

# SL Green Realty Corp. ESG Policies

Revised November 2025



# SL GREEN – ESG POLICIES

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## Introduction

SL Green is committed to creating long-term social, cultural, financial, and environmental value for our stakeholders – our investors, our tenants, our employees, and our community. SL Green's operations are primarily located in New York City, and we are therefore invested in the future of our local community. Our business is governed by ESG policies that promote transparency and accountability. These policies are listed below and provide insight into our public commitments, targets, and goals, along with the process for measuring progress and ensuring adherence. Our ESG platform is tangibly integrated throughout our business, which has bolstered our risk management practices and benefitted our corporate strategy and decision-making.

**Oversight:** SL Green's Board of Directors oversees our ESG program through the Nominating and Corporate Governance Committee (NCGC), which is reflective of the program's importance to our business strategy. While everyone at SL Green has an obligation to operationalize sustainability throughout the organization, our dedicated ESG team is responsible for implementing the program and collaborating with relevant parties. Executive oversight is held by our Chief Operating Officer (COO), who reports directly to the Chief Executive Officer (CEO) & Chairman of the Board. The ESG team provides quarterly updates to SL Green's executive leadership and the Board, covering sustainability strategy, performance, and progress. Our Chief Financial Officer (CFO) oversees the company's finances and investor relations and provides updates to shareholders on climate-related risks and opportunities.

To further instate executive oversight, our comprehensive pay-for-performance executive compensation plan is linked to specific annual ESG goals set each year at the discretion of our Board's Compensation Committee. *Please refer to our Proxy for more information on ESG-linked compensation.*

**Reporting & Transparency:** SL Green prioritizes transparency in our disclosure of material ESG topics, demonstrating accountability for our commitments and garnering trust among our stakeholders. SL Green chooses reporting scopes with guidelines, standards, and frameworks best aligned with our industry and stakeholder interests. These include the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), the Task Force on Climate-related Financial Disclosures (TCFD), and the UN Sustainable Development Goals (SDGs). These disclosures are complemented by our participation in voluntary reporting frameworks determined through stakeholder feedback to be material to our business. These include the CDP, S&P Global CSA (Corporate Sustainability Assessment), and GRESB.

**Applicability:** The ESG policies apply to all SL Green operations, employees, and, where applicable, vendors.

**Compliance:** Adherence to these policies is essential to meeting our ESG goals. Our compliance framework allows us to proactively identify where issues may occur in both our own operations and our supply chain. Compliance processes are detailed within each policy. SL Green intends to enforce the provisions of our policies vigorously. Violations could lead to sanctions, including dismissal in the case of an employee or a supplier, and in some cases civil and criminal liability. Employees and suppliers are required to report any suspected breaches of these policies. SL Green's Whistleblower Policy is publicly available and includes a substantive non-retaliation clause that enables stakeholders to submit complaints or concerns anonymously and confidentially regarding a potential violation of our policies and standards.

**Training & Awareness:** To reinforce awareness of our commitments and processes in each area, SL Green's ESG policies are available to employees who also complete annual training on many of the topics covered throughout these policies. Regular mandatory training for all employees includes annual training on topics covered in our Code of Business Conduct and Ethics, annual training on diversity and other ESG-specific training for new hires and all employees.

## Environmental Policy

SL Green's policy is to operate in ways that protect the environment surrounding our properties, minimize our broader environmental impacts, and promote environmental awareness among our stakeholders. Stakeholder engagement is essential to operating a profitable and sustainable real estate business. We are therefore committed to consulting with stakeholders on environmental issues and policy. For transparency, we annually report on our environmental performance and make data publicly available through our website.

A significant portion of our company's environmental footprint exists within our supply chain, which includes supply and service vendors and contractors. We seek to partner with qualified vendors, source environmentally responsible materials, and collaborate with tenants on the topics defined within this policy. *Please refer to our Vendor Code of Conduct for more information on supplier partnership requirements.*

Topics covered in our environmental sustainability policy include assessing climate-related issues such as: physical risks, transition risks, and associated opportunities; energy efficiency and procurement strategy; water quality, consumption reduction, and efficiency strategy; waste reduction and diversion strategy; biodiversity protection; health and wellness considerations; sustainable construction and development; and environmental management.

**Climate & Emissions Reduction:** SL Green aims to reduce portfolio-wide emissions of greenhouse gases (GHGs). The daily business operations in the real estate sector generate direct and indirect GHG emissions, which are widely acknowledged as contributors to climate change. SL Green regularly considers financial implications, risks, and opportunities related to climate change and engages with membership associations that are aligned with our objectives.

With our business located in New York, we are at the center of one of the world's most ambitious legislative environments on climate change. Under the New York State (NYS) Climate Leadership and Community Protection Act (CLCPA), a statewide net-zero carbon economy is mandated by 2050, with a zero-carbon electricity grid by 2040. In New York City, the Climate Mobilization Act (CMA) aims to reduce the city's overall emissions. The centerpiece of the CMA is Local Law 97 (LL97), which requires buildings greater than 25,000 square feet to meet strict emissions limits. These regulatory conditions make our efforts to manage GHG emissions even more vital.

**Targets:** SL Green set near-term emissions reduction targets that have been approved by the Science Based Targets initiative (SBTi). We commit to reducing absolute Scope 1 and Scope 2 GHG emissions 50.4% and Scope 3 Category 2 (Capital Goods) GHG emissions 30% by 2031, both from a 2019 base year. Progress against this goal is included in our annual ESG reporting. These targets are aligned with limiting temperature increase to 1.5 degrees Celsius above pre-industrial levels, as recommended by the Intergovernmental Panel on Climate Change (IPCC).

SL Green also committed to achieving net zero carbon operations (Scope 1 and Scope 2 emissions) by 2050 in accordance with ULI Greenprint Center for Building Performance.

**Process – Climate Resilience:** Our environmental procedures encompass a range of potential impacts, including those stemming from natural disasters. SL Green periodically updates its TCFD Report which proactively analyzes associated risk and resiliency through life cycle assessments, from asset acquisition through disposition. As part of our TCFD reporting process, we identify climate-related risks and opportunities deemed most relevant to the organization across short-, medium-, and long-term time horizons. *Please refer to our most recent TCFD Report for specific information on managing climate risk.*

**Process – Mitigating Emissions:** Asset-level carbon reduction targets are identified, and will include interim targets, resources for tenant engagement, tools to create and build awareness, and systems to monitor progress. We established a Carbon Roadmap that will enable us to meet our targets. SL Green's carbon reduction strategy is structured around the following key areas.

