THE GREEN CITIES COMPANY

Responsible Investment Policy

GREEN CITIES INVESTMENT MANAGEMENT

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1. PURPOSE

As a vertically integrated real estate investment management firm with acquisition, development, project management, and asset management expertise, The Green Cities Company's values and practices are rooted in environmental stewardship, social impact, and fiduciary responsibility across all disciplinary practices of the Firm. The Green Cities Company ("Green Cities", "GC") demonstrates its commitment to positive environmental and social outcomes across all properties and reflects this intent in its responsible investment practices.

At Green Cities, responsible investment is more than a philosophy, it is the driving force that unites environmental stewardship, social progress, and lasting value creation. We approach every asset as a Living Building: a property whose physical structure, daily operations, and resident experience function together as a single managed system. The building establishes the conditions, operations determine whether those conditions are delivered consistently, and residents experience the outcome through comfort, health, and trust.

Our deep commitment to environmental, social, and governance principles elevates the quality of our investments, fosters thriving and resilient communities, and generates measurable benefits for our residents, our communities, and our investors. To achieve these aims, Green Cities takes a proactive investment management approach that weaves Sustainability principles into every stage of the investment lifecycle from underwriting, design, construction, operations, measurement, reinvestment, all the way through to disposition. In line with the Principles for Responsible Investment (PRI), Sustainability integration means that environmental, social, and governance factors are deliberately and methodically considered alongside financial information in all investment decisions. This approach does not replace financial analysis but rather enriches it, ensuring that Sustainability-related risks and opportunities are identified and weighed every step of the way. By embedding Sustainability at the heart of our strategy, we invest where it delivers a clear return on cost, linking environmental and health improvements directly to operating efficiency, resident retention, revenue performance, and asset value. All sustainability strategies described in this policy are implemented in a manner consistent with Green Cities' fiduciary duty to its investors and are evaluated for their contribution to financial performance alongside their environmental and social impact.

2. SCOPE, ADOPTION & AVAILABILITY

This policy has been formally adopted by Green Cities Investment Management. It applies at the entity and portfolio level to all investment management activities of the firm, including all real estate equity funds, debt funds[1], and separately managed assets. The Private Placement Memorandum for each fund includes language specifically supporting Sustainability as a differentiating and fundamental aspect of the Fund's mission. The GC Operating Standards Playbook, the operational guidebook for every Green Cities property, governs day-to-day site-level execution of the resident experience, building performance, and environmental practices established in this policy.

This policy is reviewed at least annually by the Sustainability team and the Managing Partners, and is updated as material conditions, regulations, or stakeholder expectations change. It is publicly available on the Green Cities website and is provided to investors, regulators, and third-party assessors (including GRESB) on request.

3. ROLES, RESPONSIBILITIES & GOVERNANCE

Responsible investment is applied consistently across the organization through close internal collaboration throughout the entire investment process. This section defines the roles, accountabilities, and governance structures that support that work.

A. ORGANIZATIONAL STRUCTURE

The firm is governed by an executive team consisting of three Managing Partners: Molly Bordonaro, Brent Gaulke, and Kelly Saito. Each partner leads a specific division of the firm: capital and asset management; investments; finance; and construction management. Investment management activities are governed by the Investment Committee, which consists of the three Managing Partners. The acquisitions team, with participation from asset management, research, property management, and the sustainability team, is responsible for sourcing deals and making investment recommendations to the Investment Committee.

B. SUSTAINABILITY TEAM AND REPORTING LINE

Full-time, dedicated Sustainability resources at Green Cities include Jennie Kalberer, Partner, Design, Development & Sustainability, and Blake Phillips, Analyst, Assets & Investments. Together they comprise the Sustainability team. The team is responsible for designing the vision for and executing the Sustainability priorities of the firm through ongoing Sustainability management, in coordination with acquisitions, asset

[1] For debt fund investments, Green Cities applies the same sustainability evaluation framework at underwriting but does not control borrower operations. Sustainability influence is limited to what is negotiated in the loan documents.

management, property management, design, and construction management.

Sustainability resides under capital and asset management and reports to Managing Partner Molly Bordonaro. Corporate Sustainability functions, including Sustainability data management, analysis and reporting for the investment management funds, are managed by Blake Phillips. Oversight and execution of Sustainability reporting and strategies is managed by Jennie Kalberer. The team works directly with Asset Management to ensure site teams are trained on the Operating Standards Playbook and execute the operational standards consistently across the portfolio.

C. ACCOUNTABILITIES

- Responsible investment and the portfolio's performance relative to the GCI is the responsibility of all Green Cities employees.
- The executive team is responsible for ensuring that responsible investment remains at the core of the firm's business strategy. Sustainability strategies are included in the business plan for each asset; approval of and budget for these strategies is secured by the Investment Committee at acquisition and formalized in the business plan.
- The Chief Compliance Officer, Neil Riordan (CCO) ensures all investment activities comply with applicable regulations and performs internal governance risk assessments on an annual basis.
- Asset Managers collaborate with the Sustainability team to execute each property's Sustainability business plan and ensure site teams are trained, equipped, and accountable for the operational standards in the Operating Standards Playbook.
- Site teams are the day-to-day stewards of the resident experience and building performance. They deliver the three Operational Pillars defined in the Operating Standards Playbook: Curate Resident Wellbeing & Inclusive Community; Maintain the Highest Quality Building & Design Standards; and Operate in Harmony with the Natural World. The site teams submit monthly and annual operational and Sustainability reporting to support the GCI.
- External property managers collaborate with Asset Management and the Sustainability team to ensure the firm's sustainable operations practices and Sustainability priorities are implemented. Site team trainings run quarterly or whenever standards are updated, and Green Cities hosts an annual portfolio-wide sustainability forum where site

teams learn about new Sustainability initiatives and share best practices.
- Green Cities' standard Limited Partnership Agreement commits to transparent Sustainability reporting. The firm provides for further commitments and reporting requirements to Limited Partners through side letters.

