



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

Revision No.: 6  
Date: December 19, 2019

Conforms to ISO 14001:2015



## INTRODUCTION

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### ***Company Profile***

SL Green Realty Corp., an S&P 500 company and New York City's largest office landlord, is a fully integrated real estate investment trust, or REIT, that is focused primarily on acquiring, managing and maximizing value of Manhattan commercial properties.

As of September 30, 2019, SL Green held interests in 93 Manhattan buildings totaling 45.0 million square feet. This included ownership interests in 27.2 million square feet of Manhattan buildings and 17.8 million square feet securing debt and preferred equity investments.

The Board of Directors of SL Green sets high standards for the company's employees, officers, and directors. Implicit in this philosophy is the importance of sound corporate governance. It is the duty of the Board of Directors to serve as a prudent fiduciary for shareholders and to oversee the management of the company's business. To fulfill its responsibilities and to discharge its duty, the Board of Directors follows the procedures and standards that are set forth in these guidelines. These guidelines are subject to modification from time to time as the Board of Directors deems appropriate in the best interests of the company, or as required by applicable laws and regulations.

### ***Purpose of this Manual***

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

- The Environmental Policy;
- Statements of responsibility and authority;
- An overview of the company's environmental procedures and controls;
- The identification of the resources and training allocated to management, performance of work, and verification activities including internal audit;
- The appointment of the Environmental Management Representative (EMR); and
- The arrangement for periodic management reviews.

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

## SCOPE

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### ***Scope of the Environmental Management System (EMS)***

The scope of the EMS applies to key areas that SL Green has identified as 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, energy consumption, water consumption, cooling tower management, solid waste management and diversion, refrigerants, sustainable purchasing, green cleaning, integrated pest management, energy efficiency upgrades, and conservation measures.

### ***Environmental Policy***

#### **SL Green Environmental Policy**

SL Green is committed to protecting the environment and mitigating greenhouse gas emissions. Our policies cover the Environmental, Social, and Governance aspects of our portfolio.

SL Green's strategy to minimize its environmental impact is outlined below:

- Comply with all applicable legal requirements and other requirements to which SL Green subscribes which relate to its environmental aspects.
- Implement policies that protect our employees' rights and support the continual improvement of training and education for all SL Green employees.
- Promote continual stakeholder engagement and provide organizational transparency.
- Prevent pollution, cut greenhouse emissions, reduce waste, and minimize the consumption of resources throughout all of its existing operations and facilities.
- Educate, train, and motivate employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among our suppliers, subcontractors, clients, and tenants.
- Provide a framework for continuously setting and reviewing environmental objectives and targets.

SL Green is committed to the continual improvement of its environmental performance. This Policy will be documented, implemented, maintained, and communicated to all staff, contractors, and suppliers, and be made publicly available.

Endorsed by

A handwritten signature in black ink, appearing to read 'Laura Vulaj', is written over a horizontal line.

Laura Vulaj, Senior Vice President and Director of Sustainability

Date: December 19, 2019

## ***Sustainability Strategy***

Our top goals are to reduce environmental impacts through four sustainable steps. This EMS is aligned with the ISO 14001 standard and follow a “Plan-Do-Check-Act” process.

### **Step One: Plan**

The first stage of the ISO 14001 Standard is Plan, where we develop strategies and processes to optimize environmental performance. We implement environmental policies across all properties so that each building is run efficiently and sustainably. The ESG and Engineering Teams plan and set future goals based on stakeholder engagement, governmental regulations, and sustainability trends in the real estate market.

### **Step Two: Do**

After the planning stage is complete, we move onto the Do process. Our team initiates the implementation of environmental policies and procedures across all properties to ensure that organizational and building-specific goals are met. Senior leadership (EMS and Engineering Teams) are responsible for the development and implementation of environmental policies and procedures, and work with Portfolio Managers, Property Managers, suppliers, and vendors to ensure that 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 that 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 is not performing up to SL Green’s environmental standards.

### **Step Four: Act**

The final stage of the ISO 14001 standard is Act. We have created communication procedures between 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 met, then 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.

## **Locations**

The locations included in the EMS are outlined below:

#	Address	SF
1	30 East 40 <sup>th</sup> Street	69,446
2	100 Church Street	1,047,500
3	110 East 42 <sup>nd</sup> Street	215,400
4	110 Greene Street	223,600
5	125 Park Avenue	604,245
6	220 East 42 <sup>nd</sup> Street	1,135,000
7	304 Park Avenue South	215,000
8	420 Lexington	1,188,000
9	461 Fifth Avenue	200,000
10	485 Lexington Avenue	921,000
11	555 West 57 <sup>th</sup> Street	941,000
12	625 Madison Avenue	563,000
13	635 Sixth Avenue	104,000
14	641 Sixth Avenue	163,000
15	711 Third Avenue	524,000
16	750 Third Avenue	780,000
17	810 Seventh Avenue	692,000
18	1185 Avenue of the Americas	1,062,000
19	1350 Avenue of the Americas	562,000
20	1 Madison Avenue	1,176,900
21	10 East 53 <sup>rd</sup> Street	345,300
22	11 Madison Avenue	2,314,000
23	100 Park Avenue	834,000
24	280 Park Avenue	1,219,158
25	800 Third Avenue	526,000
26	919 Third Avenue	1,454,000
27	215 Park Avenue South	333,340
28	245 Park Avenue	1,592,125
29	55 West 46 <sup>th</sup> Street	347,000
30	1515 Broadway	1,750,000
31	Worldwide Plaza	2,048,725
32	2 Herald Square	369,000

## **Exclusions**

Suburban, retail-only, and residential-only properties are not included in the EMS.

## NORMATIVE REFERENCES

### **Full List of SL Green’s Applicable Environmental Plans, Policies, and Procedures**

Table 1 – SL Green Environmental Plans, Policies, and Procedures

PROCEDURES	POLICY #	DATE IMPLEMENTED	LAST REVISED
Environmental Policy	EP-1	April 2015	October 2019
Building Exterior and Hardscape Management Plan	EP-2	September 2013	March 2017
Landscape, Erosion, and Exterior Pest Management Plan	EP-3	September 2013	March 2017
High-Performance Water Fixtures and Fittings Policy	EP-4	September 2013	March 2017
Water Meter Readings	EP-5	September 2013	September 2013
Cooling Tower Water and Chemical Management Policy	EP-6	September 2013	March 2017
ENERGY STAR Portfolio Manager Benchmarking	EP-7	September 2013	September 2013
Sustainable Purchasing Policy	EP-8	September 2013	March 2017
Solid Waste Management Policy	EP-9	September 2013	March 2017
Lamp Purchasing Policy	EP-10	September 2013	March 2017
Environmental Tobacco Smoke (ETS) Control Policy	EP-11	September 2013	March 2017
Green Cleaning Policy and High-Performance Green Cleaning Program	EP-12	September 2013	March 2017
Indoor Air Quality (IAQ) Management Plan for Facility Alterations and Additions	EP-13	September 2013	March 2017
Indoor Integrated Pest Management Plan	EP-14	September 2013	March 2017
Refrigerant, Greenhouse Gas (GHG), and Climate Change Policy	EP-15	October 2014	October 2014
Corporate Environmental Targets	EP-16	October 2014	October 2014
IMT Standards Review Policy	EP-17	October 2019	October 2019
Corporate Sustainability Policy	EP-18	September 2013	June 2019

## 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 policy 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.

## CONTEXT OF THE ORGANIZATION

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SL Green, an S&P 500 company and New York City's largest office landlord, is a fully integrated real estate investment trust, or REIT, that is focus primarily on acquiring, managing, and maximizing value of Manhattan commercial properties. As of September 30, 2019, SL Green held interests in 93 Manhattan buildings totaling 45.0 million square feet. This included ownership interests in 27.2 million square feet of Manhattan buildings and 17.8 million square feet securing debt and preferred equity investments.

Our sustainability initiatives incorporate Environmental, Social, and Governance aspects of our organization.

- **Environmental** – We make a conscious effort to improve New York City by minimizing our carbon footprint through emissions reductions, resource conservation, and operational excellence. We are leading the charge for a sustainable New York by developing standardized operating procedures, completing energy efficiency projects, and implementing cutting-edge technologies to optimize peak performance. As New York City's largest landlord, we remain committed to creating the most sustainable footprint to reduce resource consumption and mitigate environmental impacts. Our unrelenting focus on environmental stewardship for over two decades has advanced the quality of our portfolio, benefiting our partners, tenants, and the greater community.
- **Social** – Our partnerships extend beyond the confines of our offices and into the greater New York City community. We strive to be agents of goodwill through volunteerism and financial patronage. Our Social vision is enhancing the health and resiliency of our employees, tenants, and the community. At the forefront of our plans is creating a work 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. There is a shared accountability among SL Green's employees to operate 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.

SL Green is committed to Environmental, Social, and Governance initiatives that deliver value and health for our stakeholders. Structured around three key areas – Efficiency, Tenant Experience, and Industry Leadership – our market-leading program continues to minimize environmental impact and increase resiliency.

## ***Environmental Management System Requirements***

SL Green’s EMS is developed to manage significant environmental aspects to limit our impacts on the environment and reduce our overall carbon footprint. The EMS is established in accordance with ISO 14001:2015 and is described in this section. Procedures for each component are given in the relevant Environmental Procedures (EPs) listed in Appendix A.

## ***Environmental Management System Documents***

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. A cross-reference of the ISO 14001 clauses to the sections of this Manual is listed in Appendix A.
<b>Objective(s)</b>	The overall environmental goals that SL Green set 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. A cross-reference of the ISO 14001 clauses to the EPs is listed in Appendix A.
<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 EMS ISO 14001 requirements.
<b>Environmental Forms/Records</b>	Record information for the audit trail and the assessment of environmental conditions and performance.

### ***Scope of Environmental Policy***

SL Green's environmental policy is included on page 4 of this document. It 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 and Director of Sustainability, and the policy shall be reviewed during the annual management review meeting.