1. **Emissions Avoidance & Capital Improvements:** Capital improvements aim to reduce energy consumption across our infrastructure and operations. They include investments in energy-efficient equipment and

building retrofits. SL Green conducts periodic ASHRAE Level II Energy Audits, which identify energy conservation measures (ECMs) that inform our capital improvement schedule. Our Engineering and Property Management teams also identify equipment near the end of its useful life and propose capital improvement projects, which result in increased energy efficiency. New construction and redevelopment projects incorporate the improvements required by more stringent New York City energy codes and allow us to identify opportunities to exceed these requirements. We leverage available incentives to subsidize energy efficiency and conservation measures within base building systems and tenant spaces whenever possible.

2. **Operational Excellence & Demand Response:** Our GHG reduction strategy extends to our development process. We incorporate high-efficiency standards and implement robust energy management solutions into planning, design, construction, and operations. SL Green uses real-time energy management and participates in demand response programs, providing monetary benefits and contributing to citywide grid resilience by minimizing energy waste and carbon emissions during peak periods.
3. **Training & Development:** We provide comprehensive training and development programs to empower employees with knowledge and skills to adopt energy-efficient practices and contribute to carbon reduction efforts. We have developed an online training platform leveraging the expertise of internal staff and vendor partners to equip employees with the skills to manage climate-related regulations, energy and water efficiency, and indoor air quality.
4. **Tenant Engagement:** We collaborate with tenants and stakeholders on energy efficiency and carbon reduction solutions. Tenant leases include language aligned with our environmental goals. We also coordinate awareness campaigns, incentive programs, and other initiatives aimed at encouraging responsible energy consumption and behavior change. We share environmental data with tenants including ENERGY STAR scores, consumption of energy and water, waste management, and pass-through savings for energy efficiency improvements.
5. **Embodied Carbon Reduction:** We identify opportunities to minimize the carbon footprint associated with the entire life cycle of our assets through design, construction, operations, and decommissioning. In the design phase, we implement a whole-building embodied carbon assessment using the Athena Eco Calculator tool to assess building reuse opportunities. Calculations are completed on a case-by-case basis when there are options for substantial reuse for major redevelopment projects. To reduce embodied carbon emissions, we employ sustainable materials, design principles, construction practices, and opportunities for adaptive reuse whenever possible.
6. **Renewable Energy Certificates (RECs):** To meet our targets, we will invest in renewable energy projects and purchase Renewable Energy Certificates (RECs) to offset any remaining carbon emissions. This commitment ensures that any unavoidable emissions are balanced by an equivalent reduction in emissions elsewhere through renewable energy generation.

SL Green calculates its emissions annually in line with GHG Protocol Accounting Standards to monitor progress towards our established targets and to understand our potential exposure to carbon pricing costs associated with LL97 and other climate regulations. *More information on our methodology is provided in the GRI Content Index located on our website.*

**Water Quality, Reduction, & Efficiency:** SL Green strives to reduce its water consumption by implementing water efficiency equipment and initiatives both in our existing buildings and in properties under development. Please note that SL Green does not operate in any high water stressed regions.

**Target:** SL Green has established a goal of reducing water use intensity 50% by 2030 from a 2017 base year. Progress against this goal is included in our annual ESG reporting.

**Process:** The ESG team works closely with the Engineering team to plan, implement, and maintain our water policy. We regularly evaluate water consumption to identify issues with, manage, and optimize water use. We analyze water consumption for all buildings based on utility bills provided to each property, and on-site teams confirm correct water usage through daily on-site meter readings. Our water management strategy includes ongoing leak detection, installing low-flow fixtures, and encouraging responsible resource management among building operators and tenants. We collaborate with tenants to incorporate water conservation measures into the design of leased space. Responsible stormwater management is included in development projects, and we implement erosion and sedimentation control planning for new construction and major redevelopment work. *Our wastewater management policy is included in our Environmental Management System (EMS).*

**Waste Reduction & Diversion:** SL Green implements market-leading initiatives that reduce waste and improve natural resource efficiency across our portfolio.

**Target:** SL Green has established a goal of 50% waste diversion by 2030 from a 2018 base year. Progress against this goal is included in our annual ESG reporting. We also ensure that the requirements of New York City Local Law 87 of 1992 are met to advance a zero-waste future in alignment with New York City's zero-waste goal. SL Green hosts recycling trainings for tenants and Local 32BJ cleaning staff.

**Process:** The ESG team works closely with our Property Management teams to plan, implement, and maintain our waste policy. Operational waste generated across SL Green's portfolio depends on the activities of tenants within buildings. Construction-related waste is managed by our internal construction team and external contractors. Partnering with our tenants, employees, vendors, and union stakeholders is a cornerstone of our ongoing efforts to reduce waste.

1. Training: SL Green's portfolio offers recycling, landfill, and e-waste services to our tenants.
2. Waste Diversion: Our building infrastructure is equipped to divert mixed recyclables (metal, glass, plastic, paper, and cardboard), and we offer free e-waste recycling to all tenants. We also collect organic waste and divert it for composting in compliance with Local Law 146, which requires tenants to compost within spaces of a designated size and business function.
3. Reuse Through Donations: SL Green participates in various donation drives and partners with local community organizations to provide tenants with donation resources to divert materials from landfills. The following items are collected for donation: sporting equipment, food, school supplies, coats, toys, among others.
4. Monitoring: To monitor progress towards our waste reduction goal, SL Green measures waste intensity per square foot for each property. We receive monthly updates from waste haulers and review waste data regularly for accuracy. Any discrepancies are resolved with haulers through Property Management. SL Green partners with a certified TRUE Advisor to complete annual waste audits at our managed properties. These assessments identify sources of contamination, areas of improvement, and ways to increase recycling rates and ensure that tenant and employee guidelines are followed. Results are presented both internally and to tenants to create customized corrective action plans. *Our hazardous waste management policy is included in our EMS.*

**Biodiversity Protection:** SL Green's business strategy centers on managing, leasing, and/or redeveloping previously built environments, which minimizes our potential impact on natural habitats or ecosystems. SL Green's development projects are all located in New York City on previously developed (brownfield) sites. Immediate biodiversity concerns associated with the built environment such as green space provisions or urban greening are typically managed at the municipal or urban planning level, rather than the purview of individual REITs like SL Green. Nonetheless, we are committed to protecting biodiversity and reporting on our activities to reduce impacts on natural ecosystems.

**Commitment:** SL Green is committed to mitigating sprawl and minimizing greenfield development, which can negatively impact ecosystems and species' habitats.

**Process:** We consider environmental factors associated with owning, operating, and developing properties in the densely populated areas of our New York City market. We are aware of the various potential impacts of real estate development, management, and services on biodiversity, and seek to avoid or customize development within defined critical areas. SL Green also conducts periodic assessments of Tier 1 Suppliers to determine the upstream effects of our supply chain on biodiversity.

SL Green also maintains an urban garden and beekeeping to promote and preserve biodiversity. The urban garden serves as a habitat for various plant species, providing food, shelter, and breeding grounds for insects, birds, and other wildlife. Our bees contribute to pollination, aiding in the reproduction of plants and promoting genetic diversity.

