Cousins

COUSINS PROPERTIES

CODE OF BUSINESS CONDUCT AND ETHICS

Last Revised: July 28, 2026

COUSINS PROPERTIES INCORPORATED
AMENDED AND RESTATED
CODE OF BUSINESS CONDUCT AND ETHICS

I. Introduction

Cousins Properties Incorporated (together with its subsidiaries and controlled affiliates, "Cousins" or the "Company") seeks at all times to conduct our business with the highest standards of honesty and integrity and in compliance with all applicable laws, rules and regulations and our internal policies.

This Amended and Restated Code of Business Conduct and Ethics (the "Code") governs the business decisions made and actions taken by our directors, officers, and employees. ***All references in this Code to "employees" should be understood to include all employees, officers, and directors of Cousins Properties Incorporated, its subsidiaries and/or any affiliate controlled by the same, unless the context requires otherwise.*** This Code has been adopted by our Board of Directors (the "Board") and is designed to comply with all regulatory and exchange requirements for establishing a code of ethics.

The Code is an expression of our fundamental core values, which are as follows:

- **Integrity**: We are guided by the principles of integrity and professionalism for every point of contact in our professional and personal lives.

- **Service Excellence**: We believe deeply in providing superior service at the highest level of courtesy and promptness to our internal and external customers.

- **Diversity**: We value and embrace diversity in the backgrounds, cultures, interests, and experiences within our organization. Respect for individuality and personal experience and backgrounds is a key tenet of this core value.

- **Empowerment**: We empower our teammates to encourage one another, celebrate accomplishments and have a passion for professional development.

- **Community Involvement**: We believe in an obligation to give back through dedication of time and leadership by our associates within the communities where we operate.

- **Innovation**: We believe persistent innovation in design, service and operations can differentiate our properties from the competition.

These core values and the other standards of conduct in this Code provide general guidance for resolving a variety of legal and ethical questions for our employees. However, while the specific provisions of this Code attempt to describe certain foreseeable circumstances and to state our employees' obligations in such event, it is impossible to anticipate all possibilities. Therefore, in addition to compliance with the Code and applicable laws, rules and regulations, our employees are expected to observe the highest standards of business and personal ethics in the discharge of their assigned duties and responsibilities.

II. Obligations of Employees, Officers and Directors

The integrity, reputation and profitability of the Company ultimately depend upon the individual actions of our employees. As a result, each such individual is personally responsible and accountable for the following:

- **Read and understand the Code**. Employees are expected to read and understand this Code and comply fully with both the letter and spirit of the principles and procedures described herein and in the other policies and procedures that govern our compliance efforts.

  To ensure understanding of the Code and its application, employees are encouraged to discuss any questions regarding this Code, including its scope and application, with their supervisors or any of the following: the Chief Executive Officer, the President, the Chief Financial Officer, or the General Counsel (each, an "Executive Officer").

- **Follow the Code**. Employees must act in accordance with this Code. The Company may periodically require employees to participate in ethics training and/or to provide written certification of their compliance with the Code.

  All leaders must help their teams understand that ***business performance is never more important than ethical business conduct.***

- **Report known or suspected violations of the Code**. If an employee becomes aware of known or suspected instances of non-compliance with this Code, he or she must report such instances (i) to his or her supervisor, (ii) to any member of the internal audit or human resources team; (iii) to any Executive Officer or the Chair of the Nominating & Governance Committee of the Board of Directors (anonymously or otherwise), as appropriate; or (iv) through any other complaint/grievance procedure then in place.

  Any report made to the Chair of the Nominating & Governance Committee should be in writing and addressed as follows:

  Personal and Confidential Communication/Only Recipient May Open
  Chair of the Nominating & Governance Committee
  Cousins Properties Incorporated
  c/o the General Counsel
  3344 Peachtree Road, NE
  Suite 1800
  Atlanta, Georgia 30326

  In addition, all known or possible instances of non-compliance may be reported anonymously using the Company's ethics hotline at www.cousins.ethicspoint.com or by calling toll-free 1-877-844-7983.

