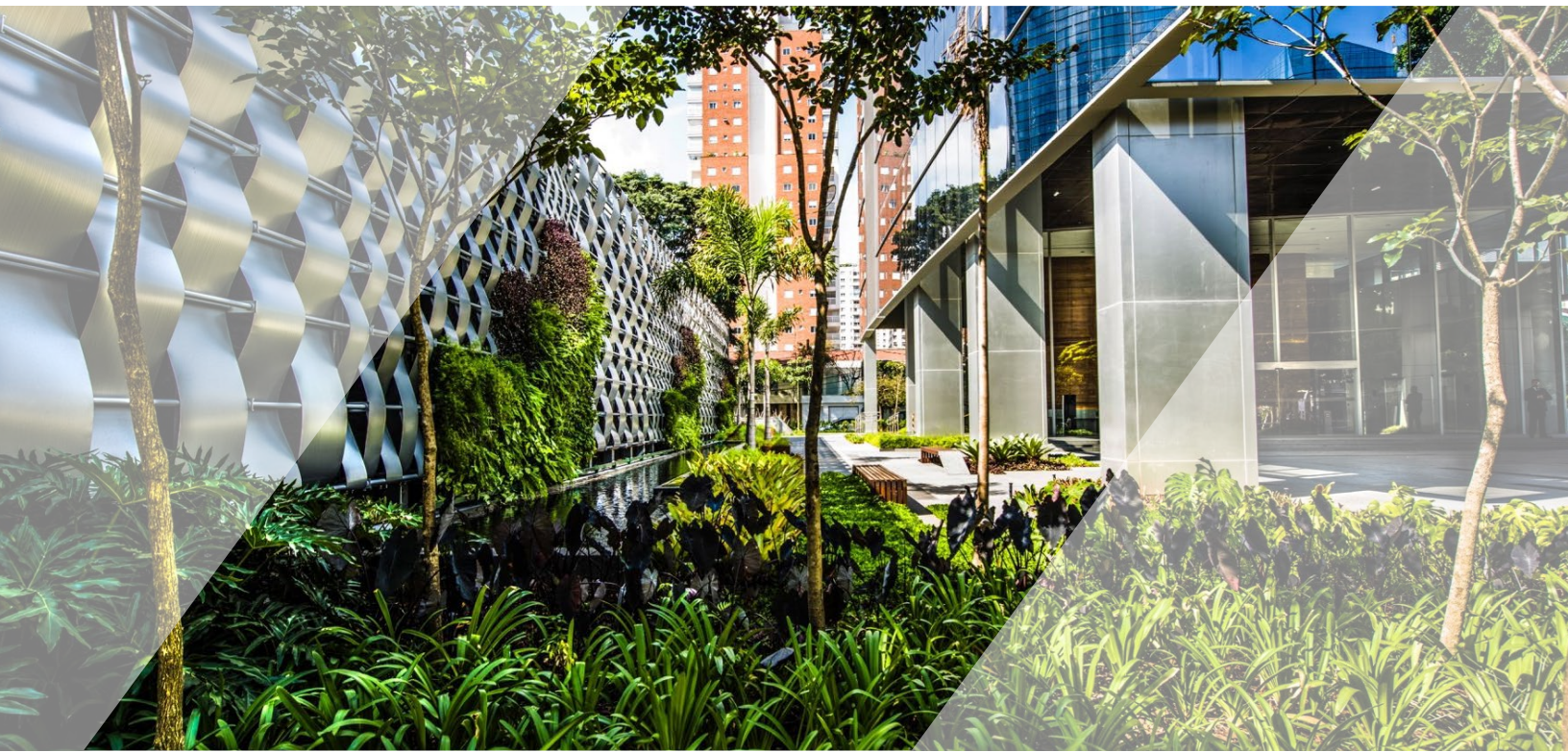


# GTIS Partners

ESG POLICY AND EMS

2020



GTIS PARTNERS

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# I. Introduction

## A. About Us

GTIS Partners is a global real estate investment firm headquartered in New York with offices in Los Angeles, San Francisco, Atlanta, São Paulo, Paris and Munich. The firm was founded in 2005 and is managed by President Tom Shapiro and Senior Managing Directors Josh Pristaw, Rob Vahradian, Tom Feldstein, Joao Teixeira and Amy Boyle.

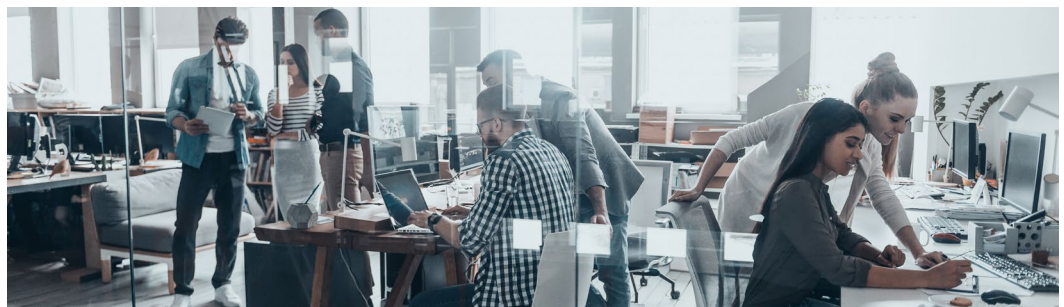
To date, GTIS Partners has committed capital to residential, retail, industrial, office, hotel and mixed-use projects in the U.S. and Brazil. The principals of GTIS Partners have over 130 years of investment, legal, finance, management and operations experience, across all major property types and geographies. By combining hands-on real estate expertise with a disciplined investment approach, GTIS Partners creates value for its investors and partners.

GTIS is committed to responsible and ethical business practices and intends to apply these practices to all areas of operation. Moreover, GTIS understands its role in social and environmental stewardship and the impact of its real estate on the environment and surrounding communities. GTIS is a leading equity investor in real estate and often structures joint ventures with third-party operators handling the day-to-day development and operation of its assets. In most of these partnerships, GTIS represents the majority-owned limited partner position with major decision rights, while third-party operators typically own a minority share of the equity, along with ongoing fees and other performance-based incentives. As such, in certain instances, GTIS will have limited ability to directly control underlying ESG process, and/or acquire and measure specific Key Performance Indicators (KPIs). However, through the distribution and utilization of the following Global Environmental, Social and Governance (“ESG”) Policy and the implementation of various KPI software, GTIS aspires to consolidate, improve and standardize processes and data across its portfolio.

GTIS aims to demonstrate industry leadership, partner with key stakeholders and business partners to drive positive outcomes and create long-term sustainable value for our businesses and for the environment.

### Mission

*Invest in assets that generate value for our clients, employees and stakeholders, providing profitability, longevity and sustainable development to ensure value-creation and tangible benefits to the environment and society as a whole.*



## B. Principles

Corporate Sustainability starts with a company's value system and its approach to doing business. The Ten Principles of the GTIS Partners ESG Policy aspire to incorporate ESG issues into investment practice in order to drive excellence throughout the GTIS portfolio, create value for all stakeholders, and positively affect the communities where we invest:

1. **INCORPORATE** Environmental, Social and Governance objectives into GTIS Partners' processes
2. **GROW** with a sustainable risk profile
3. **ENSURE** resilience of ecosystems and continued abundance of natural resources
4. **ENCOURAGE** innovation and ongoing improvement of GTIS' processes and assets
5. **PURSUE** human rights, equal opportunities and diversity
6. **DISCLOSE** accurate, adequate and timely information
7. **ENGAGE** and support stakeholders to achieve better outcomes
8. **ENHANCE** the effectiveness of policy realization
9. **REPORT** the activities and progress towards implementing the principles
10. **PROMOTE** transparency with our employees, stakeholders and society

## C. Commitments and Support

**GTIS is committed to the following:**

- a. European Public Real Estate Association<sup>1</sup>
- b. Global Real Estate Sustainability Benchmark (GRESB)
- c. International Labour Organization (ILO) Standards
- d. OECD Guidelines for Multinational Enterprises
- e. Purchasing renewable energy from the free market when possible

**GTIS is supportive of the following:**

- a. Climate Action 100+
- b. Global Investor Coalition on Climate Change (including AIGCC, Ceres, IGCC, IIGCC)
- c. Montreal Pledge

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1

Standard used for Corporate Sustainability Report



- d. RE 100
- e. Science Based Targets initiative (SBTi)<sup>2</sup>
- f. Task Force on Climate-related Financial Disclosures (TCFD)
- g. WorldGBC's Net Zero Carbon Buildings Commitment
- h. United Nations Global Compact
- i. United Nations Environment Programme Finance Initiative
- j. United Nations Principles for Responsible Investment<sup>3</sup>
- k. United Nations Sustainable Development Goals<sup>4</sup>



# SUSTAINABLE DEVELOPMENT GOALS



<sup>2</sup> Through the 2015 Paris Agreement, world governments committed to curbing global temperature rise to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C. In 2018, the Intergovernmental Panel on Climate Change warned that global warming must not exceed 1.5°C to avoid the catastrophic impacts of climate change. To achieve this, GHG emissions must halve by 2030 – and drop to net zero by 2050. Additional information on the science Based Targets initiative (SBTi) can be found [here](#).

<sup>3</sup> GTIS is supportive of the UN PRI. At this time, GTIS is not a signatory and does not report to UN PRI. GTIS submits to GRESB annually.

<sup>4</sup> Specific progress towards alignment with the UN Sustainable Development Goals will be detailed in future Corporate Sustainability Reports.

## II. Assets

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### A. ESG Due Diligence

GTIS has developed an ESG Due Diligence Checklist that is to be completed for all new acquisitions and has specific requirements for standing investments versus development assets. This document is listed in Appendix 1 and is available upon request. The checklist is integrated throughout this policy, and elements may include (but are not limited to):

#### All Acquisitions

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- Biodiversity and habitat
- Building safety
- Climate change adaptation
- Community impact
- Compliance with regulatory requirements
- Contaminated land
- Energy efficiency
- Energy supply/renewable energy
- Flooding/floodplain
- Health and well-being
- Indoor environmental quality
- Natural hazards/natural disasters
- Noise
- Procurement
- Regulatory
- Resilience
- Socio-economic
- Tenant engagement
- Waste management
- Water efficiency
- Water supply
- Transportation

#### Standing Investments

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- Energy audit
- Water audit
- Environmental Site Assessment
- KPI data
- Permits and licenses
- Technical building assessment
- Waste audit

#### Development: New Construction and Major Renovation

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- Affordable housing
- Certifications
- Community engagement
- Construction
- Education
- Materials
- Net Zero
- Safety
- Site selection
- Supply chain

## B. Standing Investments

GTIS understands that the operation of standing assets can result in significant environmental impacts within and around the site if not well managed. The implementation of the following measures, as applicable, helps reduce negative impact on the environment, while creating long-term value for the portfolio.