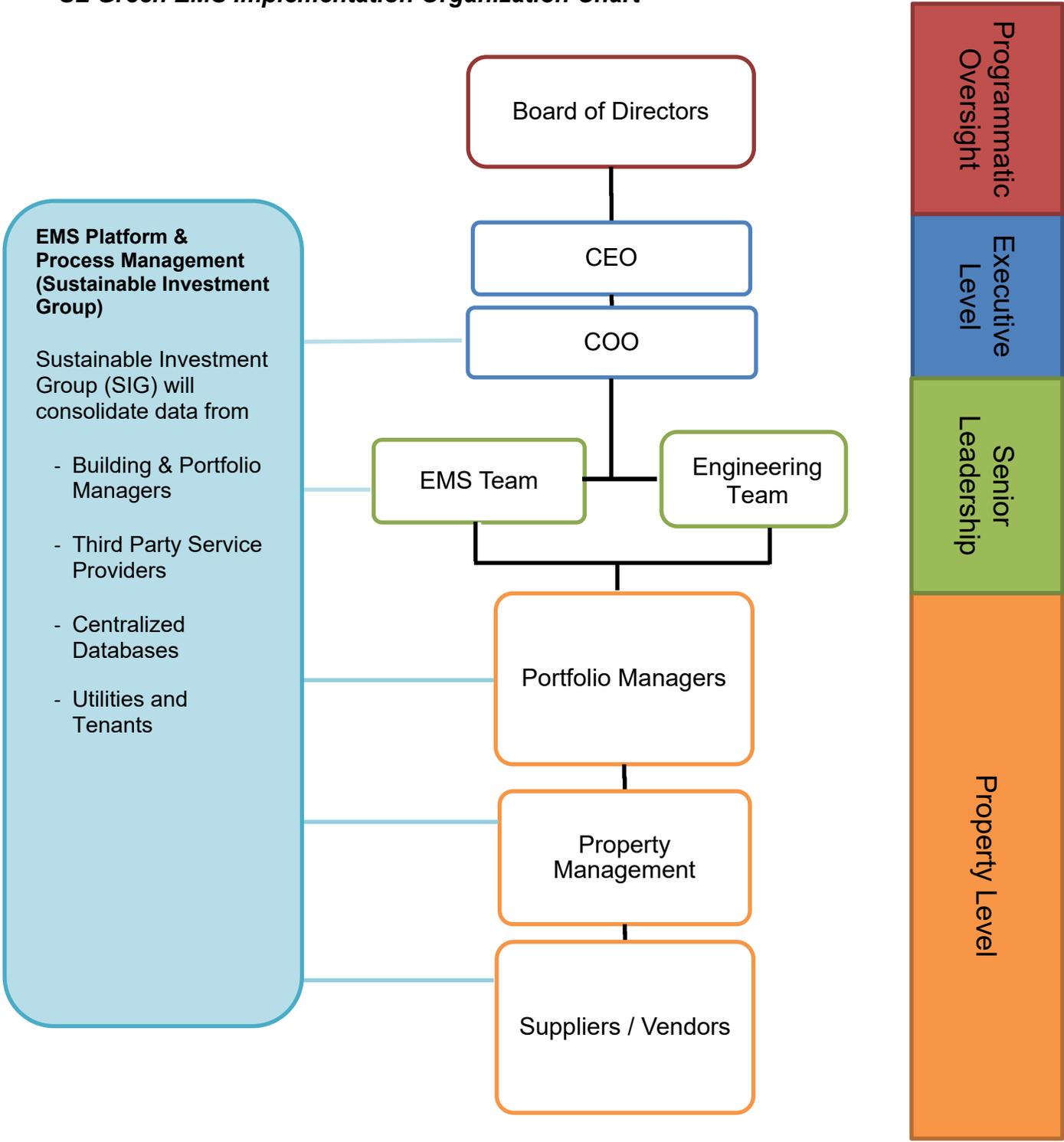
The policy will stipulate the commitments of SL Green. to continually improve our environmental management, energy and water efficiency, pollution prevention, and to comply with applicable legal requirements. We are also committed to implementing requirements aligned with third party standards including LEED, ENERGY STAR, WELL, Fitwel, GRESB, and GRI. The environmental policy shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented, and communicated to all SL Green employees and contractors. This policy will be publicly available on SL Green's website.

#### **Applicable Procedures:**

Environmental Policy – Page 4

**LEADERSHIP**

**SL Green EMS Implementation Organization Chart**



## ***Responsibilities and Expectations***

The following section defines the roles and responsibilities of the employees involved in implementing the EMS including Senior Leadership and Property Management employees (Property Level).

### **Senior Leadership**

Laura Vulaj, Senior Vice President and Director of Sustainability is responsible for:

- Endorsing the environmental policy;
- Establishing organizational level sustainability goals and strategy; and
- Reporting on the performance of EMS.

Richard Currenti, SVP 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; and
- Identify improvements for capital planning purposes.

### **Portfolio Managers**

Portfolio Managers for the SL Green portfolio 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 EMS manager and Senior Leadership; and
- Tracking and reporting sustainability performance quarterly.

### **All Employees**

All employees are responsible for:

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

### **EMS Manager**

The EMS Manager, Sustainable Investment Group, is responsible for:

- Working with all levels of the organization to ensure appropriateness of the EMS process, review data semi-annually for accuracy, review data trends as they related to EMS goals and requirements;
- Training key employees on EMS requirements, establishing process, and training applicable parties to properly utilize EMS; and
- Reviewing progress and effectiveness of EMS with Senior Leadership.

## PLANNING

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

SL Green follows a “Plan-Do-Check-Act” process to facilitate continual environmental performance improvements. The planning process includes identifying and updating of SL Green’s Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with SL Green’s environmental policy, objectives and targets are established, and appropriate programs are implemented to achieve these objectives and targets.

### **Environmental Aspects**

The planning process commences with the identification and updating of environmental aspects, SL Green’s facilities, activities, products, or services that can interact with the environment. In order to evaluate the impacts of its activities to the environment, 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, or new activities, products and services.

Such critical environmental aspects 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
- Sustainable Purchasing
- Green Cleaning
- Integrated Pest Management
- Carbon Footprint and Greenhouse Gas Emissions



Additionally, related to these environmental aspects, SL Green will pursue and track the following where possible:

- Sustainable certifications (i.e., LEED, BOMA 360, GRESB, GRI)
- Wellness certifications (i.e., WELL, Fitwel)
- Green Leases (i.e., IMT Standards)
- Energy benchmarking (i.e., 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 submeter 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 post significant impacts to the environment are under control and prioritized for improvements.

SL Green will keep this information and documentation up-to-date.

## Global Reporting Initiative

The Global Reporting Initiative (GRI) advocates for the use of sustainability reporting as a pathway for organizations to become more sustainable and contribute to future sustainable development. A sustainability report allows an organization to disclose sustainability-related information on an organization’s most critical environmental, social, and economic aspects. By utilizing GRI reporting, SL Green is able to standardize information that is reliable and applicable to help assess opportunities, quantify risks, and facilitate data-driven decision-making within the organization and with external stakeholders.

## Stakeholder Engagement

SL Green identifies stakeholders as those who affect SL Green’s business, and those who are potentially affected by the business. The following table includes examples of topics raised by SL Green’s stakeholders:

STAKEHOLDER GROUP	ENGAGEMENT FREQUENCY	ENGAGEMENT METHOD	TOPICS RAISED
Board of Directors	Annual	<ul style="list-style-type: none"> <li>→ Sustainability Report</li> <li>→ Institutional Investor Conference</li> <li>→ Annual Presentation</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Local Community, Economic Performance, Environmental Compliance, Socioeconomic Compliance</li> </ul>
Employees	Ongoing	<ul style="list-style-type: none"> <li>→ Annual Town Hall</li> <li>→ Annual Employee Survey</li> <li>→ Ongoing Program Updates</li> <li>→ Training and Education</li> <li>→ Volunteerism</li> </ul>	<ul style="list-style-type: none"> <li>→ Freedom of Association and Collective Bargaining, Diversity, Nondiscrimination, Equal Pay, Occupational Health and Safety, Employment, Training and Education, Child Labor, Forced or Compulsory Labor, Labor/Management Relations</li> </ul>
Executive Team	Monthly	<ul style="list-style-type: none"> <li>→ Annual Presentation</li> <li>→ Institutional Investor Conference</li> <li>→ Quarterly Status Report</li> <li>→ Annual Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Effluents and Waste, Local Community, Economic Performance, Environmental Compliance, Socioeconomic Compliance</li> </ul>
Industry Peers	Ongoing	<ul style="list-style-type: none"> <li>→ Joint Ventures</li> <li>→ Sustainability Committees</li> <li>→ Trade Associations</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Environmental Compliance, Effluents and Waste, Public Policy, Local Community, Customer Privacy, Economic Performance, Indirect Economic Impacts</li> </ul>
Investors	Ongoing	<ul style="list-style-type: none"> <li>→ Annual Report &amp; 10-K</li> <li>→ Proxy Statement</li> <li>→ Sustainability Report</li> <li>→ Sustainability Website Updates</li> </ul>	<ul style="list-style-type: none"> <li>→ Economic Performance, Anti-corruption, Environmental Compliance, Socioeconomic Compliance, Diversity</li> </ul>
Local Community	Ongoing	<ul style="list-style-type: none"> <li>→ Philanthropy</li> <li>→ Volunteerism</li> <li>→ Business Improvement Districts</li> <li>→ Civic Engagement</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Effluents and Waste, Indirect Economic Impacts, Local Community, Biodiversity, Public Policy</li> </ul>
Sustainability Consultant	Ongoing	<ul style="list-style-type: none"> <li>→ Energy Management</li> <li>→ Green Building Certification</li> <li>→ Sustainability Policy Development</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Environmental Compliance, Effluents and Waste, Public Policy, Supplier Environmental Assessment</li> </ul>
Tenants	Ongoing	<ul style="list-style-type: none"> <li>→ Town Hall</li> <li>→ Biannual Tenant Satisfaction Survey</li> <li>→ Newsletter and Webinar</li> <li>→ Green Building Certification</li> </ul>	<ul style="list-style-type: none"> <li>→ Security, Customer Health and Safety, Materials, Energy, Emissions, Procurement Practices, Customer Privacy</li> </ul>
Vendors	Ongoing	<ul style="list-style-type: none"> <li>→ Energy Management</li> <li>→ Green Building Certification</li> <li>→ Training and Education</li> </ul>	<ul style="list-style-type: none"> <li>→ Energy, Emissions, Water, Environmental Compliance, Effluents and Waste</li> </ul>

**Materiality**

SL Green performed a complete materiality assessment that was informed by stakeholder engagement processes. This assessment involved highlighting the sustainability topics that were most meaningful to stakeholders and relevant to our company. The chosen aspects were then paired with the respective GRI key performance indicators in the materiality matrix below.



Source: SL Green 2019 Sustainability Report

## ***Objectives, Targets, and Program(s)***

Based on the environmental policy and significant environmental aspects, objectives and targets shall be established, implemented, and maintained across every department and level within SL Green from its facilities to its operations. Programs are established, implemented, and maintained for achieving environmental objectives and targets.

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 designate the responsibility for achieving objectives and targets at each department and level of the company, along with implementation procedures and timeline.

The Director of Sustainability shall approve the objectives, targets, and programs proposed before implementation. The objectives and targets are measured if possible, and progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets, and programs shall be reviewed by the Assistant Director of Sustainability, SVP of Engineering, and EMS Manager semi-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 3 – 5 years. Organizational targets are outlined in EP-16 (Corporate Environmental Targets). 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:**

Table 1 – SL Green Environmental Plans, Policies, and Procedures – Page 7

## ***Implementation and Operation***

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

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

Table 1 – SL Green Environmental Plans, Policies, and Procedures – Page 7

## SUPPORT

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### ***Resources, Roles, Responsibility and Authority***

SL Green's Sustainability and Engineering Teams shall commit to provide resources (including educational opportunities, organizational infrastructure, and technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities, and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

The Director of Sustainability and the Senior Vice President of Engineering of SL Green shall appoint a specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities, and authority for ensuring that an environmental management system 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 environmental management system and providing recommendations for improvement.

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

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

Table 1 – SL Green Environmental Plans, Policies, and Procedures – Page 7

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

SL Green shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training, and experience, and shall retain associated records.

SL Green will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff, and remote workers, have been assessed for competence and compliance with SL Green's environmental standards.

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 environmental management system;
- The importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;
- The significant environmental aspects and related impacts, and the environmental benefits of improved personal performance; and
- The potential consequences of departure from specified operating procedures.

## ***Communication***

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 newsletters.

Employees with enquiries or complaints regarding the EMS or environmental issues shall inform their supervisor or EMS Manager. The designated EMS Manager representing each division shall maintain a log for review and consideration.

For external communication, the environmental policy is available at the corporate office and company website. All internal and external enquiries, complaints, and communications shall be discussed and reviewed during EMS review meetings with the Operations Team.

The Director of Sustainability may discuss and decide whether to communicate externally about its significant environmental aspects. The decision shall be documented in the meeting minutes. If the decision is to communicate, methods for this external communication involve publishing environmental reports or other related documents to the website.

## ***Documented Information***

The EMS documentation shall include:

- The environmental policy, objectives, and targets,
- Description of the scope of the environmental management system,
- Description of the main elements of the environmental management system and their interaction, and reference to related documents,
- Documents, including records, required by the International Standard
  - Conventions on environmental policy,
  - Objectives and targets,
  - Information on significant environmental aspects,
  - Information on processes,
  - Organizational chart; and
  - Internal and external standards.
- Documents, including records, determined by the organization to be necessary to ensure the effective planning, operation, and control of processes that relate to its significant environmental aspects.