**Indoor Air Quality:** SL Green prioritizes health, safety, and well-being for the occupants of buildings within our portfolio.

**Commitment:** SL Green is committed to maintaining health and wellness for our tenants by exceeding standard building health codes through enhanced indoor air quality (IAQ) measures.

**Process:** 100% of the company's managed properties are assessed for health and safety risks through ongoing monitoring, including periodic reviews to maintain health and wellness certifications. SL Green implements the International WELL Building Institute's (IWBI™) Health-Safety Rating (HSR) standards across our portfolio. This is an evidence-based, third-party verified assessment covering five essential categories for safe and healthy buildings, including Air & Water Quality Management. Our portfolio is also aligned with LEED standards of optimal IAQ, which stipulate that our buildings utilize materials and products that emit no, or low quantities of, volatile organic compounds (VOCs).

1. **Green Cleaning:** To further improve indoor environmental quality, the cleaning products we use meet relevant LEED standards. These standards require products to have a sustainable certification, such as Green Seal or Environmental Choice, and buildings to follow a comprehensive Green Cleaning Plan. *Our Green Cleaning Plan is included in our EMS Manual.*
2. **Improved Air Filtration:** All properties have Minimum Efficiency Reporting Value (MERV)13 or above filtration, which surpasses the New York City requirement of MERV 9 and aligns with the LEED requirement of MERV 13. To reduce occupant exposure to contaminated air, construction activities are scheduled around occupancy, spaces are inspected for asbestos, and abatement is performed as needed. *Please see our Health & Safety Policy for further information on how we manage these impacts.*
3. **Ongoing Monitoring:** All managed properties are equipped with IAQ sensors to monitor temperature, CO<sub>2</sub>, TVOCs (total volatile organic compounds), particulates, formaldehyde, and more, to proactively identify and address air quality issues.
4. **IAQ During Construction:** Construction activities are scheduled to minimize tenant exposure to particulates.

**Sustainable Construction & Development:** SL Green's environmental goals and commitments extend to our construction and development projects. With an interest in minimizing our environmental impact and using natural resources efficiently, our development mission is to identify opportunities for adaptive reuse of existing buildings and convert them into highly sustainable and attractive assets. Efforts included in our construction process include:

1. **Integrated Design Process:** Support high-performance and cost-effective outcomes through early analysis of energy use, carbon emissions, and water systems.

2. **Occupant Experience:** Place people at the center of design, creating an environment that fosters comfort, collaboration, productivity, cognitive function, and wellness.
3. **Energy & Operational Carbon Reduction:** Integrate energy-efficient design initiatives into all aspects of the project to reduce total energy use and peak demand, and as a result, significantly decrease energy costs, mitigate carbon emissions, and increase resilience.
4. **Water Management & Conservation:** Holistically address water consumption within each project to increase efficiency, reduce wastewater generation, and manage stormwater onsite to the greatest extent possible.
5. **Resilience:** Create a project that can withstand and adapt to climate shocks and stressors, maintaining core functionality in the event of a hazard, with the ability to recover rapidly.
6. **Material Resource Conservation & Embodied Carbon Reduction:** Address concern about the use of non-renewable resources and champion design principles to improve resource efficiency and environmental performance.
7. **Sustainable Construction Activity:** Conduct all demolition and construction activities in a manner that avoids air and water pollution and minimizes the amount of waste sent to landfills.
8. **Site Design & Transportation:** Create a project site design that limits impacts on the local ecosystem and supports low-emission transportation. This includes designing mixed-use properties that integrate access to commercial, residential, retail, and office spaces.
9. **Innovation:** Cultivate innovative solutions that advance current local and global priorities.
10. **Deforestation:** As SL Green operates solely in urban areas, deforestation is not material to our business operations or strategy.

**Commitment:** SL Green's design, construction, and planning procedures reflect our environmental goals meant to maximize efficiency, resiliency, and GHG emissions reduction.

**Process:** The ESG team works closely with our Engineering, Design, and Construction teams to plan, implement, and maintain our commitments to sustainable construction and development. We incorporate environmental considerations into building evaluations, use best available building designs and technologies, monitor utility incentives for the installation of improved equipment, and adopt sustainability specifications into design processes for energy, water, waste, and air quality.

Considering the impact of our projects on surrounding communities is an integral part of SL Green's processes for project management, design, construction, operations, and maintenance. Our development process involves engaging with government officials, community members, and local businesses to identify positive community impacts. *Please see our Community Engagement Policy and Vendor Code of Conduct for more information.*

**Maintaining Our EMS:** SL Green implements, maintains, and continually improves an Environmental Management System (EMS). Our EMS is customized for the buildings within our portfolio and incorporates industry best practices and elements of the ISO 14001:2015 Standard.

**Commitments:** SL Green is committed to maintaining an EMS that supports the goals outlined throughout this policy, including preventing pollution, mitigating GHG emissions, reducing waste, and minimizing the consumption of resources throughout all our existing operations and facilities. We are also committed to complying with all applicable environmental compliance obligations and the continual improvement of our environmental performance.

**Process:** SL Green ensures adherence to all applicable environmental compliance obligations with input from the ESG team, Engineering team, Portfolio Managers, and Property Managers to plan, implement, and maintain our EMS guidelines. We manage energy consumption, water use, indoor environmental quality, material selection, and each building's effect on its site throughout the planning, design, construction, and operational phases. We also enhance our environmental protection efforts through green building practices and certifications (e.g., LEED, ENERGY STAR) throughout the lifecycle of new and existing properties within our portfolio. Our EMS Manual is readily available to all SL Green employees and interested parties on our website. *Please refer to the Manual for further details on our EMS strategy and processes.*

## Workforce Development Policy

SL Green has assembled a talented and diverse team of professionals that exemplifies the excellence of our organization. Finding and retaining the best talent is imperative to our company's growth and success. We have introduced measurable human capital objectives aimed at attracting and retaining top talent, including employee education, career development, cross-training, health and wellness, innovation, and positive workplace culture, all with opportunities for open feedback. We continuously evaluate ways to make SL Green competitive in the hiring landscape.

**Employee Training & Career Development:** SL Green seeks to enhance employee performance through training and career development opportunities. Supporting employee career advancement enhances the workplace by increasing productivity, professional fulfillment, and positive collaboration.

**Goals:** SL Green strives to ensure that 100% of employees complete annual performance reviews. In addition, SL Green maintains employee education goals based on annual training hours completed per employee. Each department sets its own goal based on its training needs.

**Process:** SL Green's employee performance management includes ongoing goal-setting and formal annual performance reviews for all employees. This process ensures that employees receive consistent feedback and interaction at each level of the company. We encourage employees and supervisors to discuss job performance and solicit and share feedback on a frequent, ongoing basis.

