

**SL Green Realty Corp.**

# **Environmental Management System (EMS) Manual**

Revision No. 7

Date: June 28, 2024

Conforms to ISO 14001:2015

## AMENDMENTS

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### *Revision History*

Revision Date	Nature of Changes	Revised / Approved By
10/04/2019	First draft of updated revision from 4/17/15 EMS	Director of Sustainability
10/25/2019	Second draft	Director of Sustainability
11/20/2019	Third draft	Director of Sustainability
12/16/2019	Fourth draft	Director of Sustainability
12/17/2019	Fifth draft	Director of Sustainability
12/19/2019	Sixth draft	Director of Sustainability
06/28/2024	Seventh draft updated in coordination with ESG Policies	Senior Vice President, Sustainability & Hospitality

## INTRODUCTION

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### ***Purpose of EMS Manual***

This Manual defines SL Green's Environmental Management System (EMS) and contains:

- A description of the main elements of the EMS;
- Statements of responsibility and authority;
- An overview of the company's environmental procedures and controls;
- Identification of the resources and training allocated to management, performance of work, and verification activities including internal audit; and
- The arrangement for internal auditing and periodic management reviews.

The purpose of this Manual is to demonstrate that the EMS meets all ISO 14001: 2015 requirements and to provide guidance and direction for implementing and operating the EMS.

## NORMATIVE REFERENCES

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Plans / Policies / Procedures	Date Implemented	Last Revised	Location
Environmental Policy	April 2015	June 2024	SL Green website
Green Cleaning	September 2013	November 2016	Maintained internally
Solid Waste Management (Including Hazardous Waste)	September 2013	November 2016	Maintained internally
Building Exterior & Hardscape Management	September 2013	November 2016	Maintained internally
Landscape Erosion Pest Management	September 2013	November 2016	Maintained internally
Integrated Pest Management	November 2016	June 2021	Maintained internally
Cooling Tower & Chemical Management	September 2013	November 2016	Maintained internally
Water Fixtures & Fittings	September 2013	November 2016	Maintained internally
ENERGY STAR Benchmarking	September 2013	May 2024	Maintained internally
Retro-Commissioning	December 2009	N/A	Maintained internally
Environmental Tobacco Smoke Control	September 2013	March 2017	Maintained internally
Emergency Response Guide	November 2015	June 2022	Maintained internally
Emergency Response Closet	September 2022	N/A	Maintained internally

## TERMS AND DEFINITIONS

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<b>Auditor</b>	Person with the competence to conduct an audit.
<b>Continual Improvement</b>	Recurring process of enhancing the Environmental Management System to achieve improvements in overall environmental performance consistent with the organization's environmental policy.
<b>Corrective Action</b>	Action to eliminate the cause of a detected nonconformity.
<b>Document</b>	Information and its supporting media.
<b>Environment</b>	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
<b>Environmental Aspect (EA)</b>	Elements of an organization's activities or products or services that can interact with the environment.
<b>Environmental Impact</b>	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
<b>Environmental Management System (EMS)</b>	Part of an organization's management system used to develop and implement its environmental management processes and manage its environmental aspects.
<b>Environmental Objective</b>	Overall environmental goal, consistent with the Environmental Policy, that an organization sets itself to achieve.
<b>Environmental Performance</b>	Measurable results of an organization's management of its environmental aspects.
<b>Environmental Policy</b>	Overall intentions and directions of an organization related to its environmental performance as formally expressed by top management.
<b>Environmental Target</b>	Detailed performance requirement applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
<b>Interested Party</b>	Person or group concerned with or affected by the environmental performance of an organization.
<b>Internal Audit</b>	Systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the Environmental Management System audit criteria set by the organization are fulfilled.
<b>Nonconformity</b>	Non-fulfilment of a requirement.
<b>Organization</b>	SL Green Realty Corp.
<b>Preventive Action</b>	Action to eliminate the cause of a potential nonconformity.
<b>Prevention of Pollution</b>	Use of processes, practices, techniques, materials, products, services, or energy to avoid, reduce, or control (separately or in combination) the creation, emission, or discharge of any type of pollutants or waste, to reduce adverse environmental impacts.
<b>Procedure</b>	Specified way to carry out an activity or a process.
<b>Record</b>	Document stating results achieved or providing evidence of activities performed.