## ***Control of Documents***

The EMS documentation controls are:

- They shall be reviewed, revised as necessary, and approved for adequacy by authorized personnel and EMS Manager;
- That current version of relevant documents shall be available on an Environmental Management System Platform where operations essential to the effective functioning of the environmental management system are performed;
- That documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- Obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- Any obsolete documents retained for legal or knowledge preservation purposes shall be suitably identified.

SL Green shall ensure that documentation is legible, dated (with dates of revision), and readily identifiable, maintained in an orderly manner, and retained for a specified period. SL Green shall establish, implement, and maintain a procedure for the creation and modification of the various types of documents, and assign designated employees these respective responsibilities.

## OPERATION

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### ***Operational Control and Methodology***

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.

### ***Checking***

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 action, shall be recorded. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

## PERFORMANCE EVALUATION

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### ***Monitoring, Measuring, Analysis and Evaluation***

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 of 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.

### ***Annual Quality Assurance Review***

*(ISO 14001 Standard Clause 4.5.5)*

SL Green shall plan, establish, implement, and maintain a program and procedures to carry out periodic environmental management system audits to:

- Determine whether or not the environmental management system:
  - Conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
  - Has been properly implemented and maintained.
- Provide audit results and information for management review for environmental improvement.

The audit program, including the schedule, shall be based on the environmental importance of the relevant activities and results from previous audits. The audit procedures cover the audit criteria, scope, frequency, and methods, as well as responsibilities and requirements for conducting audits, reporting results, and retaining associated records.

SL Green shall conduct EMS audits on a regular basis, but not more frequently than on an annual basis. Periodic audits are required to ensure appropriate preventive actions are being taken and that corrective actions are being carried out on a timely basis. Processes will be audited based on policies developed for each environmental metric and relevant procedure. SL Green will utilize a tracking platform to assess the achievement of goals, ensure data quality, and identify data gaps.

### ***Management Review***

*(ISO 14001 Standard Clause 4.6)*

The "Plan-Do-Check-Act" cycle shall require SL Green's Director of Sustainability and EMS Manager to review the environmental management system periodically to ensure its suitability, adequacy, and effectiveness.

Before the Management Review, the Director of Sustainability and EMS Manager 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 Director of Sustainability and EMS Manager, together with the Assistant Director of Sustainability and Senior Vice President 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;
- Findings of the internal audits;
- 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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### ***Continuous Improvement***

*(ISO 14001 Standard Clause 4.5.3)*

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 procedure(s) 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 encountered. SL Green shall ensure that any necessary changes are made to environmental management system documentation.

### ***Control of Records***

*(ISO 14001 Standard Clause 4.5.4)*

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 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 records 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 3 years.

## **Appendix: Environmental Operating Procedures**

EP-1 – Environmental Policy

EP-2 – Building Exterior and Hardscape Management Plan

EP-3 – Landscape, Erosion, and Exterior Pest Management Plan

EP-4 – High-Performance Water Fixtures and Fittings Policy

EP-5 – Water Meter Readings

EP-6 – Cooling Tower Water and Chemical Management Policy

EP-7 – ENERGY STAR Portfolio Manager Benchmarking

EP-8 – Sustainable Purchasing Policy

EP-9 – Solid Waste Management Policy

EP-10 – Lamp Purchasing Policy

EP-11 – Environmental Tobacco Smoke (ETS) Control Policy

EP-12 – Green Cleaning Policy and High-Performance Green Cleaning Program

EP-13 – Indoor Air Quality (IAQ) Management Plan for Facility Alterations and Additions

EP-14 – Indoor Integrated Pest Management Plan

EP-15 – Refrigerant, Greenhouse Gas (GHG), and Climate Change Policy

EP-16 – Corporate Environmental Targets

EP-17 – IMT Standards Review Policy

EP-18 – Corporate Sustainability Policy



# Environmental Policy

SL Green

## SCOPE

This plan outlines the environmental commitments of SL Green with respect to its operations, activities, and overall environmental performance. During the development of this policy, the team considered the applicability to the nature, scale and environmental impacts of SL Green activities, products, and services. The policy is endorsed by the Director of Sustainability for SL Green and the policy shall be reviewed during the management review meeting. The policy shall stipulate the commitments of SL Green to continually improve its environmental management, energy and water efficiency, and pollution prevention. SL Green is also committed to comply with applicable legal requirements and other requirements to which SL Green subscribes which relate to its environmental aspects.

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Environmental Policy

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**SL Green Environmental Policy**

SL Green is committed to protecting the environment and mitigating greenhouse gas emissions. Our policies cover the Environmental, Social, and Governance aspects of our portfolio.

SL Green's strategy to minimize its environmental impact is outlined below:

- Comply with all applicable legal requirements and other requirements to which SL Green subscribes which relate to its environmental aspects.
- Implement policies that protect our employees' rights and support the continual improvement of training and education for all SL Green employees.
- Promote continual stakeholder engagement and provide organizational transparency.
- Prevent pollution, cut greenhouse emissions, reduce waste, and minimize the consumption of resources throughout all of its existing operations and facilities.
- Educate, train, and motivate employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among our suppliers, subcontractors, clients, and tenants.
- Provide a framework for continuously setting and reviewing environmental objectives and targets.

SL Green is committed to the continual improvement of its environmental performance. This Policy will be documented, implemented, maintained, and communicated to all staff, contractors, and suppliers, and be made publicly available.

Endorsed by



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Laura Vulaj, Senior Vice President and Director of Sustainability

Date: December 19, 2019



# Building Exterior and Hardscape Management Plan

SL Green

## SCOPE

This plan applies to the entire building exterior and hardscapes of each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M SSc2: Maintenance Equipment, Cleaning Chemicals, Paints and Sealants, Snow Removal and Deicers. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

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Achieving the following performance expectations will minimize the negative impact of site management practices on the ecosystem and the building users.

- a. Maintenance Equipment – reduce energy and water waste; reduce air quality and noise pollution.
  - i. **Use human powered or low-impact tools for 100% of events.**
- b. Cleaning Chemicals – reduce land and water pollution from chemical runoff.
  - i. **Use Green Seal Certified products for 100% of cleaning chemicals.**
- c. Paints and Sealants – reduce air pollution and protect user’s health.
  - i. **Use no- or low-VOC products for 100% of paints and sealants.**
- d. Snow Removal and Deicers – reduce land and water pollution from chemical runoff.
  - i. **Use low impact techniques for 100% of snow and ice removal.**

## Performance Metrics

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Documentation expectations to verify goal achievement.

- a. Maintenance Equipment - **HOURS**
  - i. Date of use, type of equipment and/or low-impact strategies, and hours of use for all equipment is recorded by the responsible party and reported to the property manager.
- b. Cleaning Chemicals - **COST**
  - i. Product name, sustainable certifications of cleaners used, and cost of all chemicals are recorded by the responsible party and reported to the property manager.
- c. Paints and Sealants – **COST**
  - i. Product name, VOC content of paints or sealants used, and cost of all paints/sealants are recorded by the responsible party and reported to the property manager.
- d. Snow Removal and Deicers – **WEIGHT**
  - i. Type and weight of deicer used are recorded by the responsible party and reported to the property manager.

## Implementation

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Procedures, Guidance, and Strategies for sustainable performance

- a. Low-Impact Maintenance Equipment Strategies
  - i. Human-powered equipment is preferred for all activities. Brooms and shovels should be used to keep hardscapes free of daily debris or snow.
  - ii. Low-Impact equipment is defined as having human powered, or having any one of the following characteristics: electric/battery powered, low-emission, or low-decibel.
    1. Low-emission is defined as either: propane/ bio-diesel fueled, or cleaner than EPA and/or CARB exhaust emission standards.
    2. Low-decibel equipment must operate at a sound level of < 70 dBa.

- iii. Mulching mowers shall be used on turf areas to return clippings into the earth. Turf areas shall be hand weeded.
- iv. Electric powered pressure washers may be used on an infrequent basis to clean the building exterior and hardscapes. Low-Impact guidelines include: sweeping debris prior to the use of the pressure washer, ensuring no trash enters the storm drainage systems, spraying in the direction of vegetation such that the excess water is used for irrigation, using only water or a low-impact cleaning chemical compliant with guidelines below.
- v. If no alternative exist, conventional gas-powered equipment used for rare events must be regularly maintained to ensure performance is met per manufacturer's documentation. Reduce air emissions by using low smoke oil in all equipment. For equipment with two-cycle engines, use models with advanced design features, such as direct fuel injection engines and exhaust power valves.
- b. **Cleaning Chemical Guidance**
  - i. When water alone is insufficient, use bio-degradable and low-impact cleaning products that meet requirements of LEED EBO&M IEQc3.3 Green Cleaning, Sustainable Cleaning Products and Materials, including the following standards:
    - 1. General purpose/bathroom/glass and carpet cleaners - Green Seal GS-37
    - 2. Cleaning and degreasing compounds - Environmental Choice CCD 110,
    - 3. Hard surface cleaners - Environmental Choice CCD 146
    - 4. Carpet and upholstery care - Environmental Choice CCD 148
    - 5. Industrial and institutional floor care products – Green Seal GS-40
    - 6. Digestion additives for cleaning and odor control - Environmental Choice CCD 112
    - 7. Drain or grease traps additives - Environmental Choice CCD-113
    - 8. Odor control additives - Environmental Choice CCD-115
    - 9. Hard floor care - Environmental Choice CCD-147
    - 10. California Code of Regulations max VOC (only products not addressed by the above standards)
- c. **Paints and Sealant Guidance**
  - i. Paints and sealants must meet the LEED EBO&M MRc3: Sustainable Purchasing requirements, including the following standards:
    - 1. Architectural Sealants – 250 g/L (SCAQMD Rule #1168)
    - 2. Flat Paint – 50 g/L (Green Seals GS-11)
    - 3. Non-flat paint – 150 g/L (Green Seals GS-11)
    - 4. Any sealants used as fillers must comply with Bay Area Air Quality Management District Regulation 8, Rule 51. Please see last page of this policy for expanded resources.
- d. **Snow Removal and Deicing Strategies**
  - i. Snow removal methods must adhere to equipment guidance above.
  - ii. When required, test deicing chemicals to determine the most appropriate products and amounts.
  - iii. When possible, use pre-emptive techniques like applying small amounts of ice-melter or anti-icing compound before snow and ice accumulate can prevent the heavy build-up that requires significant amounts of material and labor to remove.
  - iv. When conditions create the need for de-icing chemicals (freezing rain, wet snow, sleet, compacted snow, etc.), only one of the two following options are available:

1. Use only deicers that contain 100% calcium magnesium acetate.
2. Demonstrate that environmentally-preferred deicers (containing less than 5% sodium chloride, calcium chloride, magnesium chloride, potassium chloride, potassium acetate, ammonia-based products, and ferrocyanide products) were used at least 20% of the time during the performance period, measured by weight. Include a plan to phase out all deicers that are not environmentally-preferred within 3 years.

### Responsible Party

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This plan is to be implemented by the Property Manager and external vendors, which include but are not limited to: janitorial, landscape, and window washers. The Property Manager is responsible for educating external vendors in the goals and performance metrics of this plan. All external vendors are responsible for reporting their data to the property manager for inclusion in maintenance records:

- a. An inventory of equipment logging hours used at the property; maintained by the Property Manager.
- b. A performance log of building exterior and hardscape maintenance events and details of strategies employed; maintained by the Property Manager.

### Quality Control

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Property Manager shall review equipment inventory and performance logs quarterly to confirm incremental improvement in use of sustainable practices.