GTIS, in partnership with key stakeholders, shall make reasonable efforts to operate assets according to high-performance building standards and mitigate negative environmental impact of existing asset operations by implementing the following policies:

### Environmental

#### 1. Goals/Targets

GTIS is committed to environmental stewardship and reducing the environmental impact of its portfolio. The following are long-term reduction targets for GTIS standing investments where measurable consumption data can be obtained from operating partners and benchmarked on an intensity or a like-for-like basis:

- a. 2% reduction in energy consumption by 2023 over 2019 baseline
- b. 2% reduction in GHG emissions<sup>5</sup> by 2023 over 2019 baseline
- c. 2% reduction in water consumption by 2023 over 2019 baseline
- d. Incremental increase year over year in benchmarked<sup>6</sup> square footage

#### 2. Green Leasing

Green leasing practices allow tenants and landlords to collaborate to potentially save water and energy, reduce costs, and achieve organizational sustainability goals. GTIS supports integrating green lease clause/rider into tenant agreements where practical. Sustainability clauses detailed in the lease may include clauses which address topics such as<sup>7</sup>:

- a. Provide landlord and tenant sustainability contacts
- b. Landlord may include the costs of certain capital improvements intended to improve energy and water efficiency in operating expenses of tenant space benefiting tenants, upon tenant approval

<sup>5</sup> GHG Emissions are to be calculated based on industry standard methodology and will generally cover Scope 1 and Scope 2 emissions as defined by the EPA. Data may be aggregated at the desktop level in ENERGY STAR Portfolio Manager or Measurabl software and may be based on a variety of factors, including local emission factors and property benchmarking.

<sup>6</sup> Benchmarks for buildings may include the use of third-party platforms such as Energy Star, Measurabl, or BuildingOS

<sup>7</sup> A complete list of GTIS-recommended green lease clauses is available upon request. For further reading, please refer to the Green Lease Leaders criteria, also available upon request.

- c. Landlord may track energy consumption data of the common areas at this asset on a monthly basis to the extent that data is available and there are available landlord resources to collect, track the data. This energy consumption data will be recorded monthly via ENERGY STAR Portfolio Manager or other tracking tools to the extent data is available and there are available landlord resources to collect, track the data. Data will be used for the purposes of:
  - i. Monitoring and improving the energy performance of the asset and/or
  - ii. Measuring the energy performance of the asset against any agreed upon target
- d. Landlord may track water usage of the common areas at this asset on a quarterly basis to the extent that data is available and there are available landlord resources to collect, track the data. This water usage data will be recorded quarterly via ENERGY STAR Portfolio Manager or other tracking tools to the extent that data is available and there are available landlord resources to collect, track the data. Data will be used for the purposes of:
  - i. Monitoring and improving the water performance of the asset
  - ii. Measuring the water performance of the asset against any agreed upon target
- e. Landlord may provide tenant with the asset's ENERGY STAR score annually to tenant upon request as available. To the extent tenant obtains electricity independently of the landlord, tenant shall give landlord access to tenant's data on energy use for inclusion in landlord's annual reports, ENERGY STAR annual rating and similar purposes
- f. Landlord may require brokers employed by or supporting the organization shall complete at least one hour of sustainability training covering the fundamentals of energy efficiency in commercial buildings.
- g. Landlord may follow energy management best practices in landlord base building systems and common areas if feasible:
  - i. Air filters: Clean and replace air filter as recommended by the manufacturer to ensure equipment efficiency and maintain good air quality, for HVAC equipment that Landlord controls
  - ii. HVAC maintenance: Conduct regular HVAC equipment maintenance to ensure proper operation
  - iii. Space heaters: Prohibit use of space heaters
  - iv. Temperature reset practices: Adopt temperature reset practices during unoccupied periods to avoid unnecessary cooling/heating
- h. If renewable energy is available and competitive, recommend to tenants to purchase at market price
- i. Meter and track energy consumption for spaces greater than 5,000 sqft or 465 square meters
- j. Tenant may be required to submit on an annual basis to landlord energy and water consumption data, including total usage and total charges as they appear on tenant's electric, gas, water, and other utility bills, in a format deemed reasonably acceptable by landlord upon request



- k. Where the tenant carries out alterations to the asset, equipment or services within and serving the asset, which alterations may affect the environmental performance of the asset, the tenant may provide promptly such information about the alterations as the landlord shall reasonably require. Any and all tenant improvement work and/or alterations may consider as applicable, practical, and/or feasible the following criteria that adhere to state and local codes, ordinances, zoning requirements, and asset rules and regulations.

### 3. Indoor Air Quality (“IAQ”)

- a. Conduct regular IAQ testing
  - i. For commercial assets in Brazil that are operational, GTIS tests indoor air quality in landlord-controlled spaces every six months, consistent with ANVISA (Brazil National Health Surveillance Agency) regulation RE-09
- b. Ensure separate ventilation for chemical storage areas
- c. Institute a green cleaning policy
- d. Meet or exceed local outdoor air ventilation rate guidelines to control indoor sources of odors, chemicals and carbon dioxide
- e. Pollution prevention measures where possible to reduce, eliminate, or prevent pollution at its source
- f. Recommend minimum indoor air quality standards and/or maximum thresholds where practical
- g. Use high efficiency filter vacuums
- h. Use only low/no VOC paints and finishes

### 4. Material Sourcing

- a. Avoid using the International Living Future Institute (ILFI) “red list” of prohibited materials or ingredients that should not be used on the basis of their human and/or environmental impacts when possible<sup>8</sup>
- b. In addition to the “red list,” seek to avoid materials with toxic ingredients, such as: asbestos, formaldehyde, volatile organic compounds, ash, cadmium, mercury, lead, arsenic, phthalates, etc.
- c. Consider quality, safety, durability, ease of use and maintenance needs when specifying materials
- d. Purchase local materials where practical
- e. Require materials to disclose environmental impacts and/or potential health attributes where possible
- f. Use environmentally preferable products whenever cost-effective and to the extent practicable such as rechargeable batteries
- g. Use LED lighting when possible
- h. Use materials and packaging that can easily be recycled when possible

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<sup>8</sup> The materials red list (commonly shortened to simply “red list”) is a compilation of harmful-to-humans chemicals and materials compiled by the International Living Future Institute (ILFI) as part of its Living Building Challenge. Further information available upon request.

- i. Use products manufactured with the maximum practicable amount of recovered material, especially post-consumer content where possible
- j. For the US Business, use sustainability-certified materials, whenever practical, based on universally accepted standards.<sup>9</sup>

## 5. Regulatory Compliance

- a. Meet top building and operational standards during retrofits, refurbishment and tenant fit-outs as available and practical within business plans and local markets<sup>10</sup>
- b. Monitor asset compliance with local laws and regulations at least once every three years, and mitigate any identified risks where feasible

## 6. Resilience and Physical Risk

- a. Perform a resilience analysis when possible. Resilience analysis is defined as the preparedness of the built environment towards existing and future climate changes (i.e., the ability to absorb disturbances such as increased precipitation or flooding while maintaining its structure). This can be achieved by management policies, informational technologies, educating tenants, community, suppliers and physical measures at the asset level. Evaluation of risks include earthquakes, floods, heat stress, hurricanes and typhoons, seal level rise, and water stress
- b. Prepare and adapt for long-term change in climatic conditions or climate related events. Example of climate change adaptation measures can include, but are not limited to building flood defenses, xeriscaping and using tree species resistant to storms and fires, adapting building codes to extreme weather events
- c. Assign responsibility for climate risk and resilience to a Vice President of Portfolio Management
- d. Establish a systematic process for communication and review of resilience-related information by the most senior governance body with responsibility including climate-related transition risks, physical risks and social risks where possible
- e. Establish a systematic process to incorporate climate risk and resilience in annual budget review process for operational assets and similar activities where possible
- f. By 2022, establish a systematic process to assess GTIS' exposure to climate-related transition risk, physical climate risks and social risk where possible
- g. Assess the potential financial impacts of climate-related risks on an asset by asset basis

<sup>9</sup> Business and Institutional Furniture Manufacturer's Association Product Safety and Performance Standards and Guidelines, Cradle to Cradle, Carpet and Rug Institute Green Label and Green Label Plus, EPEAT, FloorScore, Forest Stewardship Council, GreenGuard, Green Seal, International Living Future Institute's Declare Database, NSF-140, Forest Stewardship Council, Rainforest Alliance, BIFMA e3 Furniture Sustainability Standard, Sustainable Agriculture Network's Sustainable Agriculture Standard, Scientific Certification Systems, UL ECOLOGO, USDA BioPreferred, U.S. EPA Safer Choice, U.S. EPA Comprehensive Procurement Guidelines, U.S. EPA WaterSense, U.S. EPA ENERGY STAR®, Health Production Declaration and Environmental Product Declaration.

<sup>10</sup> A selected list of standards may include, but is not limited to LEED, IREM CSP, Fitwel, WELL, EDGE, Enterprise Green Communities, BREEAM, IFLI, GreenGlobes, GreenPoint Rated and AQUA/HQE.

