



invitationhomes™

Vendor Code of Conduct



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Introduction & Business Practices

INTRODUCTION

At Invitation Homes Inc. (“Invitation Homes” or the “Company”), we are committed to our mission statement, “Together with you, we make a house a home.” How we carry out that mission on a daily basis is reflected in our Company’s core values: Unshakable Integrity, Genuine Care, Continuous Excellence, and Standout Citizenship. All Invitation Homes associates, regardless of location or position in the Company, have an obligation to follow the Company’s Code of Business Conduct and Ethics and act with integrity and in full compliance with the laws and regulations that govern our business activities. Everyone who works at or with Invitation Homes should feel confident about our high ethical standards, our honesty, and our integrity. This Vendor Code of Conduct (the “Code”) is an extension of our values to Company vendors and serves to highlight our commitment to ethical business practices and regulatory compliance.

Invitation Homes expects its vendors to share and embrace the letter and spirit of our commitment to integrity. A “vendor” is any firm or individual that is engaged by Invitation Homes to provide a product or service to Invitation Homes or any of its clients. Vendors include but are not limited to the following: Rehab general contractors and subcontractors, suppliers of goods or services, real estate brokers and salespeople, consultants, etc. While vendors are independent entities, their actions may significantly

impact Invitation Homes’ reputation and brand. Because of this, Invitation Homes expects all vendors and their employees, agents, and subcontractors (their representatives) to adhere to this Code while conducting business with and/or on behalf of Invitation Homes. All vendors should educate their representatives to ensure that they understand and comply with this Code.

No code can cover all policies or laws, so if you have questions about any of the information in this code, or what is expected of you, please email vendordisclosure@invitationhomes.com. We may end our business relationship with any vendor who fails to comply with this Code.

BUSINESS PRACTICES

Vendors of Invitation Homes and their representatives shall adhere to all applicable laws, rules, and regulations, and conduct their business interactions and activities with integrity and in accordance with their obligations under their specific agreements with the Company. In addition to those obligations, all our vendors shall adhere to the business practices set forth in this Code.



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Conflict of Interest

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GIFT GIVING POLICY

Vendors are required to avoid actions that may result in conflicts of interest. Vendors shall use good judgment, discretion, and moderation when offering gifts or entertainment to employees of Invitation Homes. In doing so, the vendor and/or its representatives will refrain from giving Company employees unduly lavish gifts or entertainment, airline tickets, cash, gift cards, hotel accommodations, electronics, etc. or extending gratuities or special favors or gifts, under circumstances which might reasonably be interpreted as an attempt to influence such employees in the performance of their duties for the Company (other than the exchange of normal business courtesies such as reasonable and moderate meals that are consistent with regular business practice, advertising or promotional materials, and other small gifts, which are of nominal value (less than \$200.00)). In any event, no vendor may ever offer a bribe, kickback, bartering arrangement for goods and services, and/or any other incentive to a Company employee to obtain or retain Invitation Homes' business. This includes improving, upgrading, or investing time or materials in a Company-owned home in which an Invitation Homes' employee is a tenant, without following Invitation Homes' approval procedures.

APPEARANCE OF IMPROPRIETY

Vendors shall avoid the appearance of or actual conflicts of interest. When a vendor or vendor representative has a relationship with a Company employee or a Company employee's spouse, domestic partner, or other family member or relative, the vendor must disclose the relationship and obtain Company approval prior to contract negotiations. If the vendor becomes aware of a conflict after the commencement of services, the vendor must immediately inform a disinterested member of Company management. In addition, vendors and their representatives shall not deal directly or indirectly with any Invitation Homes employee who holds, or whose spouse, domestic partner, or other family member or relative holds, a significant financial interest in the vendor. Interacting with such an employee or spouse, domestic partner, or other family member or relative of such an employee in the course of negotiating or performing the vendor agreement is also prohibited.

