

## Kennedy Wilson Code of Vendor Conduct

Our core values include conducting our business with integrity and in compliance with applicable laws and regulations. To that end, we have adopted a Code of Business Conduct and Ethics.

As a vendor providing products or services to us or any of our direct or indirect subsidiaries, we expect that you (including your representatives such as employees, agents and subcontractors) will embrace the letter and spirit of our commitment to integrity. Although we understand that you are an independent entity, your business practices and actions may significantly impact and/or reflect upon us, our reputation and our brand. Because of this, we expect that you will adhere to this Vendor Code and that you will be responsible for ensuring that your representatives do too.

Accordingly, while you are conducting business with us on our behalf, you and your representatives must (in addition to any stricter obligations under contract or otherwise):

1. **Comply with Laws.** Comply with all applicable laws, rules and regulations, including “insider trading laws” relating to transactions in our securities. No one is authorized on our behalf to instruct anyone to violate any applicable laws, rules and regulations under any circumstances.
2. **Focus on Safety.** Comply with all applicable laws, regulations and commercially reasonable practices with respect to health and safety, the handling and storage of hazardous materials, accident prevention, safety equipment and practices as well as the Safety Rules for any of our properties where work is to be performed (available from the property manager for the property), and address and remediate identified risks of accidents, injury and health impacts.
3. **No Unfair Practices.** Not use unethical or illegal business practices, including bribes or kickbacks.
4. **No Corrupt Practices.** Not give anything of value, directly or indirectly, to government officials or political candidates (domestic or foreign) except in full compliance with all applicable laws, including the Foreign Corrupt Practices Act.
5. **Conflicts of Interest.** Obtain a specific written waiver after full disclosure of any financial relationship between you or any affiliate and any of our employees (or his or her spouse, domestic partner or other family member) who is involved on our behalf in our relationship with you.
6. **Follow Sustainable Practices.** Share our commitment to sustainability by meeting or exceeding the requirements of environmental laws and regulations and taking reasonable steps, when possible, to minimize energy consumption, water use and waste generation to reduce the environmental impacts of our business operations.
7. **Fair Employment Practices.** Share our commitment to human rights and equal opportunity in the workplace and conduct your employment practices in full compliance with all applicable laws and regulations, and:
  - Not engage in discrimination in hiring, compensation, access to training, rewards, promotion, termination, or retirement based on race, sex, color, national or social origin,

- ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.
- Comply with all applicable labor laws including those related to (i) maximum hours of daily labor; payment of overtime; (iii) minimum working age and child labor laws and requirements.
  - Pay living wages under humane conditions which meet, at a minimum, national or applicable local legal standards.
  - Not use forced labor, whether in the form of indentured labor, bonded labor, or prison labor.
  - Maintain a healthy relationship with union employees, support the right to exercise freedom of association and comply with the provisions expressed in collective bargaining agreements.
8. **Maintain Confidentiality.** Use reasonable efforts to maintain the confidentiality of all sensitive information entrusted to you whose disclosure of which might be of use to our competitors, or harmful to us or our suppliers or tenants.
9. **Conserve Our Assets.** Strive to conserve our assets and use them efficiently, minimizing losses from theft, carelessness and waste or use other than for our benefit.
10. **Report Any Illegal or Unethical Behavior.** Report timely to us any known violation of this Code or of our Code of Business Conduct and Ethics. If you do not believe that talking to your primary contact is appropriate, if you are uncomfortable doing so, or if it does not result in a response with which you are comfortable, then you should contact one of our executive officers. We will not tolerate retaliation of any kind against any person who in good faith reports to us any potential issues relating to actual or threatened violations of law or this Code.