



## CVS Health Contractor Code of Conduct

CVS Health recognizes that successful operation of its store development program requires use of qualified and reputable contractors and subcontractors. CVS Health believes it is important that our construction contractors be responsible corporate citizens and share in our philosophy concerning matters of social, environmental, and working conditions.

We strive to build lasting relationships with reputable and qualified contractors that share our commitment to promote and employ best practices. We expect all of our construction contractors to respect fundamental human rights, to provide reasonable and healthy working conditions, and to treat their workforces fairly, with dignity and respect. Therefore, we developed this Contractor Code of Conduct ("Code of Conduct") to encourage adherence with such principles.

To function as one of our construction contractors, each contractor must accept the following general responsibilities, implement associated policies and maintain the minimum standards set forth below regarding conditions of employment for employees assigned to CVS Health projects. In addition, contractors must commit to communicating this Code of Conduct to their subcontractors, employees, representatives and agents. We require adherence to these expectations as a condition of all construction contractors' ongoing relationships with CVS Health.

- 1. We are committed to fair treatment, non-discrimination, authorization to work requirements and equal employment opportunities.** We recognize, respect, and support an employee's legitimate expectations to be treated fairly and the right to equal employment opportunity. Accordingly, contractors shall implement and maintain a clear and effective complaint resolution process for their employees. All contractor employees should be able to work in an environment free of harassment and unlawful discrimination by another employee or supervisor. Contractors shall comply with all applicable laws and CVS Health policy prohibiting discrimination against individuals based on their status as protected veterans, or individuals with disabilities, and discrimination against all individuals based on their race, color, gender, religion, sex or national origin.
- 2. Contractors' employees assigned to CVS Health properties shall be offered competitive compensation and benefits.** Wages and conditions of work offered by contractors shall be competitive within each respective market. Contractors shall determine the appropriate wage rates and wage progressions offered to each employee within the market-specific wage ranges; however, contractors shall pay at least the minimum wage required by state and federal law and we encourage contractors to pay employees a decent wage. Additionally, all benefits required by federal, state and local laws and regulations must be provided.
- 3. We expect compliance with the law and encourage our contractors to exceed minimal legal requirements.** Contractors shall follow the governing federal, state, and local laws regarding wages, benefits, hours of work, overtime, meal and break periods, safety, and those governing rights and responsibilities with respect to all other aspects of work and working conditions. We encourage contractors to look for opportunities to provide and develop human resource policies and programs designed to establish them as "employers of choice". Contractors shall possess all applicable



business, contractor, and/or trade licenses or other appropriate licenses or certifications required by applicable state or local law along with any and all insurance requirements as mandated contractually and/or by law. Contractors shall not have had such a license suspended nor revoked with the past five years and shall provide prompt notice to CVS in the event of any licensure suspension or revocation.

4. **We strive to maintain a culture of excellence, position ourselves as industry leaders and expect our contractors to employ similar efforts.** Contractors serving as CVS partners must employ sufficient protocols to sustain financial stability, marketplace competitiveness and a proven capability to perform the work. In observance of such fundamentals, contractors acknowledge and recognize that CVS will conduct an annual performance and financial review and will comply with CVS' requests to complete such process. This annual review will assess our contractors' business capabilities to ensure CVS is engaging with financially stable and capable companies.
5. **We care for the environment.** Contractors must always strive to minimize potential damaging effects to the environment. Accordingly, contractors shall strive to reduce adverse environmental impacts by reducing waste and emissions to air, ground, and water; handling, storing, and disposing of hazardous waste in a legal and environmentally safe manner; and recycling, as appropriate, used products and other material.
6. **We partner with, and encourage the use of, Diverse Business Enterprises.** We encourage contractors to further support the utilization of Diverse Business Enterprises and value their unique contributions to the overall process. 'Diverse Business Enterprises' are properly certified contractors, sub-contractors and vendors owned and operated by a person defined as; a Minority-Owned Business Enterprise (MBE), Woman-Owned Business Enterprise (WBE), Lesbian, Gay, Bisexual and/or Transgender Owner Business Enterprise (LGBTBE), Small Disadvantaged Business (DBE), Small Business Enterprise (SBE), Veteran-Owned Business (VBE), Service-Disabled Veteran-Owned Business (DVBE) or HUBZone Business.
7. **We support companies that, like CVS Health, in turn support the communities in which they live.** We believe that contractors who adhere to this Code of Conduct, particularly as to compensation and benefits, the environment, and partnership with Diverse Business Enterprises, support and contribute to the growth of the local community in which our employees and customers live. We encourage contractors to utilize local building trades and craft-training programs to develop skilled trade workers for the future. For example, we value participation in programs that enable former members of the military to transition from any branch of the armed forces to the building trades, or to train urban youth in vocational training programs.

CVS Health reserves the right to audit compliance with these expectations, periodically, and contractors agree to cooperate in all such reviews. If and when we determine that one or more areas need improvement, contractors agree to work with us toward achieving full compliance with these standards as efficiently as possible.