1. **Training:** All employees are required to complete the annual training on topics covered in our Code of Business Conduct and Ethics and other trainings, such as anti-corruption, anti-bribery, cybersecurity, health and safety, and non-discrimination. *SL Green's general company-wide training is described throughout our ESG policies and reporting.*
2. **Education:** In addition to company-wide training, employees are supported through job-specific training and career development opportunities. We provide employees with opportunities to pursue training and certifications from organizations such as the Building Owners and Managers Association (BOMA), U.S. Green Building Council (USGBC), Occupational Safety and Health Administration (OSHA), and Service Employees International Union (SEIU) Local 32BJ. As part of our employee benefit program, SL Green offers tuition reimbursement for additional professional development training and support for employees to obtain degrees and professional certifications from local institutions, such as New York University and Columbia University.

Employees can provide feedback on training programs through post-training surveys, which aids in our evaluation of our training's effectiveness.

**Internal Mobility:** Succession planning is essential to SL Green's long-term sustainability. To maintain consistency in our workforce, high-potential employees are identified and trained for key roles within the organization.

**Goal:** SL Green strives to fill most open corporate management positions internally.

**Process:** Succession planning is overseen by business department heads, and high-potential employees are communicated with our CEO. We prioritize promoting from within by posting vacancies internally before opening positions to external candidates when applicable. Our management structure affords employees with organic opportunities for mentorship, which allows us to grow our next generation of company leaders internally. Our strong internal talent pipeline is a result of this mentorship and our dedication to training high-potential employees for management positions. Existing managers complete management training annually.

**Employee Engagement:** Engaging and retaining our employees depends on fostering a culture of openness and transparent communication. SL Green uses structured tools to regularly assess employee satisfaction and engagement, and we actively use that feedback to strengthen our workplace culture.

**Goal:** SL Green aims for 100% participation in the annual employee engagement survey.

**Process:** To facilitate employee engagement and feedback, we hold annual town halls – a forum for executive leadership to present to employees and respond to employees' questions.

We distribute an annual third-party employee engagement survey to all employees with the objective of gathering feedback and evaluating overall employee satisfaction. These results influence updates to established policies and procedures. To supplement the workplace experience, SL Green organizes and sponsors activities to foster a sense of community, including summer outings, speaker series, book clubs, team-specific outings and events, volunteer opportunities, worker appreciation recognition, and construction milestone events.

**Employee Benefits & Wellness:** In addition to providing a positive work environment and competitive pay, we strive to ensure that all qualifying employees have access to health, medical, education, and other benefits that meet or exceed market value, including our employee stock purchase plan (ESPP) and other supplemental benefits. *Our comprehensive benefits programs for full, temporary, and part-time employees are highlighted in our annual ESG Report.* All employees are offered paid family leave and parental leave for primary and non-primary caregivers. We also support employees' family needs through fertility services, private lactation accommodations, and pre-tax childcare incentive options.

SL Green has invested in employee work-life balance through our Employee Assistance Program (EAP) and by offering access to additional mental health and wellness benefits, such as resources to help manage workplace stress. SL Green offers both full-time and part-time working options depending on job function. We promote a work-from-office culture that drives mentorship, efficiency, and excellence. Qualifying employees are offered one (1) flexible workday per month and early close Summer Fridays. In certain circumstances, SL Green will approve additional work-from-home arrangement requests.

**Process:** Our People Experience team reviews all company benefits annually with our COO. The review reflects the findings of our annual employee engagement survey to ensure that employees have a voice in our benefits assessment process. These recommendations are then presented to our Chief Investment Officer (CIO), who approves the renewal, revision, or expansion of benefit offerings to better meet the present and future needs of our employees.

## Diversity Policy

We cultivate a diverse workforce that reflects the market and customers we serve in New York City. We believe this strengthens the company by providing a broader perspective and experience on strategic and operational issues. By fostering a diverse and inclusive workplace, we have been able to attract and retain a long-tenured staff. A cross-functional approach is used to ensure diversity is a priority and consideration throughout our organization. Our Diversity Blueprint contains the following strategic focus areas:

1. Workforce Diversity Policies
2. Workforce Diversity Training & Education
3. Diversity-Focused Recruitment
4. Senior-level Oversight of Diversity Efforts
5. Career Opportunities for Underrepresented Communities
6. Collaboration with Educational Institutions Serving Underrepresented Communities
7. Supplier Diversity and Minority/Women-Owned Business Enterprise (MWBE) Targets
8. Outreach & Support for Underrepresented Communities

Our Diversity Policy applies to all SL Green operations and is administered by our People Experience team, overseen by our COO. While each member of SL Green's management team is ultimately responsible for creating an atmosphere free of discrimination, harassment, and retaliation, all employees are expected to uphold our diversity principles to ensure an inclusive workplace for everyone.

**Equal Opportunity Employment:** SL Green is an Equal Opportunity Employer. We are committed to providing equal opportunity and fair treatment to all individuals based on merit, without discrimination due to race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status, or other characteristics protected by law.

**Commitment:** SL Green's management team is dedicated to ensuring equal opportunity employment with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs, and general treatment during employment.

**Process:** Our People Experience team partners with a third-party recruitment platform that helps employers seek experienced and racially diverse talent.

**Board Diversity:** Our emphasis on diversity starts at the top of our organization with the selection process for members of our Board of Directors and ongoing succession planning for Directors. The NCGC considers diversity when reviewing prospective Director candidates and making recommendations to the Board, with an aim of bringing new perspectives to enhance Board discussion and decision-making. *For further information, please refer to our Nominating and Corporate Governance Committee Charter and Governance Principles.*

**Process:** SL Green's Board of Directors is responsible for implementing the Board Diversity Policy. As part of the recruiting and nomination process, the NCGC considers racial, ethical and gender diversity factors including, but not limited to, a candidate's knowledge, skills, education, and diversity, including with respect to gender, age, race, ethnicity, nationality, country of origin, and cultural background and perspectives, all in the context of the existing composition of the Board.

**Reasonable Accommodation:** The company will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's physical or mental disability, sincerely held religious beliefs and practices, and/or other qualifications defined by applicable law, unless doing so would impose an undue hardship upon the company's business operations.

**Process:** If an employee requests a reasonable accommodation, our People Experience team will meet with the employee to discuss the scope of limitations upon the employee's activities, and to explore potential reasonable

accommodations that will enable the employee to perform the essential functions of his or her position. If an employee does not request an accommodation, but the company becomes aware of circumstances where it believes that an employee may need an accommodation, then the company will proactively engage in a cooperative dialogue with the employee directly to inform the employee of support available.

### **Anti-Discrimination & Anti-Harassment:** Our anti-discrimination and anti-harassment policies

govern all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits. SL Green's anti-discrimination policy is in full compliance with the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, and all other applicable federal, state and local equal employment laws. SL Green also adheres to the conventions of the International Labor Organization (ILO), including C111 – Discrimination.

