



Do What's Right: Our Code of Business Ethics

Table of Contents

3 Introduction

- Message From Our CEO
- We Are Guided by Our Values
- Why We Have a Code of Business Ethics
- How Do I Do What's Right?
- Speak Up
- Violations of Our Code
- Lead With Integrity

10 Teamwork

- We Hire Team Members Ethically
- We Promote a Safe and Healthy Workplace
- We Keep Our Promise to Business Partners
- Treat Vendors Ethically

16 Integrity

- We Avoid Conflicts of Interest
- We Maintain Accurate Records
- We Understand the Rules Around Gifts

22 Accountability

- We Protect our Assets
- We Protect Our Brand
- We Communicate Carefully

27 Kindness

- We Give Back to Our Communities
- We Are Good Stewards
- We Treat Our Residents Fairly and Honestly

32 Excellence

- We Deliver Results
- We Respect the Confidentiality of Information
- We Follow the Law
- Speak Up
- Competitive Information
- We Respect the Privacy of Others

34 Inclusion

- We Respect Each Other
- We Value Our Diverse Teams
- We Believe in Fair Housing for All

38 Conclusion

- Message From Our Compliance Officer

40 Index

Introduction

Teamwork

Integrity

Accountability

Kindness

Excellence

Inclusion

Conclusion

Index

Introduction

Message From Our CEO
We Are Guided by Our Values
Why We Have a Code of Business Ethics
Making Ethical Decisions
Speak Up
Violations of Our Code
Lead With Integrity

Message From Our CEO

Hello Keypers,

Who we are as a company and how we treat each other plays an integral role in the way we serve our residents, vendors and communities. Our Mission defines our purpose as a company, our Vision outlines what we aspire to achieve, and our Values represent how we will work together.

Our Code of Business Ethics (COBE) is a helpful guide to how we live our Values in the business decisions we make every day. The way we do business is as important as the business we do. I hope you will use the COBE as a guiding light to help you operate responsibly on behalf of our team members, our residents and the communities where we live and work.

If you see something that is not in line with our Values, we want you to **Speak Up**. Our Integrity Hotline exists to hear your concerns, so we can work together to make our workplace safe, comfortable and inclusive.

Thank you for adhering to these high ethical standards and for your ongoing commitment to our family of residents.



Colleen



Colleen Keating

Chief Executive Officer,
FirstKey Homes

We Are Guided By Our Values

FirstKey Homes is a leader in the single-family rental industry. Our business is to acquire, renovate, and manage single-family homes across the country that thousands of Americans can call home. We are committed to consistently providing a high-quality home with excellent customer service and best-in-class maintenance. It matters to us that the homes we renovate and lease help stabilize communities and improve the quality of living for renters across America.

Company Mission

We give our family of residents a place to call home.

Company Vision

To proudly serve the family of residents, making our homes their own, and build communities, one caring experience at a time.

Our Core Values



Teamwork
Thrive Together



Integrity
Do What's Right



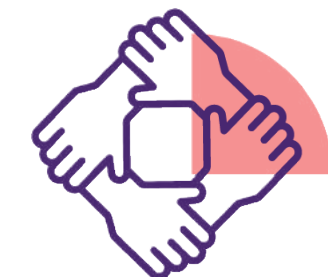
Accountability
Own It



Kindness
Lead with Compassion



Excellence
Deliver Results



Inclusion
Welcome Everyone

Why We Have a Code of Business Ethics

How Does the Code of Business Ethics (COBE) Help Me?

We all want to **Do What's Right** for ourselves, our company and the world around us. Ethical dilemmas can occur at work every day. When you are unsure of whether an action is okay to take, you can consult our Code of Business Ethics (COBE) to help you make the right choice. The COBE contains valuable guidance and resources on the laws, regulations and company policies that affect our business and help guide you in knowing what is appropriate when it comes to **Integrity** in the workplace.

Q: Who has to follow the COBE?

A: The COBE applies to every team member. All team members have the responsibility to know and follow the COBE and **Speak Up** about anything that doesn't seem right.

Q: Does the COBE contain everything I need to know?

A: The COBE lays out the basic rules for how we conduct business, but it doesn't have the answer to every question. If you are unsure about a situation, **Speak Up**.

Q: What if my supervisor asks me to do something that is against the COBE?

A: No one has the authority to make you engage in behavior that violates our COBE. If you feel pressured to violate the COBE, **Speak Up!**

How Do I Do What's Right?

If you're not sure of what to do, you can use the Ethical Decision-Making chart below to help in determining the best action.



Is it legal?



Does it comply with our policies and COBE?



Is it safe?



Is it consistent with our Core Values?



Would it be okay if the action went viral?



The Action is Probably Okay!



If you answered **"NO"** to any of the above questions, the action may have serious consequences. Do not do it!
Still not sure? Do What's Right and Speak Up!

Speak Up

What Do I Do if I Suspect a Violation or if I Am Unsure of What Action to Take?

We hope that you will feel comfortable talking to your manager, another member of management, an HR business partner, or the Compliance team. Our Open Door Policy means that you are free to talk to your manager any time about any problems, questions, or concerns about FirstKey Homes. They have a responsibility to listen and help. However we also offer a confidential reporting channel to report issues or ask questions, anonymously if you prefer.

