Conduct

Revised January 2025

## Summary

Prime Buchholz is committed to the highest standards of integrity and sustainability. We focus on sourcing products and services from businesses that promote sustainability in our communities, reflect the diversity of our markets, and, at a minimum, comply with applicable laws and regulations within the geographies where they operate.

The Prime Buchholz Vendor Code of Conduct (“Vendor Code”) outlines the fundamental principles and expectations for third-party providers (“Vendors”) engaged by Prime Buchholz to deliver goods and/or services. Vendors are required to ensure that all personnel involved in these activities, including their employees and subcontractors, comply with the applicable provisions of the Vendor Code.

Vendors are responsible for understanding the requirements of the Vendor Code and adhering to its principles in their operations. They must also integrate, communicate, and follow the terms outlined in the Vendor Code, in addition to fulfilling their contractual obligations with Prime Buchholz.

## Key Principles

### 1. Ethics and Integrity

Vendors are expected to conduct themselves ethically, free from illegal or improper activities. Prime Buchholz reserves the right to audit the supply chain to assess Vendors' business practices.

- **Anti-Corruption:** Vendors must comply fully with anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and similar laws in jurisdictions where they operate.
- **Gifts and Entertainment:** Vendors must not offer or accept inappropriate gifts or entertainment intended to gain improper advantages. Prime Buchholz and its employees may only give or accept modest unsolicited gifts on an occasional basis.
- **Conflict of Interest:** Vendors are required to disclose conflicts of interest, ensuring transparency in their dealings with Prime Buchholz.
- **Anti-Money Laundering:** Vendors must comply fully with all applicable anti-money laundering laws and regulations. Vendors are expected to conduct business with reputable parties engaged in legitimate activities and ensure that funds are derived from lawful sources.
- **Antitrust and Fair Competition:** Vendors must comply fully with applicable antitrust laws.
- **Insider Trading:** Vendors must not trade securities or encourage others to do so based on material, non-public information obtained through their relationship with Prime Buchholz. Vendors are required to ensure the confidentiality of such information and comply with all applicable insider trading laws.
- **Media and Communications:** Only authorized representatives of Prime Buchholz may communicate with the media, analysts, or the public regarding the company's business practices, strategies, or policies. Vendors engaging in public communications, including social media posts, must clearly identify their relationship with Prime Buchholz and avoid actions that might falsely suggest they represent or speak on behalf of the company without explicit written authorization.
- **Political Activities and Contributions:** Vendors engaging in political activities must do so independently, on their own time, and at their own expense. Such activities should not imply an association with Prime Buchholz.

### 2. Labor and Human Rights

Prime Buchholz upholds policies to maintain a safe, secure, and healthy work environment, free from violence, threats, harassment, or intimidation and we expect our Vendors to do the same. Vendors must implement policies that apply to all workers, including migrant and temporary employees, addressing key issues such as fair wages and benefits, prohibitions on forced and child labor, reasonable working hours, occupational safety, and respecting workers' freedom of association.

- **Non-Discrimination:** Vendors must avoid discrimination or harassment on any basis, such as race, gender, religion, or disability.
- **No Forced or Child Labor:** Vendors must ensure no forced labor, child labor, or human trafficking in their operations.

- **Fair Employment Practices:** Vendors must comply with wage, working hours, and benefits laws, providing employees with timely and clear wage statements.

### 3. Health, Safety, and Wellbeing

Prime Buchholz expects its Vendors to adopt effective health and safety practices throughout their operations.

- Vendors must provide a safe working environment, complying with occupational health and safety laws.
- Vendors must implement measures to prevent workplace hazards and ensure emergency preparedness.

### 4. Environmental Responsibility

Prime Buchholz is committed to reducing its environmental impact and expects Vendors to uphold similar standards.

- Vendors must maintain and comply with all necessary environmental permits and adhere to related regulations.
- Operations should follow industry best practices for waste management, recycling, reducing energy use, minimizing greenhouse gas emissions, and managing water resources.
- Vendors must mitigate risks to community health, safety, and security, such as spills or pollution, and provide training on worker protection, emergency preparedness, and hazardous material safety.

### 5. Data Privacy and Security

Prime Buchholz requires its Vendors to safeguard individuals' privacy and ensure the security of confidential assets and information.

- Vendors must protect the privacy of Prime Buchholz's data, ensuring compliance with all applicable data protection and privacy laws.
- Vendors must safeguard Prime Buchholz's intellectual property, confidential information, and employee and client personal data obtained in the course of their business relationship

Vendors must promptly disclose to Prime Buchholz a security breach affecting Prime Buchholz data. A security breach of Prime Buchholz client personal data must be disclosed no later than 72 hours after a Vendor becomes aware of the breach.

### 6. Inclusion

Prime Buchholz is dedicated to fostering equal opportunity and inclusion across its workplace, the communities in which it operates, and the financial services industry. We believe that differences in thought, background, and experience drives innovation, supports growth, and strengthens our competitive edge.

We value vendors who offer high-quality goods and services, innovative solutions, and a commitment to inclusion.

### 7. Compliance and Accountability

This Vendor Code of Conduct outlines the fundamental expectations Prime Buchholz has for its Vendors and serves as a cornerstone of our partnerships built on trust, accountability, and shared values.

The failure or omission by Prime Buchholz to insist upon compliance with any of the provisions of this Vendor Code in no way constitutes a waiver of its contractual rights. In the event of any conflict or ambiguity between any provision of this Vendor Code and the provisions of any contract with a Vendor, the provisions of that contract will prevail. Vendors who have violated the requirements of this Vendor Code are required to inform us as soon as practicable and remedy any such violation in a timely and responsible manner. Failure to do so may lead to review or termination of the relationship.

- Vendors must establish systems for monitoring compliance with this Code, including mechanisms for reporting and addressing violations without fear of retaliation.
- Prime Buchholz reserves the right to audit Vendors' compliance and take corrective actions, up to and including termination of the relationship, in cases of non-compliance.

To report a Prime Buchholz vendor, please email [compliance@primebuchholz.com](mailto:compliance@primebuchholz.com) or call 603-433-1143. Prime Buchholz will keep any reported information confidential, provided it does not hinder any investigation and is permitted to do so by law. Prime Buchholz prohibits retaliation against individuals who report concerns in good faith.

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