D. MEETING CADENCE

Cross-functional alignment is maintained through a structured cadence:

- Weekly asset management meetings, led by Asset Managers and supported by the Sustainability team, review leasing activity, operational performance, and the implementation of Sustainability initiatives in each property's business plan.
- Monthly financial reviews with Asset Management, and Green Cities Accounting, cover budget-to-actual performance, variance analysis, and the financial impact of Sustainability initiatives.
- Quarterly meetings between the Sustainability team, Managing Partner Molly Bordonaro, Asset Management, and site team leadership, with additional sessions convened as material changes arise, ensure everyone is aligned on long-term strategic Sustainability objectives, on shorter-term goals tied to the employee bonus program, and on specific initiatives in process or under consideration on an asset-level basis. Compensation outcomes for employees and executives are aligned with overall firm performance, which incorporates sustainability efficiencies and outcomes as part of the broader deliverables for which individuals are accountable.
- Quarterly all-team updates share Sustainability progress with the broader firm. The Sustainability team reviews the firm's Sustainability Strategic Plan annually with the executive team.

E. CORPORATE COMPLIANCE

Green Cities Investment Management (GCIM) is an SEC registered investment advisor[2] and operates under the highest standards of corporate governance. The firm's Compliance Manual is a set of formal policies that define in specific terms how the firm conducts business, including:

- Communications Policy and Procedures

[2] This registration does not imply a specific level of expertise and does not imply a recommendation by the SEC

- Complaint Policy and Procedures[3]
- Code of Ethics and Standard of Business Conduct
- Privacy Policy and Procedures
- Records Retention Policy
- Anti-Money Laundering Policy
- Business Continuity Plan

Each GCIM employee is required to sign an acknowledgment of receipt and understanding of these policies upon hire. Annual training is provided by the CCO to all employees and covers applicable federal securities laws, the firm's governance policies, regulation S-P obligations including the recognition and escalation of security incidents, and AI tool use requirements. Policies are reviewed and updated by the CCO annually and as necessary.

F. CODE OF ETHICS

The Code of Ethics is an Appendix to the Compliance Manual and central to corporate governance. It includes provisions that govern:

- Conflicts of Interest and Fiduciary Duties
- Insider Trading
- Bribery and Corruption (Zero Tolerance)
- Charitable Donations
- Political Activities and Contributions
- Whistle-Blower Policy

Investment management employees are required to disclose their personal investments and any potential conflicts of interest as part of compliance with the above policies.

G. CYBER SECURITY POLICY

The firm's Cyber Security Policy outlines steps GCIM has taken to prevent, protect, and respond to any cybersecurity threats that may occur. It includes provisions for the electronic transfer of funds, IT permissions and passwords, and remote access for investors. The policy has been updated for Regulation S-P compliance and now includes: escalation procedures requiring immediate reporting of security incidents to the CCO, who determines within 30 days whether investor notification is required; and secure data disposal requirements for physical and electronic records at end of life.

[3] Privacy Policy and Procedures, updated to reflect Green Cities' obligations under the SEC's amended Regulation S-P, including the firm's Customer Notification Program (Appendix G to the Compliance Manual)

H. EMPLOYEE HANDBOOK.

The Employee Handbook is reviewed annually by the Managing Partners in tandem with the firm's third-party human resources partner. It applies to all Green Cities employees and includes provisions related to all aspects of employee relations: Non-Discrimination Policy, Harassment Policy, Compensation, Benefits, Disciplinary Policy, and Equal Opportunity Employment Policy.

I. COMPLIANCE AUDITS & ONGOING MONITORING.

The CCO performs internal governance risk assessments annually. Any risk associated with a policy is identified, documented, and specific provisions are added to mitigate those risks. Mock SEC audits are conducted periodically by an external consultant to ensure all policies remain best-in-class. Internal and/or external audits of governance policies, including this Responsible Investment Policy, are performed annually.

4. SUSTAINABILITY INTEGRATION ACROSS THE INVESTMENT LIFECYCLE

Green Cities operates as a vertically integrated investment platform, maintaining direct control from underwriting and capital planning through design, construction, operations, and disposition. This structure ensures that assumptions made at acquisition concerning energy, water, health, and resident experience are embedded into business plans and operations, and executed over time.

We retain ownership of performance across the asset lifecycle. Underwriting criteria become operating standards. Design intent becomes maintenance protocol. Performance targets are tracked, reviewed, and corrected in real time using building data and resident feedback. As asset conditions change, operations are deliberately adjusted to maintain efficiency and ensure a positive resident experience. The result is tighter risk control, more reliable operating performance, and sustained value creation from acquisition through exit.[4]

A. SOURCING AND DUE DILIGENCE

In deal sourcing and due diligence, existing Sustainability aspects and the potential for Sustainability value creation opportunities are evaluated through documentation received from the property seller, energy audits, property condition assessments, climate risk assessments (physical and transition risk), onsite investigation, and

[4] No strategy, formula or approach can guarantee gains or avoid losses

evaluation of comps. A specific Sustainability Due Diligence Checklist is used during this process, directly informed by the measuring and reporting requirements of the GCI. Property condition assessments evaluate building safety, regulatory compliance, environmental contamination, and exposure to natural hazards. Energy audits are scoped consistent with ASHRAE standards and evaluate electrification potential, battery storage, on-site renewables, energy efficiency opportunities, fuel mix and supply-side greenhouse gas exposure, and water efficiency.