SL Green prohibits harassment, discrimination, and retaliation, whether engaged in by fellow employees, a supervisor, or a non-employee. We are committed to maintaining an inclusive workplace where all employees are treated with respect and dignity. SL Green has a zero-tolerance policy for any form of discrimination or harassment based on race, color, creed, religion, sex (including pregnancy, childbirth and medical conditions related to pregnancy, or breastfeeding), sexual orientation, sex stereotyping (including assumptions about a person's behavior or appearance, gender roles, gender expression, or gender identity), gender, gender identity or expression (including gender dysphoria), transgender status, national origin, age, disability, height, weight, marital status, military or veteran status, citizenship or immigration status, genetic information (including predisposing genetic characteristics), familial status, caregiver status, status as a victim of domestic violence, arrest or conviction record, credit history, salary history, unemployment status, natural hairstyles, on the basis of sexual and other reproductive health decision-making (including, but not limited to, a decision to use or access a particular drug, device or medical service), or status in any group or class protected by applicable federal, state, or local law ("Protected Characteristics").

*Employees should refer to our Whistleblower Policy and Non-Retaliation Policy for information on reporting concerns.*

**Commitment:** We are committed to maintaining a workplace free from discrimination, retaliation, and harassment, and cultivating an environment where all employees are treated with respect and dignity.

**Process:** To support our diversity goals, all SL Green employees, including executive management, complete annual training on the topics covered in our Code of Business Conduct and Ethics, which include diversity, fair employment, harassment and discrimination, fair wages, and equal remuneration.

**Employee Recruitment & Selection:** We strive to maintain a diverse pool of talent that reflects the market and customers we serve in New York City, which often includes targeted hiring aimed at our local communities.

**Process:** Our People Experience team partners with a third-party recruitment platform that helps employers seek experienced and diverse talent. We also partner with various organizations, such as the New York City Summer Youth Employment Program (SYEP). This program provides high school and college students with the opportunity to participate in paid professional summer internships, many of which lead to full-time employment at SL Green. *For more information, please refer to our annual ESG Report and our Diversity Policy.*

**Reporting Concerns & Anti-Retaliation:** All employees and suppliers have a responsibility to prevent and report ethical and human rights violations, including those related to harassment or discrimination. Any such communications may be made anonymously and without fear of retaliation. Violations of this policy and/or improper retaliatory conduct will lead to prompt and appropriate disciplinary action, up to and including termination of employment. Our Board's Audit Committee has established procedures for the receipt, retention, investigation, and treatment of complaints received by the Company. SL Green's Whistleblower Policy, including the non-retaliation clause, is available to employees, suppliers, customers, and other third parties. *For more*

*information on our whistleblower program and reporting a concern, please see our Code of Business Conduct and Ethics.*

**Equal Remuneration:** SL Green complies with or exceeds New York City minimum wage for all employees.

Our competitive compensation is complemented by generous employee benefits including health, dental, and vision insurance, short-term and long-term disability coverage, life insurance and coverage for accidental death and dismemberment, an employee stock purchase plan, flexible spending accounts for health and commuter costs, a 24/7 employee assistance program, pet insurance, and parental leave. A 401(K) match is provided to both full-time and part-time employees. *Please refer to our Workforce Development Policy for more information.*

**Commitments:** SL Green is committed to ensuring equal employment opportunities and adhering to all relevant labor laws and regulations, particularly regarding minimum wage standards and equal pay principles. We aim to provide competitive compensation rates specific to the New York City market and to provide a fair wage, equal remuneration, and equal pay for equal work for all company employees. This commitment extends to SL Green's suppliers, who are expected to pay all employees in accordance with union agreements (as applicable), NYS labor laws, and all other governmental regulations.

**Process:** SL Green's executive team reviews compensation rates to ensure competitiveness within the New York City market. Adjustments are made as necessary to meet or exceed minimum wage standards and maintain parity with industry norms. We also adhere to the conventions of the ILO, including C100 – Equal Remuneration Convention.

**Utilization of Minority & Women-Owned Business Enterprises (MWBEs):** SL Green is committed to promoting diversity in all aspects of our business operations, including our procurement process. We recognize the value that MWBEs bring to our construction projects and are dedicated to actively seeking opportunities to engage with and support these contractors.

**Commitments:** SL Green encourages the use of MWBE contractors in all phases of our projects, including construction, renovation, maintenance, and services procurement. For major development/redevelopment projects, MWBE targets are set and reported on.

## Human Rights Policy

In values, principles, and policies, SL Green is committed to human rights throughout our operations, our supply chain, and our partnerships. SL Green expects employees, suppliers, and third-party contractors to share our commitment and enforce these standards. We seek to minimize and proactively manage human rights risks such as impacts related to human trafficking, the use of child and/or forced labor, discrimination, poor working conditions, and challenges to equal remuneration, collective bargaining, freedom of association, and a fair and minimum wage. Our Human Rights Policy is included in our Employee Handbook.

Our greatest area of exposure to human rights risk is in our supply chain which we address through our “Supplier Due Diligence” process. SL Green’s own business operations adhere to New York City and New York State human rights laws, which minimizes our human rights risks. SL Green union employees are additionally protected through their collective bargaining agreements, which are renegotiated every three years and contain provisions related to human rights.

We adhere to the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, and the International Covenant on Civil and Political Rights. These international standards and principles inform our Human Rights Policy and due diligence processes.

**Child Labor & Forced Labor:** SL Green endeavors to uphold the highest level of ethics and responsibility when it comes to employment and labor practices. We adhere to the conventions of the ILO in these areas, including C183 – Minimum Age Convention, C182 – Worst Forms of Child Labour Convention, and P029 – Protocol of 2014 to the Forced Labor Convention.

**Freedom of Association:** SL Green respects freedom of association and collective bargaining throughout our operations, our supply chain, and our partnerships, and requires employees to comply with all applicable labor and employment laws, regulations, and policies. We ensure open communication between employee representatives and SL Green management through our acting liaison, the Realtor Advisory Board on Labor Relations (RAB). Our COO manages the relationship between RAB, union representatives, and SL Green.

SL Green adheres to the conventions of the ILO, including C087 – Freedom of Association and Protection of the Right to Organize and C098 - Right to Organize and Collective Bargaining Convention.

**Working Conditions & Working Hours:** SL Green employees must be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions, suspicious activity, or potential hazards are reported to management immediately, even if the problem is corrected. *Please refer to our Health & Safety Policy for more information.*

We comply with New York City laws on working hours and overtime. All overtime work hours are taken voluntarily, and eligible workers are compensated for voluntary work hours designated as overtime.

**Privacy & Cybersecurity:** At SL Green, we respect the right to privacy. We guard personal information to ensure the content and services we provide are tailored to tenant preferences. Data privacy and security policies and activities are the responsibility of our executive team, with oversight from the Board of Directors.

