



VENDOR CODE OF ETHICS

ACT
WITH
INTEGRITY

AVOID
CONFLICTS

PROTECT
DATA/
PROPERTY

TREAT
PEOPLE
FAIRLY

BE
ACCOUNTABLE

RAISE
CONCERNS

Realogy Holdings Corp. is committed to providing our customers and clients the highest quality real estate and relocation services. Through our business units and owned and franchised offices operating under our brands around the world, Realogy provides comprehensive real estate services to consumers and businesses alike and leads our industry in service, value and ethics. In delivering on our mission, Realogy relies on business partners—suppliers, vendors, independent sales associates, and service providers, like you—to share our commitment to achieving the highest standards of service, quality, excellence, ethics, safety, legal compliance and respect for human rights.

To help you understand our expectations and your obligations as a Realogy vendor, we developed this Vendor Code of Ethics. All vendors are expected to understand and comply with this Code as they conduct business with and on behalf of Realogy or any of its subsidiary companies (collectively, “Realogy”).

The information outlined here is important and should be read carefully. All Realogy vendors will be required to inform any individual who may represent the vendor in business dealings with Realogy to ensure they understand and comply with the principles of our Vendor Code of Ethics.

The Vendor Code of Ethics is not an exhaustive list of policies, but instead provides guidance and policy statements to vendors about the general business conduct expected by Realogy. If you have questions about how the Vendor Code of Ethics applies to a specific situation or you believe that any company or individual working for or on behalf of Realogy has violated this Vendor Code of Ethics or any applicable law, e-mail: realogy.ethics.compliance@realogy.com. You may also raise concerns through our Code of Ethics Line.

We look forward to doing business with you.
Thank you for your support.

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Policy Owner: Ethics & Compliance
Version: 5



ACT WITH INTEGRITY

Realogy operates its business with six core values in mind: **COMMUNITY, INTEGRITY, VALUE, INNOVATION, LEADERSHIP and PEOPLE**. These principles guide Realogy's business practices and its selection of vendors. While we expect that our vendors will have their own core values, it's important to share an understanding—as we begin our work together—about what is important to Realogy in advancing its business goals. The information that follows should help guide you so we can work together effectively to adhere to our core values and deliver the best-in-class products and services to our customers.

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COMPLY WITH LAWS AND REGULATIONS

As a threshold requirement, vendors must comply with laws and regulations of the countries where they are located and where they do business, as well as the laws of jurisdictions that may apply to the work they do for Realogy. Vendors must require that any individual that represents, or appears to represent, the vendor comply with the same laws and regulations that govern the vendor. In addition to any specific obligations under vendor's agreement with Realogy, all Realogy vendors must, without limitation:

- Comply with all global anti-bribery laws, including the US Foreign Corrupt Practices Act and UK Bribery Act;
- Comply with any industry-specific laws and regulations that govern the vendor's business practices; and
- Comply with all data privacy laws, especially with respect to the restrictions on retention, handling, transfer and use of customer's or employee's personal information, including financial, health and other legally protected personal information.

COMPLY WITH YOUR CONTRACT

This Code is intended to complement, rather than replace, any legal agreement or contract between a vendor and Realogy. Vendors must comply with the terms of any written agreement with Realogy. Failure to abide by the terms of the contract will give rise to legal consequences and will threaten the relationship between the vendor and Realogy.

FOLLOW HONEST AND ETHICAL BUSINESS PRINCIPLES

Realogy vendors must conduct their business and activities with integrity and according to their obligations under their agreement(s) with Realogy. While vendors may have their own internal codes of conduct that may share and overlap with principles with this Vendor Code of Ethics, vendors must abide by Realogy's requirements in this Vendor Code of Ethics for ethical business conduct.

ACCOUNTING AND BUSINESS RECORDS

Every vendor must maintain honest and accurate books and records of business information. Any required reports supplied to Realogy must be complete and may not hide or disguise any pertinent information. Vendors' financial records must conform either to a reasonable system of internal controls, or where applicable, to generally accepted accounting principles. Vendors should ensure that all business records are retained and disposed of in full compliance with any governing laws or regulations.

ANTI-CORRUPTION

Realogy does not tolerate bribery or corruption in any form. Vendors may not directly or indirectly offer, promise or authorize the giving of anything of value for an improper reason. Realogy also does not permit or sanction facilitating payments, regardless of local custom or practice. Suppliers may not engage in or allow embezzlement, money-laundering, extortion, bribes, kickbacks or reciprocity, or other forms of corruption in connection with their relationship with Realogy. Vendors must comply with all anti-corruption and global trade compliance laws and regulations, including the USA Patriot Act and the Office of Foreign Asset Controls regulations.

FAIR COMPETITION

Realogy is committed to integrity in our marketplace and expects its vendors to comply with all applicable antitrust and fair competition laws by avoiding any conduct that would unlawfully restrain competitors. Compliance with fair competition laws requires careful avoidance of price-fixing, collusion, predatory pricing, harassing competitors, and stealing trade secrets.