This ethics hotline is an independent, professional reporting service retained by the Company to assist with receiving reports of compliance concerns and suspected violations, and it is available 24 hours a day, 7 days a week.

Officers and directors who are concerned that violations of this Code may have occurred, or that other illegal or unethical conduct by other officers or directors of the Company has occurred or may occur should contact (anonymously, confidentially, or otherwise) the General Counsel or the Chair of the Nominating & Governance Committee, except as otherwise authorized by law.

- **Good faith reporting**. Employees must not use these reporting procedures in bad faith, or in a false or frivolous manner. We strongly encourage employees who submit reports anonymously through the EthicsPoint include all known relevant facts to facilitate our investigation. In addition, the Company strongly suggests that reporting employees return to the site (or call the EthicsPoint number again) to answer any questions the Company may have on the report. This will enable the employee and the Company to engage in "anonymous dialogue" in which situations are not only identified but can be resolved.

- **Not retaliate in connection with reports of possible violations of the Code**. We will not tolerate any retaliation or threat of retaliation against any employee, officer, director, or other person who makes a report in good faith regarding potential violation of the Code or our other policies and procedures. Concerns regarding potential retaliation should be immediately reported as a possible violation of the Code.

This Code is in addition to any other Company policies, including the Employee Handbook (which may be revised, updated, and supplemented from time to time and is made available to our employees on our intranet portal), and/or applicable agreements. This Code is not intended to reduce or limit other obligations that employees may have to the Company. The information and policies contained in this Code and the Employee Handbook are subject to change, and we expressly reserve the right to modify or terminate any policies or procedures at any time, whether or not described in this Code or the Employee Handbook.

III. Compliance Procedures

This Code has been approved by the Board, which has designated the Nominating & Governance Committee as the sub-group responsible for administration of this Code.

A. Administration

The Board has also directed the General Counsel and the internal audit personnel to handle the Company's day-to-day compliance matters regarding the Code, including:

- Establishing procedures for review, training, and certification of the Code by employees and officers;

- Receiving, reviewing, investigating, and resolving concerns and reports on the matters described in the Code;

- Providing guidance on the meaning and application of the Code;

- Reporting periodically and as matters arise to management and the Nominating & Governance Committee on implementation and effectiveness of the Code and other compliance matters; and

- Reporting periodically on recommended updates or amendments to the Code as deemed necessary or advisable by the General Counsel or outside legal advisors.

B. Modifications or Amendments

This Code may be amended or modified by the Board in its sole discretion, subject to the disclosure and other provisions of the Securities and Exchange Act of 1934, and the rules of the New York Stock Exchange ("NYSE"); provided, however, that the Chief Executive Officer, in his or her sole discretion, may make non-substantive modifications without the necessity of prior approval of the Board or its committees. Following any such amendment or modification, the General Counsel shall be responsible for providing appropriate communication and training to employees, officers, and directors, in addition to public disclosure of any amendment to this Code by means of one of the methods described in the rules and regulations promulgated by the Securities and Exchange Commission (the "SEC").

C. Waivers

Any waiver of a provision of this Code for our employees requires the written approval of the General Counsel. Any waiver of this Code for our directors, Executive Officers or other Designated Officers may be made only by our Board or an appropriate committee of our Board and will be disclosed to the public as required by law or the rules of the NYSE. For purposes of this paragraph, "Designated Officers" means the Company's principal executive officer, principal financial officer, principal accounting officer or controller and any other officer who is an "executive officer" as defined in the rules and regulations of the SEC and/or NYSE. Waivers may be granted only as permitted by applicable law and in extraordinary circumstances.

With respect to any waiver or approval required herein to be provided by the General Counsel, each such waiver or approval may also be granted by the Chief Executive Officer.