However you choose to **Speak Up**, your concern will be handled with the appropriate level of confidentiality. We want you to feel comfortable coming forward, so we do not tolerate retaliation against any team member when raising a question or report of misconduct honestly and in good faith. When you call the Integrity Hotline, your call will be answered by an independent, third party call center representative and forwarded to FKH's Compliance team for review. The Compliance team strives to respond promptly and consistently to alleged policy violations. During investigations, team members are required to cooperate and tell the truth. Failure to do so may result in disciplinary action, up to and including termination of employment.



Explore our Policies. Consider:

- Non-Retaliation Policy
- Open Door Policy

Did You Know?

You can report concerns about:

- Discrimination or harassment
- Workplace violence, threats or bullying
- Conflicts of interest
- Theft, fraud or bribery
- Environmental issues
- Workplace injuries or unsafe working conditions
- Inappropriate gifts or entertainment
- Accounting or financial issues
- Any violation of our COBE or company policy
- Retaliation
- Other illegal or unethical behavior

These are just examples. Anytime you see or suspect something that could harm FKH or our team members or residents, **Speak Up!**



Violations of Our COBE

What Happens When Our COBE is Violated?

Working with Integrity and living Our Core Values is an important part of our success. When one team member violates the COBE, it affects us all. That's why we take violations of our COBE very seriously. Anyone who knowingly violates the COBE, our policies, or any laws or regulations that apply to our company will face corrective action, which may include termination of employment.

Q: What if my manager tells me to do something dangerous or possibly illegal...and I'm afraid of retaliation if I speak up?

A: Contact your HR Business Partner, the Compliance Team or the Integrity Hotline.

Q: What if I reported a concern but never heard anything back about it?

A: All matters are addressed promptly, but it may not be possible to provide the results back to you due to privacy or confidentiality requirements. Follow up with your HR Business Partner if you still have concerns.

Q: What if I am asked to participate in an internal investigation? Must I participate?

A: Yes. As a FKH team member, you are obligated to cooperate in internal investigations. Failure to do so may result in disciplinary action.



Explore our Policies. Consider:

- Corrective Action Policy
- Open Door Policy

Lead With Integrity



How Do I Lead With Integrity?

As a People Leader, it's up to you to promote ethical and honest behavior in our workplace. Our success, both as individuals and as a team, depends on whether the decisions we make are the right ones.

- Set the tone. Be a good example for your team and show them, through your everyday actions, that you do business honestly and in compliance with the COBE.
- Know and comply with the COBE, related company policies and procedures, laws, and regulations.
- Do what is honest and ethical, sending the message to your team that Integrity matters.
- Create the kind of workplace where team members feel comfortable coming forward with questions or concerns. FKH does not tolerate retaliation.
- Protect confidentiality of team member's information as well as FKH's information and assets.
- Avoid Conflicts of Interest. Don't use your influence as an FKH team member to benefit yourself personally.



If you're a People Leader, be a role model for ethical conduct!

[Introduction](#)

[Teamwork](#)

[Integrity](#)

[Accountability](#)

[Kindness](#)

[Excellence](#)

[Inclusion](#)

[Conclusion](#)

[Index](#)

Teamwork

We Hire Team Members Ethically
We Promote a Safe and Healthy Workplace
We Keep Our Promise to Business Partners
We Treat Vendors Ethically

We Hire Team Members Ethically

What Do I Consider When Hiring New Team Members?

At FKH, we are proud of our diverse workforce. We are committed to providing equal employment and advancement opportunities to all individuals. To further this commitment, employment decisions at FKH will be based on merit, qualifications and abilities. FKH does not discriminate against any individual because of race, color, religion, sex, national origin, age, sexual orientation, citizenship status, disability, genetic information or any other characteristic protected by law.

Q: What if I have a great team member, but they refuse to take a reasonable suspicion test for drugs or alcohol?

A: Team members have the right to refuse to submit to an alcohol or drug test; however, such a refusal may result in immediate termination and disqualification for unemployment compensation benefits. Provide your team member with the Drug and Alcohol Testing Policy for their review.

Q: My cousin would be a great candidate for a job on my team? Can I hire them?

A: You cannot offer a job to a relative if the job involves a direct reporting relationship to you or if it might cause or appear to cause a conflict of interest. Although your cousin might be the best candidate for the job, it may cause difficulty if other team members perceive that they are getting better treatment because of your relationship with them.

What Questions Can I Ask When Hiring New Team Members?



When interviewing candidates, ask questions that help to predict performance on the job. Ask questions like:

- Tell me about how you learn best or prefer to be managed.
- What are your career goals?
- Tell me about a time when you had to interact with a difficult person and how you handled it.



Do not ask questions relating to the candidate's age, race, color, gender, national origin, religion, disability, sexual orientation, veteran status or any other protected class, marital or family status, prior drug use, or arrests that did not result in a conviction.



Explore our Policies. Consider:

- Equal Employment Opportunity Policy
- Employee Retention, Selection, and Promotion Policy
- Drug and Alcohol Testing Policy
- Conflicts of Interest Policy
- Hiring Manager Handbook
- Nepotism and Relationships at Work Policy

We Promote a Safe and Healthy Workplace

Health and Safety

We are committed to providing a safe, non-threatening, secure and healthy workplace for our team members.

- A safe and secure workplace is critical for the health and well-being of all team members and leads to our success.
- Be familiar with and follow all health, safety and security laws.
- Follow our workplace safety program directives.
- Report any unsafe conditions, situations or accidents.
- Exercise caution in all work activities.
- Provide suggestions to your leader or Human Resources Business Partner.

Q: What if there's something I can do to save time, but it poses a safety risk?

