



Vendor Code of Conduct

Elme Communities (“Elme”) is committed to developing and operating our communities and our business in a responsible and ethical manner.

To that end, Elme has developed this Vendor Code of Conduct to set forth the expectations of Elme with respect to all vendors and suppliers we do business with, and all of their subsidiaries, affiliates or other related entities involved in the provision of services or products to Elme (each, a “Vendor”). Any reference in this document to a Vendor applies equally to such Vendor’s subcontractors, suppliers, agents and employees.

Elme expects each Vendor to make best efforts to conduct their business in line with Elme’s Code of Business Conduct and Ethics available on our website at: <https://ir.elmecomunities.com/governance/governance-documents>, and to use best efforts to adhere to the following principles and practices:

Anti-Bribery and Anti-Corruption:

- Comply with all applicable anti-corruption, anti-bribery, anti-trust, and fair competition laws, and maintain professional standards in all business dealings.
- Never offer or complete an action that may be reasonably construed as offering a bribe, kickback, bartering arrangement, good(s), service(s), any other incentive, etc. to an employee of Elme. All gifts or entertainment must comply with Elme’s Code of Business Conduct and Ethics.

Data Accuracy, Security, and Record Keeping:

- Honestly and accurately record and report all information and create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.
- Maintain a safe information technology environment, adhere to any applicable requirements from Elme regarding data security, and responsibly use the physical assets and confidential information of Elme.

Conflicts of Interest / Insider Trading:

- Avoid conflicts of interests, and the appearance thereof, to the fullest extent possible.
- Comply with insider trading laws and do not engage in unethical or illegal behavior with respect to information pertaining to Elme that is obtained in the normal course of doing business or that could influence an investor’s decision to buy or sell stock in Elme.

Child Labor:

- Prohibit the use of child labor in accordance with ILO Convention 138.



Forced Labor:

- Do not condone nor permit forced or compulsory labor. Provide a workplace that is free from any form of human trafficking, slavery, abuse, and/or exploitation.

Working Hours and Compensation:

- Treat employees fairly and fully comply with applicable labor standards and applicable laws, including those that relate to minimum wage requirements, standard working hours, overtime hours and wages, and holidays.

Discrimination/Harassment/Abuse:

- Provide a workplace free from discrimination, harassment, or any other form of abuse.
- Vendors should encourage reporting of all incidents of discrimination and sexual harassment and should promptly investigate each complaint.