- a. Maintenance Equipment - Compare human and electric/battery powered equipment use to all equipment use as a ratio of time.
- b. Cleaning Chemicals - Compare Green Seal Certified cleaning chemical use to all cleaning chemicals as a ratio of cost.
- c. Paints and Sealants – Compare VOC-compliant products to all paints and sealants used as a ratio of cost.
- d. Snow Removal and Deicers – Compare low-impact product use to all products used as a ratio of weight.

Appendix

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*Bay Area Air Quality Management District Regulation 8, Rule 51*

*8-51-304 Sealant Product Limits: Except as provided in Section 8-51-305, a person shall not use in the following applications any sealant product with a VOC content, as defined in Section 8-51-226, that exceeds the following limits (expressed as grams of VOC per liter):*

*Architectural 250*

*Marine Deck 760*

*Roadways 250*

*Single Ply Roof Material Installation/Repair 450*

*Nonmembrane Roof Installation/Repair 300*

*Other 420*



# Landscape, Erosion, and Pest Management Plan

SL Green

## SCOPE

This plan applies to the entire building exterior and landscape of SL Green buildings, and provides guidelines for maintaining the operational elements of LEED EB: O+M SSc3: Landscape Management, Erosion and Sedimentation Control, and Integrated Pest Management. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

## CONTACT

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## Goals

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Achieving the following performance expectations will preserve ecological integrity, enhance natural diversity, and protect wildlife while supporting high-performance building operations and resource integration into the surrounding landscape.

- a. Landscape Management– recycle organic waste and eliminate chemical runoff
  - i. **Divert 100% of landscape debris from landfill**
  - ii. **Use organic fertilizer for 100% of events**
- b. Erosion and Sedimentation Control – preserve and restore soil infrastructure
  - i. **Follow this plan for 100% of construction and on-going maintenance activities**
- c. Outdoor Integrated Pest Management – reduce exposure to harmful chemicals
  - i. **Follow integrated methods for 100% of all pest control activities**

## Performance Metrics

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Documentation expectations to verify goal achievement.

- a. Landscape Management – debris and fertilizer
  - i. **Weight** – Date, weight of debris and method of diversion from landfill is recorded by the responsible vendor and reported to the property manager.
  - ii. **Cost** – Date, product name, sustainability criteria, and cost of fertilizer is recorded by the responsible vendor and reported to the property manager.
- b. Erosion and Sedimentation Control
  - iii. **Event** – Date and description of strategies employed by responsible party are reported to the property manager.
- c. Outdoor Integrated Pest Management
  - iv. **Event** – Date and description of strategies employed by responsible vendor are reported to the property manager. Chemical application must include notes on SF Hazard Criteria or universal notification as required below.

## Implementation

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Procedures, Guidance, and Strategies for sustainable performance.

- a. Landscape Management – debris and fertilizer
  - i. Ideal landscape stewardship is to reuse or recycle (compost) all landscape debris on site; including, but not limited to, grass clippings, leaves, cut vines, and pruned branches.
    1. Landscaping debris that cannot be retained onsite shall be directed to offsite facilities for compost or recycle.
    2. When needed, mulching mowers shall be used on turf areas to improve soil health by recycling organic matter into the soil.
    3. Inorganic and recyclable refuse found on-site will be placed in one of the on-site commingled recycling bins.
  - ii. Only organic fertilizers shall be applied to the landscape.
    1. Preference native and adaptive plant species to reduce demand for fertilizer.
    2. Test soil for available nutrients and fertilization needs. Use organic compost for soil improvement to the greatest extent possible.

3. Fertilizer use shall be kept to a minimum to prevent eutrophication of local ponds and streams.
4. When needed, use organic, water soluble fertilizer (like fish emulsion). Maintain a 25-foot buffer from fertilizer application and any waterway.
- b. Erosion and Sedimentation Control during construction and on-going operations
  - i. All landscaping and construction activities involving site work or grading shall include an erosion and sedimentation (E&S) control plan, as a component of the construction specifications, and must be submitted to the Property Manager for approval prior to implementation. The E&S plan must include this document's criteria, and conform to the 2003 EPA Construction General Permit, or the local jurisdiction, if more stringent.
    1. Stabilization measures should be implemented to prevent erosion of the top soil, including: permanent seeding, temporary seeding, and mulching.
    2. Structural control measures should be implemented to retain sediment after erosion has occurred, including: earth dikes, silt fencing, sediment traps, and sediment basin.
    3. To prevent polluting the air with dust and particulate matter the soil will be watered after construction activities. Stockpiled topsoil will be covered.
    4. Prevent sedimentation from entering storm drains with inlet protection.
  - ii. On-going operations include regular inspection of permanent E&S controls and management of seasonal weather or detritus events.
    1. Establish groundcover and mulch to cover loose soil.
    2. Prevent debris and pollutants from entering storm drains by hand sweeping and composting onsite.
    3. Inspection of storm sewers during major rainfall for evidence of sedimentation.
    4. Assessment of drainage areas, soil/slope stability, and standing water/snow after major rain/snow events.
    5. Restoration of eroded soil areas shall consider the following measures: native plants and xeriscaping practice, permanent seeding, mulching, retaining walls, and wetlands.
- c. Outdoor Integrated Pest Management – Insect, rodent, and plant-born
  - i. Integrated Methods that make use of monitoring and non-toxic preventative measures will be used to proactively manage and minimize pest issues.
    1. Identify structural, mechanical, and operational issues to prevent harborage and infiltration; eliminate debris to minimize hiding places.
    2. In the event that cleaning products are used as a component of IPM, they shall meet the criteria for LEED EBO&M IEQc3.3 Green Cleaning, Sustainable Cleaning Products and Materials.
    3. The site will be monitored on a regular basis.
    4. Pest population monitor devices will be placed in appropriate areas.
  - ii. In the event that monitoring activities reveal a need for the use of pest controls, appropriate options will be evaluated and the least-toxic option will be employed.
    1. Least-toxic pesticide status only applies to products labeled under San Francisco Tier 3 Hazard Criteria.

2. Rodent bait is never least toxic, and may only be used if it is: solid blocks, placed in locked outdoor dispensers, in a self-contained unit, in an inaccessible location, and universal notification is employed. No second-generation (single-feed) rodent baits shall be used if the building is adjacent to parkland, wild areas, or other spaces where wildlife may be unintentionally affected.
- iii. Emergency Conditions include infestations and any pest problem considered an immediate threat to health and/or safety of building occupants.
  1. Any pesticide may be used, with compliant universal notification, and must be reported to the appropriate party prior to leaving the building.
- iv. A Universal Notification System must be employed if a pesticide, other than a least-toxic pesticide as defined above, is applied on site. This notification system enables occupants and staff, including especially high-risk occupants such as children, pregnant women, and the elderly, to modify their plans based on pesticide use at the building.
  1. Notify building occupants of a pesticide application at least 72 hours in advance under normal circumstances and no more than 24 hours after an emergency application.
  2. Notification should be made through posted signs and targeted emails that ensure reaching 100% of occupants.
  3. Notification must include the following:
    - a. Pesticide product name
    - b. Active ingredient
    - c. Product label signal word (e.g., “caution”, “danger”)
    - d. Time and location of application
    - e. Contact information for persons seeking more information
- v. Every application of any pesticides shall be recorded in a log and include:
  1. Pesticide Application Date and Time
  2. Application Manager
  3. Location
  4. Target Pest
  5. Pesticide Trade Name
  6. Pesticide Active Ingredient
  7. EPA Registration Number
  8. Least-toxic status (Y/N)
  9. Universal Notification to Occupants (Date, Time, Method)
- vi. Vegetative pests (‘weeds’), fungal, and bacterial disease are inspected and monitored regularly. Manual removal and disposal are recommended. Chemical treatment is a last resort with the use of target-plant based or biological product treatment applications. Spot treatments-following least-toxic and universal notification systems-are employed only as infestation occurs.

## Responsible Party

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This plan is to be implemented by the Property Manager and external vendors, which include but are not limited to: landscape, general contractor, and pest control. The Property Manager is responsible for educating external vendors in the goals and performance metrics of this plan. All external vendors are responsible for reporting their data to the property manager for inclusion in site management records:

- a. A landscape log of debris generated and fertilizer applied at the property; maintained by the Property Manager.
- b. A performance log of construction and on-going operational erosion and sedimentation control events at the property; maintained by the Property Manager.
- c. A pest control log of integrated pest management event at the property; maintained by the Property Manager.

## Quality Control

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Property Manager shall review performance logs quarterly to confirm incremental improvement in use of sustainable practices.

- a. Landscape Management
  - i. Compare landscaping debris reused or composted to total debris generated as a ratio of weight.
  - ii. Compare organic fertilizer applied to all fertilizer used as a ratio of cost.
- b. Erosion and Sedimentation Control – Include annual roof drain and storm water control inspections in ongoing preventive maintenance schedule.
- c. Outdoor Integrated Pest Management – Compare pest control reports to universal notification events to ensure compliance with this policy.



# High-Performance Water Fixtures and Fittings Policy

SL Green

## SCOPE

This policy applies to all plumbing fixtures and fittings within each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M WEp1: water closets, urinals, public lavatory sinks, showerheads, and break room sinks. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

Exceeding the baseline fixture and fitting efficiency by installing high performance plumbing in all future renovations will reduce the burden on potable water supply and wastewater systems. Estimated annual water consumption of all the elements covered in the scope of this policy must be **at a minimum, 20% less than the baseline consumption.**

## Performance Metrics

Baseline Rates (IPC & UPC)	Fixture / Fitting Type	High Performance Rates
1.6 gpf	water closets	1.28-1.33 gpf
1.0 gpf	urinals	0.0-0.5 gpf
0.5 gpm	public lavatory sinks	0.5 gpm
2.5 gpm	showerheads	1.5-2.2 gpm
2.2 gpm	break room sinks	0.5-2.0 gpm

## Implementation

Complete an economic assessment of conversion to high performance plumbing fixtures and fittings as part of any renovation. This assessment will account for potential water supply, disposal cost savings, and maintenance cost savings.

## Responsible Party

The Property Manager will require that parties involved in any renovation will create an economic assessment of conversion to high performance fixtures and fittings.

## Quality Control

The Property Manager shall review proposed activities to determine compliance with the plan and approve or deny action.

- a. To track on-going water performance, the Property Manager shall log monthly water use in the EPA's ENERGY STAR Portfolio Manager database.



# Water Meter Readings

SL Green

## SCOPE

This policy applies to all water usage within each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M WEc1. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

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To measure building and subsystem water performance over time to understand consumption patterns and identify opportunities for additional water savings.

## Performance Metrics

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- 1) Whole-Building Metering: Have in place permanently installed water metering that measures the total potable water use for the entire building and associated grounds. Meter data must be recorded on a regular basis (weekly, at minimum) and compiled into monthly and annual summaries. Encourage metering of any gray or reclaimed water supplied to the building.
- 2) Submetering: Have in place permanently installed metering for one or more of the following water subsystems:
  - a. Irrigation: Meter water systems serving at least 80% of the irrigated landscape area on the grounds. The percentage of irrigated landscape area served must be calculated as the total metered irrigated landscape area divided by the total irrigated landscape area. All landscaping areas fully covered with xeriscaping or native vegetation that requires no routine irrigation must be excluded from the calculation entirely.
  - b. Indoor plumbing fixtures and fittings: Meter water systems serving at least 80% of the indoor plumbing fixtures and fittings, either directly or by deducting all other measured water use from the measured total water consumption of the building and grounds.
  - c. Cooling towers: Meter replacement water use of all cooling towers serving the facility.
  - d. Domestic hot water: Meter water use of at least 80% of the installed domestic hot water heating capacity (including both tanks and on-demand heaters).
  - e. Other process water: Meter at least 80% of expected daily water consumption for process- type end uses, such as humidification systems, dishwashers, clothes washers, pools and other systems using process water.