A: Don't do it! Faster isn't better if it puts your safety or the safety of others at risk.

Q: My team member fell off a ladder while we were completing a job. He's limping a little but says he's fine, so my boss said we didn't need to report it. Is that correct?

A: Always report an accident that happened on a job site, regardless of how insignificant the injury may appear. Report the injury to your supervisor, and call TriageNow at 844.319.6644.



Explore our Policies. Consider:



- Business Continuity and Disaster Recovery Policy
- COVID Safety Policy
- Driver Safety Policy
- Drug and Alcohol Testing Policy
- Fire Prevention Policy
- Incident Reporting and Escalation Policy
- Severe Weather Emergency Action Plan
- Vaccination Policy
- Workplace Violence Policy

We Promote a Safe and Healthy Workplace

If Your Job Requires Driving

- Know and follow our Drivers Safety Policy.
- Be safe, responsible, courteous and follow the laws.
- Do not use handheld devices, read or send text messages, or email while driving.



Safe and Healthy Means Violence-Free

FirstKey Homes values our most important resource: our team members. We want to foster the kind of environment where people feel safe and are always treated with Kindness. We don't tolerate:

- Threats of any kind
- Bullying or intimidation
- Defacing property
- Violent behavior
- Hate Speech or Abusive Language

Laws on weapons vary from state to state. Weapons of any kind are not allowed in the workplace, in a work-related setting, or while engaged in an activity for FirstKey Homes, except out of sight in locked personal vehicles where specifically permitted by law.

Safe and Healthy Means Drug-Free

Possessing, selling, using or being under the influence of an illegal drug on company property, including company vehicles, or at work-related events is strictly prohibited. A work-related event is any instance where two or more FKH team members are present. Working while under the influence of alcohol is also prohibited.

We Keep Our Promise To Our Business Partners

Lenders, Brokers, Homeowners Associations and Other Partners

Every business has critical partners that help to make the business run smoothly. FKH is no different.

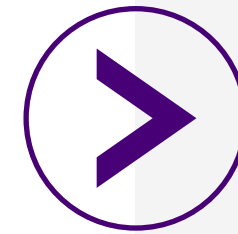
Without these partners, we could not be as successful as we are in providing our resident families a place to call home. We interact with lenders, local brokers, Homeowners Associations and other business partners that help us to do business well. We build good relationships with these business partners by interacting with them honestly, ethically and with integrity.

Vendors, Suppliers and Contractors

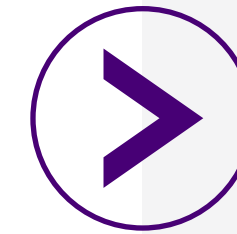
While vendors, suppliers and contractors are separate from our company, the business practices and actions of a vendor, when conducting business with or on behalf of us, may significantly impact and reflect upon FirstKey Homes. Because of this, we expect all third parties to follow our high ethical standards included in our Supplier Code of Business Ethics.

At the same time, we will interact with our third-party partners ethically and with the highest integrity as well. We select vendors based on objective criteria and ethical business practices. It takes all of us to build communities, one caring experience at a time.

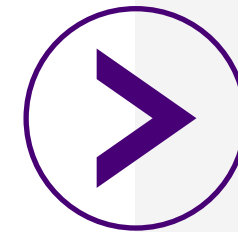
Your job may put you into contact with information (like budgets, sales forecasts or major business changes) about one of our business partners that hasn't been widely shared with the public. If so, don't share that information with anyone outside the company, including your friends or family. If this information gets out and someone benefits from it, it can be considered "insider trading."



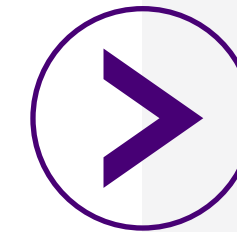
Never exaggerate or leave out information in order to impress our business partners or gain a business advantage.



Tell the truth in advertising, marketing and leasing. Don't promise features or services that we can't deliver.



Don't engage in any activities that could be harmful to our reputation.



If you find out a team member did something unethical or made a mistake, **Speak Up.**

We Keep Our Promise To Our Business Partners

Q: If I am an employee of FKH and my relative owns a business that could benefit FKH, can I recommend them? If so how? If not, why?

A: Yes, you can recommend them, but be sure to follow the Conflicts of Interest policy and disclose the relationship ahead of time.

Q: If I suspect there is someone doing something wrong with a vendor or not following the rules can I report this anonymously?

A: Yes! We encourage you to **Speak Up** and report any misconduct you see or hear about. You can report anonymously 24/7/365 to the Integrity Hotline.

Q: Who should the HOA contact for property or resident concerns?

A: We've created a centralized team (hoa@firstkeyhomes.com) to assist HOAs and the local markets with responding to HOA and municipal matters in a timely manner. The team has reduced the number of outstanding violations and ensures all HOA invoices are paid on time, creating a better trajectory and relationship with the HOAs.

Explore our Policies. Consider:



- Anti-Bribery Policy
- Asset Integration and HOA Policy
- Conflicts of Interest Policy
- Supplier Code of Business Ethics
- Vendor Management Policy
- Vendor Onboarding and Offboarding Policy
- Vendor Selection Policy



Introduction

Teamwork

Integrity

Accountability

Kindness

Excellence

Inclusion

Conclusion

Index

Integrity

We Avoid Conflicts of Interest
We Maintain Accurate Records
We Understand the Rules Around Gifts

We Avoid Conflicts of Interest

Sometimes our personal life outside of work begins to affect our business decisions. This is called a “conflict of interest.” Team members have an obligation to conduct business within guidelines that avoid both actual and potential conflicts of interest.