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## CONTEXT OF THE ORGANIZATION

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### **Company Profile**

*(ISO 14001:2015 Standard Clause 4.1)*

SL Green is a fully integrated real estate investment trust (REIT), that is focused primarily on acquiring, managing, and maximizing value of Manhattan commercial properties. A description of our current portfolio can be found in our latest ESG reporting. Our sustainability initiatives incorporate environmental, social, and governance (ESG) aspects of our organization.

- **Environmental:** As Manhattan’s largest office landlord, we are committed to creating the most sustainable footprint by reducing resource consumption and mitigating environmental impacts. We make a conscious effort to create benefits for New York City by minimizing our environmental impact through emissions reductions, resource conservation, and operational excellence. This is demonstrated through the development of standard operating procedures, completion of energy efficiency projects, and implementation of cutting-edge technologies to optimize peak performance. Our unrelenting focus on environmental stewardship has advanced the quality of our portfolio, benefiting our partners, tenants, and the greater community.
- **Social:** Our partnerships extend beyond the limits of our offices and into the greater New York City community. We strive to act as agents of good will through volunteerism and financial support. Our Social vision focuses on enhancing the health and resiliency of our employees, tenants, and the community. We work to create a culture that prioritizes productivity and wellness through training, diversity, education, and volunteerism. Our people are unified through a shared sense of purpose, as we empower our employees with the time and resources to contribute significantly to a greater New York.
- **Governance:** Our reputation for integrity is the cornerstone of the public’s trust in our company. SL Green’s employees share accountability for operating in accordance with the highest moral, legal, and ethical standards. Driven from the top, corporate responsibility is executed across all departments internally and extends to our partners, tenants, and suppliers. Our commitment to ongoing and open communication with stakeholders ensures we achieve our collective vision of model corporate citizenship.

This EMS Manual provides a detailed overview of our approach to environmental matters, as a key component of our broader sustainability objectives.

**Stakeholders Relevant to EMS**

(ISO 14001:2015 Standard Clause 4.2)

SL Green identifies stakeholders as those who affect SL Green’s business and those who are potentially affected by the business. We engage with our stakeholders frequently and in a variety of ways which include, but are not limited to the following:

Stakeholder Group	Engagement Method
Employees	Annual Company Town Hall
	Communication Portal
	Community Outreach Programs
	Employee Engagement Survey
	Training & Education
	Whistleblower Resource
Tenants	Building Rules & Regulations
	Data Sharing
	Green Building Certifications
	Lease Language
	Sustainability Design Specifications
	Tenant Incentive Programs
	Tenant Satisfaction Surveys
Investors	Annual Investor Conference
	Annual Report, Proxy, and ESG Report
	Investor Meetings and Presentations
	Quarterly Earnings Calls
	Questionnaires and Surveys
	Shareholder Outreach
	TCFD and SASB Disclosures
Contractors, Vendors, and Suppliers	Annual Supply Chain Survey
	Corrective Action Plans
	Contract Stipulations
	Data Requests
Government	Collaboration on Legislation
	Engagement on Development Plans
	Broker Meetings and Tours
	Online Resources
Industry Associations	Business Improvement Districts
	Committee Membership and Executive Leadership
Community Members	Volunteer Service
	Privately Owned Public Spaces (POPS)
	Public Transit Improvements
	Community Board Engagement

### **Scope of EMS**

*(ISO 14001:2015 Standard Clause 4.3)*

The EMS applies to areas that SL Green has identified as the greatest opportunities for managing environmental impact and associated risk of its portfolio, including owned, directly managed, and indirectly managed buildings. These operational and maintenance areas include alternative transportation, exterior and hardscape management, landscaping and erosion management, building energy use, building water use, cooling tower management, solid waste management and recycling, refrigerants, green cleaning, integrated pest management, carbon footprint and GHG emissions, and conservation measures. Suburban, retail-only, and residential-only properties are not included in the EMS.