- h. Implement resilience-related business strategies associated with the entity during the reporting year where possible
- i. By 2022, set specific climate risk and/or resilience-related targets or goals associated with GTIS during the reporting year where possible
- j. By 2022, track specific climate risk and/or resilience-related performance metrics associated with GTIS during the reporting year where possible<sup>11</sup>

#### 7. Waste

- a. Collect data where possible
- b. Establish waste standards and training for property managers
- c. Obtain waste audits, where practical
- d. Preference for billing based on weight (as opposed to volume)
- e. Recommend in-person verification through visual waste inspections, if practical
- f. Recommend use of physical compactor monitoring systems, where applicable
- g. Strive to have recycling for all projects, regardless of local legislation
- h. Strive to use a digital web-based platform for tracking waste and diversion rates

#### 8. Energy

- a. Use LED lighting if possible
- b. Use products which consume less energy, such as top tier appliances
- c. Improve building energy performance and reduce overall energy consumption through strategic envelope design strategies and high-efficiency HVAC system opportunities wherever feasible
- d. Aim for 100% data collection from all assets
- e. Use renewable energy where feasible

#### 9. Water

- a. Install water purification systems if necessary
- b. Prevent water stagnation in pipes
- c. Test water quality regularly for alkalinity and potential contaminants<sup>12</sup>
- d. Aim for 100% data collection from all assets

#### 10. Wildlife Preservation

- a. Understand the biodiversity and natural habitat of the site in order to minimize disruption and maximize preservation and conservation opportunities, inclusive of native, threatened, and endangered species evaluations

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<sup>11</sup> Metrics generally follow TCFD methodology and can be found [here](#); metrics may include expenditures related to climate risk adaptation and mitigation, expenditures and consumption on energy, fuel, water and GHG emissions, asset locations and appraised values, and the percentage of assets certified as sustainable against relevant indices.

<sup>12</sup> Specific thresholds are location and property specific. Additional information available upon request.



## Social

### 1. Stakeholder Engagement

- a. Internally and externally monitor property/asset managers' compliance with ESG-specific requirements through checks performed by independent third party, property asset/manager ESG training, property/asset manager self-assessments, regular meetings and/or checks performed by GTIS employees, and require external property/asset managers' alignment with a professional standard where possible
- b. Provide a Handbook for all Tenants with guidelines about the building's features and sustainability goals where practical. Provide tenants with clear technical instructions and manuals regarding buildings' use and operation, which may include:
  - i. Energy and water use
  - ii. Indoor air quality maintenance
  - iii. Waste management
- c. Monitor and improve customer and tenant satisfaction through the use of ongoing quarterly or annual surveys and tenant meetings, where applicable; establishing programs and developing appropriate actions based on those surveys

- d. Local Community Engagement
  - i. Community engagement programs that include ESG specific issues may include:
    - Community health and well-being
    - Effective communication and process to address community concerns
    - Enhancement programs for public spaces
    - Employment creation in local communities
    - ESG education program
    - Research and network activities
    - Resilience, including assistance or support in case of disaster
    - Supporting charities and community groups
  - ii. Monitor GTIS' impact on the community through housing affordability, Walk Score, alternative transportation options such as biking, impact on crime levels, employment level, livability score, local income generated, local residents' well-being, poverty percentage, transit score, and walkability score where practical and where data is available
  - iii. Solicit community feedback through various engagement techniques such as hosting a community meeting, sending out a survey to the local community, and others where practical
  - iv. Support the health and safety of the community when possible
  - v. In the U.S., take adequate measures to prevent a social enterprise controversy as part of its business operations through town hall meetings or other initiatives

## 2. Supply Chain

- a. Elements may include developing or applying ESG policies, planning and preparation for engagement, development of action plan, implementation of engagement plan, training, program review and evaluation, feedback session with stakeholders
- b. Utilize the GTIS Responsible Contractor Policy ("RCP") for specific funds, where applicable<sup>13</sup> (available upon request)
- c. Monitor external suppliers and/or service providers compliance with ESG-specific requirements through checks performed by independent third party, regular meetings and/or checks performed by property/asset managers, regular meetings and/or checks performed by GTIS employees, require supplier/service providers' alignment with a professional standard, supplier/service provider ESG training and supplier/provider self-assessments where possible
- d. Specific supply chain engagement program which applies to contractors, suppliers, and supply chain (beyond 1 tier suppliers and contractors) when possible

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13 The GTIS Responsible Contractor Policy is available upon request; policy is directly enforced by GTIS in specific investment portfolios



- e. Topics may include business ethics, child labor, environmental process standards, environmental product standards, health and safety of employees, health and well-being, human health-based product standards, human rights, and labor standards and working conditions

### 3. Risk Assessment

Perform an asset-level environmental and/or social risk assessment of its standing investments at least every three years where possible<sup>14</sup>. Issues include:

- Biodiversity and habitat
- Building safety and materials
- Climate/climate change adaptation
- Contaminated land
- Energy efficiency
- Energy supply
- Flooding
- GHG emissions
- Health and well-being
- Indoor environmental quality
- Natural hazards
- Regulatory
- Resilience
- Socio-economic
- Transportation
- Waste management
- Water efficiency
- Water supply

## Health and Well-being

### 1. Tenant Health, Safety and Well-being

- a. Conduct regular building maintenance and resolve comfort issues promptly
- b. Conduct regular inspections of roofing, plumbing, and HVAC equipment to identify sources of moisture and condensation and address issues immediately
- c. Conduct Technical Building Assessments at least every three years for operational assets, where applicable
- d. Encourage participation in program promoting health and well-being of tenants, customers and local surrounding communities. Program includes needs assessment, goal setting, action, and monitoring:
  - i. Needs assessment: GTIS monitors tenant health and well-being needs through tenant survey, community engagement (where feasible) and use of secondary data (where feasible)
  - ii. Goal setting: Includes addressing physical health and well-being and social health and well-being
  - iii. Action: Promote health through acoustic comfort, biophilic design, community development, physical activity, healthy eating, hosting health-related activities for surrounding community, improving infrastructure in areas surrounding assets, inclusive design, indoor air quality, lighting controls and/or daylight, physical and/or mental healthcare access, social interaction and connection, thermal comfort, urban regeneration and water quality where possible

14

May be referred to as an “ESG Evaluation”. Further materials available to qualified parties upon request

- iv. Monitoring: Track outcomes through environmental quality (air and water quality), program performance, and population experience and opinions when possible
- f. Institute a smoke-free building/campus policy; incorporate tobacco free signage as appropriate
- g. Install water bottle filling stations where feasible
- h. Institute a disaster relief plan. Each asset has its own protocols including hired security, emergency procedures, regular drills and communicating regularly with residents
- i. Meet local fire safety and carbon monoxide monitoring standards
- j. Provide a common area multi-purpose room that can be used for wellness activities or on-site exercise where feasible
- k. Provide healthy vending machine/food options where applicable
- l. Utilize an integrated pest management plan
- m. Include indoor parking where practical

## 2. Fit Out and Refurbishment Program

GTIS' fit out and refurbishment program specifically includes ESG issues. GTIS' Brazil operational portfolio has detailed fit out and refurbishment guidelines which specifically includes ESG issues. For GTIS' US funds, fit out and refurbishment programs are developed with operating partners on a case by case basis. Additional documents are available upon request. Please review section VI in this document to see additional document titles.

Specific fit out requirements may include:

- + **Green Space Planning and Design** – incorporating into the design, including ensuring sunlight availability and occupant controls
- + **Renewability** – using materials from sustainably produced sources such as FSC (Forestry Stewardship Council) or PEFC (Program for the Endorsement of Forest Certification) timber, which attract no price premium
- + **Low Impact Materials** – choose non-toxic, sustainably produced or recycled materials, such as water-based low VOC (volatile organic compounds) paints
- + **Recycled Materials** – preference for recycled materials, such as plastic fabrics, work surfaces, internal walls, partitions, insulation and floor finishes, for example. For more information, see the BRE Green Guide
- + **Lighting Controls** – use passive infrared sensors and daylight detectors to automate lighting where practical
- + **Energy Efficiency** – use products which consume less energy, such as top tier appliances

- + **Smart Metering** – use hardware technology to identify when and where energy for heating, cooling, lighting and low power is wasted when not in use.
- + **Room Booking** – use software technology to ensure meeting rooms aren't heated or cooled when empty, if practical
- + **Sustainable Design Standards** – use an environmental assessment method such as Leadership in Energy and Environmental Design (LEED), Building Research Establishment Environmental Assessment Method (BREEAM) or the SKA Rating to measure and rate the environmental quality of your specific fit-out.
- + **Heating, Cooling and Ventilation** – consider modifying or replacing your building's HVAC system with low carbon technologies such as heat recovery or passive cooling. The cost of new HVAC plant and equipment can be offset through capital allowances, as described in the Green Leasing section above.
- + **Lighting** – install LED Lamps or T5 fluorescent lighting to enjoy the benefits of energy efficiency, longer product life and lower maintenance costs.
- + **Acoustics** – create modular screens or place furniture where acoustic privacy is required. Design ceilings, walls, windows and floors with acoustic sound absorption qualities, where possible
- + **Technology** – require IT Relocation Plan and Disaster Recovery Plan to ensure business continuity. Establish IT requirements such as power point and data point diagrams. Establish internet, phone and computer network requirements during design phase. Consider cloud technologies where possible.

## C. Development: New Construction and Major Renovations

### Environmental

#### 1. Goals

GTIS understands that new construction and major renovation can result in significant environmental impacts within and around each site. GTIS aims to build assets with the highest possible performance standards with strong livability and amenity offerings, while accounting for practicality, budgetary constraints and financial considerations, which are unique to each submarket. The implementation of the strategic measures below, as applicable, will help reduce negative impact on the environment, as well as mitigate overall risk.

