

# **Vendor Code of Conduct** (February 2024)

## **Purpose**

The Company is committed to conducting our business operations with a high level of ethical and legal standards and we expect the same from our Vendors. By the term Vendors, we are referring to all of our business partners, contractors, suppliers and trade partners (herein referred to as “Vendors”). The Company expects all our Vendors to understand our standards and to act in accordance with this Vendor Code of Conduct. Our Vendors are expected to review and comply with our Company policies. These include but are not limited to the Company’s [Code of Ethics](#), our Environmental, Social and Governance Report, our [Enterprise Anti-Corruption and Anti-Bribery Policy](#), our [Enterprise Environmental Policy](#) and our [Enterprise Labor Rights & Human Rights Policy](#).

The Vendor Code of Conduct is based on internationally accepted labor standards and guidance, including the International Labour Organization (ILO) core conventions, the Universal Declaration of Human Rights, and the United Nations Guiding Principles on Business and Human Rights. as well as all applicable legal, ethical and our workplace policy standards.

## **Scope**

This Policy applies to Hovnanian Enterprises, Inc. (the “Company”), its wholly owned subsidiaries, any entity in which the Company holds more than 50% of the voting power in such entity, and their respective officers, directors, and associates.

## **Anti-Bribery and Anti-Corruption**

The Company requires that its Vendors comply with all applicable anti-bribery and anti-corruption laws including but not limited to the U.S. Foreign Corrupt Practices Act. Vendors are prohibited from any type of arrangement for a bribe, kickback, or any other form of illegal or unethical behavior to gain a competitive advantage.

## **Child or Forced Labor and Human Trafficking**

The Company does not tolerate any form of child labor, forced labor or human trafficking of any form such as slavery, bonded, indentured or involuntary prison labor. All labor in the Company’s supply chain is to be voluntary and all workers allowed the freedom of movement.

The Company requires that all Vendors within its operations and supply chain comply with the Fair Labor Standards Act and meet the state and local minimum age requirements. The Company reserves the right to audit all aspects of the Vendor Code of Conduct including all aspects of its supply chain and product safety.

## **Civil Liberties and Freedom of Speech**

The Company supports civil liberties and one’s right to life, liberty, and the security of person as well as freedom of speech, opinion and expression.

**Conflict Minerals**

The Company expects its Vendors to comply with all laws and contractual obligations concerning the use of conflict minerals.

**Audit and Compliance**

The Company reserves the right to audit our Vendors' compliance with any and all areas referenced herein including but not limited to environmental, labor and supply chain activities that impact the Company.

**Collective Bargaining and Freedom of Association**

The Company acknowledges the right of an individual to join or not join an association or union, as well as collective bargaining, and our Vendors are presumed to recognize this as well and not discriminate based on one's affiliation.

**Data Privacy**

The Company expects all its Vendors to comply with all data privacy and confidentiality laws and Vendors are anticipated to have policies and procedures to protect the sensitive data of its employees, clients and our collective customers where applicable.

**Discrimination and Harassment**

The Company does not tolerate discrimination or harassment and expects its Vendors conduct to be consistent whereby all are treated with respect and dignity. Our Vendors are not to engage in unlawful discrimination, harassment or abuse. All decisions concerning hiring, salary, advancement and termination are to be based on equal opportunity and merit.

**Diversity and Inclusion**

The Company is committed to diversity and inclusion, and we expect our Vendors to share in this commitment.

**Environmental**

The Company has an Enterprise Environmental Policy that is published on our website, and we expect all our Vendors to be familiar with and comply with these standards as it relates to their products and services. Vendors must comply with all laws, regulations and Company policies as well as procurement practices relating to the environmental impacts of the Vendors operations. We encourage our Vendors to operate in an environmentally responsible manner including but not limited to the conservation of natural resources and the avoidance of waste. Our Vendors are expected to work to limit the environment effects that their product and services may cause.

**Fair Wages, Hours & Terms**

The Company expects its Vendors to compensate their workers fairly and provide reasonable employment terms so as to promote a living or fair wage for all. Vendors are required to comply with all federal, state and local wage regulations including working time and hours regulations.

### **Health & Safety**

The Company is committed to creating and maintaining a healthy and safe workplace and we expect our Vendors to share in this important goal by providing their employees with the proper workplace safety training and compliance with all applicable laws. All Vendors are responsible for compliance with all applicable health and safety regulations including but not limited to Occupational Safety and Health Administration (“OSHA”) regulations. Where applicable, Vendors are expected to participate in on-going safety training including Safety Toolbox talks hosted by the Company as well as cooperate with safety audits that are conducted on our sites.

### **Human Rights**

The Company and its Vendors have a duty to respect and protect human rights and fundamental freedoms. This policy is in recognition of and intended to achieve conformance with the following recognized authorities: (a) The United Nations’ Universal Declaration of Human Rights, UN (1948); (b) The United Nations’ Guiding Principles on Business and Human Rights, UN (2011); and (c) The Organization for Economic Co-operation and Development’s (OECD) Guidelines for Multinational Enterprises, OECD (2011).

### **Reporting - See Something, Say Something**

Any violation or suspected violation of the Vendor Code of Conduct is encouraged to be reported and will be investigated. The Company encourages anyone including all our Vendors to report any potential violations to our Company’s anonymous Code of Ethics Hotline 855.773.4657. The hotline is maintained by a third-party provider. Anyone who calls this hotline is assured anonymity if they so desire and the call is transcribed and provided to our Audit Committee. All reports provided in good faith prohibit any kind of retaliation.

Failure to comply with this Policy may impact the Company/Vendor relationship and may result in termination of future work by Vendor.