### **EMS Strategy**

*(ISO 14001:2015 Standard Clause 4.4)*

Our top goal is to reduce environmental impacts. This EMS is aligned with the ISO 14001 standard and follows a “Plan-Do-Check-Act” process to reduce our environmental impact.

#### **Step One: Plan**

The first stage of the ISO 14001:2015 Standard is **Plan**, during which we develop strategies and processes to optimize environmental performance. We implement environmental policies across all properties so that each building runs efficiently and sustainably. The SL Green ESG team plans and sets future goals based on stakeholder engagement, government regulations, and sustainability trends in the real estate market.

#### **Step Two: Do**

After the planning stage is complete, we move on to the **Do** process. Our team initiates the implementation of environmental policies and procedures across all properties to ensure they meet organizational and building-specific goals. Senior leadership and the ESG team are responsible for the development and implementation of environmental policies and procedures, and works with the engineering team, portfolio managers, property managers, suppliers, and vendors to ensure these policies are followed.

#### **Step Three: Check**

Once environmental policies and processes have been implemented, we begin the **Check** phase, which includes measuring progress and implementing corrective action plans. Senior Leadership is responsible for checking policy compliance with portfolio managers, property managers, suppliers, and vendors. They ensure building performance improves in alignment with the portfolio’s long-term goals. Corrective action is taken when a policy or procedure is not properly implemented at a property, or if a property does not conform to SL Green’s environmental standards.

