

## **CoStar Supplier Code of Conduct**

CoStar has adopted this Supplier Code of Conduct to lay out the criteria for Suppliers to abide by while doing business with or on behalf all of CoStar. This Code of Conduct (this “Code”) is applicable to you and to all personnel employed by or engaged by you (collectively, either “Supplier” or “you”), to provide goods and services to CoStar Group, Inc. and its subsidiaries (collectively, either “CoStar” or “us”) throughout the world.

This Supplier Code of Conduct, which is based on the International Labor Organization (ILO) conventions, local laws, universally accepted fundamental principles, and Responsible Business Alliance (RBA) industry standards, describes CoStar’s expectations for how our suppliers, vendors, contractors, agents, consultants, and providers of goods and services and their employees, or anyone working on behalf of CoStar (collectively referred to as “Suppliers”), act when conducting business with CoStar.

A Supplier is defined as suppliers, vendors, distributors, channel partners, agents, contractors, consultants, and all other third parties and affiliates of CoStar Group with whom CoStar engages to provide the company with any business goods, services, functions, or activities.

CoStar Group is committed to upholding the highest standards of social responsibility, ethical conduct, responsible business practices, and adherence to all applicable laws, rules, and regulations. We expect our Suppliers to embrace our CoStar core values of employees, customer service, innovation, integrity, fun, and profitability, to inspire a brighter work day for all, and adhere to the principles outlined in this Supplier Code of Conduct.

### **1. Integrity and Compliance with Laws**

CoStar expects our Suppliers to adhere to operating in full compliance with all applicable laws, rules, and regulations that govern the goods and services being provided to all CoStar and to their business operations globally.

Compliance means not only observing the law, but also conducting corporate business in a way that recognizes your ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, you must comply with the Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, you must always, at a minimum, comply with applicable laws.

- A. Business Records and Accounting:** Suppliers will keep complete and accurate books and records regarding the sale of products to CoStar and any and all transactions or other expenditures with respect to any CoStar-related business. Suppliers are strictly prohibited from engaging in false and/or misleading accounting practices, including but not limited to creating “slush funds,” cash accounts, unaccounted cash funds, or similar improper financial practices.

**B. Anti-Corruption:** Suppliers will comply with all applicable anti-bribery and anti-money-laundering laws. All forms of bribery, kickbacks, gratuities, and other corruption are prohibited.

Suppliers are strictly prohibited from promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain or appear to gain an improper advantage. Suppliers will not improperly influence any act or decision of any government official, employee, or political candidate, including, without limitation, through the provision of any improper or unlawful gifts, meals, travel, or entertainment. Suppliers will fully comply with any rules regarding tender and bid processes, and may not offer employment to government employees or officials or their family members or close associates if doing so would violate applicable laws or could be considered to be an improper benefit in order to secure official actions.

CoStar prohibits all forms of money laundering, including disguising transactions, channeling unlawfully obtained money, or transforming such money into legitimate funds.

**C. Fair Competition and Antitrust:** Suppliers will comply with all applicable competition and antitrust laws and regulations. In addition to adherence to applicable laws and regulations, Suppliers must not discuss or agree with any competitors to (1) fix or control prices; (2) coordinate during a bidding process; (3) boycott suppliers or customers; (4) divide or allocate markets, territories, products, customers, or suppliers; or (5) limit the production or sale of products or product lines. Suppliers will only use legal means to gather information about sellers of products that compete with CoStar products.

**D. Intellectual Property and Protection of Information, Assets, Resources, and Facilities:** Suppliers will respect intellectual property rights, protect confidential information, and comply with privacy rules and regulations. Suppliers will only use information technology and software that has been legitimately acquired and licensed. Suppliers will comply with all applicable privacy and data protection laws and regulations, including but not limited to national, federal, state, local, and industry- or sector-specific laws or regulations. Suppliers will maintain the confidentiality of any confidential information and any other proprietary information that is received during the course of the business relationship with CoStar.

Suppliers will securely store confidential information or data protected by privacy rules and regulations and keep it safe from loss, theft, or unauthorized access or disclosure.

Suppliers will use any CoStar-provided assets, facilities, or resources in a manner that reflects positively on CoStar and its employees, including following any

applicable laws or policies. Suppliers operating in CoStar facilities will follow all applicable policies intended to promote health and safety, including policies intended to reduce or prevent the transmission of infectious diseases.

