

## **Vendor Code of Conduct**

**Effective as of January 25, 2022**

Broadstone Net Lease, Inc. (“BNL”, “we”, “our”) believes that it is important to consider the impacts our actions have on all stakeholders, which includes considering the integrity and business practices of our vendors. We have adopted this Vendor Code of Conduct (the “Code”) to set forth BNL’s expectations for ethical business practices, respect for labor and human rights, and vendor diversity as applicable to the vendors we engage in the course of our business. The requirements set forth in this Code also extend to any subcontractors of our vendors.

This Code cannot address or anticipate every legal, environmental, social, or ethical concern that may arise in connection with services provided by a vendor. We therefore expect our vendors and their subcontractors to operate in accordance with the expectations outlined in this Code and at minimum, comply with all applicable laws, rules, and regulations that govern their business activities. This Code supplements the terms of any agreement between BNL and a vendor, and in no way alters or amends the terms of any agreement with any vendor.

### **I. Ethical Business Practices**

BNL is committed to conducting our business in accordance with the highest ethical standards. We expect our vendors to uphold our standards and develop appropriate policies and programs to ensure that their workers understand and adhere to these standards.

#### **A. Anti-Money Laundering (“AML”) and Office of Foreign Assets Control (“OFAC”)**

Vendors must comply with all applicable AML rules and regulations, including the Bank Secrecy Act, the USA PATRIOT Act, and applicable FINRA rules and regulations. Vendors should follow industry best-practices in establishing AML policies and/or responding to Know-Your-Customer requirements. Vendors must comply with all OFAC rules and regulations and have regular screening procedures in place for transactions with sanctioned countries and specially designated nationals.

#### **B. Anti-Corruption**

BNL does not tolerate corruption or bribery in any form, and we expect our vendors to fully comply with the requirements of all applicable domestic and foreign anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the Bank Bribery Act.

#### **C. Privacy and Data Protection**

BNL requires that all confidential information shared with vendors or their subcontractors be adequately safeguarded, and requires that any such information not be accessed, disseminated, or otherwise disclosed to any third party except as expressly authorized by BNL in writing and in compliance with any existing agreement between BNL and the vendor. We expect our vendors and their subcontractors to comply with all applicable laws and regulations governing data security, privacy, record retention, and data destruction. BNL requires each of our vendors, upon request, to demonstrate that they and their subcontractors, maintain adequate data security, including cybersecurity and physical security, as well as documented internal mechanisms to safeguard our confidential information. We expect our vendors to monitor their subcontractors to ensure compliance with these requirements.

#### **D. Grievance Mechanism**

BNL expects our vendors to have a process through which workers can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers and should ensure the protection of whistleblowers.

## **II. Labor and Human Rights**

BNL expects our vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive culture. Vendors should commit to conducting business in accordance with applicable United States equal employment opportunity laws and supporting and promoting the principles of the United Nations' Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We expect our vendors to have similar policies and practices that apply to all workers, suppliers, and their supply chains.

#### **A. Wages and Benefits**

Vendors must comply with applicable wage, work hours, overtime, and benefits and other labor laws. BNL encourages vendors to commit to paying living wages under humane conditions and work toward improving standards of living for their employees and communities.

#### **B. Working Hours**

Vendors' workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours, and number of working days per week. Workers shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include for example, holidays, maternity/parental leave, family care leave, and sick leave.

#### **C. Slavery, Forced Labor and Human Trafficking**

BNL prohibits the use of all forms of forced labor, whether prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking. We will not knowingly work with vendors who engage in these practices or permit their subcontractors to engage in these practices. Additionally, vendors are encouraged to implement due diligence measures to ensure that no forced labor or human trafficking exists within their extended supply chains.

#### **D. Child Labor**

Vendors must not employ child labor and should take the necessary preventive measures to ensure that they do not employ anyone under the local minimum working age laws. Such measures include age verification systems, training for managers, and communicating with sub-vendors and suppliers on child labor issues.

#### **E. Freedom of Association and Collective Bargaining**

BNL expects vendors to respect workers' rights to freedom of association by meeting or exceeding the relevant requirements of local law and respecting their employees' right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. Further, if a vendor's workers are represented by a legally recognized union, we expect the vendor to commit to bargaining in good faith with that union.

#### **F. Inclusion and Non-Discrimination**

Workers should be treated with respect and dignity at all times. BNL requires vendors to comply with all applicable laws regarding discrimination in hiring and employment practices. BNL expects its vendors to maintain a workplace that is free from discrimination or harassment on the basis of race, color, sex, age, disability, religion, citizenship, national origin, ancestry, military status or veteran status, marital status,

pregnancy, familial status, sexual orientation, gender identity or expression, domestic violence victim status, predisposing genetic characteristics and genetic information, reproductive health decision making, including the decision to use or access a particular drug or medical service, and any other status or characteristic protected by law.

### **III. Vendor Diversity**

BNL believes that diversity is a social and economic imperative and looks to vendors to share this commitment in their operations and within their supply chain. Vendors are encouraged to take proactive steps to provide a full spectrum of enterprises – based on the ownership structure (for example, women owned, minority owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

### **IV. Management Systems and Governance**

BNL encourages vendors to institute effective management systems that utilize the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

### **V. Summary**

This Code sets forth BNL's expectations for our current and future vendors. BNL is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time. Any facts or circumstances which are likely to lead to any vendor's inability to meet the requirements and expectations of this Code should be reported immediately to its BNL relationship manager. If a vendor is found to be in violation of the requirements of this Code, BNL will expect that vendor to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner.

We expect our vendors to join us in our commitment to transparency and disclosure. If requested, vendors are expected to provide reasonable details and data about their performance on the topics included in this Code to BNL or to other entities.

The contents of this Code do not in any way affect or prejudice any of BNL's rights and remedies under the relevant agreement with each of its vendors, this Code, and any relevant local laws and regulations. The failure or omission by BNL to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant agreement with any vendor, the provisions of that agreement will prevail.