Our business-related data represents SL Green’s intellectual capital and is critical to the efficient operation of the company. Data security and privacy protection practices are in place throughout the company to secure private and sensitive data. Designated employees participate in mandatory cybersecurity training and receive regular updates about risks and techniques to reduce vulnerabilities. SL Green maintains a plan of action in the event of a data breach to quickly respond, minimize damage, and clearly communicate the breach’s scope to affected parties. We regularly assess our program and are positioned to respond to security and privacy risks, identify vulnerability gaps,

and assess data governance applications. SL Green is compliant with all requirements of Sarbanes-Oxley Act (SOX) and conducts internal and external audits. *For more information, please see our Proxy.*

**Responsible Marketing:** SL Green is committed to implementing the highest level of ethical and responsible marketing practices. We are opposed to misrepresentation of our properties in any form and seek to accurately market our buildings and punctually address tenant complaints regarding defects.

**Anti-Discrimination & Anti-Harassment:** Please refer to our Diversity Policy for more information.

**Reporting Concerns & Anti-Retaliation:** Please refer to our Diversity Policy for more information.

**Fair Wages & Equal Remuneration:** Please refer to our Diversity Policy for more information.

**Commitment:** SL Green is committed to providing safe and healthy working conditions and upholding reasonable working hours standards throughout our operations, our supply chain, and our partnerships. SL Green strictly commits to using voluntary labor only and we prohibit engaging in any form of human trafficking or forced labor in our operations and supply chain. We prohibit the use of child and forced labor, whether in the form of indentured labor, bonded labor, prison labor, or any other behavior constituting modern slavery or servitude among our employees, vendors, and union partners. Everyone must be free to leave their employer after reasonable notice without penalty.

**Process:** SL Green uses a due diligence process to identify actual and potential human rights risks in our supply chain and has a reporting structure in place for parties to inform our management of identified issues. Our due diligence framework is guided by the United Nations Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, the ILO Declaration on Fundamental Principles and Rights at Work, and New York City human rights law. Additionally, SL Green adheres to the International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

1. **Supplier Due Diligence:** SL Green's due diligence process is supported by an independent third-party who performs mandatory annual audits and assessments of our critical suppliers to ensure compliance and/or identify actual and potential issues within our supply chain on a robust variety of ESG topics. SL Green has identified our critical suppliers as those with whom our spend is over a defined threshold value (cumulatively accounting for at least 60% of current annual spend) and where SL Green displays a level of dependency.
2. **Supply Chain Assessment:** The annual assessment of our Tier 1 critical suppliers covers impacts to various groups vulnerable to human rights risks including local communities, children, women, racial and ethnic minorities, and our own employees. The audit assesses material human rights topics discussed throughout this policy, including forced labor, child labor, human trafficking, freedom of association, collective bargaining, equal remuneration, and discrimination. After completing the assessment, customized scorecards are generated for each supplier based on their industry, location, and size. These scorecards evaluate overall ESG performance based on four categories: environment, labor and human rights, ethics, and sustainable procurement. SL Green uses the scorecards to evaluate supplier ESG performance and communicate expectations. SL Green works with each supplier as needed to create customized corrective action plans addressing areas where the supplier is not compliant with our policies and establishing monitoring mechanisms. Suppliers are reevaluated before renewing existing contracts. We reserve the right to terminate or suspend any agreements and relationships with suppliers who are unable to comply with our expectations for human rights performance, or suppliers who demonstrate disregard for our corporate policies.

3. **Training:** SL Green employees complete annual training on the topics covered in our Code of Business Conduct and Ethics each year. Also, all SL Green-contracted security personnel must complete an annual eight-hour training course that includes human rights topics in the curriculum.

## Health & Safety Policy

SL Green is dedicated to safeguarding and enhancing the health, safety, and well-being of all employees, tenants, and visitors. This commitment spans from property design to daily operations and involves proactive risk identification, prioritization, and assessment based on regulatory standards for ongoing operations and emergency management. We ensure compliance with building health and safety codes, including Americans with Disabilities Act (ADA) requirements, and implement measures to enhance occupant health and wellness including IAQ, cleaning and sanitization programs, health service resources, air and water quality management, and stakeholder engagement and communication. Our policy extends to protecting and improving our vendors' health, safety, and wellbeing. We maintain a Vendor Code of Conduct that covers accident prevention, safety standards and compliance, hazardous materials, cleaning, and security. SL Green's vendor contracts stipulate that vendors must comply with applicable laws and regulations regarding health and safety in addition to our Vendor Code of Contact. *Please refer to our Vendor Code of Conduct for further information.*

**Occupational Health & Safety:** All of SL Green employees, service providers, and third-party managers are covered by our occupational health and safety management system and policies. We conduct regular safety inspections and training sessions to ensure adherence to U.S. Occupational Safety and Health Administration (OSHA) standards and proactively identify potential risks. Our Health and Safety Management System encompasses various standard operating procedures, emergency response planning, and active stakeholder engagement, overseen by our Senior Vice President of Security & Life Safety and Senior Vice President of Operations with support from dedicated employees and vendors.

**Goals:** Our primary goal is to achieve zero work-related injuries. In addition, we strive to engage 100% of our employees in health and safety procedures through feedback mechanisms, annual surveys, wellness campaigns, and labor unions.

**Commitments:** SL Green is committed to assessing 100% of the company's properties for health and safety risks and upholding the highest standards of building health, safety, and wellness. Compliance with OSHA and New York City Department of Buildings (DOB) regulations is mandatory for all construction-related operations.

**Process:** Employees must be conscientious about workplace safety, including proper operating methods, to recognize dangerous conditions or hazards. Any unsafe conditions, suspicious activity, or potential hazards must be reported to management or our People Experience team immediately, even if the problem is corrected. To progress toward zero injuries each year, we continually monitor and track any incidents and report on them annually.

1. **Risk Identification & Assessment:** The operations team conducts regular risk assessments across our properties to identify potential health and safety hazards. This involves thorough inspections of facilities, equipment, and processes to ensure compliance with regulatory requirements and industry standards. Identified risks are prioritized based on severity and likelihood of occurrence.

In an ongoing effort to ensure that SL Green and tenant construction projects are carried out safely, the construction team retains a third-party Site Safety Consultant (SSC) to monitor, inspect, and report on project safety throughout our portfolio. SSC inspectors assess whether all applicable DOB and OSHA-related safety standards are being followed.

SL Green hires an New York City Department of Environmental Protection Certified Asbestos Investigator (CAI) in applicable buildings to sample the area of work. If no Asbestos Containing Materials (ACM) are detected, an ACP-5 form (Asbestos Assessment Report) is filed. If ACM is found, the building and its occupants are notified through a variety of channels, and abatement is performed and confirmed by the CAI.

Our acquisitions process includes requesting Phase1 / Phase 2 Environmental Site Assessments (ESAs) and Asbestos Operations & Maintenance Reports.

