

HUDSON SQUARE PROPERTIES

Social Policy

Effective Date: December 2020

Objective

This social policy guides Hudson Square Properties in addressing social issues across the entity and is aligned with our mission and values.

Goals:

- Outline the manner that Hudson Square Properties addresses social issues.
- Create an environment where employees feel supported, safe, and part of a community.
- Provide a centralized resource for addressing social issues within the entity.

Responsibility

It is the responsibility of all employees to be aware of the elements of this policy. Trinity Church Wall Street remains the asset owner, while assets are managed by Hines. Hudson Square Properties' will administrate any matters relating to this policy.

HUDSON SQUARE PROPERTIES

Requirements

The below section outlines the framework adopted by Hudson Square Properties for addressing social issues within the entity.

Child Labor

It is Hudson Square Properties' policy to comply with the [Fair Labor Standards Act and Regulation 29 CFR Part 570](#) of United States Federal Law and NY State Law P882 regarding child labor and complete an employment certificate in the event someone under the age of 18 is employed by Hudson Square Properties at the corporate level. If Hudson Square Properties hires a minor, the state form required by New York would be completed, as that is the location of Hudson Square Properties' corporate headquarters.

Forced or Compulsory Labor

All employees, contractors, and suppliers of Hudson Square Properties are employed and contracted voluntarily and never against their will. It is the policy of Hudson Square Properties to prohibit expressly any acts or threats of violence by any Hudson Square Properties employee or former employee against any other employee in or about Hudson Square Properties' facilities or elsewhere at any time. Hudson Square Properties also will not condone any acts or threats of violence against Hudson Square Properties' employees, customers, or visitors on Hudson Square Properties' premises at any time or while they are engaged in business with or on behalf of Hudson Square Properties, on or off Hudson Square Properties' premises.

Employee Engagement & Development

Hudson Square Properties considers professional development and enhancing the capacity and contributions of our staff part and parcel of our value system. We encourage all employees to continue to strengthen their skills and develop their knowledge.

The Human Resources Department funds and provides both optional and required professional development programs for Hudson Square Properties employees. Employees who register or sign up for a development event are expected to arrange their schedules in consultation with their managers and attend the session. Non-attendance for unexcused reasons and/or without notifications to Human Resources may result in transfer of any cost of the individual's participation in the course to the individual's department budget.

Each department at Hudson Square Properties may identify funds in its budget to enable employees to attend Continuing Education courses or programs. The manager and employee must agree that individual outside courses, workshops and programs are appropriate vehicles for job- or department-specific technical or specialized skills training or professional advancement. Hudson Square Properties encourages all employees to take advantage of this important program. Course attendance and preparation, however, must not interfere with employee's job responsibilities, and classes must be taken on employee's own time.

Employee Health & Wellbeing

The health of employees is a priority at Hudson Square Properties. We promote employee health and wellbeing through a variety of actions.

Hudson Square Properties strives to provide comprehensive benefits to employees. These include competitive pay, health insurance, retirement plan, and time off, as well as health and wellness initiatives. Our employees in the U.S. can take advantage of the myWellness program, which gives them and their spouses access to an interactive platform called Vitality. Participants can utilize nutrition courses, gym rebates, and mental-health support, and create wellness plans that help them set goals, adopt healthy habits, and stay motivated. We also encourage employees to complete Vitality's health review and biometric screening each year.

HUDSON SQUARE PROPERTIES

Hudson Square Properties understands that building design can play an important role in fostering the health and wellbeing of building occupants. For this reason, we are committed to implement wellness design strategies to improve the health of our occupants. The Building Wellness Design Policy provides guidelines for improving health and wellbeing through building design.

Health & Safety of Employees

Hudson Square Properties' employees are its most valued asset and ensuring the physical safety of our employees is of paramount importance to us. It is Hudson Square Properties' policy to maintain safe working conditions, and to comply with all applicable federal, state, and local safety codes.

Every employee has a responsibility to him or herself, coworkers and Hudson Square Properties to observe the safety standards that have been established. Each employee is accountable to:

- Report all injuries to his or her manager immediately, even if the injury seems slight.
- Alert his or her manager if s/he becomes ill at work.
- PPE training
- Alert his or her manager to any potentially unsafe working condition or procedure.
- Observe all safety rules and regulations at all times.

Health & Safety of Tenants/Customers

Health and safety are of utmost importance to Hudson Square Properties. In order to provide a healthy and safe environment it is our policy to implement the following plans and programs at all properties in order to ensure that the health and safety of tenants is considered and protected.

- IAQ Plan
- Emergency Action Plan
- Elevator Entrapment Guidelines
- Life Safety Procedures
- Fire Safety Plan
- Fitspot Wellbeing Program

Human Rights

Hudson Square Properties will comply with all federal and state laws regarding human rights, specifically, [New York State Executive Law Article 15](#).

Inclusion & Diversity

Our policy is zero-tolerance for any form of discrimination and to provide a safe workplace and environment that assures equal opportunity and is free of any form of discrimination or harassment.