AVOID CONFLICTS

GIFTS AND ENTERTAINMENT

Realogy's approach to vendor relationships is straightforward. We expect a competitive price for the products and services offered. While we value strong business relationships, we view the offer of lavish gifts and personal favors from vendors as potentially increasing the vendor's expenses and interfering with our goal of securing the best deal for Realogy. As a result, Realogy has a gift policy limiting the value, nature and timing of gifts from and to its employees. We expect our vendors to use good judgment, discretion, and moderation when offering gifts or entertainment to Realogy employees. Realogy employees are not permitted to accept, directly or indirectly, any cash or monetary equivalents as gifts. In addition, we restrict the acceptance of any gifts, objects of value or preferential treatment from any person or enterprise that has sought or is seeking business with Realogy where doing so may influence, or appear to influence, our business judgment. Realogy employees may accept gifts of nominal value offered in the normal course of business as long as they do not occur during negotiations or within ninety days after negotiations have concluded and they do not influence or appear to influence our business judgment.

CONFLICTS OF INTEREST

A conflict of interest occurs when an individual's personal or private interests interfere or appear to interfere with his or her professional judgment or commitment to business interests. When working on behalf of Realogy, vendors must avoid giving the appearance of or engaging in any actual improper conduct and/or conflicts of interest. Vendors shall not negotiate or otherwise deal directly with any Realogy employee who has any direct or indirect financial interest in the vendor or whose relative, friend, romantic partner or member of the same household has a direct or indirect financial interest in the vendor. Any deviation from this policy requires prior written consent from a Realogy Ethics & Compliance Officer.

If an actual or potential conflict of interest arises, disclose it immediately by sending an e-mail to realogy.ethics.compliance@realogy.com or reporting it through our Code of Ethics Line.

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PROTECTION OF REALOGY PROPERTY

Vendors have a responsibility to protect and responsibly use both the physical and intellectual assets of Realogy, including Realogy-provided information technology, platforms and systems ("Realogy Information Technology Resources"), when authorized by Realogy to use such assets. Vendors must exercise care to avoid exposing Realogy's assets to loss, theft, or damage.

Vendors must also respect the intellectual property rights of Realogy and third parties with respect to, among other things, patents, copyrights, trademarks, and trade secrets. These assets belong to Realogy (or another third party) and vendors must abide by any legal restrictions in using them in connection with their work for or on behalf of Realogy. Vendors may not use Realogy's intellectual property except in compliance with the terms of their contracts with Realogy or with Realogy's written consent.



PROTECTION OF INFORMATION

Information security is a critical priority for Realogy. As our business partners, vendors may have access to information belonging to Realogy, its customers, employees or other third parties. Vendors bear responsibility for protecting this information from unauthorized access, disclosure or loss. Vendors with access to Realogy's confidential information, intellectual property or personal information about Realogy's employees or customers (or other third parties) may not disclose it to other parties without Realogy's express written consent.

Confidential information includes materials that vendors may regularly encounter in their work for Realogy, such as: pricing, cost or other financial information; sales data; franchisee, customer or client lists; client financial information; unannounced products or services; policies and practices; marketing plans or unreleased marketing materials; and customer or employee personal information.

Vendors with access to confidential information, including personal information of employees and customers, must protect such information in accordance with all applicable data privacy and information security laws. Vendors must maintain appropriate internal controls to ensure the appropriate handling of all confidential information.

Vendors with access to non-public information about Realogy cannot trade in the stock of Realogy or any other company on the basis of material non-public information. Not only are such activities against this policy, they are also illegal. Additionally, vendors are prohibited from sharing material non-public information with anyone, including family members, or advising others to trade stock on the basis of this information. Vendors may not disclose material non-public information to any outside person, or speak to media, investment professionals, market analysts or shareholders about company business.

PROTECTION OF INFORMATION TECHNOLOGY RESOURCES

Realogy maintains a secure system of technology resources and systems to conduct our business. As our business partners, vendors may be granted access to these Realogy Information Technology Resources to provide services to or on behalf of Realogy. Vendors may use Realogy Information Technology Resources only for legitimate business-related purposes and must abide by restrictions on Realogy Information Technology Resources, including those listed in any contract with Realogy and the Information Technology Acceptable Use Policy.

To ensure the security of Realogy's information, vendors must also comply with the Realogy Information Security Policy and Information Security Standards for access to Realogy's internal corporate network and systems, when necessary.

NOTIFY US IF A DATA BREACH OCCURS

A breach of data security can have far-reaching effects on our business. Unless the vendor's contract with Realogy provides a different protocol, vendors must follow the process outlined in this Vendor Code of Ethics to address a security breach of Realogy data. Vendors shall notify Realogy immediately following the discovery of any suspected breach or compromise of the security, confidentiality, or integrity of Realogy's data or account information by calling the Realogy Code of Ethics Line at 866-495-CODE (2633). Vendors shall provide follow-up written notification within 48 hours to Realogy. Written notification shall include:

- A brief summary of the available facts
- The status of the investigation
- The potential number of consumers affected (the "Affected Persons") and the jurisdiction(s) in which they reside.