Situations That Could Be a Conflict of Interest

It is impossible to list every situation that could pose a conflict of interest, but there are some common situations where conflicts often arise.



Supervisor/Employee Relationships

Having a personal relationship (romantic or familial) with someone that reports to you (or to whom you report) could pose a conflict of interest.



Outside Relationships

Both participation in a Board of Directors for an outside company and political activities, such as running for office or holding a public position, could pose a conflict of interest.



A Second Job

Having a second job outside of FKH (sometimes called “moonlighting”) could interfere with your duties and pose a conflict of interest.



Personal Relationships

Having a personal relationship (romantic or familial) with a business partner, like a vendor, contractor, resident, broker or competitor, could pose a conflict of interest.



Investments or Gifts

Significant investment in a company that we do business with or in a competitor could pose a conflict of interest. Receiving gifts from a vendor or resident could also pose a conflict of interest.



We Avoid Conflicts of Interest



Conflicts of Interest Should be Disclosed

Most conflicts can easily be avoided or addressed if they are reported and managed. If you think you may have a conflict of interest, or that any activities that you participate in may be thought by others to be a conflict of interest, disclose it to the Compliance Team.

If you have questions about doing what's right in any situation, reach out to the Compliance Team.

Is It a Conflict of Interest?

To determine if your situation may be considered a conflict of interest, ask yourself:

- Am I using my position at the company to advance my personal interests?
- Could I receive a personal benefit from it?
- Could a member of my family receive a personal benefit from it?
- Could the time spent on it interfere with my work hours at FKH?
- Am I using FKH resources or relationships to do it?
- Am I competing against our company?

Explore our Policies. Consider:



- Conflicts of Interest Policy
- Gifts and Entertainment Policy
- Nepotism and Relationships at Work Policy
- Outside Board Service Policy
- Political Activities and Lobbying Policy

We Avoid Conflicts of Interest

Q: One of our supervisors was just elected as the Mayor of the city. He is bragging about how he has connections at the city hall and can get our rental registrations, permits and inspections through the process quickly. That would certainly be good for our business if we could get our permits quicker. Is that okay?

A: Personal relationships with the city could benefit our company, but it could also tempt the supervisor to engage in bribery or provide extra benefits to the government official that is against the law. The best thing to do is report it.

Q: I just started dating a guy on my team. He reports directly to me. What should I do?

A: Relationships between team members and their supervisors are not allowed, per our Nepotism and Relationships at Work Policy. Since you are in a position of influence over him, you will have to resolve the conflict by either transferring to a different department or leaving the company if you want to continue the relationship. Failure to disclose this relationship may result in disciplinary action.

Q: I asked one of my co-workers out on a date, and she turned me down. Can I ask again?

A: As per our Anti-Harassment Policy, we have an Ask Once policy. If “they” turned you down the first time, you will have to wait for them to initiate the relationship.

Q: My family owns a painting company. They could do a great job on some of the maintenance for our homes. Can I hire them?

A: Hiring your family business to complete work could put you in a sticky situation. If the work isn’t done well, it might be difficult to relay that to the family member. However, if you do not have any influence in the decision to hire or approval of invoices for the services, it may be okay. The best thing to do is disclose it prior to the work being completed.

Q: As part of my job duties, I hold a real estate license. Can I use it in my free time to sell homes?

A: FKH holds all agents licenses exclusively, meaning the agent cannot engage in real estate activity outside of the company. Additionally, if your significant other is in the real estate business, that should also be reported through our Conflicts of Interest Policy. One exception is if you are selling or buying your personal home, but even this transaction must be disclosed and approved through the Conflicts of Interest Policy so we can guide you through the situation.

Q: One of our contractors did a great job repairing a home. Can I ask him to fix mine?

A: Yes, but before having any work done, you should disclose this through the Conflict of Interest disclosure process and get prior approval from Compliance. Additionally, all work must be performed for fair-market value based on the requirements of the Conflicts of Interest Policy.

We Maintain Accurate Records

Our investors and lenders rely on us to maintain accurate financial records, free from misleading information. Maintaining accurate records also helps us, internally, to identify trends, successes to praise and opportunities to improve.

Every team member is responsible for ensuring the accuracy and completeness of our company records.

Q: If I'm not in the accounting department, how does maintaining accurate records apply to me?

A: Every document we create as a company can be considered a record, from emails to work orders to time sheets to leases. Every department creates and uses records every day.

Q: My supervisor asked me to post an entry in our GAAP books to a capital account, but I know it is supposed to be expensed. What should I do?

A: If anyone asks you to do anything that you know isn't right, or that your gut says isn't right, **Speak Up!**

Q: We're nearing the end of a project but are over our budget. Another project that our team is completing is tracking under budget. Can I move funds from one to the other?

A: Maybe. We must maintain accurate records. If you improperly record the actuals for both projects, the records will not be accurate. However, we may be

able to transfer the funds from one project code to another so that the records will reflect the correct actual numbers for each project.



- Accurately report your timesheet and business expenses for travel, meetings, company vehicle maintenance and gas, etc.
- Obtain necessary approvals before committing the company to any costs.
- Report any pressure to over or under report.
- Report any suspected fraud to the Compliance Team.