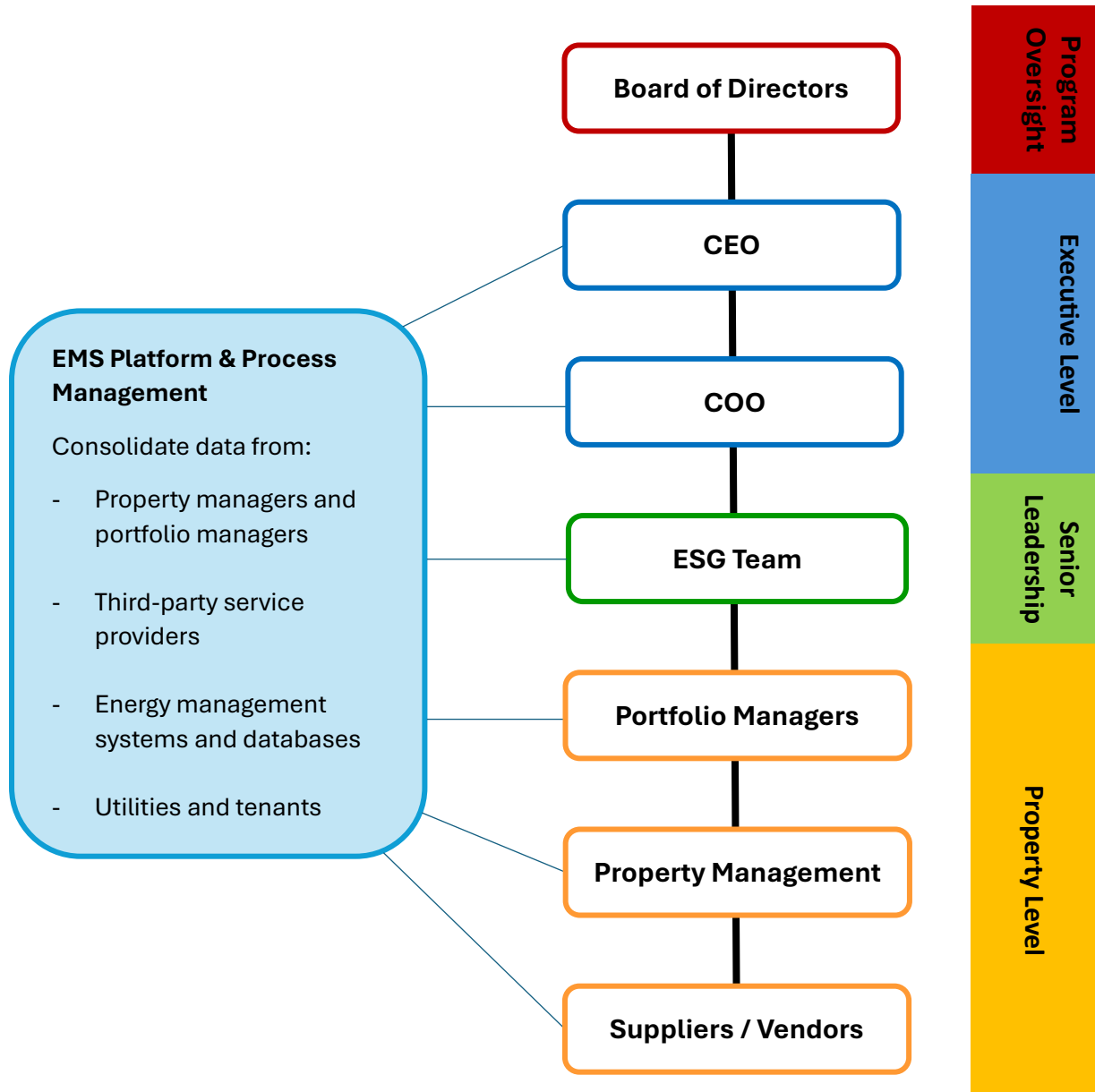
#### **Step Four: Act**

The final stage of the ISO 14001:2015 standard is **Act**. We have created communication procedures with the executive, senior, and property levels across the organization. These teams collaborate to ensure all properties are compliant with the EMS. If compliance is not achieved, these teams evaluate the situation and make necessary changes. Senior leadership is also responsible for evaluating the EMS periodically to ensure its continuing effectiveness and applicability.



**LEADERSHIP**

**SL Green EMS Implementation Organizational Chart**  
(ISO 14001:2015 Standard Clause 5.3)



## **Responsibilities and Expectations**

*(ISO 14001:2015 Standard Clauses 5.1 & 5.3)*

The following section defines roles and responsibilities for implementing the EMS, including senior leadership and property management employees (property-level).

### **Senior Leadership**

Senior Vice President, Sustainability & Hospitality is responsible for:

- Endorsing the EMS implementation strategy established in the EMS Manual
- Establishing organizational-level sustainability goals and strategy
- Reporting on the performance of EMS

Senior Vice President, Director of Engineering is responsible for:

- Reviewing EMS performance targets and objectives
- Ensuring appropriate resource allocation to enable the effective operation and continual improvement of the EMS
- Identifying improvements for capital planning purposes

### **ESG Team**

The ESG team is responsible for:

- Working with all levels of the organization to ensure appropriateness of the EMS process
- Establishing standard operating procedures for collecting, collating, and annually assuring environmental data
- Reviewing trends as they relate to EMS goals and requirements
- Training key employees on EMS requirements, establishing process, and training applicable parties to properly utilize EMS
- Reviewing progress and effectiveness of EMS with Senior leadership

### **Portfolio Managers**

Portfolio Managers are responsible for:

- Building-level implementation of EMS requirements across property teams and third-party service providers
- Ensuring collection and provision of accurate data in alignment with EMS requirements
- Communicating issues and areas for improvement to ESG team and Senior Leadership
- Tracking and reporting sustainability performance quarterly

### **All Employees**

All employees are responsible for:

- Working in accordance with the documented environmental procedures and instructions, with specific responsibilities defined in individual procedures and instructions
- Reporting problems or deviations associated with environmental issues and the EMS to the ESG team

### **Environmental Policy**

*(ISO 14001:2015 Standard Clause 5.2)*

SL Green's Environmental Policy outlines our environmental commitments with respect to our operations, activities, and overall environmental performance. During the development of this policy, our team considered the applicability to the nature, scale, and environmental impacts of our activities, products, and services. The Policy is endorsed by SL Green's Senior Vice President, Sustainability & Hospitality, and the policy shall be reviewed during the annual management review meeting.