DISCLOSURE OF CONFLICT

Vendors are required to immediately disclose any positions or actions of actual or potential conflicts of interest to vendordisclosure@invitationhomes.com. This includes disclosure of any relationships described above, material financial interest they or members of their family have in (as an owner/shareholder, partner, investor, employee, or consultant), or any affiliation with (as an officer, director, or employee of) any business, organization, or entity which is a competitor of Invitation Homes, or which has or proposes to have a business relationship with the Company, even if the vendor believes all appropriate actions have been taken to avoid or safeguard against a conflict of interest.



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CONFIDENTIAL INFORMATION, SECURITY AND PRIVACY

Confidential information means all non-public data (in any format) of Invitation Homes, including: intellectual property, technical, financial, marketing, staffing, business plans, strategic information, requests for proposals, specifications, pricing information, resident information, Company personnel information, procedures, processes, business systems, software programs, and like information, and all notes, analyses, summaries, compilations thereof or relating thereto. Vendors may not outsource, disclose, share, or use this confidential information outside the requirements defined in their contractual or nondisclosure agreement with Invitation Homes.

Unauthorized disclosures could harm Invitation Homes, breach the vendor contract, or even be illegal. Vendors shall provide their services in compliance with the highest applicable professional standards governing their contractual obligations, including requirements established by any organizations that regulate their activities. Vendors shall comply with all Invitation Homes' requirements for maintenance of passwords, confidentiality, security, and privacy procedures as a condition of receiving access to the Invitation Homes internal corporate network, all systems, and all buildings. All data stored or transmitted on Company-owned or -leased equipment is to be considered private and is the property of Invitation Homes. Invitation Homes may monitor all uses of its corporate networks and all systems (including email and other social media platforms) and/or access all data stored or transmitted using the Company network. To avoid compromising any potential confidentiality, a vendor may speak to the press on Invitation Homes' behalf only if the vendor and/or representative is expressly authorized in writing to do so by one of the Company communications professionals.

INSIDER TRADING

Vendors must avoid insider trading by not buying or selling Invitation Homes' securities when in possession of material information about Invitation Homes or another company that is not available to the investing public and that could influence an investor's decision to buy or sell Invitation Homes securities.

PROTECTION OF ASSETS

Vendors shall protect and responsibly use both the physical and intellectual assets of Invitation Homes, including its property, supplies, and equipment, when authorized by the Company to use such assets. Vendors shall use information technology and systems provided by Invitation Homes (including email and any social media platforms) only for authorized Company business-related purposes. Invitation Homes strictly prohibits vendors and their representatives from using Company-provided technology and systems to create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate and/or send any false, derogatory, or malicious communications using Company-provided information, assets, and systems. Vendors shall comply with the intellectual property ownership rights of Invitation Homes and others, including but not limited to copyrights, patents, trademarks, and trade secrets. Vendors shall use software, hardware, and content only in accordance with their associated license or terms of use.

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BUSINESS INTEGRITY; LICENSING AND PERMITS

All vendors must conduct their business activities in compliance with applicable laws and regulations, and must obtain all required licenses, inspections, or permits in performing their obligations.

COMPLIANCE WITH ANTI-CORRUPTION LAWS

Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Vendors must not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, or applicable anti-corruption laws or regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Vendors must not offer or accept bribes, kickbacks, bartering arrangements, goods, services, or any other means to obtain an undue or improper advantage. Vendors must uphold fair business standards in advertising and sales.

ANTITRUST

All vendors must conduct their business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which the vendors conduct business. Vendors should promote free and fair competition in the marketplace and avoid business practices that have the purpose or effect of limiting competition, such as bid rigging, price fixing, cover pricing, market sharing, or any other type of anti-competitive behavior.

WHISTLEBLOWER PROTECTION AND ANONYMOUS COMPLAINTS

Vendors must create programs to ensure the protection of vendor and worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the Invitation Homes Vendor Code of Conduct. Vendors shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

COMMUNITY ENGAGEMENT

Vendors are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.