D. Consequences of Non-Compliance

Violations of our Code not only damage our Company's reputation – they may also be illegal. Punishments for misconduct can be severe, including financial penalties, criminal convictions, and exclusion from government programs. Employees who fail to follow the provisions of this Code or any of our other policies or procedures will be considered to be acting outside the scope of their employment and thus will be subject to disciplinary action, up to and including termination.

E. Investigation Process; Confidentiality of Reporting

We will investigate all reports made pursuant to this Code, and in any such investigation we will respect the rights of all involved parties and observe principles of fairness and dignity. Upon receipt of a report, we will initiate an investigation, collect information, analyze the findings, and determine appropriate steps to address or resolve any issues that have been identified in accordance with the provisions of this Code and other applicable Company policies.

All reports made by employees will be treated in strict confidence and will only be disclosed to the extent necessary or advisable to conduct the investigation and take any remedial action, or as otherwise required by applicable law. Employees must not interfere in our investigation into any reported conduct, nor should they engage in their own fact-finding. All employees are expected to cooperate upon request in any investigation into reported conduct.

When reporting conduct suspected of violating the Code, the Company prefers that employees identify themselves in order to facilitate the Company's ability to take appropriate steps to address the report, including conducting any appropriate investigation. If an employee wishes to remain anonymous, he or she may do so. In the event the report is made anonymously, however, the Company may not have sufficient information to look into or otherwise investigate or evaluate the allegations. Accordingly, persons who make reports anonymously should endeavor to provide as much detail as is reasonably necessary to permit the Company to look into, investigate and evaluate the matter(s) set forth in the anonymous report. In certain circumstances, it may not be possible for the Company to ensure absolute confidentiality and anonymity due to the requirements of applicable laws, rules, or regulations or the requirements of court or administrative authorities having jurisdiction. However, the Company is committed to protecting the confidentiality of all allegations to the extent possible.

F. Prohibition on Retaliation

We will not tolerate retaliation against any employee who, in good faith, reports a possible violation or other concern regarding this Code or our other policies and procedures. Acting in "good faith" means that you provide all of the information you have and believe that you are giving a sincere and complete report. We are committed to ensuring that our employees have the ability to raise concerns or report misconduct without fear of retribution. Accordingly, individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination. In the event of a concern regarding potential retaliation, the employee having such concern should report it immediately using any of the available reporting avenues.

IV. STANDARDS OF CONDUCT

A. Honest and Ethical Conduct and Fair Dealing

We are committed to ensuring that our employees and other representatives represent our services in a fair and honest manner, exhibiting the highest standards of honest and ethical conduct. All promotional materials (*e.g.*, advertising, labeling and literature) and public statements must be truthful and non-misleading.

No employee or representative should ever misstate facts or create misleading impressions, including by omission of information necessary to make a statement fair and balanced. This applies to our services as well as the services of our competitors. All express or implied claims, comparisons and/or testimonials must be true, accurate and complete.

No employee should take unfair advantage of another person through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealing practice. Whenever the ethical or legal requirements of a situation are unclear, employees should contact their supervisors or the General Counsel.

B. Financial Records and Periodic Reports

Accurate and reliable records are crucial to our business. As such, we require honest and accurate recording and reporting of information, including in reports and documents that the Company files with, or submits to, the SEC and in other public communications made by the Company. All of our employees must ensure that we maintain accurate books and records and financial documents, engage in appropriate document retention practices (the Company's policy on document retention is maintained on our employee intranet portal), follow established internal controls, and provide prompt and accurate answers to our investor disclosure requirements.

In support of our commitment, we have, among other measures, (i) designed and implemented disclosure controls and procedures (within the meaning of applicable SEC rules) and (ii) required the maintenance of accurate and complete records, the prohibition of false, misleading, or artificial entries on its books and records, and the full and complete documentation and recording of transactions in our accounting records. In addition to performing their duties and responsibilities under these requirements, all employees involved in our SEC reporting process, including the Executive Officers, will establish and manage the Company's reporting systems and procedures with due care and diligence to ensure that:

- Reports filed with or submitted to the SEC and other public communications contain information that is full, fair, accurate, timely and understandable and do not misrepresent or omit material facts.