2. **Training:** All employees undergo comprehensive occupational health and safety training upon joining SL Green and receive annual refresher courses. Training covers a wide range of topics, including proper operating methods, hazard recognition, emergency response procedures, and compliance with relevant regulations. Specialized training programs are provided on a departmental level for additional applicable training topics. SL Green also partners with industry leaders to administer these trainings, including BOMA, OSHA, USGBC, and Local 32BJ, among others.
3. **Standard Operating Procedures (SOPs):** SL Green maintains several SOPs in support of our occupational health and safety program that cover the following topics, among others:
  - Class E Testing
  - Infectious Disease Exposure Prevention Plan (IDEPP)
  - Electric Personal Transportation (EPT) Devices
  - Regular OSHA Trainings
  - Green Cleaning
  - Elevator Intercom Testing
  - Loading Dock Access
  - Property Removal – Package Equipment Pass
  - Security & Life Safety Equipment Inspections
  - Firearms & Weapons
  - Security Camera Video Request – External Entities
  - Access Control & Visitor Management
  - Property Inspections
  - Integrated Pest Management Plan
  - Cooling Towers Disinfectant Management
4. **Reporting & Response:** We have established clear reporting mechanisms for employees to raise concerns or report unsafe conditions, suspicious activities, or workplace injuries. Any workplace injury, accident, or illness must be reported to the employee's supervisor immediately, regardless of the severity of the injury or accident. If an employee is injured at the workplace, SL Green's protocol is for the supervisor to call a third-party registered nurse (RN) (available by telephone 24 hours a day, 7 days a week in over 220 languages) and/or our People Experience team on the employee's behalf. If a supervisor (or our People Experience team) is not available, the employee should contact an RN directly. The RN will provide a recommendation towards self-care or professional treatment.

OSHA and SL Green share a collective goal to prevent injuries and illnesses in our workplaces. OSHA requires employers to maintain occupational injury and illness records by filling out OSHA 300 and 301 forms, or a First Report of Injury (eFROI) form, quarterly. All forms are to be submitted in an Excel document along with a signed PDF of Form 300A. The final report is sent to our People Experience team annually for company-wide submission to the U.S. Department of Labor.

For all construction projects, our SSC inspector conducts at least two visits per month to each site to ensure compliance. The inspector shares the complete inspection report with the appropriate Portfolio Manager, Portfolio Administrator, Property Manager, Assistant Property Manager, Chief Engineer, and Construction Vice President. Identified safety concerns are addressed using the following mechanisms:

- Site safety inspections and any negative observations
- Safety items noted during inspections to be out of compliance
- Vendors ranked by violation ratio
- Most noted code-related items during inspections

5. **Continuous Improvement:** We actively solicit feedback from employees, tenants, and other stakeholders to identify areas for improvement in our health and safety practices. This feedback is used to refine our

policies, procedures, and training programs to ensure they remain effective and relevant. We also conduct regular reviews and audits of our health and safety management system to identify areas for enhancement and ensure compliance with evolving regulatory requirements.

**Optimized Health & Wellness:** We prioritize health and wellness within our properties for employees, tenants, and visitors by obtaining certifications such as the International WELL Building Institute (IWBI™) Health-Safety Rating (WELL HSR) and adhering to additional LEED O&M (Operations & Maintenance) Standards. Our buildings are equipped with measures to enhance indoor air quality, utilize low-emitting materials, and undergo regular inspections to identify opportunities for improvement.

**Commitment:** SL Green is committed to ensuring that all of the company's properties are assessed for health and safety risks and that the highest standards of building health, safety, and wellness are upheld. We are committed to achieving 100% WELL HSR certification at properties in our operated portfolio.

**Process:** Optimized health and wellness standards are validated by obtaining third-party certifications that prove our commitment to health and safety. To further engage employees in health and wellness, SL Green conducts a month-long wellness campaign each year to spotlight awareness for employee-focused initiatives and activities. Our employees are integral to the success of our health and safety management system, and we encourage feedback as we strive for continuous improvement. Health and safety are among the topics included in our annual employee survey.

**Emergency Preparedness:** Emergency preparedness is an important part of SL Green's business continuity strategy and is deeply ingrained in our initiatives and procedures to ensure the continued health and safety of our employees and tenants. Our Senior Vice President of Security & Life Safety leads our health and safety efforts with oversight from the COO. We have a designated Security & Life Safety team, an Emergency Operations Center, and Fire & Life Safety Directors (FSDs) to oversee the emergency preparedness and response aspect of health and safety.

**Commitment:** SL Green is committed to emergency preparedness and protocols that meet or exceed compliance with federal, state, and municipal regulations.

**Process:** Responsiveness to emergencies hinges on readiness, resulting from a combination of training and procedures. Construction, Engineering, Property Management, and Security & Life Safety personnel receive an Emergency Response Guide (ERG), which highlights critical steps to be taken before, during, and after an emergency. The ERG is intended to enhance existing emergency preparedness procedures, be utilized in pre-planning and training initiatives, and used as a reference in emergencies. The FSDs complete quarterly reports and, if required, discuss how to further operationalize the elimination of hazards and risk mitigation. Each SL Green building must have a current evacuation plan in place, maintain two operational portable emergency radios, and have a designated Emergency Response Closet (ERC). The ERC must be stocked with required emergency inventory and inspected quarterly.

1. SOPs: SL Green maintains several SOPs in support of our Emergency Preparedness program:

- Corporate Emergency Access System (CEAS)
- Elevator Entrapments & Emergency Calls
- Emergency Contacts
- Emergency Notification System
- Emergency Radio System
- Emergency Response Closet
- Emergency Response Guide (ERG)
- Firearms & Weapons
- Life Safety Plan

## Community Engagement Policy

At SL Green, we hold ourselves to the highest standard of corporate responsibility and strive to be active and responsible members of our New York City community. We are dedicated to making a positive impact through our development projects, philanthropic endeavors, and partnerships with local stakeholders. Throughout our operations, we prioritize engaging with local stakeholders to ensure our projects benefit tenants and surrounding communities. Our commitment to community engagement extends across all levels of our organization. We recognize the value of continually enhancing our focus on community relations and project-specific community impacts. This aligns with SL Green's long-standing history of projects and partnerships that contribute to the well-being of New Yorkers. In addition to engaging with New York City and New York State officials, members of various departments within SL Green, including operations, finance, and construction, actively engage with local stakeholders. Our employees are viewed as stewards of our engagement strategy, guided by the principles outlined in the policy below.

**Philanthropy & Community Giving:** Philanthropy is a central part of SL Green's community engagement strategy. We focus on meaningful contributions to the communities in which we operate to ensure resilience and create long-term value for all stakeholders. We invest in local infrastructure and initiatives and facilitate employee volunteer events with community-based organizations each year. SL Green organizes employee fundraising initiatives and offers donation-matching, in-kind donations, and monetary donations.