B. ACQUISITION

For acquisitions, the Sustainability team, along with Acquisitions, Asset Management, Marketing, Design, and Construction Management, develops each property's Sustainability business plan in line with our goals as expressed in the GCI. The team conducts a gap analysis to identify opportunities for specific Sustainability strategies and engages in internal cross-functional workshopping where the unique attributes of each property (location, historical context, biodiversity, access to green spaces) are considered holistically. Value creation, increasing operating income, improving tenant retention, enhancing occupant health and wellness, mitigating physical and/or regulatory risk, are all assessed for each Sustainability strategy underwritten in the business plan. The Investment Committee actively considers Sustainability alongside all other investment factors in determining a property's financial and impact return potential.

C. NEW CONSTRUCTION

For new construction projects, a set of aspirational environmental goals is established early through an all-team workshop ("ecocharrette") that involves an extended version of the traditional design and construction team, specialized consultants, jurisdictional authorities, utility program representatives, and others as appropriate. Throughout design, the team vets various Sustainability strategies in terms of cost, effort, and overall impact and creates a focused business plan aligned with the Green Cities Index.

D. MANAGEMENT & OPERATIONS

Green Cities embeds Sustainability practices directly into the day-to-day operations of every property through robust training and empowerment of on-site management teams. The Operating Standards Playbook is the operating standard for every Green Cities property. It defines the resident experience we deliver, the building performance we maintain, and the environmental practices we uphold. Site teams deliver three Operational Pillars defined in the Playbook:

- **Curate Resident Wellbeing & Inclusive Community:** consistent service and communication, programming that fosters belonging, responsive maintenance, and predictable resident experience.
- **Maintain the Highest Quality Building & Design Standards:** indoor air quality, healthy materials, thermal comfort, lighting and visual comfort, and proactive maintenance and building care.
- **Operate in Harmony with the Natural World:** waste reduction and responsible diversion, water stewardship, energy performance, healthy environmental practices, climate resilience and emergency preparedness, and biophilic design.

Comprehensive, ongoing Sustainability education is provided to each management team. Training programs cover energy and water data collection, waste management protocols, emergency response, fostering inclusivity, and supporting tenant wellness. Refresher training runs quarterly or whenever standards are updated. New team members complete onboarding before taking on independent responsibilities. For ongoing assets, Sustainability business plans are updated annually to ensure alignment with property budgets and to communicate specific performance targets for that year.

E. DISPOSITION

Sustainability value creation is a deliberate driver of financial performance and resilient asset growth at disposition. Integrated Sustainability strategies are designed to translate environmental stewardship, social equity, and robust governance into tangible results: stronger resident retention, premium rents, decreased expenses, higher net operating income, and optimized valuations at disposition, all underpinned by cost savings and operational efficiencies. Industry-leading certifications such as LEED and Fitwel[5] are cornerstones of this approach, positioning properties as market leaders for discerning renters and institutional asset buyers.

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[5] Industry reporting or certifications do not imply specific level or recommendations from these organizations

5. ENVIRONMENTAL COMMITMENTS

The commitments below define how Green Cities manages environmental issues across the portfolio. They are organized around the environmental issue areas relevant to our business and to industry assessment frameworks. Each commitment is supported by the operational, monitoring, and reporting infrastructure described in Section 7 of this policy.

A. ENERGY CONSUMPTION

Green Cities is committed to managing and reducing energy use across all owned and managed assets. We pursue this through portfolio-wide metering and benchmarking, capital improvements that reduce building loads, operational practices that maintain calibrated systems, and on-site renewable energy where it is economically viable and technically appropriate.

Acquired assets: goal of 20% energy reduction over the EPA Portfolio Manager baseline, with an ideal of 30% reduction. Incremental year-over-year improvement is sought, with the performance target achieved by the end of the hold period (typically 3–5 years)[6].

New developments: goal of 30% energy reduction over the 2010 ASHRAE 90.1 baseline for LEED. All new development projects follow a holistic integrated design process, including energy modeling and commissioning of HVAC, lighting, and water systems.

Renewable energy systems are integrated where economically viable and where solar exposure is adequate, after giving priority to reducing overall building loads through efficiency improvements.

B. GREENHOUSE GAS (GHG) EMISSIONS

Green Cities is committed to measuring, reducing, and reporting greenhouse gas emissions across Scope 1, Scope 2, and Scope 3 categories, consistent with the GHG Protocol. Emissions are reported in CO_2e and cover the gases identified by the GHG Protocol, including CO_2, CH_4, N_2O, and F-gases (refrigerants).

Scope 1: fuel combustion and refrigerants: Natural gas combustion is the largest single source of Scope 1 emissions across the portfolio. We address this through electrification opportunities at acquisition and major capital events, energy efficiency that reduces gas demand, and continuous

[6] Past performance is not an indicator of future results and above targets may not always be achievable

performance monitoring. Refrigerant leakage is now quantified portfolio-wide and audited annually. We are transitioning HVAC equipment from R410A to lower-GWP alternatives such as R454B at end of life, in response to the EPA's AIM Act, with modeling indicating greater than 95% reduction in refrigerant-related emissions at affected properties.

Scope 2: purchased electricity: Reduced through efficiency, electrification paired with low-carbon procurement where available, and on-site renewable generation. We track grid carbon intensity by market because it materially affects emissions outcomes; identical operational performance can produce very different emissions results across markets.