SL Green's Environmental Policy is to establish how we operate in ways that protect the environment surrounding our properties, minimize our broader environmental impacts, and promote environmental awareness among our stakeholders. We are also committed to implementing requirements aligned with third-party standards including LEED, ENERGY STAR, WELL, GRESB, the Sustainability Accounting Standards Board (SASB), the Task Force on Climate-related Financial Disclosures (TCFD), and the Global Reporting Initiative (GRI). The Environmental Policy provides a framework for setting and reviewing objectives and targets and is maintained and communicated to all SL Green employees and contractors. *Please refer to our Environmental Policy maintained on our website for further information.*

## **PLANNING**

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### **Actions to Address Risks and Opportunities**

*(ISO 14001:2015 Standard Clause 6.1)*

As part of SL Green's commitment to enhancing the resilience of our properties, we have established comprehensive procedures to effectively manage and respond to climate-related impacts across our business. Central to this approach is the annual assessment of our climate-related risks and opportunities with regular disclosure informed by the TCFD recommendations. We evaluate physical and transition climate-related risks as well as climate transition opportunities.

Our procedures encompass a range of potential impacts, including those stemming from natural disasters such as storms, heatwaves, hurricanes, flooding, and other severe weather. We recognize that the intensity of weather events and the rise in sea levels have the potential to impact our properties, operations, and overall business. *Please refer to our latest TCFD reporting for further information.*

We manage potential risks through meticulous adherence to local, state, and federal compliance obligations, and we recognize that robust environmental stewardship allows us to maximize our value to our stakeholders including tenants, investors, and employees. *Please refer to our annual ESG reporting and 10-K for further information.*

### **Environmental Aspects**

*(ISO 14001:2015 Standard Clause 6.1.2)*

The planning process begins with identifying and updating the aspects of SL Green's facilities, activities, products, or services that can interact with the environment. To evaluate environmental impacts, SL Green establishes, implements, and maintains a procedure to identify the environmental aspects of its activities, products, or services that it can control and influence. This accounts for planned or new developments and

new activities, products, and services. Significant environmental aspects include:

- Building energy use
- Building water use
- Solid waste management and recycling
- Conservation measures
- Cooling tower management
- Refrigerant management
- Landscaping and erosion management
- Exterior and hardscape management
- Sustainable purchasing
- Green cleaning
- Integrated pest management
- Alternative transportation
- Carbon footprint and greenhouse gas emissions

Related to these environmental aspects, SL Green pursues and tracks the following where possible:

- Sustainable certifications and disclosures (e.g., LEED, BOMA 360, GRESB, GRI)
- Wellness certifications (e.g., WELL, Fitwel)
- Green leases (e.g., IMT Standards)
- Energy benchmarking (e.g., ENERGY STAR)
- Implementation of energy conservation measures (i.e., New York City Local Law 87)
- Annual tenant energy disclosure (i.e., New York City Local Law 84) and submetering of tenant spaces greater than 5,000 square feet (i.e., New York City Local Law 88)

SL Green will ensure that all environmental aspects that may pose significant impacts and are under our control are prioritized for improvements.

### **Compliance Obligations**

*(ISO 14001:2015 Standard Clause 6.1.3)*

SL Green complies with all applicable local, state, and federal environmental regulations related to our identified environmental aspects. Our portfolio managers, engineering team, and ESG team ensure that our environmental compliance obligations are tracked, monitored for updates, and fulfilled across all our properties. We maintain records of our environmental compliance obligations and compliance actions at each of our buildings.