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Environment, Health & Safety

Environment, Health & Safety

OCCUPATIONAL INJURY PREVENTION

Vendors must eliminate physical hazards when possible. Vendors must provide workers with a safe and healthy work environment. They should take proactive measures that support accident prevention and minimize health risk exposure. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

EMERGENCY PREVENTION, PREPAREDNESS, AND RESPONSE

Vendors must anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

HAZARDOUS SUBSTANCES AND RESTRICTIONS

The Company is committed to an environmentally sustainable future and expects its vendors to conduct their operations in a way that protects the environment and in compliance with all applicable environmental laws. Vendors must comply with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances. To ensure safe handling and disposal, vendors should identify and manage substances that pose a hazard if released into the environment and comply with applicable labeling laws and regulations for recycling and disposal.

Vendors are encouraged to reduce their carbon footprint and undertake sustainability initiatives to meet our objectives of protecting the planet while lowering operating costs and improving the efficiency of our homes.

SOLID WASTE MANAGEMENT

Vendors must manage and dispose of non-hazardous solid waste generated from their operations as required by applicable laws and regulations.

POLLUTION PREVENTION AND RESOURCE REDUCTION

Vendors must endeavor to reduce or eliminate solid waste, wastewater, and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.



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Labor & Human Rights

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ANTIDISCRIMINATION

Vendors must not discriminate against any worker based on race, ancestry, color, age, national origin, ethnicity, religious creed or belief, physical or mental disability, marital or familial status, legally protected medical condition, genetic information, military or veteran status, sex (including pregnancy, childbirth, breastfeeding, or related medical condition, and reproductive choices), gender (including gender identity and gender expression), sexual orientation, citizenship status, protected activity (such as opposition to or reporting of prohibited discrimination or harassment), and any other status or classification protected by applicable law, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination.

HARASSMENT

Vendors must treat all workers with respect and dignity. Vendors must have and follow policies prohibiting discrimination, harassment, or retaliation against any employee on the basis of any protected category, including race, ancestry, color, age, national origin, ethnicity, religious creed or belief, physical or mental disability, marital or familial status, legally protected medical condition, genetic information, military or veteran status, sex (including pregnancy, childbirth, breastfeeding, or related medical condition, and reproductive choices), gender (including gender identity and gender expression), sexual orientation, citizenship status, protected activity (such as opposition to or reporting of prohibited discrimination or harassment), or any other status or classification protected by applicable law. They may not subject workers to corporal punishment or physical, sexual, psychological, or verbal harassment or abuse. In addition, vendors must provide an environment that allows employees to raise concerns without fear of retaliation.

Where it is allowed by law, vendors should have a system that allows employees to anonymously report their concerns.

HIRING AND EMPLOYMENT PRACTICES

Invitation Homes is committed to equal opportunity in employment. The Company's commitment to equal opportunity employment applies to all persons involved in the Company's operations (including vendors). Vendors' hiring practices must include verification of workers' legal rights to work in the country and ensure that all mandatory documents, such as work permits, are available. Invitation Homes' vendors are expected to support diversity and equal opportunity in their workplaces.

Labor & Human Rights

NO FORCED LABOR OR HUMAN TRAFFICKING

We condemn forced labor and human trafficking and will not knowingly work with vendors who engage in these practices. All workers have the right to engage in work willfully, without surrendering identification and without the payment of fees. Workers have the right to freedom of movement, and our vendors must ensure it is afforded to them. Suppliers must also procure their raw materials and/or components solely from sources that do not utilize forced labor or engage in human trafficking.

NO UNDERAGE LABOR

We do not tolerate the use of underage labor and will not knowingly work with vendors that utilize underage workers. Vendors must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age-appropriate work.

WAGES

Vendors must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live.

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DOCUMENTATION AND RECORDS

The Company's financial information and statements are prepared in compliance with generally accepted accounting principles and statutory accounting practices and procedures for regulatory purposes. As a financially responsible organization, we are committed to ensuring that all internal and external financial records are maintained by using effective internal controls, including procedures to protect the Company's assets. It is our expectation that our vendor partners will exercise a similar commitment to financial responsibility, including but not limited to:

- Honestly and accurately recording and reporting all business information and complying with all applicable laws regarding their permitting, completion, and accuracy; and
- Creating, retaining, and disposing of business records in full compliance with all applicable legal and regulatory requirements.