GTIS, in partnership with key stakeholders, will make reasonable efforts to mitigate negative environmental impact of new construction and major renovation by accomplishing the following goals:

## 2. Energy

- a. Evaluate and incorporate renewable energy strategies when feasible, strive for Net Zero Energy facilities where practical
- b. Improve building energy performance and reduce overall energy consumption through strategic envelope design strategies and high-efficiency HVAC system opportunities wherever feasible
- c. Include minimum energy efficiency requirements for:
  - i. Planning and design including development and implementation of a commissioning plan, integrative design process, to exceed relevant energy codes or standards and requirements for minimum energy use intensity post-occupancy where possible
  - ii. Air conditioning, commissioning, energy modeling, high-efficiency equipment and appliances, lighting, occupant controls, passive design, space heating, ventilation and water heating where possible
  - iii. Operational energy efficiency monitoring, including building energy management systems, energy use analytics, post-construction energy modeling and sub-meters by system where possible
- d. Perform (hypothetical) energy modeling where practical and accretive
- e. Target energy efficiency for new construction and major renovation and incorporate on-site renewable energy, automatic appliance monitoring systems such as systems to anticipate and monitor malfunctioning equipment (Real-Time and Predictive Fault Detection sensors) and energy-saving techniques where practical

## 3. Green Building Certification

- a. Consider the implementation of LEED, IREM CSP, Fitwel, WELL, EDGE, Enterprise Green Communities, BREEAM, IFLI, GreenGlobes, GreenPoint Rated, AQUA/HQE, or other green protocols and indicators whenever practical.
- b. Strive to develop documented cost-benefit analysis for all new construction to evaluate whether or not green certifications are favored for specific business plans, given financial returns targets, budgetary restrictions and other considerations

## 4. Greenhouse Gas Emissions

- a. Aim to track greenhouse gas emissions related to construction, on an asset-by-asset level, by 2023 for specific investments

## 5. Indoor Air Quality

- a. Adhere to air quality strategies during construction and before occupancy

- b. Avoid installing outdoor air intakes at street level or near other outdoor sources of pollutants
- c. Effectively control construction dust and particulates through increased filtration
- d. Use low emitting materials
- e. Use only no/low VOC paints and finishes

## 6. Materials

- a. Assess the life cycle emissions of its projects using the Embodied Carbon in Construction (EC3) Calculator Tool where applicable to be evaluated on a case-by-case basis and disclose the embodied carbon emissions of its developments completed within the last three years where possible
- b. Avoid using the International Living Future Institute (ILFI) “red list” of prohibited materials or ingredients that should not be used on the basis of their human and/or environmental impacts when possible<sup>15</sup>
- c. In addition to the “red list,” seek to avoid materials with toxic ingredients, such as: asbestos, formaldehyde, volatile organic compounds, ash, cadmium, mercury, lead, arsenic, phthalates, etc.
- d. Consider quality, safety, durability, ease of use and maintenance needs when specifying materials
- e. Purchase locally extracted or recovered materials and import local fill where practical
- f. Require materials to disclose environmental impacts and/or potential health attributes (Environmental Product Declarations and Health Product Declarations) where possible
- g. Use environmentally preferable products whenever cost-effective and to the extent practicable such as rechargeable batteries
- h. Use LED lighting when possible
- i. Use low-emitting VOC materials where possible
- j. Use materials and packaging that can easily be recycled when possible
- k. Use products manufactured with the maximum practicable amount of recovered material, especially post-consumer content where possible
- l. Use rapidly renewable materials and recycled content materials when possible
- m. In the U.S., use sustainability-certified materials, whenever practical, based on specific standards herein<sup>16</sup>
- n. Use rapidly renewable materials and recycled content materials when possible

<sup>15</sup> The materials red list (commonly shortened to simply “red list”) is a compilation of harmful-to-humans chemicals and materials compiled by the International Living Future Institute (ILFI) as part of its Living Building Challenge. Further information available upon request.

<sup>16</sup> Business and Institutional Furniture Manufacturer’s Association Product Safety and Performance Standards and Guidelines, Cradle to Cradle, Carpet and Rug Institute Green Label and Green Label Plus, EPEAT, Floorscore, Forest Stewardship Council, GreenGuard, Green Seal, International Living Future Institute’s Declare Database, NSF-140, Rainforest Alliance, Sustainable Agriculture Network’s Sustainable Agriculture Standard, Scientific Certification Systems, UL ECOLOGO, USDA BioPreferred, U.S. EPA Safer Choice, U.S. EPA Comprehensive Procurement Guidelines, U.S. EPA Water Sense.



- o. Please see the detailed GTIS renovation and fit out guides for more information

## **7. Regulatory Compliance**

- a. Adhere to State and local codes, ordinances, and zoning requirements

## **8. Resilience**

- a. Perform a resilience analysis when possible. Resilience analysis is defined as the preparedness of the built environment towards existing and future climate changes (i.e., the ability to absorb disturbances such as increased precipitation or flooding while maintaining its structure). This can be achieved by management policies, informational technologies, educating tenants, community, suppliers and physical measures at the asset level
- b. Prepare and adapt for long-term change in climatic conditions or climate related events. Example of climate change adaptation measures can include, but are not limited to building flood defenses, xeriscaping and using tree species resistant to storms and fires, adapting building codes to extreme weather events
- c. Assign responsibility for climate risk and resilience to the GTIS ESG Committee where possible
- d. Establish a systematic process for communication and review of resilience-related information by the most senior governance body with responsibility including climate-related transition risks, physical risks and social risks where possible
- e. Establish a systematic process to incorporate climate risk and resilience into planning, budgeting, evaluation and similar activities where possible
- f. Establish a systematic process to assess GTIS' exposure to climate-related transition risk, physical climate risks and social risk where possible
- g. Assess the potential financial impacts of climate-related risks on GTIS where possible
- h. Implement resilience-related business strategies associated with the entity during the reporting year where possible
- i. Set specific climate risk and/or resilience-related targets or goals associated with GTIS during the reporting year where possible
- j. Track specific climate risk and/or resilience-related performance metrics associated with GTIS during the reporting year where possible

## **9. Site Selection**

- a. Analyze land topography to avoid removal of native material which could cause an environmental disturbance
- b. Assess technical, social and environmental risks, as well as mitigation needs and related costs

- c. Consider local access to mass transportation, urban infrastructure, connect to multi-modal transit networks, and other services
- d. Identify soil and water characteristics, including their contamination levels, restoration possibilities and mitigation needs, as well as related costs in order to avoid any community risks
- e. Locate projects within existing developed areas when possible
- f. Protect, restore, and conserve aquatic ecosystems, farmlands, floodplain functions, and historical and heritage sites when possible
- g. Site design and development requirements:
  - i. Manage waste by diverting construction and demolition materials from disposal
  - ii. Manage waste by diverting reusable vegetation, rocks and soil from disposal
  - iii. Minimize light and noise pollution to the surrounding community
  - iv. Perform environmental site assessment
  - v. Protect air quality during construction
  - vi. Protect and restore habitat and soils disturbed during construction and/or during previous development
  - vii. Protect surface water and aquatic ecosystems by controlling and retaining construction pollutants
- h. Redevelop brownfield sites where applicable
- i. Understand the biodiversity and natural habitat of the site in order to minimize disruption and maximize preservation and conservation opportunities, inclusive of native, threatened, and endangered species evaluations

#### 10. Waste

- a. Define waste disposal areas and attempt to recycle whenever practical
- b. During construction, adhere to:
  - i. Pollution prevention plans
  - ii. Waste management practices that support recycling where practical
- c. Establish targets for waste stream recovery, reuse and recycling when possible
- d. Implement diversion rate requirements when possible
- e. Promote efficient on-site solid waste management through:
  - i. Management and construction practices including construction waste signage, diversion rate requirements, education of employees/contractors on waste management, incentives for contractors for recovering, reusing, and recycling building materials, targets for waste stream recovery, reuse, and recycling, waste management plans and waste separation facility where possible
  - ii. On-site waste monitoring through hazardous and nonhazardous waste monitoring/audit where possible

- f. Provide incentives for contractors for recovering, reusing and recycling building materials when possible

## 11. Water

- a. Adopt water savings devices, water treatment systems and water reuse where practical
- b. Employ and build on-site wastewater treatment solutions and reuse of storm water for non-potable applications where practical
- c. Include minimum water conservation requirements if possible
- d. Promotes water conservation through:
  - i. Requirements for planning and design including development and implementation of a commissioning plan, integrative design for water conservation, requirements for indoor water efficiency, requirements for outdoor water efficiency, requirements for process water efficiency, requirements for water supply, requirements for minimum water use intensity post-occupancy where possible
  - ii. Common water efficiency measures including commissioning of water systems, drip/smart irrigation, drought tolerant/low-water landscaping, high-efficiency/dry fixtures, leak detection system, occupant sensors, on-site wastewater treatment, reuse of stormwater and greywater for non-potable applications where possible
  - iii. Operational water efficiency monitoring through post-construction water monitoring, sub-meter and/or water use analytics where possible
- d. Utilize native plantings, xeriscaping and integrated pest management landscaping strategies where practical
- e. Utilize water consumption meters

## Social

### 1. Building Safety

- a. Communicate safety information
- b. Continuously improve safety performance
- c. Demonstrate safety leadership
- d. Develop building safety policies where possible
- e. Entrench safety practices
- f. Manage safety risks
- g. Provide access to medical personnel when possible

- h. Provide Personal Protective Equipment and Life Saving Equipment
- i. Provide training curriculum when possible
- j. Promote design for safety
- k. Staff on-site health and safety professional when possible

## 2. Injury Reporting

- a. Monitor conditions for and/or track indicators of employee safety including workstation and/or workplace checks, absentee rate, fatalities, injury rate, near misses, lost day rate, and severity rate where possible

## 3. Stakeholder Engagement

- a. Assess the potential socio-economic impact of development projects on the local community as part of the planning and pre-construction phases when possible including housing affordability, Walk Score, alternative transportation options such as biking, impact on crime levels, employment level, livability score, local income generated, local job creation, local residents' well-being, poverty percentage, transit score, and walkability score where practical and where data is available
- b. Engage with the local communities and stakeholders where the project is located where possible
- c. Develop and implement a community communication plan including:
  - i. Community health and well-being
  - ii. Effective communication and process to address community concerns
  - iii. Employment creation in local communities
  - iv. Enhancement programs for public spaces
  - v. ESG education program
  - vi. Research and network activities
  - vii. Resilience, including assistance or support in case of a disaster
  - viii. Supporting charities and community groups
- d. Systematic process to monitor the impact of development projects on the local community during different stages of the project including:
  - i. Analysis and interpretation of monitoring data
  - ii. Development and implementation of a communication plan, community monitoring plan and risk mitigation plan
  - iii. Identification of nuisance and/or disruption risks
  - iv. Identification of stakeholders and impacted groups
  - v. Management practices to ensure accountability for performance goals and issue identified during community monitoring
- e. Take adequate measures to prevent a social enterprise controversy as part of its business operations through town hall meetings or other initiatives