- Business transactions are properly authorized and completely and accurately recorded in all material respects on our books and records in accordance with generally accepted accounting principles and our established financial policies.

- Appropriate measures are taken to protect the confidentiality of our non-public information and the non-public information of third parties with which we are entrusted.

- Retention or disposal of Company records is in accordance with applicable legal and regulatory requirements.

Company records include any and all paper or electronic files that are maintained in the normal course of business, which include (but are not limited to) customer order / billing information, contracts, payroll records, time and attendance records, travel and expense reports, accounting and financial data, emails, and performance information. All company records must be complete, accurate and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited.

C. Conflicts of Interest and Corporate Opportunities

We recognize and respect the right of our employees to engage in outside activities which they may deem proper and desirable, provided that employees fulfill their obligations to act in the best interests of the Company and to avoid situations that present a potential or actual conflict between their interests and the Company's interests.

A "conflict of interest" occurs when a person's private interest interferes, or even appears to interfere, in any way with the interests of the Company as a whole. A conflict can arise when an employee or director takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when an employee or director, or a member of his or her family, receives improper personal benefits as a result of his or her position with the Company. Each individual's situation is different and in evaluating his or her own situation, an employee or director will have to consider many factors.

Where there is a real or perceived conflict of interest involving a director, an Executive Officer or a Designated Officer, the matter should be referred to the Chair of the Audit Committee. For our directors and Executive Officers, our policy is that conflicts of interest should be avoided, except as approved by the Audit Committee. In the case of directors and Executive Officers, conflict of interest transactions may also be subject to public reporting, pursuant to the rules of the SEC, as a related party transaction.

Employees and directors also owe a duty to the Company to advance the Company's legitimate business interests when the opportunity to do so arises. Employees and directors are prohibited from (i) taking for themselves personally any actual or potential opportunities that are discovered through the use of corporate property, information, or position, (ii) using corporate property, information, or position for actual or potential personal gain and/or (iii) competing with the Company, unless the General Counsel has confirmed in writing that the Company has no interest in the opportunity.

The Company respects the various interests of its employees outside of the workplace, and employees are permitted to pursue outside interests, such as work with political, charitable, and other organizations, as well as employment, directorship, and other off-duty activities. However, any outside activities by an employee should not encroach on the employee's ability to properly perform his or her duties with the Company. Engaging in outside activities is not permissible if such activities:

- Create a real, potential, or perceived conflict with the Company's interests, as discussed above.
- Interfere with the employee's job responsibilities or performance.
- Involve working for a competitor or supplier.
- Use Company resources, including other employees or vendors.
- Involve the use of confidential information of the Company or risk the disclosure of such

confidential information.
- Imply sponsorship or support by the Company of an outside organization.
- Risk damaging the Company's business or reputation.

D. Compliance with Laws, Rules and Regulations, Including Anti-Bribery, and Insider Trading

We are committed to conducting our business with honesty and integrity and in compliance with all applicable laws, rules, and regulations. No employee shall engage in any unlawful or unethical activity or instruct others to do so, for any reason.

The Company requires strict adherence to the U.S. Foreign Corrupt Practices Act, and where applicable, any similar anti-corruption and anti-bribery laws of the United States or other countries with jurisdiction over the Company and its operations. As part of our compliance policies, including our gift and entertainment policy (which is available to employees on our intranet portal), we have provided our employees with certain guidelines and principles which reflect our dedication to ensuring full compliance with all anti-bribery and corruption laws and regulations. These policies include the following:

- Our employees and representatives may not directly or indirectly offer payments (or anything else of value, such as gifts) whether to a government official or any other person to make that individual or the entity they represent act in a manner that will assist us in obtaining or retaining or securing any improper business advantage. We seek competitive advantages only through superior performance and never through unfair practices.

