

RESPONSIBLE CONTRACTING POLICY

SUMMARY: This policy outlines the process and criteria for the engagement of contractors to ensure that selection is based on the contractor's demonstrated ability to meet all requirements.

1. POLICY STATEMENT |

Aspen Properties (the "**Company**") affirms its commitment to responsible operations with respect to all its real estate investment, development, and management activities.

This Responsible Contracting Policy (the "**Policy**") seeks to ensure that contractors directly involved in the development, management and maintenance of real estate will be selected based upon a demonstrated ability to enhance the value of the Company's real estate. Contractors promote tenant satisfaction by providing superior service and proper maintenance while controlling property expenses.

Within that context, the Company supports the engagement of qualified contractors who can be expected to provide competitive and high-quality service and products to the Company, utilizing appropriately trained and compensated employees in a manner that adds value to its investments and considering the Company's corporate social responsibility and Sustainability initiatives.

2. SCOPE |

This policy applies to all Aspen employees.

3. REQUIREMENTS |

Initial Requirements of the Policy

The following principles shall govern the administration of the Policy:

- **Duty of loyalty:** Assets will be owned and managed for the exclusive benefit of the Company, its owners, and its co-investment partners in conformity with all applicable laws and the Company's contractual obligations.
- **Prudence:** The Company will exercise all reasonable care, diligence, skill, and prudence in the selection of contracting services.
- **Competitive Return:** Investments and services will be made and managed in a manner that produces a superior risk-adjusted return.
- **Competitive Bidding:** Contractors will generally be selected through a competitive bidding and selection process, with the understanding that factors such as, but not limited to, demonstrated skill, experience, dependability, fees, safety record, time to complete and operating practices will be taken into consideration in addition to price. Any exceptions to the competitive bidding process must receive approval in accordance with the Policy on Corporate Authorizations.
- **Local, Provincial and Federal Laws:** Contractors will abide by all applicable laws.



CONTRACTOR REQUIREMENTS

In addition to the Initial Requirements (a) through (e) above, the Company requires that in order to engage a contractor, such contractor is required to confirm that it adheres to the standards set out below:

- Contractors will abide by Canada's provincial and federal Employment Standards Acts and the relevant labour laws applicable in their jurisdiction of operation.
- Contractors will seek to compensate their employees with fair wages and benefits. Fair wages and benefits are established from then prevailing standards as paid on comparable real estate projects, reflecting prudent commercial practices and local market factors that include the nature of the project, comparable job or trade classifications and the scope and complexity of services provided.
- Contractors will abide by the Occupational Health and Safety act or regulation applicable in their jurisdiction of operation.
- Contractors will treat workers with respect and dignity in the workplace and prohibit physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and harassment or discrimination based on race, gender, sexual orientation, colour, ethnic origin, religion, marital status, family status, age or disability.
- Ensure that Aspen's reputation is protected by adhering to Aspen's policies regarding conduct and behaviour, conflicts of interest, workplace harassment, personal information protection, e-mail and internet use, dress code, and all health and safety policies.
- Perform the work in accordance with the terms of the contract.

INSURANCE

Proof of insurance must be provided by independent contractors, including the following:

- General liability insurance with a minimum of \$5,000,000 in coverage, with Aspen as an additional insured.
- Workers' compensation insurance and payment of WCB premiums.
- if the use of the independent contractor's personal vehicle is necessary for the performance of the contract, automobile insurance.



EMPLOYEES REQUIREMENTS

The responsibilities are as follows:

- To offer contract work, obtain the approval of the Property Manager or General Manager.
- Prior to awarding contract work, obtain at least three (3) competitive quotations or bids must be received and considered prior to awarding any contract, unless this provision is waived by the Vice President, Property Management & Operations.
- Expenditure Authorization Forms (EAFs) are required before any Tenant Improvement and major capital Building Improvement work commences. Forms must be signed by
 - Vice President, Property Management & Operations
 - Chief Operating Officer
 - Vice President, Financial Reporting & Corporate Services
 - President & CEO, and
 - Executive Chair of the Board
- Prior to awarding the contract, evaluate all contract bids to ensure that all criteria have been properly addressed.
- Prior to the commencement of work, ensure the independent contractor executes the independent contractor's agreement.
- Prior to the commencement of the work, ensure that the independent contractor has provided proof of adequate insurance coverage.
- Provide a copy of relevant Aspen's policies to the independent contractor and ensure that the independent contractor has reviewed and understands same.

SELECTION AND POLICY COMPLIANCE

- The requirement of three (3) competitive quotations or bids must be received and considered prior to awarding any contract, unless this provision is waived by the Vice President of Property Management
- Contractors will generally be selected by a competitive bidding process reasonably tailored to the circumstances that includes consideration of competitive risk-adjusted returns and delivery of superior service, and factors such as, but not limited to, demonstrated skill, experience, dependability, fees, safety record, estimated time to complete and operating practices.
- The Company will take reasonable steps to investigate valid complaints relating to the



failure of any contractor to comply with this Policy.

- Any contractor performing services for the Company that fails to abide by the terms of this Policy may be subject to termination.
- Any alleged violation of this policy should be reported to the Director of Human Resources or Vice President of Property Management.

4. POLICY ENFORCEMENT |

Aspen Properties reserves the right to take corrective action for breach of this policy, up to and including dismissal.