### 3. Supply Chain

- a. Encourage the reduction of consumption of goods within the building premises and/or the sourcing of sustainable or ethical goods
- b. GTIS has the following ESG requirements in place for its contractors, when possible, including business ethics, child labor, community engagement, environmental process standards, environmental product standards, health and well-being, human rights, human health-based product standards, occupational safety and labor standards and working conditions<sup>17</sup>
- c. GTIS monitors its contractors' compliance with its ESG-specific requirements by contractor ESG training, contractors updating reports on environmental and social aspects during construction, external audits by third party, internal audit and weekly/monthly (on-site) meetings and/or ad hoc site visits where possible
- d. Use recycled materials when practical, given budgetary constraints and financial return targets

## Health and Well-being

### 1. Incorporate occupant health and well-being through:

- a. Requirements for planning and design including Health Impact Assessments and integrated processes where possible
- b. Common occupant health and well-being measures including the following where possible:
  - i. Accessible stairways
  - ii. Adequate lighting in stairwells
  - iii. Emergency egress points, stairwells, parking lots and entryways
  - iv. Acoustic comfort
  - v. Active design features
  - vi. Biophilic design
  - vii. Bicycle parking and storage
  - viii. Commissioning
  - ix. Daylight
  - x. Ergonomic workplace
  - xi. Fitness facilities in building
  - xii. Humidity controls
  - xiii. Illumination, incorporate as much daylight/or blue-enriched light as possible into design without introducing glare

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Specific information is detailed directly in construction agreements





- xiv. Inclusive design
  - xv. Indoor air quality
  - xvi. Natural ventilation
  - xvii. Occupant controls
  - xviii. Physical activity
  - xix. Thermal comfort
  - xx. Water quality
- c. Provisions to verify health and well-being performance including occupant education and post-construction health and well-being monitoring where possible



# III. Environmental Management System

GTIS understands that real estate consumes large amounts of energy and water resulting in significant GHG emissions and environmental impact. To understand and manage our consumption, mitigate risk and drive operational excellence throughout the portfolio, GTIS will utilize a data management system through a third-party sustainability data management partner. This EMS document and the data management system will allow GTIS to measure, manage, and act on key performance indicators to improve operational and environmental performance over time.

In addition to the data management platform, GTIS will utilize the basic guidelines from international standard for environmental management ISO 14001 as a protocol for fostering continuous improvement within our EMS framework.

## Organizational Chart – US and Partners





GTIS' environmental goals and practices aim to reduce risk and foster environmental health and abundance within the communities where we invest, while creating superior assets and driving operational excellence throughout the GTIS portfolio.

GTIS' environmental goals and practices intend to:

- + Adopt sustainable certifications for new and existing buildings, where practical
- + Avoid materials that are toxic to humans and the environment
- + Consider climate impact in managing risks and opportunities
- + Contribute to the enhancement of city infrastructure where practical
- + Create superior assets that operate efficiently with reduced environmental impact
- + Drive energy and water efficiency and reduce natural resource consumption
- + Promote the management and proper disposal of waste and effluents generated in its assets
- + Monitor water toxicity and protect aquatic ecosystems within our projects whenever practical

All of these practices are taken into consideration when hiring suppliers and procuring materials. Whenever practical, these practices are included in the procurement process to ensure compliance with the GTIS ESG Policy. GTIS uses the ESG Evaluation Due Diligence Checklist for all assets at all stages of investment. The due diligence process ensures each asset is looked at with an environmental, social, and governance perspective. Each asset receives an ESG review annually at a minimum. GTIS also performs a Social Risk Assessment across its workforce every three years as a minimum. ESG factors may be included as part of annual performance goals.

GTIS uses ENERGY STAR Portfolio Manager, Measurabl and CTE's data management system to measure and monitor energy, water, waste and GHG data. Those data management systems help GTIS set goals and establish KPIs when feasible.

## B. Do

### 1. Implement interim objectives that progress towards achieving our long-term sustainability targets

The EMS Policy will be shared with all GTIS employees and all new employees will receive a copy. The EMS will be shared externally to the extent it is requested by external partners and maintained confidential. The EMS will be updated by the ESG Committee periodically as needed and at a minimum every five years. Yearly trainings will be held to remind employees about the EMS and how their job may contribute to its success. GTIS publishes

an annual Sustainability Report where progress on targets set are shared. GTIS follows all applicable environmental rules and regulations of the U.S. and Brazilian governments.

The GTIS ESG Committee responsible for the EMS and may delegate responsibilities as necessary. The most senior decision maker is Josh Pristaw, a Senior Managing Director. The GTIS ESG Committee members are listed in the glossary. The ESG Committee and its delegates commit to the following tasks:

- + Communicating the importance of effective environmental management and conforming to the EMS requirements
- + Directing and supporting all stakeholders to contribute to the effectiveness of the EMS
- + Ensuring the EMS achieves its intended outcomes
- + Ensuring the resources needed for the EMS are available and utilized
- + Promoting continual improvement
- + Supporting other relevant departments to demonstrate the connection as it applies to their areas of responsibility
- + Taking accountability for the effectiveness of the EMS

GTIS has adopted business continuity procedures (BCP) which all employees must follow in the event of a significant business disruption event, such as a natural disaster, terrorist activity or other catastrophic event that could partially or completely restrict access to GTIS' main business premises or disrupt business at GTIS. The business continuity procedures are intended to protect Clients' and Investors' interests from being placed at risk as a result of GTIS' inability to provide investment advisory services due to a significant business disruption event that may disable operations at GTIS' physical locations.

Employees are provided with a copy of GTIS' Business Continuity Plan ("BCP") upon commencement of employment and upon amendment. The CCO is responsible for providing training to employees on the BCP in order to ensure the success of the BCP in the event of a disaster. Such training may also take the form of I-8 disaster scenario preparedness and significant business disruption drills. GTIS will update this plan whenever there is a material change to the GITS' operations, structure, business or office location. A review of the Firm's BCP is completed at least once annually.

GTIS will conduct an annual test of these procedures to ensure efficiency in case of a significant business disruption. This plan outlines a communication network intended to facilitate the continuity of GTIS' business in the case of a significant business disruption.





All employees are encouraged to adhere to these guidelines while acting in a safe and prudent manner in light of the given circumstances and are encouraged to keep a copy of this BCP at their home as well as at the office.

In the event of an emergency disaster during business hours the Fire Department and/or Building Management will generally make the decision to evacuate any floors based on their initial and continuous assessment of the situation. Employees should follow the instructions of the Fire Department and/or Building Management who may instruct employees to shelter in a building designated area or regroup on a higher or lower floor. Employees should not exit the building until told to do so. Once instructed to exit the building employees should meet at the designated reassembly location.

At the asset level, GTIS defers to property managers to maintain an emergency preparedness and response plan for each specific asset.

## C. Check

### 1. Measure our progress against our targets

GTIS evaluates its performance annually during the GRESB submission process for applicable funds. The data can be assured by a third-party whenever needed. GTIS aims to continuously increase its score. If feasible, a gap analysis can be performed indicating areas for improvement to increase the GRESB score for future years.

In the US, GTIS benchmarks asset-by-asset energy, water and greenhouse gas emissions performance against its peers using ENERGY STAR Portfolio Manager to generate energy and water ratings for assets where utility usage and waste metrics based on available data. ENERGY STAR Portfolio Manager is also used to track asset performance over time

and measure progress against individual asset goals when possible. Waste data is tracked when available.

The ESG Committee leverages the data management systems to track energy, water, waste, and emissions data. The data is analyzed. Areas of opportunity for low performing assets and high performing assets where the best practices can be shared with the lower performing assets are highlighted. One of the data management systems, Measurabl, offers data quality reviews which GTIS will use when needed.

Technical building assessments and/or energy audits are conducted on assets every three years where applicable to identify opportunities that drive continuous improvement of energy and water efficiency and waste management.

Additionally, the ESG Committee will review the EMS periodically as needed to ensure it is conforming to ISO 14001 requirements. The EMS may be periodically audited as needed. During a potential audit, the following steps may be taken:

- + Define the audit criteria and scope for each audit
- + Conduct audits objectively and impartially
- + Ensure control of records of audit activities
- + Share the results with the senior management team

The results of the EMS audits may be shared with the management team and acted on by the management team and/or ESG Committee. If non-conformities were to happen, the ESG Committee would act straightaway to correct the non-conformity and inform management immediately. The cause of the non-conformity would be studied, and changes would be made to ensure no future non-conformities occur. The process will be documented by the ESG Committee, and an update to the ESG Policy would potentially be made to address specific issues.

## D. Act

### 1. Identify opportunities to continuously improve our operational and environmental performance

GTIS shall continuously look for areas of improvement and implement actions to achieve those improvements. The EMS is a continuous process where progress happens with each iteration. Feedback is always welcome and encouraged because it often leads to better performance. Periodic reviews of the results will be scheduled, and next steps taken based on the results. Performance will be evaluated against the targets when possible. GTIS is committed to continually improving the EMS to enhance its performance. Wherever feasible, GTIS will pursue more sustainable options in every facet of the business.

# IV. GTIS Corporate

GTIS inspires trust in its employees, investors and stakeholders through its accountability, corporate responsibility, equity and transparency.



### ACCOUNTABILITY

Ensure timely and accurate review of corporate performance on key environmental, social and governance issues



### CORPORATE RESPONSIBILITY

Implement appropriate risk management and ESG objectives in the GTIS business model, considering financial, intellectual, human, social and natural capital in the short, medium and long term



### EQUITY

Strengthen human capital and promote diversity, human rights and financial inclusion. Our equity principles combat forced and child labor. We do not tolerate sexual harassment or exploitation in any form



### TRANSPARENCY

Make available to all stakeholders' information across our practices, funds and assets to ensure a straightforward understanding of our financial, social and environmental performance<sup>18</sup>

<sup>18</sup> GTIS' stakeholders included, but are not limited to clients, communities, employees, end users (tenants or buyers), general contractors, government, investors, joint venture partners, operating partners, property managers, special interest groups, and suppliers.