## Implementation

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Install a permanent building-level meter to measure the entire potable water use of the building. This includes water consumption from occupant-related plumbing fixtures, cooling towers, laundering, dishwashing, indoor and outdoor water features, irrigation, exterior cleaning, and manufacturing processes. Assess high water-use applications and install subsystem-level water metering to measure and track potable water consumption by specific building systems. Consider targeting subsystems for which metering incentives and rebates might exist or where deduct metering will lessen utility costs by avoiding sewage charges.

Implement continuous logging of meter readings, either through automatic electronic data logging or through manual recordings, in order to analyze water use trends over time. The interval between readings must be one week or less. Compile and retain monthly and annual water consumption summaries, both for total consumption and by subsystem.

## Responsible Party

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The Property Manager and Chief Engineer will evaluate metering equipment and install any additional meters needed. They will also perform at least weekly meter readings and establish a program for compiling and analyzing water consumption data to understand consumption patterns and identify opportunities for saving water.

## Quality Control

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The Property Manager shall review proposed activities to determine compliance with the plan and approve or deny action.

- a. To track on-going water performance, the Property Manager shall log monthly water use in the EPA's ENERGY STAR Portfolio Manager database.



# Cooling Tower Water and Chemical Management Policy

SL Green

## SCOPE

This policy applies to all cooling towers and/or evaporative condensers within each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M WEc4: cooling tower water use and chemical management. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

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**Daily monitoring** of the cooling towers and/or evaporative condensers will reduce potable water consumption and prevent microbial growth, such as Legionella bacteria, and mineral build-up through effective water management.

## Performance Metrics

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- a. Chemical Treatment
- b. Bleed-off, make-up water and target concentration ratios
- c. Biological controls
- d. Set points: For all systems
- e. Training: Duration, frequency, and topics

\*Refer to contracted vendor's customized Cooling Tower and Chemical Management Plan for building-specific information

## Implementation

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- a. Record water meter readings daily
- b. Monitor set points and conductivity

## Responsible Party

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The Property Manager will contract a vendor to customize a management program based on the metrics of this policy.

- a. Cooling Tower Management vendor must provide
  - i. Photographic evidence of conductivity meter
  - ii. Training

## Quality Control

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The Property Manager shall review proposed program to determine compliance with this policy and approve or deny action.



# ENERGY STAR Portfolio Manager Benchmarking

SL Green

## SCOPE

This policy applies to all energy usage within each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M EAp2. This policy was established in September 2013, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

## CONTACT

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## Goals

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To establish the minimum level of operating energy efficiency performance relative to typical buildings of similar type to reduce environmental and economic impacts associated with excessive energy use.

## Performance Metrics

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- 1) Case 1. Buildings eligible for ENERGY STAR rating: For buildings eligible to receive an energy performance rating using the EPA's ENERGY STAR® Portfolio Manager tool, achieve an energy performance rating of at least 69. If the building is eligible for an energy performance rating using Portfolio Manager, Option 1 must be used. Have energy meters that measure all energy use throughout the performance period of all buildings to be certified. Each building's energy performance must be based on actual metered energy consumption. A full 12 months of continuous measured energy data is required. Calibrate meters within the manufacturer's recommended interval if the building owner, management organization or tenant owns the meter. Meters owned by third parties (e.g., utilities or governments) are exempt.
- 2) Case 2. Buildings not eligible for ENERGY STAR rating: For buildings with a primary space type not eligible to receive an energy performance rating using Portfolio Manager, comply with 1 of the following:
  - a. Option 1. Adjusted benchmark score: Demonstrate energy efficiency performance that is better than 69% of similar buildings (69th percentile or better) by benchmarking against national source energy data provided in the Portfolio Manager tool as an alternative to energy performance ratings.
  - b. Option 2. Alternative score: Demonstrate energy efficiency performance by determining an alternative rating score using the Portfolio Manager tool to report the building's energy use data from the performance period.
  - c. Option 2a. Streamline baseline: Enter energy use data during the performance period for at least 1 year into Portfolio Manager to determine the "weather-normalized source energy intensity". Use this value in the offline calculator to determine the percent reduction from the streamlined baseline.
  - d. Option 2b. Energy baseline including historical data: Enter at least 3 consecutive years of historical energy use data into Portfolio Manager in addition to the current year's data to determine the "weather-normalized source energy intensity" for each year. Use these values in the offline calculator to determine a baseline using the historical energy use data of the project building.
  - e. Option 2c. Energy baseline including historical data plus comparable buildings: In addition to the historical data used in Option 2b, provide energy use data for at least 3 other buildings with similar uses over at least a 2-year period to determine the "average energy performance of a similar building" in Portfolio Manager. Enter this data into the offline calculator.

## Implementation

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Achieve energy efficiency performance better than the minimum requirements listed above; points are awarded according to the table below.

Have energy meters that measure all energy use of all buildings. Each building's energy performance must be based on actual metered energy consumption. A full 12 months of continuous measured energy data is required.

Calibrate meters within the manufacturer's recommended interval if the building owner, management organization or tenant owns the meter. Meters owned by third parties (e.g., utilities or governments) are exempt.

Use the Portfolio Manager tool available on the ENERGY STAR website to benchmark the project even if it is not eligible for an EPA rating: <http://www.energystar.gov/benchmark>.

## Responsible Party

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The Property Manager and Chief Engineer will evaluate metering equipment and install any additional meters needed. They will also work with external consultants and vendors to confirm accuracy of the building's profile on ENERGY STAR Portfolio Manager.

## Quality Control

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The Property Manager shall review proposed activities to determine compliance with the plan and approve or deny action.

- a. To track on-going energy performance, the Property Manager shall log monthly energy use in the EPA's ENERGY STAR Portfolio Manager database.



# Sustainable Purchasing Policy

SL Green

## SCOPE

This policy applies to all on-going consumable and durable good purchases within each SL Green building, and provides guidelines for sustainable purchasing in the following operational areas: Property Management Office, Tenant Operations, Building Maintenance, and Construction. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy. The following LEED credits are covered by this policy:

- a. MR Credit 1: Sustainable Purchasing – Ongoing Consumables
- b. MR Credit 2: Sustainable Purchasing - Durable Goods & Electric-Powered Equipment
- c. MR Credit 3: Sustainable Purchasing – Facility Alterations and Additions
- d. MR Credit 4: Sustainable Purchasing – Reduced Mercury in Lamps
- e. MR Credit 5: Sustainable Purchasing – Food

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## Goals

---

Achieving the following performance expectations will reduce the demand on virgin resources, re-use and recycle durable materials, as well as reduce the source of indoor air contaminants.

- a. MRc1: Ongoing Consumables
  - i. **60% of purchases meet sustainability criteria**
- b. MRc2: Durable Goods: Furniture & Electric-Powered Equipment
  - i. **40% of purchases meet sustainability criteria**
- c. MRc3: Facility Alterations and Additions
  - i. **50% of purchases meet sustainability criteria**
- d. MRc4: Reduced Mercury in Lamps
  - i. **100% of lamp purchases average 70 picograms mg per lumen-hour or less**
- e. MRc5: Food
  - i. **25% of purchases meet sustainability criteria**

## Performance Metrics

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All purchases (except lamps) are quantified by **cost in US dollars.**

- a. Exclude taxes and shipping
- b. Mercury Lamps are quantified by **picograms of mercury (mg) per lumen hour.**

## Implementation

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Prioritize spending on products that are environmentally sound and socially beneficial based on the following sustainability criteria:

- a. MRc1: Ongoing Consumables
  - i. 10% post-consumer or 20% post-industrial recycled content
  - ii. 50% rapidly renewable
  - iii. 50% harvested/extracted and processed/manufactured within 500 miles
  - iv. 50% FSC certified paper
  - v. Rechargeable Batteries
- b. MRc2: Durable Goods: Furniture & Electric-Powered Equipment
  - i. Furniture
    - 1. 10% post-consumer and/or 20% post-industrial recycled content
    - 2. 70% salvaged
    - 3. 50% rapidly renewable
    - 4. 50% FSC wood
    - 5. 50% harvested/extracted and processed/manufactured within 500 miles
  - ii. Electric-Powered Equipment
    - 1. ENERGY STAR® Qualified Products
    - 2. Battery or Corded equipment that replaces conventional gas-powered equipment
- c. MRc3: Facility Alterations and Additions - any tenant build-out or base building renovation should include materials that are:
  - i. 10% post-consumer and/or 20% post-industrial recycled content

- ii. 70% salvaged
  - iii. 50% rapidly renewable
  - iv. 50% FSC wood
  - v. 50% harvested/extracted and processed/manufactured within 500 miles
  - vi. Adhesives and sealants have VOC content less than SCAQMD Rule#1168, or Bay Area Air Quality Management District Regulation 8, Rule 51. See appendix.
  - vii. Paints and Coatings have VOC content not exceeding Green Seal Standard 11.
  - viii. Non-carpet finished floor is Floor Score Certified
  - ix. Carpet meets CRI Green Label Plus, carpet cushions meet CRI Green Label
  - x. Composite panels and agrifiber products contain no added urea-formaldehyde resins
- d. MRc4: Reduced Mercury in Lamps – Three factors of each lamp purchase are entered into the LEED Online tracking form to calculate a weighted picograms per lumen-hour
- i. Mercury content
  - ii. Lumen output
  - iii. Lamp life
- e. MRc5: Food - Includes all purchases within the property, including: tenants, cafes, vendors, and vending machines.
- i. Locally sourced within 100 miles
  - ii. Fairtrade, [www.fairtrade.net](http://www.fairtrade.net)
  - iii. Food Alliance, [www.foodalliance.org](http://www.foodalliance.org)
  - iv. Marine Stewardship Council (MSC) Blue Eco-Label, [www.msc.org](http://www.msc.org)
  - v. Protected Harvest, [www.protectedharvest.org](http://www.protectedharvest.org)
  - vi. Rainforest Alliance, [www.rainforest-alliance.org](http://www.rainforest-alliance.org)
  - vii. US Department of Agriculture Organic, [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

## Responsible Party

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The success of this policy is dependent on whole-building participation and sharing of data.

- a. Property Manager – Educate all purchasing managers in the building to the goals of this policy, and communicate with tenant representatives and general contractors to ensure efficient delivery of metrics.
  - i. Provide sustainability criteria and specifications to the tenant's architect to include in construction documents.
  - ii. Maintain a purchase log of all applicable purchases within the building.
- b. Tenant Representative – Requested to voluntarily track and report material purchases to the property manager for inclusion in purchase records, including:
  - i. Date of purchase, the item purchased, the quantity purchased,
  - ii. Cost per item
  - iii. Sustainability criteria achieved (if any), and any supporting manufacturer's documentation.
- c. Building Maintenance Staff - Comply with this policy for all building maintenance and lamp purchases.
  - i. Report lamp purchase metrics to Property Manager.
- d. General Contractors – All construction projects must submit to the property manager:
  - i. Construction plans for approval prior to beginning work.
  - ii. Purchase records of materials after work is complete.
  - iii. Supporting documentation from the material manufacturer is required for all products that meet one or more of the sustainability criteria.

## Quality Control

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The property management representative aggregates the information by LEED credit and verifies compliance based on the sustainability criteria listed in the procedures.

- a. The Purchasing of Ongoing Consumables, Durable Goods, and Food will be measured by the property manager quarterly by comparing cost of materials meeting sustainability criteria to total material cost.
- b. For purchasing of facility alteration and additions or mercury containing lamps, all future purchases are to be reviewed by the property manager. The Property Manager shall review proposed activities to determine compliance with this policy and approve or deny action.

## Appendix - Definitions

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**Chain-of-custody:** A tracking procedure for documenting the status of a product from the point of harvest or extraction to the ultimate consumer end use, including all successive stages or processing, transformation, manufacturing, and distribution.