- Don't make false or misleading statements to anyone on any company documents.
- Never withhold or fail to communicate information critical to the accuracy of our company records.
- Don't dispose of any information relevant to any current or threatened litigation.
- Don't give in to any pressure to "make the numbers work." **Speak Up!**

Explore our Policies. Consider:



- Anti-Harassment Policy
- Delegation of Authority and Spend Authorization Policy
- Employee Credit Card Usage Policy
- Travel and Expense Reimbursement Policy

We Understand the Rules Around Gifts

Similarly, giving gifts or entertainment to our business partners or residents with the intent to influence the recipient's business decision is considered bribery and is strictly prohibited.

Any gifts given or received that are above \$250 (one-time or in total over a year period) must be disclosed to the Compliance team. Gifts of cash, or cash equivalents, are strictly prohibited.

Q: I heard that one of my co-workers was asking for donations from our vendors for our annual holiday party. The donations were above the gift threshold of \$250 and were in cash. I love our annual party and don't want to give that up, but I feel uncomfortable about asking for gifts from our vendors. What should I do?

A: We should never ask our vendors for cash donations for any reason. This could cause them to feel obligated to give it with fear of losing business if they don't. It may also make us feel obligated to provide them with more business in the future, even if they aren't doing a good job. You should report this situation to the Compliance Team.

Explore our Policies. Consider:



- Gifts and Entertainment Policy
- Non-Solicitation Policy
- Political Activities and Lobbying Policy
- Anti-Bribery Policy

Generally Gifts Are Acceptable If:



- They don't create an appearance that the gift giver is entitled to preferential treatment, an award of business, or better prices or improved terms of sale.
- They would not embarrass FKH or the gift giver if disclosed publicly.
- They do not prevent the recipient from awarding FKH's business to one of the gift giver's competitors.

Generally Are Prohibited If:



- They are in the form of cash, gift cards or gift certificates.
- They are given under circumstances that appear to be a way to secure an improper business advantage.

Introduction

Teamwork

Integrity

Accountability

Kindness

Excellence

Inclusion

Conclusion

Index

Accountability

We Protect our Assets
We Protect Our Brand
We Communicate Carefully

We Protect Our Assets

The resources that the company provides us to do our jobs are the property of the company and should be used for company purposes only. Team members should not have an expectation of privacy with regards to any computer, mobile devices, workspaces or any other assets that the company owns.

By protecting and taking care of our assets, you are helping us to protect our residents, team members and business partners, and provide us with a competitive advantage.



What is an Asset?

Here are some examples of what an asset is for our company.



FKH Homes



Office Furniture



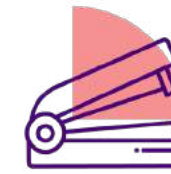
Office Phones



Laptops



Mobile Phones



Office Supplies and Equipment



Company Files



Company Records



Company Vehicle



Networks and Servers



Tools and Equipment



Intellectual Property like Brands, Trademarks, Patents, etc.

We Protect Our Assets

Q: If I'm going on vacation, can I leave my password so my co-worker can use it to fill in for me when I'm out?

A: No. Your login credentials are your own and should not be used by anyone else, even the IT department. Do not give out your password to anyone.

Q: My son's birthday party is coming up. Can I use the company printer to print out birthday invitations?

A: In general, you should limit your personal use of company assets, including company-issued physical or technology assets. Limited personal use of things like email, internet access, phone, and copy machine is okay as long as it truly is occasional, doesn't interfere with your work, doesn't violate any of our policies, doesn't compromise the security of our network and doesn't cost anything to FirstKey Homes.



- Use complex passwords and don't share them with anyone.
- Keep our company devices secure. Bring them inside instead of leaving them in your car.
- Only use secure network connections.
- Lock your computer screen when it is not being used.
- Don't leave documents with confidential information laying around.
- Maintain a clean and secure workspace.
- Stop, Look and Think before you Click the Link.



- Don't install unapproved software on company devices.
- Don't discuss company information in public places where others could hear you.
- Don't download music or video files from peer-to-peer networks.
- Don't use checks, money orders or credit card information from our residents for your personal use.

Explore our Policies. Consider:



- Acceptable Use Policy
- Confidential Information Policy
- Data Classification Policy
- Information Request Procedures
- Intellectual Property Policy
- Invention Assignment Policy
- Phish Failure Escalation Policy

We Protect Our Brand

Our reputation means a lot to us and to our investors, residents and business partners. We want to continue to be seen as a leading and growing provider of well-kept single-family rental homes nationwide.

That's why we want to ensure we are protecting our brand and "intellectual property." Intellectual property includes our logo and any other trademarks we have, trade secrets, patents and copyrights.

Rental scams on social media and other platforms can harm our brand and reputation. This happens when other people claim to be us and try to rent out our homes to unsuspecting potential residents. If you see anything like this, report the scam to our Marketing Team.



Explore our Policies. Consider:

- Invention Assignment Policy
- Resident Facing Changes Policy



We Communicate Carefully



Every time we speak or write something on behalf of the company, it can have an impact on our reputation. Whether it's a speaking engagement, a post on social media or just a casual conversation with a friend, what we say reflects on who we are. We want anything we say to be accurate and consistent.

Unless you are authorized to speak on behalf of the company, you should:

- Not talk to anyone in the media. Forward all media inquiries to the Media Relations Team.
- Make it clear in any social media posts that you are speaking on your own behalf and not on behalf of the company. State that the views and opinions expressed are my own and not of FKH. This should be placed either at the beginning or end of post.
- Get approval from your manager for any speaking engagements before accepting.
- Be careful about anything you put in writing. Anything in an email, text message, Teams chat or any company document on any company device can be used by the company.