## A. Governance

### 1. Compliance and Responsibility

GTIS Partners is committed to fostering a culture of compliance. This commitment is assured through the Compliance Program adopted by GTIS to comply with Rule 206(4)-7 of the Advisers Act, and to ensure that GTIS complies with the rules and regulations of the Advisers Act and all applicable Federal Securities Laws.

The purpose of the Compliance Program is twofold: First, to provide the GTIS Team (any partner, officer, director, manager or employee) with an introduction to the primary laws, rules, and regulations governing investment advisory activities. Second, to provide the GTIS team with a framework to conduct its respective duties and obligations under the Federal Securities Laws.

Additional information about compliance is available upon request.

All partners, officers, directors, managers and employees of GTIS are required at the beginning of their employment to acknowledge that they have read, understood, and agreed to comply with the procedures within this document. The GTIS team is required to attend a yearly training (including when the ESG Policy is materially amended) about the ESG Policy. Environmental, Social and Governance policies and goals shall also be incorporated within annual employee evaluations and executive compensation where applicable. GTIS encourages our investors and employees to take an active stance in actualizing our ESG Policy, as we find this critical to fostering a positive and sustainable firm culture.

### 2. Ethics and Transparency

GTIS encourages its business partners, suppliers and stakeholders to adopt the same ethical values and transparency standards set forth in the GTIS ESG Policy:

- a. Anti-corruption enforcement follows the U.S. Foreign Corrupt Practices Act of 1977 and all applicable Brazilian laws. Therefore, all GTIS subsidiaries, service providers, JV partners, and business partners are subject to compliance with the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”) and all applicable Brazilian laws. Neither GTIS nor any director, officer, agent, employee, or other person associated with or acting on behalf of GTIS will, directly or indirectly, violate any provision of the FCPA and/or any applicable Brazilian laws including:
  - i. Make any bribe, rebate, payoff, influence payment, kickback, or other payment to a government official to secure a benefit, favor, or other improper advantage.
  - ii. Make any unlawful payment to foreign or domestic government officials or employees or to foreign or domestic political parties or campaigns from GTIS funds.

- iii. Illegal use of any GTIS funds for unlawful contributions, gifts, entertainment, or other expenses relating to political activity
- b. GTIS adheres to the U.S. Office of Foreign Assets Control and Money Laundering and Terrorist Financing and complies with U.S. economic and trade sanctions administered by the United States Treasury Department's Office of Foreign Assets Control ("OFAC"). Accordingly, GTIS warrants that neither it nor any director, officer, agent, employee, or other person associated with or acting on behalf of Company will, directly or indirectly, violate any provision of the U.S. economic and trade sanctions administered by OFAC, including:
  - i. Knowingly causing GTIS or any of its affiliates to engage, directly or indirectly, in transactions or dealings involving any country, other than Cuba, that is subject to U.S. government sanctions or any national or assets of such countries.
  - ii. Knowingly causing GTIS or any of their affiliates to engage in transactions with entities or persons designated by OFAC as specially designated nationals.
- c. In addition, GTIS shall undertake reasonable efforts to ensure that any entity in which it invests is not involved in any activity that violates the FCPA, including as described the three sub-bullets above.
- d. Suppliers and business partners forbid child labor and forced labor and promote healthy work conditions.
- e. Suppliers and business partners should know and agree with GTIS' principles and policies, and not object to GTIS' monitoring procedures. When necessary, suppliers and business partners agree to take corrective and preventive measures to resolve any violation of this Policy.
- f. Suppliers and business partners should report any relevant information regarding their relationships with stakeholders to GTIS.

GTIS strives to maintain the highest fiduciary duties in all aspects of its business. GTIS will not engage in fraudulent behavior and maintains the highest level of ethical business.

GTIS has adopted a Cybersecurity Policy, which all employees must follow. GTIS implemented this policy in order to prevent any cybersecurity threats, incidents or breaches to its technology infrastructure. It covers the topics of governance risk and assessment, access rights and controls, data loss prevention, vendor management, training and incident response. The GITS Compliance Manual / Code of Ethics is available upon request for more information.

GTIS complies with the requirements set forth in the European Union's General Data Protection Regulation. It imposes enhanced operational requirements for firms that "process" personal data of individuals in the European Union even if such processing occurs in the United States. These additional requirements include heightened notice, consent and recordkeeping, limits on data use and retention, mandatory breach notifications, and certain restrictions on transfers of personal data.

All GTIS employees and their spouses, generally may not make a federal, state or local political contribution without the pre-approval of the CCO. Similarly, they are required to obtain pre-approval prior to making a contribution to a political action committee or a political party.

GTIS ensures all clients and shareholders are entitled to certain rights. Additional information, including the compliance manual, and sample Limited Partnership Agreements terms can be provided upon request to qualified investors.

GTIS is responsible for ensuring transparency with its stakeholders as previously defined. This includes, but is not limited to: clients, communities, employees, end users (tenants or buyers), general contractors, government, investors, joint venture partners, operating partners, property managers, special interest groups, and suppliers. To the extent there are any ESG related controversies, misconduct, penalties, incidents or accidents, GTIS has a system in place to collect data and report on any wrongdoing. In the event an operating partner made the mistake, the asset manager would immediately report it to the ESG Committee, which would then report to Equity Capital Markets team. In the event the mistake was made by a GTIS employee, any whistleblower would be covered by protections contained in the GTIS compliance manual, and appropriate corrections would be enacted.

### 3. Whistleblower Policy and Grievance Reporting

If any employee reasonably believes that any policy (including this Policy), practice, or activity performed by GTIS or associated operating partners violates any law or regulation, the employee is encouraged to bring this fact to the attention of the General Counsel. Examples of illegal activities include, but are not limited to, violations of any federal, state or local laws that GTIS or the employee is subject to and any fraudulent financial reporting (including reporting in discordance with applicable financial reporting rules). For the avoidance of doubt, this Policy is applicable to all GTIS partners, directors, executive, officers, employees and all others engaging in any dealings on behalf of GTIS.

It is the purpose of GTIS to adhere to all laws and regulations that are applicable to it and the underlying purpose of this Policy is to ensure support of all employees in achieving such goal of full legal compliance. The whistleblower is not responsible for investigating the activity or for determining or identifying fault or corrective measures; appropriate GTIS management officials are charged with these responsibilities. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, when required by law or as a result of a request from government regulators.

Retaliation against an employee who has brought an issue forward under this Policy in good faith is strictly prohibited. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, reduction in pay, or poor work assignments and threats of physical or psychological harm. The right of a whistleblower for protection against retaliation does not include immunity from any personal wrongdoing.

In addition, GTIS has established a grievance reporting hotline through Lighthouse Services to detect and address any of the following:

- Accounting Controls
- Age/ethnicity
- Audit and Risk Detection
- Bribery/Fraud/Theft
- Criminal Misconduct
- Discrimination
- Ethics and Compliance
- Environmental Hazards
- Financial Issues
- Gender
- General Misconduct
- Harassment and Hostility
- Human Resources Issues
- Identity Theft
- Information Security
- Insider Trading
- Partner Relations
- Privacy and Security
- Safety
- Shareholder Concerns
- Vendor Concerns

**ANYONE CAN PHONE OR EMAIL THE GRIEVANCE  
HOTLINE ON AN ANONYMOUS BASIS TO ADDRESS  
ANY OF THESE POTENTIAL ISSUES.**

**Website:** [www.lighthouse-services.com/gtispartners](http://www.lighthouse-services.com/gtispartners)

**Toll-Free Telephone:**

English speaking USA and Canada: 833-270-0002

Spanish speaking USA and Canada: 800-216-1288

**ATandT USADirect:**

**All other countries:** 800-603-2869 (must dial country access code first)

**Email:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)

**Fax:** (215) 689-3885 (must include company name with report)



#### 4. Performance Indicators

GTIS regularly collects and reviews the following economic, social and governance indicators for all unrealized assets in the portfolio. GTIS also collects and reviews specific environmental indicators for operational assets where reliable data is available:

Category	Indicator
Economic (by Asset or Joint Venture)	<ul style="list-style-type: none"> <li>Equity capital invested and distributed</li> <li>Fair Market Value (please refer to the latest GTIS Valuation Policy)</li> <li>Financial return profile</li> <li>Future projected capital commitments and anticipated distributions</li> <li>Project updates, including acquisition, development, leasing, financing and disposition activity</li> </ul>
Environmental	<ul style="list-style-type: none"> <li>Energy consumption by asset</li> <li>Greenhouse gas emission where possible to measure</li> <li>Number of initiatives to enhance efficiency and mitigate environmental impacts of the assets</li> <li>Percentage and total volume of water recycled and reused</li> <li>Total volume of waste generation by asset</li> <li>Water consumption withdrawal by asset</li> </ul>
Social	<ul style="list-style-type: none"> <li>Absentee and injury rates</li> <li>Age group distribution, gender ratio, international background, racial diversity, socioeconomic background</li> <li>Commit to perform demographic analysis on all investments on a regular basis, including income, employment, livability, crime, infrastructure etc.</li> <li>Completion percentage and results of basic vitals, radiation and light testing for Brazil employees</li> <li>Completion percentage and results of employee satisfaction surveys</li> <li>Corporate philanthropy and volunteer opportunities for U.S. Headquarters</li> <li>Employee remuneration through the Compensation Committee</li> <li>Percentage of employees trained in Compliance, Employee Handbook and the ESG Policy</li> <li>Retention rates after parental leave</li> <li>Total GTIS workforce turnover, by asset</li> <li>Total number of incidents of discrimination and corrective actions taken</li> </ul>

Category	Indicator
Governance	<ul style="list-style-type: none"> <li>• Complaints on grievance hotline and resolution time</li> <li>• Number of Whistleblower instances</li> <li>• Aligned with our Global Data Protection Policy (available upon request), our IT department also reviews permissions regularly, runs multiple vulnerability scanning analyses both internally and externally, and gets results on a quarterly basis from 3rd parties. Our IT department also runs penetration tests annually to test data protection<sup>19</sup>.</li> <li>• Number of executive board members, independent/non-executive board members, average tenure of a board member, number of independent/non-executive board members with competencies relating to environmental and social topics</li> <li>• Number of external and independent members of fund advisory boards, including age group distribution, board tenure, gender pay gap, gender ratio, international background, racial diversity, socioeconomic background</li> <li>• Percentage of assets analyzed for risks related to bribery and corruption and any incidents</li> <li>• Report the criteria used for nominating and selecting highest governance body members and its committees, including whether and how:</li> <li>• Diversity is considered</li> <li>• Expertise and experience relating to economic, environmental, and social topics are considered</li> <li>• Independence is considered</li> <li>• Stakeholders (including shareholders) are involved</li> </ul>

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Further information, including samples of such IT reports are available upon request to qualified parties

## 5. Policy Enforcement and Improvement

This policy is monitored by the ESG Committee of GTIS Partners and is integrated into GTIS' overall business strategy. The ESG Committee is comprised of representatives from various groups within GTIS including acquisitions, asset management, portfolio management, senior management and the firm's Management Committee. The committee annually reviews and approves the ESG Policy and meets quarterly to assess progress to ensure that the latest business challenges are properly addressed. Meeting minutes will be recorded and distributed to the Committee.