Scope 3: embodied carbon and tenant-related emissions: Embodied carbon associated with construction, renovation, and equipment replacement is now tracked and used as a forward-looking capital planning input. Project categories with the highest embodied carbon, flooring, lighting, appliances, and mechanical and plumbing repairs are evaluated before procurement to support lower-carbon material selection without compromising durability, performance, or resident experience.

C. CLIMATE CHANGE ADAPTATION

Green Cities is committed to identifying, assessing, and managing physical climate risks to our assets and operations. Climate risk assessments are performed as part of due diligence for every acquisition and revisited during the hold period.

Physical risk assessment: Acute risks (flooding, wildfires, hurricanes) and chronic risks (sea-level rise, increasing temperatures, drought) are assessed through third-party climate risk platforms such as Moody's Climate Solutions. For each asset, we evaluate risk scenarios under multiple climate projections and overlay these findings with property-specific characteristics (elevation, construction type, historical loss data). Financial implications are quantified through scenario-based modeling of insurance costs, capital expenditures, and long-term NOI impact.

Adaptation in operations and capital: Findings inform capital planning, asset hardening, and operational adjustments including stormwater controls, roof and envelope inspections, irrigation strategies in drought-prone markets, and resilience-informed mechanical sizing. Emergency preparedness procedures are documented at 100% of multifamily assets, with drills tracked through the GCI.

Transition risk: Green Cities monitors federal, state, and international policy developments including energy benchmarking requirements and emissions caps and evaluates how shifts may impact assets' financial and operational performance.

D. POLLUTION PREVENTION

Green Cities works to prevent and reduce pollution across the categories that affect our assets and the communities around them, including air, water, soil, noise, light, and thermal pollution. Site conditions, building age, vendor availability, and local market constraints vary, so the practices below describe our standard approach and the direction we drive toward at every property; specific measures are applied where feasible and prioritized based on each asset's circumstances. This commitment is broader than smoking restrictions alone, although our goal is for all properties to be non-smoking; for acquired properties that allow smoking, we transition to non-smoking via a phase-out plan targeting one year where practicable.

- **Air pollution:** we specify low-VOC paints, adhesives, sealants, and flooring for on-site and vendor work wherever available; we seek to avoid PVC/vinyl, PFAS-treated textiles, antimicrobial treatments, flame-retardant foams, and high-VOC products; scented air fresheners are discouraged in common areas; refrigerant leakage is monitored and addressed as issues are identified.

- **Water pollution:** Integrated Pest Management prioritizes prevention and favors non-toxic materials as a default; pesticide volumes are tracked through the GCI where data is available; organic waste management practices guide landscape materials; stormwater retention and erosion control measures are implemented during construction consistent with project scope and local requirements.

- **Soil pollution:** non-toxic chemicals are prioritized in maintenance equipment and fertilizers where suitable alternatives exist; environmental contamination on or adjacent to properties is assessed during due diligence.

- **Noise, light, and thermal pollution:** addressed through acoustic upgrades during renovation when scope allows, glare-conscious fixtures and lighting on timers or occupancy sensors where feasible, and HVAC tuning that aims to maintain stable indoor temperatures without unnecessary mechanical noise or heat rejection.

Green-certified cleaning products at Green Seal G-37 equivalent or better are our standard property-wide and are made available and free of charge to all residents and vendors. Walk-off mats at entrances help reduce particulate transfer.

E. INDOOR ENVIRONMENTAL QUALITY (IEQ)

Green Cities is committed to maintaining indoor environmental quality that supports occupant health, comfort, and wellbeing. This commitment covers indoor air quality, daylight access, thermal comfort, acoustic conditions, and material health.

- **Indoor air quality:** MERV-13 filtration is the portfolio standard where mechanical systems allow; 100% of common areas and 75% of residential systems operate at the highest allowable MERV rating, with portfolio-wide goals to increase coverage. Walk-off mats at all entries (10-foot minimum) capture up to 80% of outdoor particulates. IAQ testing is conducted at new developments and acquisitions, results are shared with residents, and the portfolio has a 100% pass rate on tested assets.

- **Daylight and lighting:** LED lighting is prioritized, with color temperatures and wattages selected to match the function of each space. Daylight access is preserved through operable blinds, clean windows, and clear sightlines.

- **Thermal comfort:** scheduled HVAC maintenance and seasonal setpoint reviews keep systems reliable; residents receive proactive guidance during extreme heat or cold events; temperature and airflow concerns are addressed quickly.

- **Acoustics:** acoustic considerations are included in renovation specifications, including fitness flooring, carpet, and FFE selections.

- **Material health:** the GC healthy materials template governs every selection across the portfolio (see Material Sourcing below).

F. MATERIAL SOURCING

Green Cities is committed to responsible procurement that considers the environmental and human-health impacts of materials across their life cycles. The following attributes are prioritized for construction and renovation materials:

- Locally sourced raw materials
- Raw materials extracted in an environmentally responsible manner
- Locally manufactured
- Recycled content
- Rapidly renewable content
- No added urea-formaldehyde resins
- Zero or low-emitting VOCs
- Sourced from suppliers that pay living wages
- Free of PVC/vinyl, PFAS treatments, antimicrobial treatments, and flame-retardant foams
- Vendor take-back programs for end-of-life recycling

Supply chain requirements for designers and contractors are enforced through project specifications. All substitutions must be routed through ownership, via the project architect, for approval. Embodied carbon is tracked and used as an input to capital planning, with project categories evaluated before procurement to support lower-carbon material selection.

G. BIODIVERSITY AND HABITAT

Green Cities is committed to protecting and enhancing biodiversity and habitat in and around our assets. Biodiversity features are tracked through the GCI and average approximately two per asset across the portfolio.

- Pollinator gardens, green roofs, herb gardens, beehives, and fruit and vegetable gardens are installed where feasible.

