

HOWARD HUGHES HOLDINGS INC. SUPPLIER CODE OF CONDUCT

Howard Hughes Holdings Inc. (together with its subsidiaries and controlled entities, “Howard Hughes”) is committed to conducting our business at the highest ethical level, and this commitment extends to our expectations and relationships with our suppliers. Our suppliers and vendors are strongly encouraged to follow the same ethical standards as Howard Hughes with respect to environmental impact, social responsibility, and corporate governance principles that guide our business.

Though our suppliers are independent entities, the business practices and operations of our suppliers impact our business in material ways, and to enhance our corporate responsibility efforts, it is important that our suppliers acknowledge the guidelines set forth by this Supplier Code of Conduct. All references in this Code to “laws” means all applicable laws, regulations, directives, rules, decrees, and governmental orders.

Environmental Impact

Howard Hughes strives to conform with all applicable environmental laws and regulations and to promote respect for the environment in all our activities. We are committed to seeking sustainable business practices at our headquarters and across our properties and encourage our suppliers and vendors to responsibly manage resources and utilities in a sustainable manner that protects biodiversity and conserves energy, water, and material resources. All suppliers are expected to support this same spirit of environmental integrity while engaged in business with, and on behalf of Howard Hughes, while adhering to all local rules, standards, and laws in the geographies in which they operate. Vendors are also expected to support Howard Hughes’ efforts to develop, implement and maintain procedures and programs designed to protect and preserve the environment including:

- Protection of the Environment – Vendors will comply with all applicable environmental laws and regulations (such as laws relating to limiting pollution) and pursue voluntary green certification goals and targets established by Howard Hughes; and
- Carbon and Environmental Footprint – Vendors are expected to reduce their carbon emissions in areas within their control and to strive to reduce natural resource consumption and improve the quality of life of their community

Responsible Sourcing of Materials

Suppliers will exercise due diligence with relevant materials in their supply chains to identify potential risks and take appropriate steps to mitigate them, including conducting exercising due diligence to the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, child labor, forced labor

and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.

Social Responsibility Towards Employees and Communities

We expect our suppliers and contractors to be fair and just in all business dealings including the respect, health, and security of those they serve. Treating people with respect and dignity, actively fostering diversity of thought and background, and creating equitable opportunities for employment are critical aspects of Howard Hughes' culture. Suppliers are encouraged to contribute to a culture of inclusive productivity.

These principles have been confirmed within our Human Rights Policy. Our behaviors and actions are shaped by the United Nations Universal Declaration on Human Rights and the International Labor Organization (ILO) Conventions.

Howard Hughes takes seriously the threats of security to our personnel, data, and properties. All suppliers we work with are to follow the protocols established in our privacy policy for the protection of our employees and broader communities.

Freedom of Association

Suppliers will respect the rights of employees and comply with all laws concerning freedom of association and collective bargaining.

Anti-Discrimination

Suppliers will evaluate individuals based on skills and qualifications and not on personal characteristics or beliefs and will not discriminate against any worker based on age (other than to protect minors), disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. Where a supplier's activities require workers or applicants to take medical or drug tests, the supplier will comply with all applicable laws and shall not use the test results in a discriminatory manner.

Anti-Harassment and Abuse

Suppliers will commit to a workplace free of harassment and abuse. Suppliers will not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, or sexual harassment.

Child Labor

Howard Hughes complies with all laws and regulations in the communities in which we operate, which consistently prohibit the unlawful employment and exploitation of children in the

workplace. Therefore, we will work closely with the proper authorities to address any such instances that we become aware of, including with our suppliers and vendors.

Howard Hughes is committed to upholding ethical standards and ensuring the protection of children's rights. We strictly prohibit the use of child labor in any form within our supply chain. Our suppliers are encouraged to adhere to this principle, affirming that no person shall be employed who is below the minimum legal age for employment as defined by local laws and regulations.

Forced Labor

Howard Hughes is committed to eradicating forced, bonded, or compulsory labor, as well as any form of slavery or human trafficking, from our supply chain. We expect our suppliers and vendors to uphold this commitment and strictly refrain from engaging in any such practices.

Working Hours

Suppliers will not require workers to work more than the maximum hours of daily labor set by local and national laws or regulations. Suppliers will ensure overtime is paid in accordance with local and national laws or regulations.

Wages and Benefits

Suppliers will pay at least the minimum wage required in any jurisdiction and provide any benefits required by law and/or contract. Suppliers will communicate pay structure and pay periods to all workers. Suppliers will meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and wage deductions will not be used as a disciplinary measure. All use of temporary and outsourced labor will be within the limits of applicable law.

Health and Safety

Suppliers will obtain, keep current, and comply with all required health and safety permits. Suppliers will comply with the reporting and posting requirements of applicable permits and regulations and adhere to general principles of health and safety risk prevention to mitigate potential hazards and ensure a safe working environment for all personnel

Our suppliers should ensure that personnel working in hazardous environments receive appropriate and comprehensive safety training to mitigate risks effectively. This includes but is not limited to:

- training on the proper handling of equipment, emergency procedures, and hazard recognition;
- ensure that appropriate emergency prevention programs are in place to prevent accidents or injury.

We also expect our suppliers to proactively identify and assess potential health risks associated with their operations and implement measures to mitigate these risks, including having contingency plans in place to respond effectively to any health or safety emergencies that may

arise. Suppliers are also expected to ensure that all personnel are provided with the necessary equipment and personal protective equipment (PPE) and that there is a clear process for reporting injuries and accidents in accordance with applicable laws and regulations.

Corporate Governance

Our [Code of Conduct](#) reflects our value of conducting our business with high integrity and ethical considerations at front of mind. All suppliers are encouraged to adhere to this standard while engaged in business with Howard Hughes and encouraged to apply this same standard to their operations, including not engaging in corruption, conflicts of interest, and anti-competitive practices. Our commitment to a harassment free workplace is extended to our suppliers as well as compliance with all laws regulating antitrust, money laundering, and corruption.

Awareness & Reporting

Howard Hughes is committed to ensuring that this policy is accessible to the public, made aware of expectations through focused campaigns and training, and by maintaining open lines of communication with all our partners.

Similarly, we expect our suppliers to provide a safe mechanism for reporting and information to ensure all individuals understand how to report workplace concerns in a manner where they are protected from retaliation.