The GTIS ESG Policy will be shared with all employees and business partners at the beginning of their relationship, upon entering into joint venture and management agreements with GTIS operating partners. At a minimum, employees will be trained and informed of this Policy during annual compliance training.

The ESG Policy, along with updates on GTIS' ESG practices, will be disclosed to the firm, investors, employees, supply chain, tenants and clients through normal business dealings, on the GTIS website, in annual reports, corporate sustainability reports, or more frequently as needed. Whenever practical, the sustainability disclosure will be reviewed by an independent third party to assess the reliability, integrity and accuracy of the information.

For the funds listed below, the GTIS team will submit an annual survey to the Global Real Estate Sustainability Benchmark "GRESB"<sup>20</sup>. Each fund will receive a score that will be used for qualitative and quantitative insights about ESG performance. The GTIS Partners ESG Committee will review and analyze results as well as revise policies and business practices where necessary for the coming years. The committee is responsible for ensuring ESG Policy compliance and any goals set forth here or in the annual Sustainability Report.

### FUNDS CURRENTLY SUBMITTING TO GRESB<sup>20</sup>:

- GTIS Brazil Fund I
- GTIS Brazil Fund II
- GTIS Brazil Fund III
- GTIS US Property Income Fund

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As of November 2020. Additional funds to be migrated to the GRESB program at a later date.

## 6. Risks and Opportunities

The core of the GTIS Partners' governance policy is to ensure financial, social and environmental risk management. Environmental and Social performance are fundamental indicators of how GTIS assesses and manages risk. As a general rule, GTIS' best practices also require the firm to make a reasonable inquiry into its clients' and fund investors' investment objectives, risk tolerance, investment experience and financial situation before assets are acquired.

In order to formally integrate risk management into corporate governance, our due diligence and operational requirements adhere to the five main process steps described below:

<b>1. IDENTIFY</b>	Recognize and describe any risk's potential interference with GTIS criteria of compliance and success
<b>2. ANALYZE</b>	Collect all relevant data to determine risk level, its probability of occurrence and resulting consequences
<b>3. EVALUATE</b>	Define its magnitude to the business plans, ongoing building operations and the surrounding environment
<b>4. MITIGATE</b>	Develop a plan with relevant underwriting where necessary to eliminate or reduce the impact to an acceptable level
<b>5. MONITOR AND TRACK</b>	Evaluate any potential damage, as well as avoid future recurrence

## B. Social

GTIS intends to cultivate global equality, diversity, inclusion, well-being and human capital

GTIS is aware that its social impact goes far beyond its direct real estate transactions. Considering this, the firm strives to address all processes in a project's lifecycle in our social responsibility policy. GTIS continuously enforces and oversees compliance with local legislation and expects all of our business partners and suppliers to take similar measures. We implore our collaborators to immediately communicate any non-compliance.

## 1. Community Relations

The main principle of community relations is the acceptance of the civic responsibility of a company. GTIS takes an active interest in the well-being of its environment using several methods to create and maintain a beneficial relationship between company and community.

## 2. Community Engagement Programs

GTIS has a community engagement program that includes sustainability-specific issues including topics such as:

- a. Effective communication and processes to address community concerns
- b. Enhancement programs for public spaces
- c. Employment creation in local communities
- d. Community health and well-being
- e. Research and network activities
- f. Supporting charities and community groups

## 3. Employee Engagement and Satisfaction

- a. GTIS performs an employee satisfaction survey at least once every three years.

## 4. Human Rights

- a. As an international firm, GTIS recognizes its unique position to positively impact local economies across the globe. As such, GTIS champions the Universal Declaration of Human Rights as part of our core values in our endeavor to promote global welfare and equality.
- b. GTIS works to avoid sexual and moral harassment of any kind in all its projects and offices. Therefore, it does not allow for any behavior that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact in the workplace.
- c. GTIS adopts equal opportunity procedures.
- d. GTIS does not accept any kind of child labor on its projects and works to prevent the child labor in its value chain.
  - i. Per US and Brazilian law, children under the age of 14 may not be employed. Children between the ages of 14 and 16 may be employed in specific occupations for limited hours, and children between the ages of 16 and 18 may be employed in non-hazardous occupations for an unlimited number of hours
  - ii. Suppliers and business partners must abide by local laws regarding child labor

- iii. Suppliers and business partners should obtain legal documentation from all employees to prove their date of birth
- e. GTIS does not have any kind of forced or compulsory labor on its projects. GTIS monitors to assure that all its workers and first-tier suppliers' workers are hired according to local law and are managed, paid and respected as free individuals.
  - i. GTIS and suppliers never withhold any share of any worker's wages, benefits, property or documents in order to compel people to continue working for the company
  - ii. GTIS forbids the use of any kind of forced or compulsory labor by suppliers and business partners
- f. GTIS does not have any specific policies nor practices differentiating hiring opportunities, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, birth, religion, disability, gender, sexual orientation, marital status, political opinions, age or any other conditions that could give rise to discrimination.
- g. Managers and leaders respect the human rights declarations. GTIS strives to create a friendly and safe environment so all employees can express their concerns, especially regarding abuses of any type and/or non-compliance.

For more information, please see the most recent GTIS Compliance Manual, available upon request.

## 5. Labor Practices

GTIS aims to foster a safe and fair work environment by enforcing local labor laws and regulations in addition to the following guidelines:

- a. Employees are given optional time off due to military leave, bereavement, jury duty, blood or bone marrow donations, and voting.
- b. Employees are guaranteed freedom to leave the workplace premises after completing the standard workday and are free to terminate their employment if they give reasonable notice to GTIS (or its partners, if that is the case).
- c. Encourage operators, contractors and developers to comply with the labor practices stated above.
- d. Ensure our contractors' health and safety by enforcing our environmental process standards and on-site regulations.
- e. For U.S. Investments and Offices (not applicable to Brazil):
  - i. All workers are formally hired, and wages follow the FLSA minimum wage laws.
  - ii. As defined in the U.S. FLSA, overtime is voluntary, not regularly requested, and reimbursed at a premium rate, unless freely negotiated with a workers' union. Hourly workers are reimbursed at an overtime rate 1.5 times the regular rate of pay for hours worked after 40 per week.

- iii. Wages and overtime pay follow the standards set in the U.S. Fair Labor Standards Act (FLSA).
- f. GTIS encourages freedom of association. Workers may be represented by a union of their preference, following local labor laws.
- g. Include sustainability factors and progress in Annual GTIS Employee Evaluations when applicable.
- h. Potential wage deductions are never made for disciplinary purposes.
- i. Wages, benefits and deductions are clearly detailed in writing for each pay period to all employees.
- j. Weekly work hours and resting periods (for meals and breaks), vacation time, sick time and holidays are provided according to local labor laws.

## 6. Social Risk Assessments

- a. Complete a Social Risk Assessment at least every three years. The full assessment is available upon request. Topics covered include:
  - i. Child labor
  - ii. Community development
  - iii. Controversies linked to social enterprise partnering
  - iv. Customer satisfaction
  - v. Employee engagement
  - vi. Employee health and well-being
  - vii. Employee remuneration
  - viii. Forced or compulsory labor
  - ix. Freedom of association
  - x. Health and safety: community, contractors, employees, tenants/customers, supply chain (beyond tier 1 suppliers and contractors)
  - xi. Human rights
  - xii. Inclusion and diversity
  - xiii. Labor standards and working conditions
  - xiv. Stakeholder relations

## 7. Stakeholder Engagement

GTIS provides guidance about environmental and social issues to its partners and clients as applicable, encouraging best practices and knowledge of GTIS' ESG Policy.

As part of its commitment to stakeholder engagement, GTIS:

- a. Adapts communications to meet stakeholder expectations
  - i. Stakeholders include, but are not limited to clients, communities, employees, end users (tenants or buyers), general contractors, government, investors, joint venture partners, operating partners, property managers, special interest groups and suppliers.



- b. Encourages stakeholders to take responsibility through policies, procedures, guidelines and specific requirements within contracts.
- c. Improves business processes and practices in response to stakeholder feedback.
- d. Provides assurance to satisfy stakeholder concerns.
- e. Treats stakeholders as partners and works with them to achieve excellence.

### C. GTIS Corporate Offices



The impact of the built environment has become an important aspect of sustainable buildings. From the design and materials selected during new construction to the chemicals used and ventilation provided in existing building management. GTIS aims to provide safe corporate offices that enhance occupant well-being, comfort and productivity.

To minimize the environmental footprint of GTIS' company office space, the firm considers the following in its office selection process:

- a. **Building Site Attributes:** The base building's location, surrounding services and available green space
- b. **Building Features:** The building's envelope, mechanical and electrical systems, adaptability to future needs, and resilience in the event of disaster or infrastructure failure
- c. **Occupants' Well-Being:** The building will be constructed in accordance with the health and well-being benefits for its employees' section
- d. **Transportation:** Convenience of access to alternative transportation, such as bus lines, subways, trains and bicycle paths

In addition, GTIS trains its team to adhere to the ESG Policy, promoting waste recycling and conservative water and energy consumption practices within its offices. GTIS will report on energy consumption, water consumption, and waste generated for its company office spaces.