**Composite Wood:** Made from several materials and agrifiber products are products made from agricultural fiber. These materials comprise particleboard, medium-density fiberboard, plywood, oriented-strand board, wheatboard, strawboard, panel substrates, and door cores.

**Durable Goods:** Have a useful life of two years or more and are replaced infrequently and/or may require capital program outlays. Examples include furniture, office equipment, appliances, external power adapters, televisions, and audiovisual equipment.

**Furniture, Fixtures, and Equipment (FF&E):** All items that are not base building elements, such as lamps, computers, and electronics, desks, chairs, and tables.

**Ongoing Consumables:** Have a low cost per unit and are regularly used and replaced in the course of business. Examples include paper, toner cartridges, binders, batteries, and desk accessories.

**Post-consumer Content:** The percentage of material in a product that is recycled from consumer waste.

**Pre-consumer Content:** The percentage of material in a product that is recycled from manufacturing waste. Examples include planer shavings, plytrim, sawdust, chips, shells, trimmed materials, over-issue publications, and obsolete inventories. Excluded are materials such as rework, regrind, or scrap generated in a process and capable of being reclaimed within the same process that generated it.

**Rapidly Renewable Materials:** Planted and harvested in less than 10 years.

**Off-site Salvaged Materials:** Recovered from an off-site source and reused.

**On-site Salvaged Materials:** Recovered from and reused at the same building site.

## Appendix VOC Limits

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Flat Paint – 50 g/L (Green Seals GS-11)

No-flat paint – 150 g/L (Green Seals GS-11)

Architectural Sealants – 250 g/L (SCAQMD Rule #1168), Marine Deck 760, Roadways 250, Single Ply Roof Material Installation/Repair 450, Nonmembrane Roof Installation/Repair 300, Other 420



# Solid Waste Management Policy

SL Green

## SCOPE

This policy applies to all waste generated, stored, and removed from each SL Green building. This policy was established in November 2016 is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy. The following LEED credits are covered by this policy:

- a. MR Credit 7: Solid Waste Management-On-Going Consumables
- b. MR Credit 8: Solid Waste Management-Durable Goods
- c. MR Credit 9: Solid Waste Management-Facility Alterations and Additions

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**Goals**

Achieving the following performance expectations will protect the environment and public health, conserve natural resources, and minimize landfilling and/or incineration and reduce toxicity:

- a. MRc7: On-Going Consumables – **50% of waste recycled and 100% of all batteries and lamps recycled**
- b. MRc8: Durable Goods – **75% of goods diverted from landfill**
- c. MRc9: Facility Alterations and Additions – **70% of waste recycled**

**Performance Metrics**

All waste streams are quantified by **weight in pounds**.

**Strategy**

Material	Diversion Method	Handling Procedure
Glass, Plastic, Paper, Cardboard, and Metal (commingled)	Building occupants are educated on the recycling program and how to use the recycling facilities including deskside and breakroom bins.	Cleaning staff move the individual bags to a central collection point in the building. The hauler reports weights on a regular basis.
Mercury-containing Lamps	Building Maintenance staff collects spent fluorescent lamps and stores the unbroken lamps in a secure area.	Taken away by an authorized hauler for safe disposal, in accordance with local regulations.
Batteries	Building occupants deliver batteries to a specially-designated collection point for disposal.	Taken away by an authorized hauler for safe disposal, in accordance with local regulations.
Durable Goods: Electronic Waste	Once a year, building management hosts a week-long e- recycling drive by providing a secure collection area for unwanted electronic goods.	Taken away by an authorized hauler for safe disposal, in accordance with local regulations.
Durable Goods: Furniture	Durable goods that have reached the end of their life within the building but still have value and may donated/re-used should be reported to the property manager.	Store on site for future tenant use, and arrange for donation of any items that are unable to be stored.
Building Materials	Building management coordinates with contractors to collect construction waste for re-use/recycling.	Amounts are tracked and taken away by an authorized hauler at the end of the demolition/ construction period for recycling.

## Responsible Party

---

The success of this policy is dependent on whole-building participation and sharing of data.

- a. Property Manager – Educate all building users to the goals and strategies of this policy. Implement annual waste audits and e-recycling drives. Manage an on-site furniture bank with available resources and/or donate unwanted furniture. Collect receipts of all waste removal and organize into a performance log.
- b. Tenant Representative – Foster a culture of recycling. Report any independent paper recycling receipts to the property manager.
- c. Building Maintenance Staff – Manage lamp recycling program, and report recycling receipts to the property manager.
- d. General Contractors – Recycling of all demolition and other construction waste is required at the building. Reuse of existing materials including doors, hardware, ceiling tiles and other items is encouraged to the greatest extent possible.

## Quality Control

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The property management representative aggregates the information by LEED credit and verifies compliance by comparing the amount of goods diverted from the landfill to the total amount of waste.

- a. An annual waste audit in compliance with LEED EBO&M MRc6: Waste Stream Audit, is conducted to verify accuracy of the waste vendor's reported diversion rates.



## Lamp Purchasing Policy

SL Green

### SCOPE

This policy applies to all lamp purchases within each SL Green building, and provides guidelines for sustainable purchasing in the following operational areas: Property Management Office, Tenant Operations, Building Maintenance, and Construction. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy. The following LEED credits are covered by this policy:

- a. MR Credit 4: Sustainable Purchasing – Reduced Mercury in Lamps

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## Goals

---

Achieving the following performance expectations will reduce the demand on virgin resources, re-use and recycle durable materials, as well as reduce the source of indoor air contaminants.

- a. MRC4: Reduced Mercury in Lamps
  - i. **100% of lamp purchases average 70 picograms mg per lumen-hour or less**

## Performance Metrics

---

All purchases are quantified by **picograms of mercury (mg) per lumen hour.**

Implementation

---

Prioritize spending on products that are environmentally sound and socially beneficial based on the following sustainability criteria:

- a. MRC4: Reduced Mercury in Lamps – Three factors of each lamp purchase are entered into the LEED Online tracking form to calculate a weighted picograms per lumen-hour
  - i. Mercury content
  - ii. Lumen output
  - iii. Lamp life

## Responsible Party

---

The success of this policy is dependent on whole-building participation and sharing of data.

- a. Property Manager – Educate all purchasing managers in the building to the goals of this policy, and communicate with tenant representatives and general contractors to ensure efficient delivery of metrics.
  - i. Provide sustainability criteria and specifications to the tenant's architect to include in construction documents.
  - ii. Maintain a purchase log of all applicable purchases within the building.
- b. Tenant Representative – Requested to voluntarily track and report material purchases to the property manager for inclusion in purchase records, including:
  - i. Date of purchase, the item purchased, the quantity purchased,
  - ii. Cost per item
  - iii. Sustainability criteria achieved (if any), and any supporting manufacturer's documentation.
- c. Building Maintenance Staff - Comply with this policy for all building maintenance and lamp purchases.
  - i. Report lamp purchase metrics to Property Manager.
- d. General Contractors – All construction projects must submit to the property manager:
  - i. Construction plans for approval prior to beginning work.
  - ii. Purchase records of materials after work is complete.
  - iii. Supporting documentation from the material manufacturer is required for all products that meet one or more of the sustainability criteria.

## Quality Control

---

The property management representative aggregates the information by LEED credit and verifies compliance based on the sustainability criteria listed in the procedures.

- a. For purchasing of mercury containing lamps, all future purchases are to be reviewed by the property manager. The Property Manager shall review proposed activities to determine compliance with this policy and approve or deny action.



# Environmental Tobacco Smoke (ETS) Control Policy

SL Green

## SCOPE

This policy applies to all smoking areas outside each SL Green building, and provides guidelines for maintaining the following operational elements of LEED EB: O+M IEQp2. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

---

To prevent or minimize exposure of building occupants, indoor surfaces, and systems to environmental tobacco smoke (ETS).

## Performance Metrics

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- 1) Option 1: Prohibit smoking in the building and within 25 feet of building entries, outdoor air intakes, and operable windows.
- 2) Option 2: Prohibit smoking in the building and within 25 feet of building entries, outdoor air intakes, and operable windows, except in designated, negatively-pressurized smoking rooms.
- 3) Option 3 (Residential Only): Prohibit smoking in all common areas in the building and within 25 feet of building entries, outdoor air intakes, and operable windows opening to common areas, and reduce air leakage between smoking and non-smoking areas.

## Implementation

---

Option 1: Smoking does not occur in the building or within 25 feet of the building's entries, outdoor air intakes, and operable windows. Personnel shall ensure that smoking occurs only in the designated exterior smoking areas where ETS cannot enter the building or ventilation system, and away from concentrations of building occupants or pedestrian traffic.

Option 2: Smoking does not occur outside of designated interior smoking areas or within 25 feet of the building's entries, outdoor air intakes, and operable windows. Personnel shall ensure that smoking occurs only in the designated smoking areas inside and outside the building in locations where ETS cannot enter the building or ventilation system, and away from concentrations of building occupants or pedestrian traffic. Designated smoking rooms shall be designed to contain, capture and remove ETS from the building. At a minimum, the smoking room(s) must be directly exhausted to the outdoors, away from air intakes and building entry paths, preventing air containing ETS from recirculating to the non-smoking areas of the building. The smoking rooms must also be enclosed with impermeable deck-to-deck partitions and operated at a negative pressure relative to the surrounding spaces of at least an average of 5 Pa (0.02 inches water gauge) and with a minimum of 1 Pa (0.004 inches water gauge) when the door(s) to the smoking room are closed. Responsible personnel shall verify the differential air pressures in the smoking room by conducting 15 minutes of measurement, with a minimum of one measurement every 10 seconds, of the differential pressure in the smoking room with respect to each adjacent area and in each adjacent vertical chase with the doors to the smoking room closed. The testing must be conducted with each space configured for worst-case conditions for transmitting air from the smoking rooms into adjacent spaces.

Option 3: Smoking does not occur in any common areas of the building or within 25 feet of the building's entries, outdoor air intakes, and operable windows. Appropriate steps shall be taken to reduce air leakage between smoking and non-smoking areas, including but not limited to:

- Minimize uncontrolled pathways for ETS transfer between individual residential units by sealing penetrations in walls, ceilings, and floors in the residential units and by sealing adjacent vertical chases adjacent to the units.
- Weather-strip all doors in the residential units leading to common hallways to minimize leakage from outdoors.

Demonstrate acceptable sealing of residential units by conducting a blower door test in accordance with ASTM-779-03, Standard Test Method for Determining Air Leakage Rate by Fan Pressurization, AND use the progressive sampling methodology defined in Chapter 7 (Home Energy Rating Systems, HERS Required Verification and Diagnostic Testing) of the California Residential Alternative Calculation Method Approval Manual. Residential units must demonstrate less than 1.25 square inches of leakage area per 100 square feet of enclosure area (i.e., the sum of all wall, ceiling, and floor areas).

### Responsible Party

---

The Property Manager and Chief Engineer shall implement this policy in coordination with other appropriate personnel. This policy should be detailed and clearly communicated to all building occupants and contractors who may service the exterior environment of the building. Compliance with smoking policies will be enforced by building management and violations will be addressed.

### Quality Control

---

The Property Manager shall evaluate compliance with the policy on an ongoing basis. Building management shall use its discretion to discipline building occupants that do not abide by the smoking policy.



## Green Cleaning Policy

SL Green

### SCOPE

This plan applies to the interior common areas and tenant space of each SL Green building, and provides guidelines for green cleaning. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy. The following LEED credits are covered by this policy:

- a. IEQc3.2: Custodial Effectiveness Assessment
- b. IEQc3.3: Purchase of Sustainable Cleaning Products
- c. IEQc3.4: Sustainable Cleaning Equipment

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## Goals

---

Green Cleaning conserves resources and limits exposure of building occupants and maintenance personnel to potentially hazardous chemical, biological and particulate contaminants, which adversely affect air quality, human health, building finishes, building systems, and the environment.