Explore our Policies. Consider:



- Invention Assignment Policy
- Resident Facing Changes Policy
- Social Media Policy

Introduction

Teamwork

Integrity

Accountability

Kindness

Excellence

Inclusion

Conclusion

Index

Kindness

We Give Back to Our Communities
We Are Good Stewards
We Treat Our Residents Fairly and Honestly

We Give Back to Our Community

Our Vision is to proudly serve the family of residents, making our homes their own, and build communities, one caring experience at a time. We are committed to giving back to the communities in which we live and work.

Charitable Activities

We encourage our team members to participate in community activities, including donating their time and money to charity. We offer time off for volunteering to help benefit our communities and often sponsor company-wide opportunities for our team members to participate in charitable contributions or initiatives.

When participating in charitable activities, make sure:

- It is on your own time (or the allotted paid time off for volunteering).
- It is using your own money or resources. Any company resources given or used must be approved in advance.
- It is lawful activity.
- It doesn't violate any of our policies.

Q: I am very passionate about our LGBTQ community and want to participate in the local PRIDE parade. Unfortunately, it is on a weekday when I am normally scheduled to work. Can I participate?

A: FKH provides employees with 16 hours of paid volunteer time each year. You may use that time to participate in the parade. You can also use any other Paid Time Off that is allocated to you for participating in outside activities.

Political Activities

If you choose to participate in political activities, it must be done on your own time and using your own resources. We do provide paid time off to vote in the general election of federal public officials.”

Team members who wish to run for political office or participate in a leadership role in a campaign for someone else must seek approval and disclose their activity to the Compliance Team prior to participation.

As a company, we will not make contributions to any federal candidates, except through our pre-approved trade association, and will not reimburse any contributions to any federal, state, local or other campaigns.

Q: My friend asked me to serve in a leadership role on her campaign for Mayor of our town. Can I participate?

A: It depends. Leadership roles in campaigns can take a lot of time and effort, which could cut into the time you are supposed to be spending on work for FKH. You should disclose this to the Compliance Team and have them provide you with an official determination.



Explore our Policies. Consider:

- Conflict of Interest Policy
- Outside Board Service Policy
- Volunteer Time Off Policy
- Political Activities and Lobbying Policy

We Are Good Stewards

We are committed to being good stewards of the environment in the communities where we own our homes. An investment in the environment is an investment in future generations and the future of our world.

Environmental

Wherever possible, we are committed to reducing our footprint on the environment. This means that we encourage our team members to participate in sustainable activities, such as recycling, and conserving energy and water. Here are some things you can do to help reduce our footprint on the environment:

- Turn the lights and projectors off when you leave your office or conference rooms.
- Use washable cups and mugs.
- Separate recyclable materials from non-recyclables and place them in the proper disposal containers.
- Shred any company documents when you are done with them.
- Follow all environmental laws and regulations.
- Dispose of hazardous materials in a safe and lawful way and ensure any vendors that you manage do the same.



Explore our Policies. Consider:

- Human Rights Policy

Social

We are committed to protecting human rights and the dignity of people. Modern slavery is a real concern in the world today, and we are committed to ensuring our business and supply chain are free from forced labor, exploitation of children, subminimum wage, and human trafficking issues. If you see any concerns about the safety of our residents, business partners or team members, **Speak Up!**

Governance

We take pride in the way our company is structured; from the Board to the Senior Leadership Team, to the front-line managers and supervisors, we ensure transparency in our governance structure. This COBE and our policies and internal controls are in place to ensure compliance with all laws and regulations that affect our business.

Q: My co-worker is trying to convince me to vote for their candidate. I already told them that I wasn't interested in talking about it. What do I do?

A: Continuing to discuss political, religious, or social topics with those who have told you they don't want to talk about it is not respectful and does not support our Core Values of Kindness and Inclusion. For more information on what you should and should not discuss in the workplace, see our Do's and Don'ts for Navigating Workplace Conversations. You can politely decline to talk with them about this topic. If they continue to push, you should **Speak Up!**

We Are Good Stewards

Q: Our team finished painting a house, and had some materials left over. It's okay to just toss it in the trash, right?

A: It depends. Some materials, like oil-based paint, can be considered hazardous material. Be sure to dispose of it properly in accordance with the EPA's guidance. Most other paints must also be treated before throwing them in the trash as well.

Environmental, Social and Governance (ESG) is a way we consider the company's performance across three areas:

E - The impact on the environment

S - The impact on the social institutions and human relationships

G - Way in which an organization governs itself and makes decisions



Explore our Policies. Consider:

- Human Rights Policy
- Keyper Handbook
- Supplier Code of Business Ethics



We Treat Our Residents Fairly and Honestly

Our residents and potential residents rely on us to provide them with truthful information and treat them fairly with the utmost respect. We are committed to ensuring a positive resident experience throughout the process so that we can give our family of residents a place to call home.



- Maintain the property to code, and complete all maintenance assigned to you.
- Provide itemized and justified reports for any security deposits withheld.
- Respond to residents' complaints quickly and honestly.
- Protect the personal information of our residents.
- Collect residents' debt in a lawful and respectful manner.



- Don't ignore complaints from residents.
- Don't ignore bankruptcy stay orders.
- Don't mislead residents on lease terms or hide any fees.
- Don't make faulty repairs or charge for incomplete maintenance services.
- Don't treat our residents' personal property disrespectfully.