- We will not pay excessive travel or entertainment expenses on behalf of a government official or other person, as such payments could be considered bribes.

- In addition, all exchanges of gifts or social amenities are only acceptable when based on a clear business purpose and within the bounds of good taste. No such activities should be of a type which could embarrass or harm the reputation of the Company.

- As noted above, accurate books and records are required; falsifying records to conceal a bribe is not only prohibited, it might be a criminal offense.

In addition, our employees are strictly prohibited from engaging in any act or omission that may result in a violation of any applicable anti-corruption, kickback or similar law or regulation. The Company does not tolerate the provision or acceptance of any improper payments or advantages in relation to its business.

Employees and directors are required to comply with the insider trading laws which make it unlawful for any person who has material non-public information about the Company to trade the stock or other securities of the Company or to disclose such information to others who may trade, as well as our insider trading policy, which is available to employees through our intranet portal. Any questions regarding the Company's insider trading policy should be directed to the General Counsel.

E. Confidentiality

In carrying out the Company's business, employees may access confidential information, data and documents and become aware of information about the Company, its investors, other employees, customers, prospective customers or other third parties that is not generally known to the public. This includes bids, quotations, technologies, concepts, business strategies and plans, financial data, employment arrangements and other confidential information. It is the duty of every employee not to use or disclose this information improperly or in a way that could be detrimental to the interests of the Company or its co-venturers, partners, customers, suppliers, or investors.

Employees must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. We also require that our employees exercise caution in communicating or transmitting confidential information, especially electronically, due to the security and access concerns regarding email communications. Confidential information of the Company should only be discussed with those employees who need to know the information to perform their functions for the Company. Improper disclosure of confidential information includes disclosure to non-employees (other than attorneys or advisors authorized by the Company to receive such information) or to family members, friends, online communities, group chats, forums, or other physical or virtual communication platforms. Further, Company documents should be managed and maintained pursuant to all applicable document management policies. Our employees' obligations to preserve confidentiality continue even after their employment with us terminates.

Employees shall not misuse confidential information for personal gain. This is not limited to activity concerning publicly traded securities, but it also includes any financial instrument or contract, security, derivative, or evolving formulation such as prediction market contracts. A prediction market, also referred to as an event market, information market, or betting platform, is a market (often an online or virtual platform) in which participants buy and sell contracts for which payoffs, or some other financial result, depend on the outcome of a future event.

In addition to the above, all employees should refer to the policies set forth in the Company's Insider Trading Policy, which is available to employees through the Company's intranet portal.

If any employee has any questions regarding whether information in his or her possession is confidential, or whether disclosure or use of information is permissible, he or she should consult the General Counsel.

The Company further encourages a culture where all persons or entities can raise concerns or report violations or suspected violations of law or regulations to governmental agencies and regulatory authorities without fear of retaliation or reprisals. All persons or entities may: (a) communicate, without notice to or approval by the Company, with governmental agencies and regulatory authorities; (b) participate in any investigation or proceeding that may be conducted by any governmental agency or regulatory authority, including providing documents or other information without notice to the Company; or (c) receive an award from any governmental agency or regulatory authority in connection with providing such information or participating in any investigation or proceeding. This paragraph applies in all situations and is meant to clarify and supersede any and all prior statements, policies, or procedures (including all other sections of this Code of Business

Conduct and Ethics), as well as any contracts or agreements made by the Company with any persons or entities.

F. Equal Employment Opportunity and Harassment

Our focus in personnel decisions is on merit and contribution to the Company's success. Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. The Company affords equal employment opportunity to all qualified persons without regard to any impermissible criterion or circumstance. Our objective is to provide a work environment free of discrimination and harassment based on gender, race, color, national origin, age, religion, marital status, disability, sexual orientation, or veteran status.

