

HIGHWOODS PROPERTIES VENDOR CODE OF CONDUCT

Highwoods Properties (“Highwoods”) is committed to socially responsible, professional and ethical business practices. Highwoods, in its Code of Business Conduct and Ethics (the “Highwoods Code”), has established and expressly stated a set of ethical business standards and practices applicable to its employees, directors and shareholders. The Highwoods Code is available on our website at www.highwoods.com. In addition to our internal commitment to ethical business practices, Highwoods strives to align this commitment with its purchasing policies. As such, this Highwoods Properties Vendor Code of Conduct (the “Vendor Code”) summarizes the minimum set of ethical standards our vendors must meet or exceed for Highwoods to consider purchasing any vendor’s goods or services. While local customs and laws vary by country, the importance of human rights is a worldwide and universal constant and this Vendor Code is intended to reflect that importance and apply universally regardless of country, region or market. The provisions of the Highwoods Code that apply to our vendors are hereby incorporated into this Vendor Code. In addition, we expect our vendors to, at a minimum, comply with the following:

EMPLOYMENT PRACTICES

Labor Laws. At all times, Highwoods vendors shall fully comply with all applicable labor, wage and employment laws and regulations.

Child Labor. Highwoods vendors shall not violate any applicable child labor laws. In addition, for all Highwoods vendors, the minimum age for employment shall be 16 or the age for completing compulsory education, whichever is higher.

Involuntary Labor. Highwoods vendors shall not use forced or involuntary labor of any kind, including, but not limited to, prison labor, slave labor, indentured labor or otherwise.

Excessive Working Hours. Highwoods vendors shall not require workers to work more than the maximum hours of daily labor set by national or applicable local laws. Highwoods vendors shall ensure that any overtime worked is voluntary and paid in accordance with local laws and regulations.

Union Employees. To the extent applicable, Highwoods vendors shall maintain a working relationship with their union employees, comply with any collective bargaining agreement, and acknowledge and respect their employees’ freedom to associate without fear of reprisal.

Fair Wages. Highwoods vendors must pay workers at least the minimum wage required by the applicable local laws and provide all legally mandated benefits including holidays and leaves and applicable premium rates for overtime. Highwoods vendors shall not make any deductions from worker wages as a disciplinary measure. All workers shall be provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed throughout their term of employment.

Workplace Discrimination. Workers shall be employed, promoted and compensated based on their ability to perform their job rather than on the basis of gender, race, religion, age, sexual orientation, pregnancy, marital status, political affiliation, union membership, social association, ethnicity or any other status protected by applicable local laws or custom.

Workplace Harassment. Highwoods vendors shall be committed to creating a workplace free of harassment and shall not subject workers to any form of harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Highwoods vendors shall maintain an internal process to allow employees to confidentially and anonymously report allegations of harassment, mistreatment, discrimination or other abuse. Highwoods vendors shall promptly and thoroughly investigate all such reports and shall respond to such reports and/or investigations in an appropriate and socially responsible manner.

HEALTH & SAFETY

Workplace and Occupational Safety. Highwoods vendors shall fully comply with all federal, state, local and any other applicable workplace health and safety laws and regulations and shall provide their employees with a safe and healthy workplace and adequate procedures to prevent accidents and injury in the course of performing their work related duties. Highwoods vendors must have evacuation procedures, worker training and drills, appropriate first aid supplies, fire detection and suppression equipment as well as clearly marked exit facilities.

Hazardous Materials. Highwoods vendors must post material safety data sheets in the primary language of workers and train workers in the labeling, safe handling, use and storage of any hazardous materials.

Environmental Laws. Highwoods vendors shall comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal and release of such materials.

Security. Highwoods vendors shall comply with all applicable trade restriction and sanctions laws and shall not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or who is subject to applicable trade sanctions.

Community. Highwoods vendors are encouraged to engage directly or through partnerships in projects that improve the social well-being of employees and their families in the local community.

SUSTAINABILITY

Environmental Impacts. Highwoods is firmly committed to reducing the environmental impacts of our operations and making the communities where we operate better places to live and work. Highwoods efforts in this regard can be found in our Corporate Responsibility Report on our website at www.highwoods.com. Highwoods expects its vendors to share in this commitment by meeting or exceeding the requirements of environmental laws and regulations and by implementing sustainability policies consistent with those expressed in the Highwoods Corporate Responsibility Report and to otherwise work to reduce environmental impact factors such as energy consumption, water usage and waste.

IMPLEMENTATION AND DOCUMENTATION

Highwoods requires all Highwoods vendors to understand this Vendor Code and take all necessary steps to act in accordance with it. In addition, all Highwoods vendors should educate their employees, contractors, agents and representatives to ensure they understand and comply with this Vendor Code. Highwoods vendors shall retain on-premises documentation needed to demonstrate compliance with this Vendor Code and provide Highwoods representatives with access to such documentation. Failure by a Highwoods vendor to abide by this Vendor Code may result in the immediate cancellation by Highwoods of all outstanding orders and a refusal to do business in any manner in the future.