**E. Trade Controls:** Suppliers will strictly comply with all applicable trade laws and regulations, including the export control laws and regulations of the United States that control the import, export, and re-export of the goods and services being provided to CoStar. Without limiting the generality of the foregoing, Suppliers will ensure that: (1) it is not a citizen of, or located within, a country or territory that is subject to a comprehensive European Union, United Nations, or U.S. government embargo or other significant trade restrictions; (2) is not listed on any European Union, United Nations, or U.S. government list of prohibited or restricted parties; and (3) no information that it creates, submits, or otherwise discloses to CoStar is subject to any restriction on disclosure, transfer, download, export, or re-export under applicable trade laws and regulations.

**F. Public Sector Procurement and Lobbying:** Activities that may be appropriate when dealing with non-public sector or non-government customers may be improper and even illegal when dealing with government entities, government-owned entities, government-controlled entities, or entities subject to government procurement rules ("Government Customers"). Suppliers that do business with Government Customers will comply with all laws, rules, procurement regulations, and contract clauses that relate to the acquisition of goods and services by such Government Customers, whether such sale is direct or indirect and including marketing or recommendation of CoStar products and/or services.

Lobbying is any activity intended to influence a government entity. Some governments consider procurement and sales activities as lobbying. Suppliers are responsible for determining if an activity is legally defined as lobbying, and must ensure any legal requirements associated with lobbying activities are met. Suppliers will not lobby governments on behalf of CoStar.

**G. Insider Trading:** CoStar shares information with Suppliers so that they can successfully meet their goals and obligations. Insider Trading is any activity where someone buys, sells, or otherwise transacts in securities (stocks) while in possession of nonpublic material information about that company. Information is considered material when it may be seen as important to the investing public and could impact an investor's decision to buy, sell, or hold securities.

CoStar prohibits any form of illegal insider trading and expects Suppliers will, (1) comply with all applicable insider trading and securities laws, (2) not trade (buy, sell, or otherwise transact in) CoStar securities or those of any other company while in possession of material nonpublic information about CoStar or that company, (3) not

engage in tipping or otherwise share material or inside information with other parties, or advise other parties to trade on such information.

## 2. Fair Marketing and Sales Practices

CoStar purchases the products and services of others on the basis of price, quality, and service. We expect our Suppliers representing CoStar to operate on the same basis. Accordingly, all business dealings must be impartial, objective, and free of corruption and improper influence.

- A. **Advertising Standards and Sales Practices:** Suppliers' marketing and sales practices are expected to reflect a commitment to honest and fair dealings with their current and potential customers, and will not engage in any misleading or deceptive practices; misrepresent products, services, and prices; or make unfair, misleading, inaccurate, or false claims about, or comparisons with, competitor offerings. If a Supplier is, with CoStar's prior written approval, engaged in any advertising, marketing, or promotional activities that reference or implicate CoStar or its name, logo, or services in any manner, the advertising, marketing, or promotional activities will comply with all laws, rules, and regulations, and must be truthful and accurate.
- B. **Conflicts of Interest:** Suppliers will be transparent about any interests, activities, or relationships that might conflict (or appear to conflict) with the best interest of CoStar, and will not engage in any activity that would interfere with or may reasonably be perceived to interfere with Supplier's contractual responsibilities to CoStar. Conflicts that must be promptly disclosed to CoStar may include (but are not limited to) CoStar personnel being the Supplier's officer, director, or shareholder or other close personal relationships between supplier and CoStar personnel, or payment of incentives to CoStar personnel. Suppliers must disclose both personal and organizational conflicts of interests.
- C. **Gifts, Business Entertainment, and Travel:** Moderate, proportional, and properly recorded business entertainment and gifts can create goodwill and sound working relationships. Gifts offered or received by Suppliers (1) must be consistent with customary business practices, (2) must be reasonable in value, open, and transparent, (3) cannot be cash or a cash equivalent, (4) cannot reasonably be construed as a bribe or payoff, (5) and will not violate any laws, regulations, or applicable policies of the other party's organization. Travel expenses incurred by Suppliers must follow all contractual agreements, not be excessive or lavish, and follow all applicable laws and policies.

## 3. Human Rights and Labor Standards

CoStar is committed to maintaining a work environment that values inclusion, equity, diversity, respect, and integrity. We expect Suppliers to share the CoStar commitment to human rights, fair treatment, and equal opportunity in the workplace, and in accordance with all applicable labor and employment laws and regulations.