Vendors agree to notify the Affected Persons regarding any security breach/privacy event in compliance with the applicable laws of the affected jurisdiction(s). All costs associated with any security breach privacy event, including but not limited to, the costs of the notices to, and any legally required credit monitoring for, Affected Persons shall be the sole responsibility of the vendor. Vendors shall coordinate with Realogy with respect to any communication to any third party, including but not limited to the media, vendors, consumers, and Affected Persons regarding any security breach/privacy event.

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FOLLOW LAWFUL EMPLOYMENT PRINCIPLES

Realogy expects our vendors to share our commitment to diversity, inclusion, equal employment opportunity, and a safe and harassment-free workplace. Realogy vendors shall conduct their employment practices in full compliance with all applicable laws and regulations in all operations.

HARASSMENT

At Realogy, we believe in maintaining a productive work environment free of harassment. We treat each other with respect and do not commit or tolerate harassment in any form, including sexual harassment. We prohibit harassment by or against anyone involved in our operations, including employees, independent sales associates, vendors, contractors, subcontractors, consultants and any other third party. We expect our vendors, independent sales associates and third parties, whether operating on Realogy premises or other location, to follow these principles and cooperate with Realogy in maintaining its commitment to a workplace free of harassment.

DISCRIMINATION

We are committed to creating an inclusive work environment of diverse backgrounds, ethnicities, cultures, beliefs and experiences that is free from discrimination, harassment and intimidation. We do not tolerate any discrimination by or against anyone involved in our operations, including employees, independent sales associates, vendors, contractors, subcontractors, consultants and any other third party. We expect our vendors, independent sales associates and all third parties involved in our operations, whether operating on Realogy premises or other location, to comply with all laws that prohibit discrimination based on a person's race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status or any other status protected by applicable law.

SAFETY

We take safety very seriously. We are committed to providing a safe workplace free of health and safety hazards. We expect our vendors to have and enforce a drug free work policy, and we prohibit the use, possession, distribution or sale of illegal drugs while conducting business with or on behalf of Realogy, or on Realogy's premises. Our work environment must be free from violence. We do not allow weapons or explosives on our work premises. We do not tolerate threats, intimidation, aggression or violent behavior of any kind. Realogy expects vendors to provide a safe and healthy work environment that fully complies with all applicable safety and health regulations and practices.

WORKING HOURS, WAGES AND HUMAN RIGHTS

Realogy expects its vendors to follow all applicable wage and hour laws, including minimum wage, overtime and maximum hour rules. In addition, Realogy expects full compliance with all minimum working age laws and requirements. We take very seriously our responsibility to remain alert to any risks to human rights and to ensure that our business practices, as well as those of our supply chains, do not foster or support slavery or human trafficking in any way. Realogy does not tolerate any child or forced labor or any other unacceptable treatment of workers, and we will not partner with companies that engage in human trafficking or employ, either directly or indirectly, any child or forced labor, including indentured labor, bonded labor, or prison labor. Realogy reserves the right to visit vendor locations to ensure compliance with this provision, where circumstances allow.

THE ENVIRONMENT

Suppliers must comply with all environmental laws and regulations where our business is conducted. Suppliers are encouraged to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible.

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EDUCATE YOUR WORKFORCE

All vendors must ensure that individuals representing the vendor in business dealings with Realogy understand and comply with the Vendor Code of Ethics. Vendors will immediately inform their Realogy contact if any situation develops that violates the principles of this Vendor Code of Ethics.

REALOGY'S RIGHT TO ENFORCE THIS CODE

Realogy will enforce the terms of the Vendor Code of Ethics under the terms of our agreement with any vendor. Realogy vendors are expected to self-monitor their compliance with this Vendor Code of Ethics.

In addition to any contractual rights Realogy may have, Realogy may request the immediate removal of any individual representing the vendor who behaves in a manner that is unlawful or inconsistent with this Vendor Code of Ethics.



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If you wish to report questionable behavior or a possible violation of the Vendor Code of Ethics, you can either work with your Realogy contact to resolve your concern or you may contact our Code of Ethics Line. Realogy supports a third-party administered Code of Ethics Line that vendors may use to report issues. You may report your concern in any of the following ways:



Call the **Realogy Code of Ethics Line** at **866-495-CODE (2633)** (reports may be made anonymously where permitted by law). For dialing instructions for vendors outside the U.S., go to <http://theline.realogy.com>;



Enter a report on the Realogy Code of Ethics Line at **<http://theline.realogy.com>**; or



Send a letter to the Chief Ethics & Compliance Officer at Realogy Holdings Corp., 175 Park Avenue, Madison, NJ 07940.

Realogy will investigate all reports made through the Code of Ethics Line and we keep the reports confidential to the degree possible. Realogy will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior and/or a possible violation of the Vendor Code of Ethics.