### **These comprehensive compliance obligations include but are not limited to:**

- NYC Local Law 97: Emissions Reductions
- NYC Local Law 92/94: Green & Solar Roof Requirements
- NYC Local Law 88: Lighting Upgrades & Sub-metering
- NYC Local Law 87: Energy Audit & Retrocommissioning
- NYC Local Law 84: Benchmarking & Energy Efficiency Rating
- NYC Local Law 77: Cooling Tower Registration & Maintenance
- NYC Local Law 33/95: Building Energy Efficiency Rating
- NYC Local Law 32: No.4 Oil Phaseout

- NYC Local Law 154: All-Electric Buildings
- Rules of the City of New York (RCNY) Title 16: Solid Waste Management & Recycling
- Rules of the City of New York (RCNY) Title 15: Wastewater Disposal
- NYSDEC – 6 NYCRR New York’s Environmental Regulations
  - Chapter I – Fish and Wildlife (Parts 1-189)
  - Chapter II – Lands and Forests (Parts 190-199)
  - Chapter III – Air Resources (Parts 200-317)
  - Chapter IV – Quality Services (Parts 320-496)
  - Chapter V – Resource Management Services (Parts 500-614)
  - Chapter VI – General Regulations (Parts 615-624)
  - Chapter VII – State Aid (Parts 625-638)
  - Chapter VIII – Law Enforcement (Parts 641-642)
  - Chapter IX – Independent Agencies within the Department (Parts 645-648)
  - Chapter X – Division of Water (Parts 649-941)
- NYS Climate Leadership & Community Protection Act (CLCPA)
- NYS Clean Indoor Air Act
- Standards for Universal Waste Management: 40 CFR Part 273
- Safe Drinking Water Act: 40 CFR Part 141-142
- Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA): 40 CFR Part 171.4 & 40 CFR Part 171.5
- Emergency Planning & Community Right to Know Act (EPCRA): 40 CFR 350-372
- Asbestos Abatement & Record-Keeping: 40 CFR 61.145

### ***Environmental Objectives and Strategy***

*(ISO 14001:2015 Standard Clause 6.2)*

Based on SL Green’s Environmental Policy and its significant environmental aspects, all stated objectives and targets shall be established, implemented, and maintained across every department and level within SL Green from its facilities to its operations.

When establishing and reviewing its objectives, SL Green shall take into consideration financial, business, operational, and legal requirements, significant environmental aspects, technological options, and stakeholder engagement. The programs shall designate the responsibility for achieving objectives and targets at each department and level of the company, along with implementation procedures and timeline.

The Senior Vice President, Sustainability & Hospitality shall approve the objectives, targets, and programs proposed before implementation. The objectives and targets are measured if possible, and progress towards achieving them is continually monitored and reviewed. The achievement of objectives, targets, and programs shall be reviewed by the Vice President, Director of Sustainability, Senior Vice President, Director of Engineering, and ESG team annually.

SL Green shall update the programs as appropriate for new projects and new or modified activities, products, or services to ensure that environmental management applies to such projects and activities. In the event that objectives and targets in the programs are not met, the program shall be revised as necessary, and documented evidence will be maintained for the corrective actions taken.

The documents from all obsolete objectives, targets, and programs shall be maintained as an EMS record for three to five years. Specific organizational targets are outlined in our Environmental Policy. Building-level

targets and initiatives are outlined within the applicable plan or policy associated with the specific environmental aspect.

**For list full list of applicable procedures, reference:**

*Normative References – SL Green Environmental Plans, Policies, and Procedures*

## **SUPPORT**

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### **Resources, Roles, Responsibilities, and Authority**

*(ISO 14001:2015 Standard Clause 7.1)*

The implementation of the EMS requires SL Green to clearly define roles, responsibilities, and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

Responsibilities at the building level and portfolio level are clearly outlined within each environmental plan, policy, and procedure referenced below.

SL Green’s ESG, engineering, and operations teams shall commit to providing resources (including educational opportunities, organizational infrastructure, and technological and financial resources) essential to EMS implementation and control. The roles, responsibilities, and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

The ESG team shall have defined roles, responsibilities, and authority for ensuring that an EMS is established, implemented, and maintained in accordance with the requirements of the ISO 14001 Standard. These employees are responsible for reporting to senior leadership on the performance of the EMS and providing recommendations for improvement.