Equal Employment Opportunity (EEO) and Non-Harassment

Hudson Square Properties is committed to the concepts and practices of equal employment, ensuring that applicants and employees are treated fairly regardless of their race, color, sex, national origin, age, disability, sexual orientation or identification, military or veteran status, genetic information, marital status, or status in any other group protected by federal, state or local law.

Sexual Harassment

With respect to sexual harassment, Hudson Square Properties prohibits unwelcome sexual advances or requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- Submission is made explicitly or implicitly a term or condition of employment,

HUDSON SQUARE PROPERTIES

- Submission or rejection is used as the basis for employment decisions affecting an employee, and/or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Non-Discrimination Against and Accommodation of Individuals with Disabilities:

Hudson Square Properties complies with applicable federal, state and local laws providing for non-discrimination in employment against qualified individuals with disabilities. Reasonable accommodation for such individuals will be provided in accordance with these laws. In this connection, Human Resources will evaluate the feasibility of requested accommodations and determine whether such accommodations will create an undue hardship for Hudson Square Properties. It is Hudson Square Properties' policy to, without limitation:

- Ensure that qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment process and that employees with disabilities are treated in a nondiscriminatory manner in all terms, conditions, and privileges of employment
- Keep all medical-related information confidential in accordance with applicable law and retain such information in separate confidential files
- Provide applicants and employees with disabilities with reasonable accommodation, except where such an accommodation would create an undue hardship for Hudson Square Properties.

Labor Standards, Working Conditions, & Employee Remuneration

Fair Labor Standards Act (FLSA)

At Hudson Square Properties, all jobs are categorized as exempt or non-exempt. These terms relate to the Fair Labor Standards Act (FLSA), which defines jobs for which individuals are eligible to receive overtime pay. All jobs in the above classifications may be exempt or nonexempt, according to the FLSA standards.

Compensation

Full-time employees are provided with a comprehensive cash and non-cash compensation package, which may include benefits in addition to salary. We also provide a more limited compensation package with benefits to qualified part-time employees.

Hudson Square Properties strives to provide comprehensive benefits tailored to the local regions and countries where we operate. These include competitive pay, health insurance, retirement, and time off, as well as health and wellness initiatives. We perform an annual compensation review of staff verses market rate compensation. Market rates is compiled by HR through a network of peer organizations.

Stakeholder Relations & Engagement

Hudson Square Properties' policy on stakeholder engagement aims to address three main groups of stakeholders through various methods, with the goal of understanding what is important to these groups and how Hudson Square Properties can improve the experience for all. Internal and external stakeholders and engaged in a variety of ways.

Employees

- Employee survey: every two to three years
- Performance reviews: annually, with regular check-ins
- Intranet communications: ongoing
- Webcast with CEO: quarterly
- Management orientation: annually
- Internal conferences: ongoing

Tenants

- Tenant retention survey: annually
- Tenant satisfaction survey: every two years
- GREEN OFFICE™ program: one time

HUDSON SQUARE PROPERTIES

Investors

- Investor survey: every three years
- Interviews (10–15 people): ongoing
- Reporting: quarterly
- Investor conference: every 18 months
- Participation in events: ongoing

Reporting of Questionable Activity & Non-Retaliation

Hudson Square Properties encourages its employees, agents, clients, contractors, subcontractors and volunteers to report any conduct or situation that they believe may be a violation of a Hudson Square Properties policy or applicable law to the Director of Human Resources. Hudson Square Properties is committed to promptly reviewing and/or investigating any issue brought to its attention and will take appropriate remedial action. Reports will be treated as confidential to the maximum extent possible. Hudson Square Properties is also committed, as a matter of principle, to protecting the rights of those individuals who report these issues to Hudson Square Properties. Hudson Square Properties' policy, along with applicable law, prohibit any retaliatory action to be taken against an individual who reports these issues in good faith, or for participating in or assisting in an investigation regarding the conduct that the individual reasonably believes violates Hudson Square Properties policy or applicable law. This protection applies to all employees, agents, clients, contractors, subcontractors and volunteers of Hudson Square Properties. Any allegations that prove not to be substantiated and that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. An individual who retaliates against someone who has reported a violation is subject to discipline up to and including termination or removal.

The Company has selected EthicsPoint to provide a simple, risk-free way to anonymously and confidentially report actual or suspected activities that may involve accounting, internal accounting controls, auditing matters, criminal conduct or violations of its Code. Employees may file a web-based report at www.ethicspoint.com or contact EthicsPoint by dialing toll free 866-384-4277. All complaints should provide as much detail as possible regarding the activities and/or the practices that are alleged. Reporting individuals will remain anonymous and reports submitted via EthicsPoint are confidential. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Appropriate members of Hudson Square Properties management will be automatically alerted to all complaints.

Ongoing Evaluation

This policy and any associated policies will be evaluated for effectiveness and updated as necessary to ensure all measures are effective and up to date with Hudson Square Properties practices.

Implementation

In order to properly support the implementation of this policy, Hudson Square Properties employees should read, understand, and follow all requirements listed above.