- Native and drought-tolerant plantings are prioritized; xeriscaping is used in water-stressed markets and is projected to reduce irrigation demand at participating assets.

- On-site stormwater treatment and retention are required, along with erosion control measures during construction.

- Pesticide use is tracked, minimized, and governed by Integrated Pest Management practices that prioritize prevention.

- Regenerative agriculture programs are operated at multiple properties in partnership with vendors such as RoofCrop and Green City Growers; assets have achieved certifications including National Wildlife Federation Certified Wildlife Habitat status.

H. NET ZERO

Green Cities supports the long-term ambition of Net Zero by 2050, consistent with the Paris Agreement and our membership in the ULI Greenprint network. The firm continues to evaluate frameworks such as the Science Based Targets initiative as guidance for real estate matures. Our current decarbonization work is anchored in measurable operational interventions, including the AIM Act refrigerant transition, embodied carbon evaluation in capital planning, and ongoing energy efficiency improvements across the portfolio.

We acknowledge that achieving net zero will involve a combination of efficiency improvements, electrification, on-site renewable generation, low-carbon procurement, and refrigerant transitions. Our approach prioritizes operational reductions before considering offsets. Progress is measured through the GCI and reported annually in the Environmental and Community Impact Report.

I. WATER PERFORMANCE TARGETS[7]

Multifamily properties: goal of 25% potable water use reduction over the EPA Portfolio Manager baseline, with ideal goal of 30% reduction.

Commercial properties: goal of 40% potable water use reduction over the EPA Portfolio Manager baseline.

J. WASTE PERFORMANCE TARGETS[8]

Multifamily properties: goal of waste diversion rate of 20%, with an ideal goal of 40%.

Commercial properties: goal of waste diversion rate of 30%, with an ideal goal of 40%.

K. INDUSTRY CERTIFICATIONS[9]

Green Cities incorporates two green building certification standards into its policies and practices: LEED and Fitwel. A commitment to assessing and implementing LEED Certification on all projects whenever feasible is at the foundation of our Sustainability platform and is proposed and reviewed as part of the underwriting and business plan of each property.

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[7] Past performance is not an indicator of future results and above targets may not always be achievable
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[9] Industry reporting or certifications do not imply specific level or recommendations from these organizations

Green Cities is a Fitwel Champion and pursues Fitwel certification wherever feasible.

6. SOCIAL COMMITMENTS

Green Cities is committed to improving our communities, providing healthy and engaging spaces for our tenants, and supporting the health and wellbeing of our employees. A strong social platform is an essential component for creating higher-quality and better-performing investments. The commitments below address employee engagement, supply chain practices, tenant engagement, community engagement, and ongoing social risk management. Green Cities is a women- and minority-owned firm, and that perspective directly informs how we invest, govern, and operate.

A. EMPLOYEE ENGAGEMENT

A detailed Employee Engagement Plan is maintained by the Managing Partners in tandem with the firm's third-party HR business partner. The Plan describes how employee needs are assessed, identifies specific employee engagement goals, outlines a plan for issuing new programs and offerings, and specifies how outcomes are monitored.

B. DIVERSITY, EQUITY, INCLUSION & ACCESS (DEI&A)

Green Cities supports diversity, equity, and inclusion and engaged with a strategic DEI consultant to provide education and capacity building to the partners and staff. Green Cities tracks age, ethnicity, international background, and gender of all employees, including the executive team. At hire, employees are given the opportunity to voluntarily provide specific information with respect to ethnicity, gender, international background, veteran status, and physical disability. Pay equity analyses are conducted on a regular basis. The firm's commitment to diversity and inclusion extends to leadership and governance: Green Cities is a women- and minority-owned firm, and the composition of the Managing Partners and Investment Committee reflects that ownership. Leadership composition is reviewed and disclosed as part of the firm's regular reporting to investors and external assessors.

C. LABOR RELATIONS

As a U.S.-based company with a national footprint, Green Cities adheres to national laws in the United States that govern employment and which expressly prohibit child labor and forced/compulsory labor. In no instance has Green Cities ever used or condoned the use of child labor or forced/compulsory labor.

D. HUMAN RIGHTS & MODERN SLAVERY

Green Cities is committed to upholding internationally recognized human rights principles across our own workforce, our supply chain, and the residents and communities served by our properties. The firm maintains a zero-tolerance position on modern slavery, forced and compulsory labor, child labor, and human trafficking in any form, and expects the same standard from contractors, vendors, and other partners engaged in connection with our investment and operating activities. Supplier and contractor relationships are evaluated on an ongoing basis for alignment with these expectations, and any credible concerns are escalated for review and remediation. This commitment applies to all Green Cities operations and is reviewed at least annually as part of the firm's broader Sustainability and compliance oversight.

E. HEALTH & SAFETY (EMPLOYEES)

Green Cities supports the health, safety, and wellbeing of employees by creating a safe and healthy work environment and providing benefits as part of overall compensation. The Employee Manual describes numerous benefits, including free fitness center access, employer-sponsored health/dental/vision insurance, alternative transportation subsidies, and 401(k) retirement benefits. Green Cities adheres to all local and national laws including OSHA, tracks worker's compensation claims. The firm applies Universal Design principles in its workplace so the environment supports employees across a range of abilities and disabilities. This includes adjustable sit-to-stand workstations, ergonomic seating, accessible circulation and amenity areas, and accommodation of individual needs on request. The intent is to make the daily work environment usable, comfortable, and healthy for all employees.