**For list full list of applicable procedures reference:**

*Normative References – SL Green Environmental Plans, Policies, and Procedures*

### **Competence, Training, and Awareness**

*(ISO 14001:2015 Standard Clauses 7.2 & 7.3)*

SL Green shall ensure all persons performing tasks that may have a significant impact on the environment are sufficiently educated and trained. This standard applies to SL Green employees, contractors, sub-contractors, and temporary staff. SL Green shall establish, implement, and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programs to ensure awareness and competence at each relevant function and level by addressing:

- The roles and responsibilities in achieving conformity with the EMS;
- The importance of conformity with the Environmental Policy and the procedures and the requirements of the EMS;
- The significant environmental aspects and related impacts, as well as the environmental benefits, of improved personal performance; and

- The potential consequences of departure from specified operating procedures.

## **Communication**

*(ISO 14001:2015 Standard Clause 7.4)*

For internal communication, information regarding the EMS (i.e., the policy, objectives, targets, and programs) is readily available to employees in annual reports, company websites, and email updates. Employees with inquiries or complaints regarding the EMS or environmental issues shall inform their supervisor or the ESG team. The ESG team shall maintain a log(s) for review and consideration.

For external communication, the Environmental Policy and EMS Manual are available at the corporate office and company website. All internal and external inquiries, complaints, and communications shall be discussed and reviewed during EMS review meetings with the Operations team.

The SVP, Sustainability & Hospitality will discuss the impacts of the complaints and inquiries and will communicate externally if there is a relevant and significant environmental impact. If the decision is to communicate, methods for this external communication involve publishing environmental reports or other related documents to the website.

## **Documented Information**

*(ISO 14001:2015 Standard Clause 7.5)*

The EMS documentation shall include the following as required by ISO 14001:

- Scope of EMS
- Environmental Policy
- Risks and opportunities
- Information on significant environmental aspects,
- Compliance obligations
- Environmental objectives
- Operational control
- Emergency preparedness and response
- Records of training, skills, experience, and qualifications
- Evidence of communication
- Monitoring performance results
- Evidence of compliance evaluation results
- Management review results
- Nonconformities and corrective action

Documentation will also include additional documents and records determined by the company to be necessary to ensure the effective functioning, maintenance, and improvement of the EMS.

## **Document Control**

*(ISO 14001:2015 Standard Clause 7.5.3)*

Records shall be maintained to keep track of SL Green's environmental performance, to demonstrate conformity to the requirements of the EMS, to maintain audit trails in accordance with the requirements of the ISO 14001 Standard, and to document the results achieved.

SL Green shall establish, implement, and maintain a procedure to denote the identification, storage, protection, retrieval, retention, and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product, or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss. The retention period of each type of environmental record shall be specified. SL Green shall utilize a tracking platform for the purposes of control of records and will ensure records are retained for a minimum of three years.

The purposes of these EMS documents are as follows:

<b>Environmental Policy</b>	Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements, and pollution prevention.
<b>Environmental Management System Manual (EMS Manual)</b>	Describes the Environmental Management System and outlines how the requirements of the International Standard (ISO 14001) are achieved.
<b>Objective(s)</b>	The overall environmental goals that SL Green sets to achieve.
<b>Target(s)</b>	The set of measurable performance requirements that SL Green establishes to achieve the objectives.
<b>Program(s)</b>	The program and schedule SL Green implements to achieve the objectives and targets.
<b>Environmental Procedures (EPs)</b>	Define the roles, responsibilities, and actions to be taken to ensure that activities are performed, and the EMS implemented in accordance with the Environmental Policy and the requirements of ISO 14001.
<b>Register of Environmental Aspects</b>	Compiles the environmental aspects that are derived from the activities and services of SL Green. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects.
<b>Register of Legal and Other Requirements</b>	Compiles the legal and other requirements, which include legislation, codes of practice, and regulatory and non-regulatory guidelines that are applicable to SL Green.
<b>Environmental Instructions (EIs)</b>	Describe which and how activities should be performed to manage significant environmental aspects and to achieve the ISO 14001 requirements for the EMS.
<b>Environmental Forms/Records</b>	Record information for the audit trail and the assessment of environmental conditions and performance.