We do not tolerate (and do not tolerate our representatives engaging in) discrimination, unlawful harassment, hate-related behaviors, threats of workplace violence or other conduct or actions that have a direct or indirect discriminatory or other harmful effect. Every employee is expected to be sensitive to and aware of any behaviors or situations that could be interpreted as violating that policy and is responsible for taking steps to correct any such behavior or stop any such actions. Any complaints alleging harassment or other discriminatory conduct should be made in the same manner as other reports of violations of this Code and should be handled in a timely manner.

G. Protection and Proper Use of Company Assets

All employees should protect the Company's assets and ensure their efficient use. Company assets include, but are not limited to, confidential information, software, computers, office equipment and other supplies. All employees must appropriately secure all company property within his or her control to prevent its unauthorized use. All Company assets should be used for legitimate business purposes only. Company employees shall make sure that any use of Company assets that is not solely for the benefit of the Company is approved beforehand through the General Counsel. In addition, all employees shall follow the guidelines and requirements of the Employee Handbook as it relates to use of Company's assets.

H. Political Contributions; Political Activities

We encourage our employees to contribute to the community and to fully participate in local and national political processes. However, there are certain ethical guidelines for doing so. It is important that our employees' individual political activities be kept separate from Company political activities. If an employee chooses to participate in activities of a political nature, then such employee must make clear that such activities are his or her own and not implicitly or explicitly endorsed by the Company.

Any Company contribution that could be a political donation requires the review and pre-approval of the General Counsel. In addition, when permitted by law and authorized by the Chief Executive Officer, the Company may express its views through designated spokespersons on specific issues that are important to the Company's business and may make contributions to, or otherwise support, candidates to elective office.

V. OTHER POLICIES

This Code shall be the sole code of ethics adopted by the Company for purposes of Section 406 of the Sarbanes-Oxley Act of 2002 and the applicable rules and regulations thereunder. Insofar as other policies or procedures of the Company govern or purport to govern the behavior or activities of the Covered Persons who are subject to this Code, they are superseded by this Code to the extent that they overlap or conflict with the provisions of this Code.

VI. INTERNAL USE

This Code is intended solely for the internal use by the Company and does not constitute an admission, by or on behalf of the Company, as to any fact, circumstance, or legal conclusion.

VII. VENDOR CODE OF CONDUCT

We also expect the consultants, independent contractors, and vendors we retain or with whom we do business generally to abide by this Code or by similar principles of honest and highly ethical conduct, as set forth on Exhibit A.

Exhibit A

General

The Cousins Properties Incorporated ("Cousins" or "the Company") Vendor Code of Conduct ("the Vendor Code") describes Cousins' expectations of how its vendors, consultants, and independent contractors conduct business. All vendors, consultants, and independent contractors (singularly and collectively, "Vendors") engaged in providing products and services to Cousins are expected to embrace this commitment to integrity by complying with the Vendor Code and communicating and enforcing the Vendor Code provisions throughout their organization and across their supply chain, including to sub-vendors and subcontractors.

We expect that our Vendors understand the requirements of this Vendor Code, operate in accordance with the expectations outlined in this Vendor Code and comply, at a minimum, with all applicable laws, rules, regulations, and standards within the geographies in which they operate. In instances where standards outlined in the Vendor Code differ from local laws, Vendors must respect these standards within the framework of the applicable local laws. Vendors must be open and cooperative with regulators and comply with global and local jurisdictional requirements. This document summarizes the Company's expectations of Vendors, sub-vendors, and their staff.

Vendor Code of Conduct:

1. Ethical Business Practices

Cousins is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. We expect our Vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

a. Anti-Bribery

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

b. Privacy and Data Protection

We expect our Vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary, and confidential information, including information that they access, receive or process on behalf of Cousins. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational, and financial consequences for the Vendor, individuals whose personal information may be implicated, and Cousins. In addition, Vendors must comply with all applicable privacy / data protection and information security laws and regulations.

c. Grievance Mechanism

We expect 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.