F. TRAINING & DEVELOPMENT

Sustainability training is conducted by the Sustainability team in several ways. A detailed review of the firm's annual Environmental and Community Impact Report is held in Q2 each year. All new Asset Managers receive in-depth Sustainability training. All other new hires are provided an overview of the firm's Sustainability platform, and ad-hoc "lunch and learn" events are held periodically on topics such as biophilic design, green infrastructure, and certification standards. The Sustainability team trains onsite property management teams using the Operating Standards Playbook, and all site staff receive detailed training about the specific sustainability features of their property.

G. SUPPLY CHAIN ENGAGEMENT

For new construction and renovation projects, Green Cities construction management and asset management staff, along with external design partners, ensure material and finish specifications comply with environmental, health and social priorities in the Green Cities Index. Supplier engagement includes specific discussions with manufacturing and FF&E vendors with the goal of increasing transparency in supplier raw-material disclosure and furthering market adoption of green product certifications. Green Cities prioritizes partnerships with local, women-owned, and minority-owned vendors across all building functions construction, landscaping, HVAC, maintenance, cleaning, and resident events. Monthly W/MBE spend is tracked and reported.

H. TENANT ENGAGEMENT

Green Cities' tenant engagement program builds a strong sense of community at each asset through a values-based approach to lifestyle programs and tenant communication.

I. TENANT PROGRAMS

Green Cities properties feature curated lifestyle programs such as recycling, free green cleaning supplies for residents, move-in gifts, EV car charging, expanded bike rooms, herb gardens, fresh-produce delivery, on-site clothing donation drop-offs, and volunteer events. Each property delivers a minimum of twelve events annually, balanced across wellness, sustainability, and community engagement. Tenant satisfaction is measured through annual surveys at all properties, and feedback informs how programs evolve.

J. GREEN LEASE PROVISIONS

All properties are non-smoking; for acquired properties that allow smoking, the firm transitions to non-smoking via a one-year phase-out plan. All interior renovation work is governed by the firm's sustainable materials policy.

K. HEALTH & SAFETY (RESIDENTS AND SITE STAFF)

The safety of residents and staff is of utmost importance. Buildings are designed, built, and operated in compliance with all local and national building codes. A combination of site staff and Green Cities corporate staff perform walk-throughs at weekly, monthly, and annual intervals. Equipment maintenance is performed according to an annual maintenance calendar by facility staff and outside vendors and tracked through the GCI.

Emergency procedures are documented at 100% of multifamily assets, with safety meetings and drills tracked through the GCI.

L. COMMUNITY ENGAGEMENT

Green Cities emphasizes the positive impact the construction and management of properties can have on local communities. Specific impacts tracked and reported through the GCI include health and safety, ecological health, emergency preparedness, and economic opportunity such as affordable housing and diversity in hiring artists, contractors, and vendors.

Green Cities has adopted a Responsible Contractor Policy requires the selection of contractors who pay fair wages and benefits, including employer-sponsored family health care, defined benefit pensions, and training or apprenticeship programs and who honor workers' legal rights to self-organization and union representation.

The firm focuses on proactive engagement with the local community through volunteerism and charitable giving, hosting donation drives and volunteer events that connect residents with the broader community. Market data: demographics, employment, market absorption, leasing comps is monitored by the firm's data analyst and shared internally at appropriate intervals.

M. SOCIAL RISK MANAGEMENT

Integral to the firm's investment management activities is a consistent reassessment of social risks affecting employees, tenants, and local communities. For community and tenant-related risks, assessment is performed on an ongoing basis as a function of Green Cities' hands-on approach to investment management, being highly present in each market, and in conjunction with Sustainability stewardship activities. For employee-related risks, assessment is performed on an ongoing basis through the third-party human resources partner, working with the partners on employee policies, and through feedback from various employee-led working groups focused on improving company culture and work processes.

Green Cities performs an annual assessment update to the Green Cities Index to reflect changing perspectives from stakeholders and industry trends with respect to the material impacts tracked and reported.

7. SUSTAINABILITY MONITORING, MEASUREMENT & REPORTING

Green Cities maintains a proprietary framework, the Green Cities Index (GCI), to track all material Sustainability impacts. The GCI is the firm's portfolio-wide performance framework, designed to make building outcomes consistent, comparable, and actionable. It collects raw data from all assets and integrates Sustainability and DEI&A considerations throughout the investment lifecycle and within the Firm.

Green Cities established the GCI in 2020 following an extensive Materiality Assessment guided by the Firm's core values: Continuous Innovation, Institutional Rigor, Sustainability & Human Focus, Successes to be Proud of, and Commitment to Our Investors. The assessment was shaped by leading standards, PRI, GRI, GRESB, TCFD, LEED, and Fitwel[10], and informed by input from investors, tenants, and industry experts. Green Cities updates this assessment annually.

A. GCI IMPACT AREAS

The GCI is organized around five Impact Areas that distill complex performance information into clear narratives, connecting operations, building systems, and lived experience to decision-making and investment priorities.

- **Energy and Emissions:** driving reductions in energy use and greenhouse gas emissions through efficiency and innovation.
- **Water, Waste and Ecology:** conserving water resources, minimizing waste generation, and preserving ecological health.
- **Community and Inclusivity:** building equitable, inclusive communities that foster belonging.
- **Health and Wellbeing:** enhancing safety, comfort, and overall wellness for residents.
- **Resilience and Risk Mitigation:** preparing for and managing climate risks, transition risks, and emergencies through proactive assessments, capital planning, preventative maintenance, and biodiversity.

Each Impact Focus Area is supported by a suite of strategies and well-defined Key Performance Indicators (KPIs). Some initiatives are

[10] Industry reporting or certifications do not imply specific level or recommendations from these organizations

implemented consistently across the entire portfolio; others are applied where they can deliver the greatest benefit. All Sustainability strategies are measured and reported within defined KPIs.