- a. IEQc3.3: Products: **90% of consumables are sustainable**
- b. IEQc3.4: Equipment: **50% of existing inventory and 100% of new purchases have sustainable labels**

## Performance Metrics

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Documentation expectations to verify goal achievement.

- a. IEQc3.3: Products: **Cost in dollars**
- b. IEQc3.4: Equipment: **Cost in dollars**

## Implementation

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Follow the standards and guidance in this policy for all cleaning activities. Refer to the janitorial vendor's green cleaning program for detailed procedures.

- a. Cleaning Product Purchases meet IEQc3.3: Purchase of Sustainable Cleaning Products
  - Green Seal GS-37, for general-purpose, bathroom, glass and carpet cleaner use for industrial and institutional purposes
  - Environmental Choice CCD-110, for cleaning and degreasing compounds
  - Environmental Choice CCD-146, for hard-surface cleaners
  - Environmental Choice CCD-148, for carpet and upholstery care.
- i. Disinfectants, metal polish, floor finishes, strippers or other products not addressed by GS-37 or Environmental Choice CCD-110, 146, or 148 shall meet at least one of the following standards for the appropriate category:
  - Green Seal GS-40, for industrial and institutional floor-care products
  - Environmental Choice CCD-112, for digestion additives for cleaning and odor control
  - Environmental Choice CCD-113, for drain or grease-trap additives
  - Environmental Choice CCD-115, for odor-control additives
  - Environmental Choice CCD-147, for hard-floor care
  - California Code of Regulations maximum allowable VOC levels for the specific product category.
- ii. Disposable janitorial paper products and trash bags meet the minimum requirements of one or more of the following programs for the applicable product category:
  - U.S. EPA Comprehensive Procurement Guidelines for Janitorial Paper and Plastic Trash Can Liners
  - Green Seal GS-09, for paper towels and napkins
  - Green Seal GS- 01, for tissue paper
  - Environmental Choice CCD-082, for toilet tissue
  - Environmental Choice CCD-086, for hand towels
  - Janitorial paper products derived from rapidly renewable resources or made from tree-free fibers.

- iii. Hand soaps meet one or more of the following standards:
  - No antimicrobial agents (other than as a preservative) except where required by health codes and other regulations (i.e., food service and health care requirements)
  - Green Seal GS-41, for industrial and institutional hand cleaners
  - Environmental Choice CCD-104, for hand cleaners and hand soaps.
- b. Cleaning equipment purchases meet IEQc3.4: Sustainable Cleaning Equipment
  - Vacuum cleaners meet the requirements of the Carpet and Rug Institute “Green Label” Testing Program— Vacuum Cleaner Criteria and are capable of capturing 96% of particulates 0.3 microns in size and shall operate with a sound level less than 70dba.
  - Carpet extraction equipment for restorative, deep cleaning is certified by the Carpet and Rug Institute’s “Seal of Approval” Testing Program for deep-cleaning extractors.
  - Powered floor equipment—e.g., electric and battery-powered floor buffers and burnishers—is equipped with vacuums, guards and/or other devices for capturing fine particulates, and operates with a sound level less than 70dba.
  - Propane-powered floor equipment has high-efficiency, low-emission engines with catalytic converters and mufflers that meet California Air Resources Board (CARB) or Environmental Protection Agency (EPA) standards for the specific engine size, and operate with a sound level of less than 90dba.
  - Automated scrubbing machines are equipped with variable-speed feed pumps and onboard chemical metering to optimize the use of cleaning fluids. Alternatively, the scrubbing machines use only tap water with no added cleaning products.
  - Battery-powered equipment is equipped with environmentally preferable gel batteries.
  - Powered equipment is ergonomically designed to minimize vibration, noise and user fatigue.
  - Equipment is designed with safeguards, such as rollers or rubber bumpers, to reduce potential damage to building surfaces.
- iv. Hard-floor and carpet maintenance
  - Use few, or no, harmful chemicals; remove and eliminate irritating dust, dirt and other contaminants; and protect and preserve floors.
  - Reduce the frequency of stripping or removing coatings to once every two years to conserve cleaning and floor restoration materials and minimizing occupants’ exposure to harmful chemicals.
- v. Entryway systems
  - Grilles; Grates; and/or Walk-off mats at all primary entrances shall be cleaned weekly at a minimum. These systems shall be a minimum of 10 feet long in the direction of travel.

- c. Protect vulnerable building occupants
  - To protect vulnerable building occupants, such as pregnant women, children, asthmatics, elderly occupants, individuals with allergies and highly sensitive individuals, use only low/no VOC cleaning products
  - Perform routine cleaning and floor restoration activities after working hours when the majority of occupants have left the building
  - Limit the number of cleaning chemicals used in the building
  - Maintain a high level of cleanliness thus minimizing the presence of irritants
- d. Hand hygiene
  - Hand hygiene is included in the training program
  - Hand soap is available in all restrooms and back-of-house spaces. Per regulations, hand-hygiene notices will be placed in all employee rest rooms.
  - Alcohol-based waterless hand sanitizer is provided in all key building environments including restrooms, commons areas, and personal spaces.
- e. Handling and storage of cleaning chemicals & chemical concentrates and dilution systems
  - Storage: Cleaning chemicals are stored in a single-locked janitorial closet on the ground floor. Workers access chemicals at the beginning of their shift and as needed.
  - Dilution: Chemical concentrates and dilution systems are used to minimize risk to staff and occupants, and to conserve resources. Employ procedures identified in the janitorial vendor's green cleaning program.
  - Safety: The cleaning chemical supplier is required to provide accurate MSDSs for all chemicals which are filed in the chemical storage room.
  - Spills: The supervisor should be notified immediately and chemicals contained. Clean up spill immediately and contact poison control or 911 if accident escalates to health issue.
- f. Staffing and training - All cleaning personnel shall receive regular training; upon hire and annually at minimum. Vendors shall supply evidence of compliance with the following training requirements prior to contract award or renewal:
  - Employee safety and health, including hand hygiene
  - Regulatory compliance standards—OSHA, EPA, local
  - Job Hazard Analysis (JHA) / OSHA JSA - Unsafe attitudes and conditions accident prevention.
  - Record-keeping
  - Safe chemical storage and handling
  - Hazards of use, disposal, and recycling of cleaning chemicals, dispensing equipment and packaging
- g. Occupant feedback and evaluation of new technologies
  - All guests and employees may contact the Property Manager to provide feedback on cleaning practices. Occupants are encouraged to alert the management to any issues relating to the green cleaning program. A formal survey is administered once a year.
  - The Property Manager issues annual occupant feedback surveys to seek input on cleaning practices in addition to other performance metrics.
  - The janitorial vendor and Property Manager regularly have conversation and research new green cleaning technologies to integrate into the building's green cleaning procedures.

## Responsible Party

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The Property Manager is responsible for educating external vendors in the goals and performance metrics of this plan.

- a. All external vendors are responsible for reporting their data to the property manager:
  - i. IEQc3.3: Products – Purchase records of any consumables
  - ii. IEQc3.4: Equipment - An inventory of all equipment, maintenance logs, and new purchase receipts

## Quality Control

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Prior to implementation, service providers involved in the building's plan shall submit all information about proposed practices to the Property Manager to determine compliance with the plan and approve or deny action.

- a. Property Manager shall review equipment inventory and purchase logs quarterly to confirm incremental improvement in use of sustainable practices.
- b. Once a year, a third-party, or the responsible parties of this policy will conduct an APPA Audit to demonstrate compliance with LEED EB: O+M IEQc3.2: Custodial Effectiveness Assessment.



# High-Performance Green Cleaning Program

SL Green

## SCOPE

This program applies to the interior common areas and tenant spaces of each SL Green building, and provides guidelines for green cleaning. This program was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy. This program is in compliance with IEQp3 and the following LEED credits are covered by this policy:

- a. IEQc3.2: Custodial Effectiveness Assessment
- b. IEQc3.3: Purchase of Sustainable Cleaning Products
- c. IEQc3.4: Sustainable Cleaning Equipment

## CONTACT

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## Goals

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Green Cleaning conserves resources and limits exposure of building occupants and maintenance personnel to potentially hazardous chemical, biological and particulate contaminants, which adversely affect air quality, human health, building finishes, building systems, and the environment. Personnel involved with various elements of the green cleaning program shall carry out their tasks according to this program. To ensure an effective and coordinated effort, the building staff responsible for overseeing the Green Cleaning Policy and Program shall review all proposed cleaning activities before implementation.

- a. IEQc3.3: Products: **90% of consumables are sustainable**
- b. IEQc3.4: Equipment: **50% of existing inventory and 100% of new purchases have sustainable labels**

## Performance Metrics

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Documentation expectations to verify goal achievement.

- a. IEQc3.3: Products: **Cost in dollars**
- b. IEQc3.4: Equipment: **Cost in dollars**

## Implementation

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Follow the standards and guidance in this policy for all cleaning activities. Refer to the janitorial vendor's green cleaning program for detailed procedures.

- a. Cleaning Product Purchases meet IEQc3.3: Purchase of Sustainable Cleaning Products
  - Green Seal GS-37, for general-purpose, bathroom, glass and carpet cleaner use for industrial and institutional purposes
  - Environmental Choice CCD-110, for cleaning and degreasing compounds
  - Environmental Choice CCD-146, for hard-surface cleaners
  - Environmental Choice CCD-148, for carpet and upholstery care.
- i. Disinfectants, metal polish, floor finishes, strippers or other products not addressed by GS-37 or Environmental Choice CCD-110, 146, or 148 shall meet at least one of the following standards for the appropriate category:
  - Green Seal GS-40, for industrial and institutional floor-care products
  - Environmental Choice CCD-112, for digestion additives for cleaning and odor control
  - Environmental Choice CCD-113, for drain or grease-trap additives
  - Environmental Choice CCD-115, for odor-control additives
  - Environmental Choice CCD-147, for hard-floor care
  - California Code of Regulations maximum allowable VOC levels for the specific product category.
- ii. Disposable janitorial paper products and trash bags meet the minimum requirements of one or more of the following programs for the applicable product category:
  - U.S. EPA Comprehensive Procurement Guidelines for Janitorial Paper and Plastic Trash Can Liners
  - Green Seal GS-09, for paper towels and napkins
  - Green Seal GS- 01, for tissue paper

- Environmental Choice CCD-082, for toilet tissue
  - Environmental Choice CCD-086, for hand towels
  - Janitorial paper products derived from rapidly renewable resources or made from tree-free fibers.
- iii. Hand soaps meet one or more of the following standards:
- No antimicrobial agents (other than as a preservative) except where required by health codes and other regulations (i.e., food service and health care requirements)
  - Green Seal GS-41, for industrial and institutional hand cleaners
  - Environmental Choice CCD-104, for hand cleaners and hand soaps.
- b. Cleaning equipment purchases meet IEQc3.4: Sustainable Cleaning Equipment
- Vacuum cleaners meet the requirements of the Carpet and Rug Institute “Green Label” Testing Program— Vacuum Cleaner Criteria and are capable of capturing 96% of particulates 0.3 microns in size and shall operate with a sound level less than 70dba.
  - Carpet extraction equipment for restorative, deep cleaning is certified by the Carpet and Rug Institute’s “Seal of Approval” Testing Program for deep-cleaning extractors.
  - Powered floor equipment—e.g., electric and battery-powered floor buffers and burnishers—is equipped with vacuums, guards and/or other devices for capturing fine particulates, and operates with a sound level less than 70dba.
  - Propane-powered floor equipment has high-efficiency, low-emission engines with catalytic converters and mufflers that meet California Air Resources Board (CARB) or Environmental Protection Agency (EPA) standards for the specific engine size, and operate with a sound level of less than 90dba.
  - Automated scrubbing machines are equipped with variable-speed feed pumps and onboard chemical metering to optimize the use of cleaning fluids. Alternatively, the scrubbing machines use only tap water with no added cleaning products.
  - Battery-powered equipment is equipped with environmentally preferable gel batteries.
  - Powered equipment is ergonomically designed to minimize vibration, noise and user fatigue.
  - Equipment is designed with safeguards, such as rollers or rubber bumpers, to reduce potential damage to building surfaces.
  - A log shall be kept for all powered cleaning equipment to document the date of purchase and all repair and maintenance activities. Vendor cut sheets for all equipment used onsite shall be stored onsite. When cleaning equipment replacement is necessary, acquisition dates and supporting documentation shall be retained to demonstrate that all newly acquired equipment complies with the specifications.
- i. Hard-floor and carpet maintenance
- The floor and carpet maintenance program at each building is designed to use few, or no, harmful chemicals; remove and eliminate irritating dust, dirt and other contaminants; and protect and preserve floors.
  - To minimize chemical use, each building has reduced the frequency of stripping or removing coatings and is able to maximize the floor’s longevity,