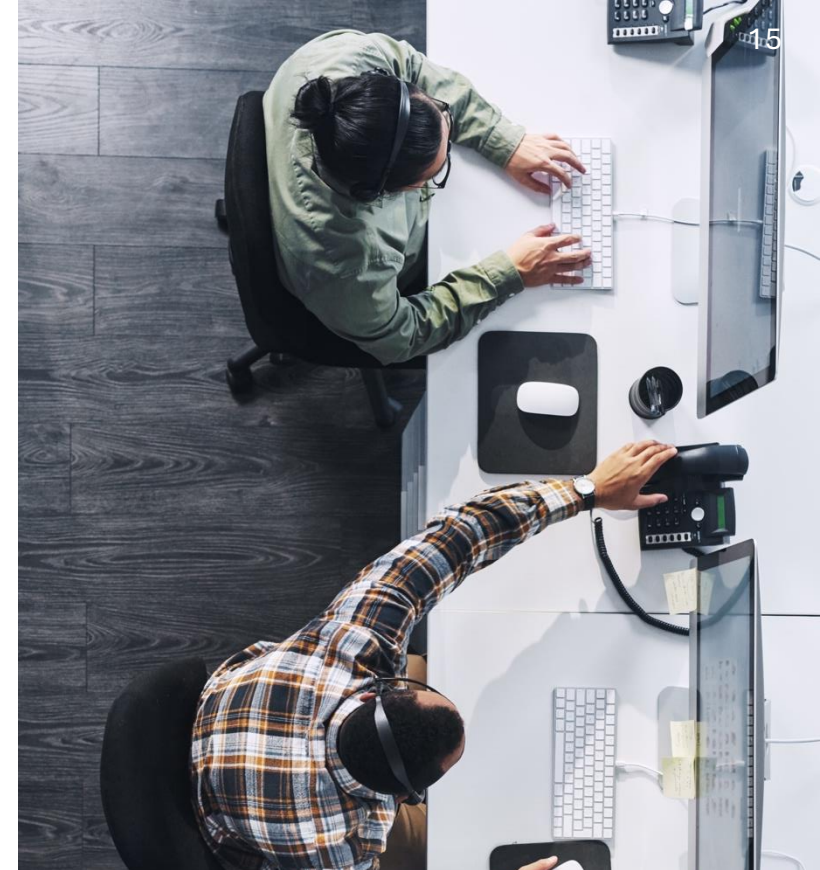
Vendors shall create and maintain documents and records to ensure regulatory compliance and conformity with this Code. Failure to comply with this Code or the law and failure to certify to this Code when requested may result in discontinuance of business relationships.

REPORTING VIOLATIONS

All vendors should immediately report any known or suspected violation of the Code, including any violation of applicable laws, rules, regulations, or policies, to the Company's Legal and Compliance Department at: legal@invitationhomes.com or the Whistleblower Hotline at 877-231-3984 or www.reportlineweb.com/invitationhomes.

All reports of known or suspected violations of the law or the Vendor

Code will be handled sensitively and with discretion. The confidentiality of any reporting person will be protected to the extent possible, consistent with applicable law and the Company's need to effectively investigate the reported concern. Invitation Homes will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior and/or a possible violation of this Code.



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I understand that Invitation Homes expects all vendors and vendor employees, agents, and subcontractors (their representatives) to adhere to the Company's Vendor Code of Conduct while they are conducting business with and/or on behalf of Invitation Homes.

As the _____ (title) of _____ (company name), I _____ (name) fully understand and agree that I will abide by the policies referenced. I am aware that failure to comply with the policies outlined in the Vendor Code of Conduct may result in the Company's termination of the business relationship with the vendor.

ACKNOWLEDGMENT AND SIGNATURE

Name: _____

Signature: _____

Title: _____

Company: _____

Date: _____