B. OPERATIONAL POLICIES

Each asset has a tailored set of operational policies built on a uniform baseline that includes:

Green Cleaning Policy: non-toxic cleaners used in all common areas; free green cleaning kits to multifamily tenants.

Ongoing Purchasing and Waste Policy: recycled-content products in property management; expanded recycling for tenants (electronics, lightbulbs, batteries).

Site Management Policy: non-toxic chemicals in maintenance equipment and fertilizer; organic waste management for landscape materials; irrigation management to reduce water waste.

Integrated Pest Management: non-toxic materials prioritized; communication protocol for any pest chemical treatments; minimization of impact on local ecosystems and resident health.

Facility Maintenance and Renovation: recycled, locally sourced, and non-toxic building materials prioritized.

C. ENVIRONMENTAL MANAGEMENT SYSTEM

Green Cities operates an environmental management system that includes assessment, planning, execution, and outcome monitoring. The GCI is the foundation of this system and the framework used to report over 75 impact metrics for each asset annually in the Environmental and Community Impact Report. The EMS was developed in alignment with ISO 14001 and is reviewed and updated annually.

D. DATA MANAGEMENT TOOLS

- **Green Cities Index:** the firm-wide framework for tracking material Sustainability impacts; updated annually as materiality evolves.
- **Measurabl:** paid data collection platform used to organize Sustainability performance data and as the clearinghouse for the

firm's annual GRESB submittal[11]; climate risk assessments are completed via the Measurabl platform and third party vendors.

- **EPA Portfolio Manager:** free online database used to collect utility data and calculate building energy use intensities; linked to Measurabl. To ensure data integrity, real-time meter readings are reconciled against utility bill data in Portfolio Manager.

- **Real-time utility monitoring:** web-based systems at some properties capture electricity, gas, and water consumption in real time; experienced metering specialists assist with anomaly investigation and performance trend interpretation.

- **Glumac:** third-party verifier of energy, water, and waste data prior to publication. Energy and emissions calculations follow the Toitu Enviromark carbon reduction program (formerly CEMARS), which applies ISO 14064-1 methodology for greenhouse gas accounting.

- **ARC:** used as a benchmarking platform for properties pursuing or maintaining LEED certification, providing performance comparison against a subset of market-specific, high-performance LEED-certified properties.

E. DATA COVERAGE

Data coverage across the portfolio is maintained at a high standard: 95% for energy, 100% for emissions, 100% for water, and 100% for waste.

F. BUILDING PERFORMANCE OPTIMIZATION

Asset Management, the Sustainability team, building engineers, and property managers meet quarterly to review trends, discuss any retro-commissioning or other building-related activities affecting energy and water performance, and identify efficiency opportunities.

- **Benchmarking:** each platform compares property energy use against a unique baseline. For annual benchmarking, Glumac, our energy specialist performs a full review of utility bills (electricity, gas, water) and real-time monitoring data. Results captured in the GCI include EUI (kBTU/sf/yr), percent improvement over the EPA baseline for the reporting year, percent improvement over prior year, and percent improvement over

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the performance target.

- **Optimization:** data collection and benchmarking inform performance improvements and operating-cost reductions across the portfolio.

G. MONTHLY OPERATIONAL REPORTING

Site teams submit monthly and annual reporting to support the GCI, covering: flooring replacement, paint usage, LED lighting upgrades, major maintenance, refrigerant management, waste diversion, green cleaning products, pesticide use, building irrigation, safety drills, CPR/AED certification, W/MBE spend, resident events, herb gardens and urban agriculture, and ENERGY STAR appliance replacements.

H. ANNUAL REPORTING AND TRANSPARENCY[12]

Green Cities prioritizes transparency and accountability in all aspects of Sustainability reporting. The firm's commitment to meeting and exceeding Sustainability objectives is demonstrated through both voluntary and mandatory disclosures.

- The annual Environmental and Community Impact Report captures sustainability outcomes across the entire active portfolio, organized around the five GCI Impact Focus Areas and providing clear, quantifiable results. Beyond portfolio-wide data, the firm highlights notable Sustainability achievements at the individual asset level.

- Green Cities participates in the annual GRESB survey and submits annual metrics to ULI Greenprint's Center for Building Performance.

- Sustainability performance is incorporated into the firm's quarterly investor reports, providing limited partners with regular visibility into portfolio-level Sustainability outcomes alongside financial results.

- As a signatory of the UNPRI, Green Cities completes the annual UNPRI survey.

- Performance measurement aligns with established third-party frameworks: GRESB, PRI, LEED, Fitwel, and TCFD with portfolio

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data independently verified by Glumac. The firm also monitors emerging disclosure frameworks, including the Task Force on Nature-related Financial Disclosures (TNFD), as guidance for the real estate sector continues to evolve.

8. STEWARDSHIP & INDUSTRY ENGAGEMENT[13]

A. INDUSTRY LEADERSHIP

Green Cities has been an advocate for responsible investment that maximizes overall value to investors for over two decades, through extensive involvement with Sustainability-focused organizations and initiatives at various levels within the commercial real estate community.