Q: I received a replacement for a resident's broken oven, but the new oven had a missing part that could cause serious harm. Can I go ahead and install it and wait for the part to come later?

A: No. Making faulty repairs, particularly one that could harm the resident or our home, are not acceptable. Work with the resident to make the complete replacement once all parts are received.

Q: One of our residents insists that her HVAC is not working. I've tested the unit, and it's working properly. What do I do?

A: The key to helping our residents is empathy. Acknowledge the resident's frustration. Clarify why exactly the resident feels the HVAC isn't working and explain the way the unit works to help provide understanding.



Explore our Policies. Consider:

- Resident Anti-Discrimination Policy

[Introduction](#)

[Teamwork](#)

[Integrity](#)

[Accountability](#)

[Kindness](#)

[Excellence](#)

[Inclusion](#)

[Conclusion](#)

[Index](#)

Excellence

We Deliver Results
We Respect the Confidentiality of Information
We Follow the Law
Speak Up
Competitive Information
We Respect the Privacy of Others

We Deliver Results

We Respect the Confidentiality of Information

There are a lot of people who trust us to protect the privacy of their information. As a company, we also create information that needs to be protected to ensure we maintain our competitive advantage. We have a responsibility to protect any information that could be harmful to the company, our investors, our residents or our other business partners, if it is shared outside of the company.

We Follow the Law

Antitrust laws have been enacted to ensure fair dealing and competition in the marketplace. We do not participate in any conversations that might lead to price fixing, price discrimination, bid rigging, allocation of markets or customers, or any other anti-competitive agreements with our competitors. If a conversation or situation appears to limit competition in a market between competitors, suppliers or others, discuss it with the Compliance Team.

Speak Up

If you find out about any known or suspected breach of our systems or of any confidential or personal information, **Speak Up!** Just like you take steps to protect your own information, be sure to protect our company's and business partners' information as well.

Competitive Information

Oftentimes we may want to gather information about our competitors so we can understand how we compare to them. This is okay if it is done in a legal and ethical manner. Confidential information about competitors that is not publicly available should not be gathered or used. If you are unsure, contact the Compliance Team with questions or concerns.

We Respect the Privacy of Others

The privacy of our team members' and residents' personal information is of utmost importance. Our residents trust us to maintain the privacy of their information. We are responsible for ensuring that we are securing the information properly and not sharing it with others. If there is a business need to share information outside our company, talk to our Legal department about putting a non-disclosure agreement in place before sharing the information, and disclose only what is necessary on a "need to know" basis. Employee personal information, including medical information, should also be kept confidential and not shared with anyone who does not have a "need to know."



Explore our Policies. Consider:

- Antitrust Policy
- Website Privacy Policy

[Introduction](#)

[Teamwork](#)

[Integrity](#)

[Accountability](#)

[Kindness](#)

[Excellence](#)

[Inclusion](#)

[Conclusion](#)

[Index](#)

Inclusion

We Respect Each Other
We Value Our Diverse Teams
We Believe in Fair Housing for All

We Respect Each Other

We Create a Comfortable Work Environment

Everyone deserves to feel safe and respected while at work. That's why we work to create a comfortable work environment for all our team members and business partners.

Do not act in a way that singles out any employee or group of employees based on race, age, color, religion, gender, national origin, ancestry, disability, veteran or marital status, sexual orientation, or any other attribute protected by law; behavior like that is strictly prohibited.

Harassment can take many forms. Some examples of harassment are:

- Jokes about someone's ethnic background or other protected class.
- Unwelcome verbal or physical contact.
- Repeated requests for dates after being turned down or unwanted flirtation or proposition.
- Discussing sexual activity or desires.
- Repeated misconduct that a reasonable person would see as offensive.
- Unwelcomed sharing of photos that include other team members on social media.
- Hate speech or abusive language.

Q: What if I receive an email with material that made fun of my race and made me feel disrespected?

A: Any material that degrades or expresses hate against a certain group of people is not welcome at FKH. You could tell the team member that you found the email offensive. You could also report this to the Integrity Hotline.

Q: What if my supervisor said something that made me feel uncomfortable. Is that harassment?

A: While you have the right to work in an environment free from hostile behavior, not every offensive comment or situation is considered harassment. If you believe you are being subject to harassment, you should contact your HR Business Partner or the Integrity Hotline.



Explore our Policies. Consider:

- Equal Employment Opportunity Policy
- Employee Resource Groups

We Value Our Diverse Teams

Diversity and Inclusion

Inclusion is one of our Core Values. It is a part of who we are. We respect every team member, resident and business partner for the unique perspectives they bring. We strive to create an inclusive environment in every situation, so our workplace is a comfortable and inviting place to be.

Equal Employment Opportunity

We're committed to having diverse teams that reflect the communities in which we live and work. Our company is an Equal Opportunity Employer. We provide equal employment and unbiased growth and development opportunities. In all our employment processes – recruiting, hiring, developing, promoting, compensation and benefits, discipline, and termination – decisions are made based solely on suitability for the job and do not discriminate based on race, age, color, religion, gender, national origin, ancestry, disability, veteran or marital status, sexual orientation, or any other attribute protected by law.

Workplace Opportunities

Our company accommodates individuals with disabilities or religious commitments. We are committed to removing barriers for our team members and business partners. If you believe you need an accommodation, discuss your request with your manager or HR Business Partner.

Q: I always get passed up for promotion, while others with less skills and abilities in a different gender and race get selected. What should I do?

