



VENDOR CODE OF CONDUCT

Green Brick Partners, Inc. (“Green Brick”, “the Company”, “we”, “our”) strives to conduct our business operations using the highest ethical standards and conduct. As part of this approach, we expect our business partners, suppliers, vendors, and contractors (together, “Vendors”) to act in accordance with all applicable laws, rules, and regulations, as well as abide by the principles and standards outlined in this Vendor Code of Conduct (“Code”). We also expect our Vendors to follow best industry practices so that our homes are built in a manner that meets or exceeds the expectations of Green Brick and our customers. Green Brick may terminate the relationship with Vendors that do not adhere to this Code or any other of our requirements or standards. Green Brick also may conduct audits of Vendors’ compliance with this Code and require remediation of any violations and take action, up to and including termination of the relationship with the Vendor, in the event that the Vendor does not address and resolve any identified violations of this Code.

VENDOR PRINCIPLES AND STANDARDS

Compliance with Laws and this Code

Vendors are expected to understand and comply with the laws and regulations that apply to their activities, including any licensing, permitting, registration or inspection requirements, and the provisions in this Code. Vendors are expected to maintain the highest ethical conduct in carrying out their provision of materials, labor, and services and to uphold our standards and to develop policies and programs as needed to ensure that their operations and employees understand and adhere to these standards and this Code. Vendors are expected to communicate the principles and standards in this Code to all workers and supervisors within their operations and to third parties involved in supplying products or materials they supply for our operations. In addition, Vendors should promptly inform us of any material Code nonconformities of which they become aware. We expect Vendors to authorize and to fully cooperate with any monitoring efforts Green Brick or our agents or representatives may deem appropriate to ensure conformance with this Code. This includes the responsibility of Vendors to respond to questions and requests for records, documents, and other information, as well as providing reasonable access to business facilities and workers.

Human Rights and No Child and Forced Labor or Human Trafficking

Vendors must operate in accordance with applicable laws establishing the minimum age of workers and in relation to working conditions. Green Brick will not tolerate Vendors’ use of any involuntary or forced labor at any time, including indentured, bonded or prison labor, child labor, engage in human trafficking in any form, or use any kind of physical corporal punishment. Vendors must respect internationally recognized human rights, including at a minimum under the *International Bill of Human Rights* and adhere to the *UN Guiding Principles on Business and Human Rights*.

Treatment of Employees

1. **Discrimination and Harassment.** Vendors are expected to treat all workers fairly and with

dignity and respect. Accordingly, Vendors must not engage in unlawful discrimination, harassment, or abuse based on race, color, religion, national origin, ancestry, familial status, age, veteran status, physical disability, mental disability, medical condition, gender, sexual orientation, marital status or any other legally protected status. Hiring, pay, benefits, advancement, termination and retirement decisions should be based on merit and equal opportunity.

2. Wages and Benefits. We expect Vendors to compensate their workers fairly and to provide reasonable employment terms. Vendors must comply with all federal, state, and local wage regulations and laws, including the Fair Labor Standards Act, with respect to wages, working time, and maximum working hours and number of working days per week.
3. Occupational Health and Safety. Green Brick recognizes that health and safety are paramount to its operations and business. Vendors are expected to provide all workers with a clean, safe, and healthy work environment that complies with all applicable laws, safety regulations, and standards, including providing a workplace or jobsite free of unnecessary safety and health risks and hazards and compliance with the rules and regulations of the Occupational Safety and Health Administration (OSHA). Vendors must promptly report to Green Brick and the authorities any threats or acts of violence that occur at the worksite.

Environment

Vendors must comply with all applicable environmental laws and regulations. Consistent with our sustainability goals, we encourage Vendors to operate in an efficient and environmentally responsible manner, conserve natural resources, and minimize waste and the use of environmentally harmful materials. If Vendors observe a spill or release of any hazardous or toxic substance or material at the worksite, Vendors should take, whenever safety permits, immediate remediation and mitigation efforts and report the incident to Green Brick.

Anti-Bribery and Anti-Corruption

Vendors shall not enter into any kind of illegal or unethical arrangement by which a bribe, kickback, or any other form of impermissible benefit is exchanged for business or personal use or advantage. Vendors shall comply with all applicable anti-bribery and anti-corruption laws, such as the Foreign Corrupt Practices Act.

Code of Ethics and Conflicts of Interest

Green Brick is committed to the highest ethical business and legal standards, which is detailed in our Code of Business Conduct and Code of Ethics (the “Code of Ethics”). We expect our Vendors to also exhibit high ethical standards aligned with our Code of Ethics in conducting their business. Green Brick is concerned with conflicts of interest that create actual or potential job-related concerns. Conflicts of interest occur when personal considerations or relationships cause Vendors to act against best practices or the best interests of their business, engage in unethical conduct, and fail to perform their jobs and duties to the best of their ability. We will not enter any relationship with Vendors that may have, or may appear to have, a conflict of interest. Vendors should immediately and fully disclose any conflicts of interest of which they become aware.

Effect of Code

As an expression of principles, standards, and expectations, this Code is not intended to create or provide any rights for any third party or to establish or impose any obligations, duties,

responsibilities, or liabilities of any kind on Green Brick or its representatives or agents. We may from time to time, and without prior notice, amend this Code to reflect changes in our business, circumstances, or in the law.