- Early leadership in sustainable building systems with LEED certification usage beginning in 2001.
- Reporting by fund to GRESB since 2013, currently with a 4 Star rating; ranked #2 among U.S. multifamily value-add funds in 2024.[14]
- Signatory of the United Nations-supported PRI since 2017, supporting the UN Sustainable Development Goals through the impact of integrated Sustainability strategies.[15]
- Member of the US Green Building Council (USGBC) since the early 2000s, supporting affiliated USGBC chapter organizations in each of the firm's key markets.[16]
- Member of ULI's Greenprint Center for Building Performance since 2019, with a public commitment to ULI Greenprint's goal of Net Zero by 2050 declared in 2021.[17]
- Aligned with TCFD standards for climate-related financial disclosures.[18]

[13] Industry reporting or certifications do not imply specific level or recommendations from these organizations
[14] There is no fee for the award. Past performance is not indicative of future results. For more information on GRESB please visit https://www.gresb.com/nl-en/
[15] Industry certifications and awards does not imply a specific level a recommendation from these organizations. There is no fee for the award. Past performance is not indicative of future results. For more information on PRI please visit https://www.unpri.org/
[16] For more information on USGBC please see https://www.usgbc.org/
[17] For more information on ULI Greenprint please visit https://americas.uli.org/research/impact-lab/uli-randall-lewis-center-for-sustainability-in-real-estate/membership/uli-greenprint-goals/
[18] For more information on TCFD please see https://www.fsb-tcfd.org/

B. ADVOCACY

Green Cities believes in promoting policies that improve environmental and social, practices and that transition the industry into a more sustainable future, with the goal of maximizing overall value for investors. The firm engages with stakeholders to increase Sustainability understanding, create buy-in around Sustainability value creation, and create feedback loops to inform the evolution of the Sustainability program based on the most material Sustainability impacts. Priorities include Sustainability factors with material impact on financial and/or operational performance such as retro-commissioning and staff training; Sustainability factors with systemic influence such as climate change and ecological resilience; and specific Sustainability factors relevant to beneficiaries such as the Responsible Contractor Policy.

Green Cities advocates for broader adoption of responsible investment practices and sustainable development strategies in a variety of ways, including:

- Participation in formal collaborative engagements.
- Leveraging internal resources (i.e., the Sustainability team) to provide guidance to the broader team and represent the firm. Partner approval is required for any significant or new positions on Sustainability initiatives.
- Engaging with policymakers directly and with third-party organizations and non-profits that engage with policymakers.
- Participating in sign-on letters to support Sustainability policy initiatives.
- Responding to policy consultations on Sustainability policy initiatives.
- Providing technical input on Sustainability policy changes.
- Establishing unique partnerships with other green building professionals and non-profits to further environmental and social objectives.
- Engaging with standard-setters and industry associations including GRESB, USGBC, NAREIM, and PREA to help define and advance industry best practice around Sustainability-related considerations.
- Active membership in the ULI Greenprint Multifamily, including involvement in the Resilience and Embodied Carbon Committees.
- Active Membership in the Ownership Forum for MindfulMaterials: leadership in broader adoption of healthy materials.

Outcomes from the firm's Sustainability stewardship activities are shared internally during weekly and quarterly standing all-team meetings and externally through the annual Environmental and Community Impact Report, quarterly announcements to investors, and press releases.

9. CONFLICTS OF INTEREST & EXCLUSIONS

Green Cities currently manages three active equity funds (Funds III, IV, and V) and one debt fund (Green Cities Debt Fund I). Funds III through V share substantially similar investment strategies — value-add multifamily, commercial, and mixed-use acquisitions in targeted U.S. markets — and all active funds are governed by this Responsible Investment Policy, which establishes consistent sustainability standards and operational practices across the portfolio. Because investment mandates are substantially aligned and a uniform policy framework applies to all funds, the likelihood of material conflicts between Advisory Clients is currently low. This assessment is subject to change as new funds are raised or investment mandates evolve; this policy will be updated accordingly.

The primary categories of potential conflict and how they are addressed:

Investment opportunity allocation: governed by each fund's Governing Documents and subject to Investment Committee oversight. Transactions involving a potential conflict require approval by the relevant fund's Advisory Committee, composed of investor representatives.

Affiliated services: the Green Cities Company and its affiliates may provide property management, development, and construction services to fund investments at market-rate fees. These arrangements are disclosed in each fund's Offering Documents and require Advisory Committee approval.

Co-investment by principals: Managing Partners and key personnel invest directly or indirectly alongside limited partners, aligning firm interests with investor interests. Differing interests that may nonetheless arise are disclosed in each fund's Offering Documents.

Management resource allocation: the firm maintains sufficient staff to ensure no Advisory Client is disadvantaged by concurrent fund management.

The firm's Code of Ethics addresses additional conflicts including insider trading, gifts and gratuities, and political contributions, and is certified annually by all Advisory Personnel. The Chief Compliance Officer conducts an annual governance risk assessment and all actual or potential conflicts not addressed above are disclosed in the applicable Offering Documents and Governing Documents.

10. DISCLAIMER

This policy contains forward-looking statements and projections relating to sustainability outcomes and financial performance. Actual results — including energy reductions, emissions, water and waste diversion, and investment returns — may differ materially from those described. No assurance can be given that any estimated or targeted reduction or sustainability outcome will be achieved. Past performance is not an indicator of future results.

Nothing in this policy should be read to suggest that sustainability objectives take precedence over Green Cities' fiduciary duty to its investors. All sustainability strategies are implemented consistent with the investment mandates set forth in each fund's Offering Documents and Governing Documents.

References to third-party certifications and ratings — including LEED, Fitwel, GRESB, B Corp, PRI, and ULI Greenprint — do not imply endorsement or recommendation by those organizations. Green Cities' SEC registration does not imply a specific level of expertise or a recommendation by the SEC.

This policy is for informational purposes only, is reviewed and updated at least annually, and is subject to change. It does not constitute an offer to sell or solicitation of an offer to purchase any interest in any Green Cities fund and should not be relied upon as the basis for any investment decision. Prospective investors should refer to the applicable Offering Documents.