## OPERATION

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### **Operational Control and Methodology**

*(ISO 14001:2015 Standard Clause 8.1)*

SL Green shall establish, implement, and maintain operational control procedures to manage its significant environmental aspects. SL Green shall ensure that all operations and activities carried out by its employees or contractors that are associated with the significant environmental aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and



Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. SL Green shall monitor its staff and contractors by communicating its Environmental Policy and other relevant EPs and EIs.

### ***Emergency Preparedness***

*(ISO 14001:2015 Standard Clause 8.2)*

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, Security & Life Safety leads our health and safety efforts with oversight from the Chief Operating Officer. 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.

Responsiveness to emergencies relies on readiness, resulting from a combination of training and procedures. Construction, engineering, property management, and security 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.

SL Green maintains several standard operating procedures 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 Plans

## PERFORMANCE EVALUATION

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### **Monitoring, Measurement, Analysis, and Evaluation**

*(ISO 14001:2015 Standard Clause 9.1)*

SL Green shall establish, implement, and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking performance, applicable operational controls, and conformity with the company's objectives and targets. SL Green shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained for all applicable environmental aspects, such as energy, water, and gas meters.

### **Management Review**

*(ISO 14001:2015 Standard Clause 9.3)*

While implementing the EMS, SL Green shall monitor and measure the key characteristics of its operations and activities on a regular basis. All results, including instances of nonconformity, corrective action, and preventative actions, shall be recorded. As part of the checking process, a periodic audit of the EMS shall provide a basis for management review.

The "Plan-Do-Check-Act" cycle shall require SL Green's Senior Vice President, Sustainability & Hospitality, Vice President, Director of Sustainability, and the entire ESG team to review the EMS periodically to ensure its suitability, adequacy, and effectiveness.

Before the management review, the Director of Sustainability and ESG team shall schedule the meeting, communicate the meeting objectives to all participants, gather all relevant records, and prepare a summary report (if necessary) for discussion. The Senior Vice President, Sustainability & Hospitality and ESG team, together with the Senior Vice President, Director of Engineering, shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, operations and maintenance protocols, technology, preventative maintenance requirements, and lessons gained from previous experience.

Topics to be discussed in the management review shall include but not be limited to:

- Review of the Environmental Policy, objectives, targets, and programs;
- Review of legal compliance and compliance with other requirements (including contractor compliance with SL Green's standards);
- Environmental aspects of activities and public disclosure;
- Review of nonconformities and the status of corrective or preventive actions;
- Communications from external interested parties, including complaints;
- Areas for improvement with respect to environmental performance;
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects;
- Plans for growth, expansion, or restructuring within SL Green and how it relates to environmental aspects;
- Identify the need for modification of the existing EMS in light of the above items; and
- Follow up action from previous management reviews.

The review shall initiate a new “Plan-Do-Check-Act” cycle with improvements in SL Green’s environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and retained as an EMS record.

## **IMPROVEMENT**

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### ***Nonconformity, Corrective Action, and Continual Improvement***

*(ISO 14001:2015 Standard Clauses 10.2 & 10.3)*

Continual improvement of the EMS can be achieved by identifying, correcting, and preventing instances of nonconformity. SL Green shall establish, implement, and maintain procedures for dealing with actual and potential nonconformities and for taking corrective action and preventive action. The procedures shall define requirements for:

- Identifying and correcting nonconformities and taking actions to mitigate their environmental impacts;
- Investigating nonconformities, determining their causes, and taking actions in order to avoid their recurrence;
- Evaluating the need for actions to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence;
- Recording the results of corrective actions and preventive actions taken; and
- Reviewing the effectiveness of corrective actions and preventive actions taken.

Actions taken shall be appropriate to the magnitude of the environmental impacts. SL Green shall ensure that any necessary changes are made to EMS documentation.