- A. **Freely Chosen Employment and Child Labor:** Employment with Suppliers must be an expression of free choice and there should be no forced, bonded, or involuntary labor, or slavery or trafficking of persons. Suppliers must allow workers to discontinue employment upon reasonable notice. Suppliers must not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports, or work permits. Suppliers must also abide by local minimum wage and maximum working hours requirements, and the use of child labor is strictly prohibited.
- B. **Lawful Employment and Freedom of Association:** CoStar expects Suppliers, prior to employing any worker, to validate and review all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction. Suppliers are expected to respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions and others that allow employees to bargain collectively.
- C. **Non-Discrimination:** Suppliers will not unlawfully discriminate in any employment decisions, including hiring, compensation, promotion, discipline, or termination, based on age, ancestry, color, gender (including pregnancy, childbirth, or related medical conditions), gender identity or expression, genetic information, marital status, medical condition, mental or physical disability, national origin, protected family care or medical leave status, race, religion (including beliefs and practices or the absence thereof), sexual orientation, military or veteran status, or any other considerations protected by applicable law.
- D. **Safe Conditions:** CoStar expects Suppliers to promote and provide a safe and secure workplace. Suppliers are expected to have policies and practices in place to ensure the health and safety of their employees, and take all necessary steps to provide a safe working environment.

Additional information is available in [CoStar Group's Modern Slavery Statement](#).

#### 4. Environmental Standards and Community Involvement

- A. **Environmental Considerations and Sustainability:** CoStar is committed to protecting and respecting our environment. We expect our Suppliers to follow all applicable environmental laws, regulations, and standards. This includes requirements for chemical and waste management and disposal, recycling,

industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting.

As part of our Supplier Agreement, Suppliers will adhere to CoStar's policies and procedures including the CoStar Environmental Sustainability Policy. Suppliers are expected to contribute to our environmental objectives stated in the CoStar Environmental Policy and collaborate with us to improve the environmental performance. Suppliers should have their own environmental management system, including quantifiable goals to reduce environmental impact and greenhouse gas (GHG) emissions, and minimize waste, energy consumption, and the use of materials of concern, as well as adopt measures and controls (including audits), reporting, and training.

- B. Supplier Diversity:** Encouraging inclusion, Suppliers shall endeavor to include small and socio-economically diverse suppliers, such as minority-owned (MBE), women-owned (WBE), disability-owned (DBE), veteran-owned (VBE), disabled veteran-owned (DVBE), service disabled veteran-owned, and lesbian/gay/bisexual/transgender-owned (LGBTQ), and other small businesses (SBA) in sourcing subcontracting activities where possible.
- C. Community Involvement:** CoStar seeks to work with Suppliers that share our commitment to social and economic development and the sustainability of the communities we serve. Therefore, we encourage Suppliers to proactively and positively engage with their communities.
- D. Business Continuity:** Suppliers will maintain a culture of resilience by proactively working to minimize business interruptions by establishing business continuity and technology recovery plans.

## 5. Compliance Standards

- A. Assistance:** Suppliers will provide reasonable assistance to and will cooperate with any investigation, audit, or due diligence effort by CoStar, including of an alleged or suspected violation of this Supplier Code of Conduct or of an alleged or suspected violation by a CoStar employee of CoStar's Code of Conduct. Suppliers will also allow CoStar reasonable access to all documentation concerning the Supplier's compliance with this Supplier Code of Conduct and laws applicable to any work conducted on CoStar's behalf. Any Supplier violations or non-compliance with this Code will be grounds for termination of CoStar's relationship with the Supplier, notwithstanding any conflicting terms in any Supplier contract or order form.

- B. Ensuring Compliance:** Suppliers will communicate and transmit this Code to their employees who service or work on the CoStar account and take steps to ensure continuous compliance.
- C. Preventing Retaliation:** Suppliers must prohibit retaliation in any form against anyone who, in good faith, reports any actual or potential violation of this Code, or any illegal or unethical behavior. Retaliation will be prohibited for any good faith report, even if it ultimately turns out to be unfounded.

## 6. Enforcement

This Code places you in the forefront with those corporations throughout the world that emphasize the importance of honest business conduct and solid business ethics. Our standards can be met only with your cooperation. CoStar trusts that you will recognize that you must adhere to the standards of this Code. You agree to abide by the terms of this Code, and acknowledge that compliance with this Code is required to maintain your status as a CoStar Supplier.