GTIS is headquartered in a LEED Gold and Fitwel 1 Star certified building located at 787 Seventh Avenue, in New York. All of the electricity used by GTIS' New York office is offset through Renewable Energy Certificates (RECs). The building's ownership and property management team have installed high-efficiency motors and a Thermal Storage System, which have substantially cut annual electricity consumption. In addition, they have also implemented a waste diversion and e-waste recycling program, and regularly perform humidity and indoor air quality testing. GTIS designed and developed its office space on the 50th floor with low-flow water fixtures and automated touchless water faucets to conserve water.

The Brazil headquarters are located at Vista Faria Lima, a LEED Gold certified office building that GTIS designed and developed. Vista Faria Lima was migrated to the free market in Q1 2020 and purchases all of its energy from renewable sources.

For its U.S. and Brazilian offices, GTIS follows the U.S. Occupational Safety and Health Act (OSHA) as well as applicable Brazilian laws and strives to provide employees with a workplace free of recognized serious hazards. This includes fire prevention and emergency action plans and a commitment to a safe workplace. GTIS performs a health and safety check for all offices and employees on an annual basis.

## 1. Corporate Health and Well-Being Benefits

- a. Accessible stairwells that encourage physical activity, where applicable.
- b. Access to outdoor amenities, such as walking paths, picnic tables and restorative gardens.
- c. Acoustical solutions for internally and externally generated noise.
- d. Appropriate ventilation in work areas and conduct regular indoor air quality testing to ensure ventilation compliance to ASHRAE standards.
- e. Biophilic design when possible.
- f. Encourage participation in program promoting health and well-being of employees. Program includes needs assessment, goal setting, action, and monitoring where possible:
  - i. Needs assessment: GTIS monitors tenant health and well-being needs through employee survey on health and well-being and physical and/or mental health checks.
  - ii. Goal setting: Includes addressing mental health and well-being, physical health and well-being, social health and well-being.
  - iii. Action: Promote health through acoustic comfort, biophilic design, childcare facility contributions, flexible working hours, healthy eating, humidity, illumination, inclusive design, indoor air quality, lighting controls and/or daylight, noise control, paid maternity and paternity leave in excess of legally required minimum, physical activity, physical and/or mental healthcare access, social interaction and connection, thermal comfort, water quality, and working from home arrangements where possible.
  - iv. Monitoring: Track outcomes through environmental quality, population experience and opinions, and program performance when possible.

- g. Filtered water and healthy food including weekly corporate sponsored lunches.
- h. Flu shots.
- i. Health Advocate which people navigate complex health insurance issues including mental health and wellness coaching.
- j. Health benefits including medical insurance, life insurance, vision plans and dental plans. Please refer to the latest GTIS Employee Handbook for more information.
- k. Health checks on employees and building safety checks.
- l. Indoor air quality standard that includes green cleaning and low emitting materials.
- m. Natural lighting, as much as practical, in all regularly occupied office areas, automated lighting and occupancy controls.
- n. Promoting team integration through group activities.
- o. Smoke-free working environment.
- p. Thermal and olfactory comfort.
- q. Work Life Matters, an assistance program to help find the balance between home and work life including lifestyle and fitness management and dependent care and care giving for US employees.

## 2. Covid-19 Protocols

As part of GTIS' Covid-19 protocols, GTIS may work with property managers at GTIS office locations to implement the following:

- a. Enhanced cleaning procedures.
- b. One-way traffic throughout spaces.
- c. Office space reconfigured to maintain a distance of at least six feet between desks and workers.
- d. Personal Protective Equipment (PPE) provided upon entry.
- e. Plexiglass between desks to protect workers.
- f. Temperature checks upon entry.
- g. Upgraded air filters and changed more frequently.

## V. Glossary

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**ACCOUNTABILITY:** A key concept in modern management theory and practice. It means that managers are held responsible for carrying out a defined set of duties or tasks, and for conforming with rules and standards applicable to their posts

**CHILD LABOR:** Any work executed by children under 14 years of age. Children above 14 years old can work on a restricted hourly basis, according to the Fair Labor Standards Act

**ENVIRONMENTAL MANAGEMENT SYSTEM (EMS):** Is an internal framework that structures all procedures, projects and tactics into a cohesive program which aligns the sustainability efforts at the organizational level

**FORCED AND COMPULSORY LABOR:** All work or service that a person has not offered voluntarily and is made to under the threat of punishment or retaliation or is demanded as a means of repayment of debt

**GTIS TEAM:** Partners, officers, directors, managers, and employees of GTIS

**ISO 14001:** Specifies the requirements for an environmental management system that an organization can use to enhance its environmental performance. ISO 14001:2015 is intended for use by an organization seeking to manage its environmental responsibilities in a systematic manner that contributes to the environmental pillar of sustainability

**STAKEHOLDER:** Individuals, group of individuals or organizations that affect and/or could be affected by an organization's activities, products or services and associated performance with regard to the issues to be addressed by the engagement. Stakeholders include, but are not limited to clients, communities, employees, end users (tenants or buyers), general contractors, government, investors, joint venture partners, operating partners, property managers, special interest groups, and suppliers

**STAKEHOLDER ENGAGEMENT:** Process used by an organization to engage relevant stakeholders for a clear purpose to achieve accepted outcomes. Also recognized as a fundamental accountability mechanism, since it obliges an organization to involve stakeholders on identifying, understanding and responding to sustainability issues and concerns, and to report, explain and be answerable to stakeholders for decisions, actions and performance

**SUSTAINABLE DEVELOPMENT:** Development that meets the needs of the present without compromising the ability of future generations to meet their own needs (Brundtland, 1987)

### GTIS ESG COMMITTEE MEMBERS<sup>21</sup>:

- a. Hal Doueck – Vice President, Portfolio Management (NY)
- b. Josh Pristaw – Senior Managing Director (NY)
- c. João Teixeira – Senior Managing Director (Brazil)
- d. David Pahl – Managing Director (Atlanta)
- e. Beatriz Rosique – Director, Legal (Brazil)
- f. Eduardo Gottschald – Asset Management (Brazil)
- g. Allison Soren – Vice President, Compliance (NY)
- h. Peter Ciganik – Managing Director, Strategy, Research & Investor Relations (NY)
- i. Thomas Baur – Senior Director, US Income Investments (Germany)
- j. Chaitali Patel – Managing Director, Investor Relations (NY)
- k. Audreane de Iasi – Director of Design and Construction (Brazil)
- l. Stephen Tanenbaum – Managing Director, Head of Industrial/Logistics (US/Brazil)
- m. Paulo Millen – Senior Director, Asset Management (Brazil)
- n. Robert McCall – Managing Director, Head of Brazil Acquisitions (NY)
- o. Dietrich Heidtmann – Managing Director/Fundraising (International)
- p. Ed McDowell – Managing Director – US Acquisitions (US)
- q. Rob Sun – Vice President – Product Development and Corporate Strategy (US)
- r. Gustavo Correa – Infrastructure Analyst (Brazil)
- s. Eduardo Klepacz – Managing Director and Head of Infrastructure (Brazil)

### GTIS ESG COMMITTEE OBSERVERS<sup>22</sup>:

- a. Amy Boyle – Chief Financial Officer (NY)
- b. Erika Rezende – Vice President of Finance (Brazil)
- c. Tom Blair – Portfolio Management (NY)
- d. Chris Chang – US Asset Management (NY)
- e. Amit Rind – Director, Acquisitions (NY)

21 The ESG Committee member list is as of November 2020 and is subject to change due to changes in employee turnover, business strategy and other factors.

22 The ESG Committee observers list is as of November 2020 and is subject to change due to changes in employee turnover, business strategy and other factors.

# VI. References and Affiliations

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## 1. Brazilian References and Affiliations

- a. Corporate Sustainability Index (ISE – IBOVESPA)
- b. Instituto Brasileiro de Governança Corporativa (IBGC): Code of Best Practices in Corporate Governance

## 2. Global References and Affiliations

- a. AA1000 Stakeholder Engagement Standard (Accountability 2015)
- b. Convention on the Rights of Child (UN 1989)
- c. Ethos Institute of Business and Social Responsibility
- d. European Association for Investors in non-listed Real Estate Vehicles (INREV)
- e. Fundamental Principles and Rights at Work (ILO 1998)
- f. Global Reporting Initiative (GRI)
- g. Green Lease Leaders Program
- h. International Finance Corporation - Stakeholder Engagement (2007)
- i. International WELL Building Institute
- j. IFC Excellence in Design for Greater Efficiencies (EGDE)
- k. Leadership in Energy and Environmental Design (LEED)
- l. Pension Real Estate Association (PREA)
- m. Social Accountability 8000
- n. The Johannesburg United Nations World Summit on Sustainable Development (UN 2002)
- o. The Rio Declaration on Environment and Development (UN 1992)
- p. The Ten Principles of the United Nations Global Compact (UN 2000)
- q. Universal Declaration of Human Rights (UDHR)
- r. UN Principles for Responsible Investment
- s. Sustainable Finance Disclosure Regulation (SFDR): GTIS is willing and able to comply with any Regulatory Technical Standards that are formally adopted in the future



### 3. U.S. References and Affiliations

- a. Dow Jones Sustainability Index
- b. Enterprise Green Communities
- c. Family and Medical Leave Act (FMLA)
- d. FTSE4Godd Index Series
- e. Labor-Management Reporting and Disclosure Act (LMRDA)
- f. Office of Labor-Management Standards (OLMS)
- g. U.S. Foreign Corrupt Practices Act of 1977
- h. U.S. Office of Foreign Assets Control and Money Laundering and Terrorist Financing
- i. Urban Land Institute (ULI)
- j. U.S. Environmental Protection Agency (EPA)
- k. U.S. EPA's ENERGY STAR Specifications
- l. U.S. Greenhouse Gas Reporting Program (GHGRP)
- m. U.S. Occupational Safety and Health (OSH) Act and Administration

## VII. Appendix - Additional Materials Available Upon Request

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1. ESG Evaluation
2. JVA Guidelines
3. GTIS Responsible Contractor Policy
4. Green Lease Rider Templates
5. Manual de Obras e Reformas (Prédios Comerciais)
6. Fit Out Guide
7. GTIS Compliance Manual (Compliance Manual / Code of Ethics)
8. Social Risk Assessment
9. Global Data Protection Policy

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