A: Discrimination based on gender and race is not allowed here. If you feel that you were unfairly denied a promotion, talk to your HR representative or contact the Integrity Hotline.

Q: I'm an hourly employee. Can I participate in Employee Resource Groups?

A: The ERGs will have some of their events and activities during lunch hours and after working hours so all employees have the ability to participate.



- Treat everyone fairly.
- Accept and value team members' different perspectives and ideas.
- Respect and leverage diversity of thought and experiences.
- Respect the right of freedom of association.



Explore our Policies. Consider:

- Employee Resource Groups
- Equal Employment Opportunity Policy

We Believe in Fair Housing for All

FirstKey Homes is An Equal Housing Lessor

We believe that every family deserves a place to call home, which is why we do not discriminate based on race, color, religion, sex, national origin, disability or familial status, or any other class protected by law.

FirstKey Homes is an equal housing lessor pledged to the letter and spirit of all applicable state and federal fair housing laws, including, without limitation, the Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended), for the achievement of equal housing opportunities for all rental applicants and Residents throughout each of the states in which we operate.

We Follow the Law

We are committed to following all laws and regulations that apply to our company. This includes fair housing laws, eviction laws, consumer protection and privacy laws, antitrust and fair competition laws, anti-corruption laws, anti-money laundering laws, employment laws, and any other laws that apply to our business. If you have questions about any of the laws or regulations that apply to us, you can contact the Legal department.

Q: I overheard a co-worker telling a prospective resident that the neighborhood they are interested in might not be the best fit for them because they have kids. Is this a violation?

A: This is an FHA violation. We should not provide potential residents any information that is based on familial status. Telling a resident that a neighborhood isn't good for them based on any protected class could be a violation of fair housing laws. Treat all residents the same, and don't discriminate based on any protected class.

Q: One of our residents posted a bad review. I could provide the resident what he wants, but it is against our policy. What should I do?

A: Our policies are in place to ensure that every resident gets the same treatment, and no one is viewed as getting preferential treatment that could be considered discrimination. You shouldn't violate our policies, even if the resident might remove the negative review. Talk to the Compliance Team to ensure we can provide equal opportunities for all residents.



Explore our Policies. Consider:

- Anti-Bribery Policy
- FCRA Policy
- FDCPA Policy
- Reasonable Accommodation Policy
- Resident Anti-Discrimination Policy
- Sanctions/AML Policy

[Introduction](#)

[Teamwork](#)

[Integrity](#)

[Accountability](#)

[Kindness](#)

[Excellence](#)

[Inclusion](#)

[Conclusion](#)

[Index](#)

Conclusion

Message From Our Compliance Officer

Message From Our Compliance Officer

Dear Keypers,

Our company is grounded on a set of Core Values that help us to make decisions every day. These decisions are not always easy to make, and sometimes the laws and regulations we have to comply with are difficult to understand. That's why we have the Code of Business Ethics (COBE) to help guide us in making the right decisions for the company each and every day.

It's my job, as the Compliance leader, to ensure you have the resources to make those decisions in an ethical manner and in compliance with the laws and regulations to which our company is subject.

If you see any violations of this COBE or of any policies or procedures that we have created to help you do your job, please don't hesitate to reach out to me. If you feel uncomfortable, you can always contact our Integrity Hotline and report your concerns anonymously. You can be sure that there will be no retaliation for any concern raised honestly. All concerns are confidentially reviewed and investigated.

Addressing concerns quickly will help to ensure everyone has a comfortable and inviting workplace. And that's the kind of workplace you deserve!



Elizabeth Simon

Vice President, Compliance

Index

Accountability	5, 22	Drugs	11, 12	Leaders	9	Values	5
Accounting	20	Entertainment	21	Lenders	15	Vendors	15, 31
Accurate Records	20	Environment	29	Litigation Holds	20	Violations of the COBE	8
Advertising	14	Equal Employment	11, 36	Marketing	15, 33	Vision	5
Alcohol	11, 12	Opportunity		Media	25	Workplace Accommodations	36
Antitrust	33, 37	Ethical Decision Making	6	Mission	5	Workplace Violence	12
Asset Protection	23	Excellence	5, 32	Modern Slavery	29		
Board of Directors (outside)	17	Fair Housing	37, 20	Money Laundering	37		
Brand	26	Fraud	20	Moonlighting	17, 18		
Bribery	15, 21, 37	Freedom of Association	36	Nepotism	11, 17, 18		
Brokers	14	Gifts	21	Open Door	7, 35		
Business Partners	14, 29	Governance	29	Political Activities	17, 18, 28		
Charitable Activities	28	Harassment	18, 35	Privacy	23, 33, 37		
Communications	26	Hiring	11	Procurement	15, 29		
Competitive Information	33	Homeowners Association	15	Records Management	20		
Confidential Information	15, 23, 33	Human Rights	29	Recruiting	11		
Conflict of Interest	11, 15, 18	Inclusion	5, 34, 36	Rental Scams	25		
Consumer Protection	37	Information Security	25, 33	Residents	31		
Contractors	15, 29	Insider Trading	15	Retaliation	7, 35		
Corrective Action	8	Integrity	5, 6, 9, 10	Safety	12		
Data Privacy	8, 24, 37	Intellectual Property	25, 26	Social Media	26		
Discrimination	36, 37	Investments	17	Solicitation	21		
Diversity	36, 37	Kindness	5, 27	Speak Up	7, 15, 33		
Driving	12	Laws	29, 37	Suppliers	15, 30		
				Teamwork	5, 10		

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