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CODE OF ETHICS

We Build Great Things™



TABLE OF CONTENTS

1.0 Introduction	3
2.0 Scope of Application	3
3.0 Communication	3
4.0 Our Code	4
#1 - Our Core Values	4
#2 - Our Commitment	5
#3 - Obey the Law	5
#4 - Act Ethically	5
#5 - Promote a Positive and Ethical Work Environment	5
#6 - Avoid Conflicts of Interest	6
#7 - Recordkeeping	6
#8 - Public Disclosures	6
#9 - Adhere to All Competition and Antitrust Laws	6
#10 - Political Contributions and Activities	6
#11 - Bidding, Negotiating and Performing Contracts	6
#12 - Gifts, Gratuities and Business Courtesies	6
#13 - Doing Business with U.S. Governments	7
#14 - Employment of Government Personnel	7
#15 - Consultant, Agents and Representatives	7
#16 - Protect Proprietary and Confidential Information	7
#17 - Use of Assets	7
#18 - Use of Electronic Communications	7
#19 - Report Unethical Conduct	7
#20 - Cooperate in Ethics Investigations	8

INTRODUCTION

Ethics is at the core of Efficiency Properties, defining our culture and driving our success. Our strong reputation for integrity and fair dealings continues to be a key asset as we grow into new markets. Every team member is responsible for upholding legal and ethical standards, which are embedded in our Mission, Vision, Values. This Code of Conduct consolidates our policies, offers guidance, and reinforces compliance. The ripple symbol throughout this code reflects our commitment to ethical responsibility—our actions create lasting impacts. By embracing these values, we contribute to the success of our colleagues and the Efficiency Properties family.

Scope of Application

This policy applies to the Efficiency Properties family of companies.

Communication

This policy is made available to all employees and partners through this website.

OUR CODE

#1 - Our Core Values

At EfficiencyProperties™, we believe that true success comes from creating value for others through a foundation of people, integrity, continuous improvement, and innovation. By fostering growth, embracing ethical principles, striving for efficiency, and leveraging cutting-edge technology, we are committed to building a lasting impact in the real estate industry.

PEOPLE

True success is defined not by personal achievements but by the value we create for others. People are the foundation of any organization—without them, there is no growth, no impact, and no lasting legacy. We are committed to driving value in the marketplace by prioritizing the growth, success, and experiences of our employees, investors, partners, and customers.

INTEGRITY

We are committed to honesty, maintaining transparency and truthfulness in everything we do. We embrace accountability, taking full responsibility for our decisions and actions at all levels. Our dedication to ethical behavior guides us to make choices that reflect strong moral principles, even when faced with challenges. We ensure consistency by adhering to our values and principles, no matter the circumstances.

IMPROVEMENT

Efficiency, the byproduct of continuous improvement, is not just in our name—it's what we do. We firmly embrace Kaizen, a Japanese philosophy meaning "continuous improvement" or "change for the better." This approach focuses on making small, incremental improvements in processes, products, and services over time. The goal of Kaizen is to enhance efficiency, quality, and overall performance through the collective effort of everyone in the organization, from leadership to frontline employees.

INNOVATION

Smart Real Estate Development requires continuous innovation, combining advanced construction technologies like prefabrication, modular design, and panelization with

Code of Ethics

property technologies such as IoT, AI, and automation. This allows us to create efficient, sustainable, and connected buildings that are easier to build, manage, and maintain, while improving quality of life and prioritizing environmental responsibility.

#2 - Our Commitment

All employees, officers, directors, agents, consultants, and contract workers of Efficiency Properties must follow this Code of Conduct and its relevant policies. Violations may result in corrective action, including termination.

#3 - Obey the Law

We are committed to conducting business in full compliance with all applicable laws and regulations.

#4 - Act Ethically

Efficiency Properties upholds the highest ethical standards in all business activities. Ethical issues can often be avoided by using common sense. If you find yourself thinking:

"Just this once..."

"No one will know."

"It doesn't matter how, as long as it gets done."

"Everyone does it."

"Shred that document."

Stop and ask yourself:

Is this legal, fair, and honest?

Would I be comfortable if this was made public?

Will I feel good about my decision later?

#5 - Foster a Positive & Ethical Workplace

We are committed to a respectful, inclusive, and ethical work environment. Leaders have a special responsibility to set the tone. Discrimination and harassment are not tolerated, and we comply with all applicable laws and policies regarding workplace conduct, safety, and environmental responsibility.

#6 - Avoid Conflicts of Interest

Employees, officers, and contractors must act in the best interest of Efficiency Properties, avoiding situations where personal interests may interfere with company decisions. Use company resources ethically and never for personal gain.

#7 - Accurate Recordkeeping

All transactions must be recorded accurately and in compliance with accounting standards. Falsifying records, misrepresenting information, or misallocating costs is strictly prohibited.

#8 - Transparent Public Disclosures

We ensure that all public communications, reports, and disclosures are accurate, complete, and timely. Confidentiality must be maintained while fostering transparency.

#9 - Compliance with Competition & Antitrust Laws

We adhere to competition laws in all regions where we operate. Employees must avoid any discussions or agreements that could restrict fair competition. Violations may result in severe penalties.

#10 - Political Contributions & Activities

Political participation must be done on personal time and at personal expense. Efficiency Properties follows all regulations regarding corporate political contributions and lobbying activities.

#11 - Fair Bidding & Contracting

We compete honestly for business and ensure all proposals, bids, and contracts are truthful and compliant with legal and ethical standards.

#12 - Gifts, Gratuities & Business Courtesies

Favorable treatment should never be exchanged for gifts or perks. Employees must follow all policies regarding interactions with government officials and business partners.

#13 - Doing Business with Governments

Contracts with government entities require strict compliance with laws and regulations. Employees must be aware of and follow all applicable rules.

#14 - Hiring Former Government Personnel

Employment discussions with former or current government employees must comply with all conflict-of-interest laws.

#15 - Consultants, Agents & Representatives

Business partners must uphold our ethical standards. We do not engage third parties to act unethically on our behalf.

#16 - Protect Proprietary & Confidential Information

Employees must safeguard company and client confidential information and use it only for authorized purposes.

#17 - Responsible Use of Company Assets

Company resources must be used responsibly and only for business purposes, unless explicitly approved.

#18 - Proper Use of Electronic Communications

Emails, messages, and online communications must align with company policies and ethical guidelines.

#19 - Reporting Unethical Conduct

Employees must report unethical or illegal behavior without fear of retaliation. Reports will be investigated confidentially and addressed promptly.

#20 - Cooperate in Ethics Investigations

Employees must fully cooperate with ethics investigations. Providing false information or refusing to participate may result in disciplinary action, including termination. This Code of Conduct is essential to maintaining our integrity and upholding Efficiency Properties' commitment to ethical business practices.