Our flagship community initiative, the [FOOD1ST Foundation](#), was developed in 2020 in response to the COVID-19 pandemic. SL Green established FOOD1ST to provide meals for local emergency service workers and vulnerable populations. This non-profit organization continues to operate in New York City and has shifted its focus to addressing food insecurity by partnering with local restaurants to revitalize New York City's food and beverage industry. SL Green also organizes location-specific donations. For example, since the opening of the SUMMIT One Vanderbilt, SL Green has donated 1% of gross ticket sales to New York-focused charities through the SUMMIT Foundation.

**Process:** We continuously evaluate and refine our philanthropy and community giving efforts to maximize our positive impact and uphold our commitment to corporate social responsibility. Employees are encouraged to report volunteer hours and donations made to eligible organizations through designated channels. To incentivize and support employee philanthropy, SL Green offers a dollar-for-dollar charitable gift matching program (up to \$2,000 per year), doubling financial contributions made by employees to eligible non-profit organizations. Organizations that practice racial or any other discrimination are ineligible for our charitable gift-matching program.

**Employee Volunteerism:** SL Green encourages employees to volunteer their time and expertise to the local community as part of our philanthropy program. Employee volunteer events are regularly coordinated by SL Green, most often by our People Experience team, and include a mentorship program for local students, public park cleanups, blood drives, and managing donations drives for clothing, food, toys, and school supplies. Tenants are also encouraged to participate in select donation drives.

**Process:** To promote community outreach, employees are granted one paid day off annually to devote to volunteerism. This day can be utilized for initiatives coordinated by SL Green, or chosen directly by the employee, allowing for flexibility and personal engagement in meaningful causes. Through volunteerism, our employees play a role in enriching the lives of those in need and strengthening the bonds within our community. Through these collective efforts, we continue to make a positive and lasting impact in the areas where we live and work.

**Community Development & Local Stakeholder Engagement:** At SL Green, we are committed to responsible development that enhances the well-being of the neighborhoods where we operate. Our approach involves integrating community needs and stakeholder input into our projects from inception to completion. Through transparent engagement and proactive management of community impacts, we strive to build positive relationships and create lasting value for all stakeholders. Considering the impacts our projects can have on surrounding communities is an integral part of SL Green's business processes and allows SL Green to proactively manage our reputational risk. Community impact is overseen by the Executive Vice President of Development and factored into all stages of our buildings' life cycles through project management, design, construction, operation, and maintenance.

Examples of SL Green's community impact include offering affordable housing opportunities to low-income tenants and addressing community investment needs through transit revitalization and other infrastructure improvements. Our local stakeholder engagement program is described in more detail below.

**Process:** While SL Green assesses community impact across all our operations, our approach is specific to each development project and building to maximize benefits that are most material to that project or building. To mitigate negative impacts and identify ways our projects can have positive community impacts, a comprehensive engagement strategy is developed for each of our development projects. Each strategy includes the following tenets:

1. **Stakeholder Identification:** Key stakeholders, including community boards, elected officials, business improvement districts, and local organizations, are identified. We also enlist community representatives (such as community leaders, law enforcement, transportation and public safety officials, planners, business groups, chambers of commerce, schools, libraries, charities, resident associations, and philanthropies) and identify vulnerable groups by communicating with local community boards and elected officials.
2. **Early Engagement Planning:** Community consultation begins in the early planning phases of each development project to identify potential stakeholder concerns. A designated community outreach contact is assigned to lead these engagement efforts. SL Green then assesses community stakeholder objectives and concerns through dialogue and ongoing consultation.
3. **Stakeholder Engagement & Ongoing Consultation:** Continued and regular engagement methods are established to promote dialogue, gather feedback, ensure transparency and accountability, and resolve issues throughout development. Methods to collaborate with relevant groups may include holding regular public meetings or arranging site visits. All outreach materials comply with applicable laws and regulations. Examples of consultation methods include access to project details and plans, public and community board meetings, public review and approval processes, site visits, and other events. We ensure that we are transparent and that all community outreach, marketing, and communications materials are accurate and comply with all applicable laws and regulations.
4. **Feedback Incorporation:** Local community feedback is incorporated into project designs and plans wherever feasible, with a focus on addressing concerns related to waste reduction, noise pollution, traffic management, job creation, education support, safety, and environmental sustainability. We aim to regularly review and improve our approach to identifying local community stakeholders and their material issues, as well as the outcomes from engagement.

**Community Grievances:** SL Green aims to provide reasonable access to grievance mechanisms for local communities and address these issues amenable to all relevant stakeholders and their interests. While our whistleblower mechanisms are available to our internal stakeholders (including employees, contractors, and suppliers), we have established specific channels to collect, record, and address community complaints or grievances.

**Process:** Grievance channels for local stakeholders include contact information made available through postings at all active construction sites, available at public community review hearings, or directly through emailing or calling SL Green's Corporate office. Inquiries are reviewed on a rolling basis and processed based on topic area and severity level. Most actionable inquiries are directed to general management and filtered based on relevant department. Designated contacts are assigned from operations, maintenance, facilities, finance, and construction teams. Priority inquiries may be escalated to executive management for further review.

**Tenant Engagement:** Tenants are considered a pillar of our local stakeholder engagement program. SL Green's business strategy is driven by identified needs from tenant feedback. Effective tenant engagement is crucial, not only for enhancing tenant satisfaction, but also for achieving our environmental sustainability goals. Active and ongoing communication with tenants plays a significant role in reducing energy consumption and carbon emissions, contributing to our overall sustainability objectives.

**Process:** SL Green's tenant communication strategy ensures tenants are notified of important events (e.g., upcoming work, building emergencies, etc.). Communication includes both real-time information and planned notifications. Further, we engage with tenants through a variety of operation-specific initiatives including:

1. **Tenant Satisfaction Surveys:** SL Green issues bi-annual tenant satisfaction surveys, which measure a variety of priorities, such as overall satisfaction with management, maintenance and cleanliness, commitment to sustainability, accessibility, building safety and security, and amenities. These assessments are conducted by a third-party agency. The results are benchmarked against industry peers to allow us to identify and prioritize product and service development areas.
2. **Waste Reduction Campaigns:** SL Green holds annual recycling training and education events for tenants and presents them with the results of our annual waste audits to increase education and awareness of waste goals.
3. **Energy and Carbon Emissions:** We educate tenants on energy conservation in a variety of ways, as well as conducting surveys on building sustainability, identifying energy incentives as tenant partnership opportunities, and providing tenants with access to energy data monitoring.

By engaging tenants in our sustainability initiatives, SL Green aims to foster a collaborative environment where both the company and tenants contribute to reducing waste, energy consumption, and carbon emissions. Tenant engagement is a fundamental aspect of our commitment to sustainability and environmental stewardship. *Our approach to local stakeholder engagement is further discussed in our annual ESG reporting. Our Environmental Sustainability Policy provides further details on our approach to tenant engagement on environmental issues.*