2. **Labor and Human Rights**

We expect our Vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture. We expect our Vendors to have similar policies and practices that apply to all workers, suppliers, and their supply chains, including migrant and temporary workers, and address the following topics:

a. **Wages and Benefits**

Vendors must comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. Cousins encourages vendors to work toward improving standards of living and quality of life for their employees and communities.

b. Working Hours

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

Cousins does not tolerate slavery, forced labor, or human trafficking in any form and Cousins will not knowingly work with Vendors who engage in these practices or permit their subcontractors to engage in these practices. We expect our Vendors to fully comply with requirements of applicable slavery, forced labor and human trafficking laws.

All work must be performed under and in accordance with contracts that have been entered into voluntarily. Vendors must not use involuntary labor of any kind, including prison labor, debt bondage, or forced labor by governments. Vendors must not engage in practices associated with forced labor. Additionally, Vendors must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no 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 applicable legal minimum age of employment. Such measures include age verification systems, training for managers, and communicating with sub-Vendors and suppliers on child labor issues.

e. Freedom of Association

Cousins expects Vendors to respect workers' rights to freedom of association by meeting or exceeding the relevant requirements of local law.

f. Inclusion and Non-Discrimination

Workers should be treated with respect and dignity at all times. Cousins requires Vendors to comply with all applicable laws regarding discrimination in hiring and employment practices. Cousins expects Vendors to maintain a workplace free of discrimination, harassment, victimization, and any other form of illegal or inappropriate behavior or abuse on any grounds protected by law, including but not limited to age, disability, ethnic origin, gender, nationality, race, sexual orientation, marital status, pregnancy, religious beliefs, or veteran status.

3. Vendor Diversity and Inclusion

Cousins values and embraces diversity in the backgrounds, cultures, interests, and experiences within our organization, and we expect our Vendors to share this commitment in their operations and within their supply chain. Respect for individuality and personal experience and backgrounds is a key tenet of this commitment.

4. Environmental Stewardship

Environmental stewardship is an important aspect of how Cousins operates our business. Cousins encourages our Vendors to adhere to similar environmental efforts as appropriate to their businesses and aligned with best practices locally and globally. This includes implementing processes to identify and manage risks and opportunities related to the environment and water.

a. Energy and Emissions

Cousins encourages our Vendors to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their suppliers. Vendors are encouraged to take reasonable efforts to reduce greenhouse gas (GHG) emissions caused by their operations. If requested by Cousins, we encourage Vendors to disclose energy and emissions management policies and performance.

b. Water

Vendors are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Vendors are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

c. Waste

Vendors are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste and in particular, hazardous waste, must be managed in a responsible manner. Chemicals and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling or reuse and disposal. All workers who handle waste and hazardous wastes must be properly trained on how to deal with substances and the potential hazards the material presents to the worker and environment if mismanaged or released. Vendors must only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws and best management practices.

d. Material Restrictions and Handling

All materials used by Vendors must comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling, and disposal.

5. Management Systems and Governance

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

Summary

This Vendor Code sets forth Cousins' expectations for current and future Vendors. Cousins expects all new and existing Vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein. Any facts or circumstances which are likely to lead to any Vendor's inability to meet the requirements and expectations of this Vendor Code should be reported promptly to its Cousins relationship manager.

Cousins is committed to continuously reviewing and updating this Vendor Code. Therefore, this Vendor Code is subject to modification from time to time. The contents of this Vendor Code are additional to and do not in any way affect or prejudice any of Cousins' rights and remedies under the relevant contracts with each Vendor, if any. In the event of any non-compliance to the requirements of this Vendor Code or breach of contract, Cousins reserves its rights and retains the sole discretion to exercise any rights under this Vendor Code, any relevant contract and/or local laws and regulations.

The failure or omission by Cousins to insist upon strict performance and compliance with any of the provisions of this Vendor 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 Vendor Code and the provisions of any relevant contract with any Vendor, the provisions of that contract will prevail.