- thereby conserving cleaning and floor restoration materials and minimizing occupants' exposure to harmful chemicals.
- A written floor maintenance plan and log shall be maintained, which details the number of coats of floor finish being applied as the base and other applications (top coat), along with all relevant maintenance/restoration practices and the dates and duration of these activities.
- ii. Entryway systems
- Grilles, Grates, and Walk-off mats at all building entrances shall be cleaned weekly. These systems shall be a minimum of 10 feet long in the direction of travel.
  - If grates and/or grilles are used, they shall be vacuumed and surface cleaned daily. Grille/grate wells shall also be cleaned during this process and mopped weekly.
  - If walk-off mats are used, they shall be professionally cleaned on a monthly basis and thoroughly vacuumed onsite on a daily basis. The flooring beneath the mats shall be vacuumed and mopped on a weekly basis as well.
- c. Protect vulnerable building occupants
- To protect vulnerable building occupants, such as pregnant women, children, asthmatics, elderly occupants, individuals with allergies and highly sensitive individuals, use only low/no VOC cleaning products
  - Perform routine cleaning and floor restoration activities after working hours when the majority of occupants have left the building
  - Limit the number of cleaning chemicals used in the building
  - Maintain a high level of cleanliness thus minimizing the presence of irritants
- d. Hand hygiene
- All restroom facilities, including those in guest rooms, public areas and back-of-house spaces shall include appropriately approved hand soaps.
  - Per regulations, hand-hygiene notices will be placed in all employee rest rooms.
- e. Handling and storage of cleaning chemicals
- Storage: Cleaning chemicals are stored in a single-locked janitorial closet on the ground floor. Workers access chemicals at the beginning of their shift and as needed.
  - Safety: The cleaning chemical supplier is required to provide accurate MSDSs for all chemicals which are filed in the chemical storage room.
  - Spills: The supervisor should be notified immediately and chemicals contained. Clean up spill immediately and contact poison control or 911 if accident escalates to health issue.
- f. Chemical concentrates and dilution systems
- Chemical concentrates and dilution systems are used according to the procedures of the contracted vendor to minimize risk to staff and occupants, and to conserve resources. The following procedures are documented in the contracted vendor's plan:
    - i. Dilution system description
    - ii. Protocol for Use
    - iii. Maintenance
    - iv. Contaminant and treatment of laboratory chemicals

1. For any drain that handles laboratory-type liquids, containment drains must be provided that will appropriately treat the liquid waste
  2. Containment drains are installed and used, as necessary, to minimize risk to staff and occupants, and to mitigate contamination of natural resources
- g. Staffing and training - All cleaning personnel shall receive regular training; upon hire and annually at minimum. Vendors shall supply evidence of compliance with the following training requirements prior to contract award or renewal:
- Employee safety and health, including hand hygiene
  - Regulatory compliance standards—OSHA, EPA, local
  - Job Hazard Analysis (JHA) / OSHA JSA - Unsafe attitudes and conditions accident prevention.
  - Record-keeping
  - Safe chemical storage and handling
  - Hazards of use, disposal, and recycling of cleaning chemicals, dispensing equipment and packaging
  - Sample training topics include:
    1. Employee safety and health compliance as it relates to the cleaning program
    2. Regulatory compliance standards—OSHA, EPA, and other local, state, and federal rules and regulations
    3. Unsafe attitudes and conditions in the work place through Job Safety Analysis—OSHA JSA or JHA (Job Hazard Analysis)
    4. Employee performance improvement, such as accident prevention and record-keeping
    5. Compliance with health and safety rules, and regulation and confidentiality issues
    6. Safe chemical storage and handling
    7. Disposal and recycling of cleaning chemicals, dispensing equipment and packaging
  - All workers shall receive, at minimum, annual training
  - Staffing Plan:
    1. To meet cleaning objectives within the building, minimum staffing requirements must be met. Factors such as occupancy rates, seasonal variations and other considerations should be taken into account when adjusting the staffing plan. Typical cleaning time varies by building.
- h. Occupant feedback and evaluation of new technologies
- All guests and employees may contact the Property Manager to provide feedback on cleaning practices. Occupants are encouraged to alert the management to any issues relating to the green cleaning program. A formal survey is administered once a year.
  - The Property Manager issues annual occupant feedback surveys to seek input on cleaning practices in addition to other performance metrics.
  - The janitorial vendor and Property Manager regularly have conversation and research new green cleaning technologies to integrate into the building's green cleaning procedures.

**Responsible Party**

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The Property Manager is responsible for educating external vendors in the goals and performance metrics of this plan.

- a. All external vendors are responsible for reporting their data to the property manager:
  - i. IEQc3.3: Products – Purchase records of any consumables
  - ii. IEQc3.4: Equipment - An inventory of all equipment, maintenance logs, and new purchase receipts
- b. Green cleaning strategies for the property shall include actions performed by the following contractors:

Function	Company Name	Primary Contact	Phone

**Quality Control**

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Prior to implementation, service providers involved in the building’s plan shall submit all information about proposed practices to the Property Manager to determine compliance with the plan and approve or deny action.

- a. Property Manager shall review equipment inventory and purchase logs quarterly to confirm incremental improvement in use of sustainable practices.
- b. Once a year, a third-party, or the responsible parties of this policy will conduct an APPA Audit to demonstrate compliance with LEED EB: O+M IEQc3.2: Custodial Effectiveness Assessment.



# Indoor Air Quality (IAQ) Management Plan for Facility Alterations and Additions

SL Green

## SCOPE

This plan applies to all interior facility alterations and additions for each SL Green building, and provides guidelines for indoor air quality management to sustain the comfort and well-being of construction workers and building occupants. This plan was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

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Successfully limit and control indoor air contaminants potentially stemming from the construction phase and continuing into the building occupancy.

- a. **Follow SMACNA guidelines** for HVAC protection, source control, pathway interruption, housekeeping and scheduling

## Performance Metrics

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Documentation expectations to verify goal achievement.

- a. **A Photo Log** to record physical evidence that the five SMACNA guidelines followed during construction
- b. **A Flush-Out Log** to record airflow, duration, and site conditions prior to occupancy

## Implementation – SMACNA Guidelines

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- a. HVAC Protection - Avoid or minimize use of permanently installed HVAC systems during construction. All HVAC equipment shall be protected from collecting dust and odors (which can “stick” to porous materials in the system and later be released).
  - i. Return Air System: The return side of the HVAC system shall be shut down whenever possible during heavy construction/dust generating activities. The system should be isolated from the surrounding environment as much as possible to prevent induction of pollutants. During construction, all return system openings in the construction area should be sealed with plastic or be fitted with temporary filters with a Minimum Efficiency Reporting Value of 8 if the system is operational during construction; Attach filters at return air inlets to protect return ductwork. All filters shall receive frequent periodic maintenance and/or replacement. Filtration efficiency shall be as stipulated in the reference standard. The Contractor shall document all maintenance and replacement of all filtration media. All filtration media shall be replaced just prior to substantial completion and occupancy. During installation, open ends of duct shall be sealed with plastic at the end of each day.
  - ii. Duct Cleaning: If excessive dust or debris has accumulated due to inadequate protection according to this plan during the construction process, the ducts and associated equipment shall be cleaned prior to occupancy. The ducts in a given area shall be cleaned after dust producing activities have been completed in that area. A statement will be submitted to the Property Manager from the specialty contractor performing the duct cleaning indicating which sections of duct have been cleaned.
- b. Source Control
  - i. As the building is enclosed, the use of portable combustion type heaters (i.e. kerosene, propane) should be minimized or not used at all to prevent elevated levels of combustion product contaminants.
  - ii. The building will utilize products (solvents, caulks, carpet, adhesives, paints and coatings, composite wood and agrifiber product) that emit low quantities of VOCs listed in the specifications. During construction activities that produce odors or VOCs, fresh ventilation air utilizing 100% outside air will be provided when possible, rather

- than return air. The Contractor will not exceed the HVAC system's ability to remove moisture from the outside air.
- iii. When using fuel powered equipment inside the building, bottled gas will be used instead of diesel. Electric equipment will be used when possible, such as forklifts, chainsaws, or masonry saws. Equipment that is not being used will be cycled off.
  - iv. Containers of wet products (paint, adhesives, etc.) will be kept closed when not in use. Before these products are discarded, waste materials that can release odors or dust will be covered or sealed.
  - v. All waste materials will be promptly discarded in the appropriate waste receptacle. Waste materials that are recyclable should be deposited in the appropriate recycling receptacle.
  - vi. Smoking is only allowed in the designated smoking areas located outside of the buildings, at least 25 feet from any outdoor air intakes, operable windows, doors, or other openings. Designated smoking areas are appropriately marked with signage. Building entrances and the building perimeter are marked with "no smoking" and "no smoking permitted within 25' of building entrance" signage.
  - vii. Moisture: Accumulated water shall be removed as soon as possible and work areas shall be kept dry. Porous materials such as insulation shall be protected from moisture and any materials that get wet shall be dried out completely immediately after moisture is observed. Porous items such as duct insulation that remains damp for more than a few hours shall be replaced.
- c. Pathway Interruption
- i. Isolation of Construction: During construction, areas of work shall be isolated when possible to prevent contamination of previously cleaned spaces. When possible, barriers such as dust curtains or plastic sheets shall be erected between work areas to prevent unwanted airflow from dirty to clean spaces. Temporary exhaust directly to the outside shall be provided in these areas when practical. Dust and odor producing materials shall be kept away from air intakes.
  - ii. Equipment and Materials: Equipment and materials not being used shall be kept clean by covering them or moving them to a clean area. Building materials shall be stored in a weather tight, clean area prior to unpackaging for installation.
  - iii. Containers of wet products (paint, adhesives, etc.) shall be kept closed when not in use. All waste materials shall be promptly discarded in the appropriate waste receptacle (waste materials that are recyclable should be deposited in the appropriate recycling receptacle.) Waste materials which can release odor or dust shall be covered or sealed before discarding.
- d. Housekeeping
- i. Construction contaminants in the building will be reduced prior to occupancy through regular space cleaning activities. Once the building or space is enclosed, any standing water will be cleaned up immediately to prevent mold and mildew growth and, solvent, paint, and other VOC emitting chemical spills will be cleaned up immediately as well. As an added measure, the VOC requirements of each project should not allow the use of high solvent-based materials. In an instance where ductwork becomes laden with air pollutants, ductwork will be cleaned prior to further placement. Equipment and materials that are not being used will be kept clean by covering them or moving them to a clean area. Building materials will be stored in a weather-tight, clean area prior to unpacking for installation. There will be no storage

- of open paint or glue buckets. All buckets should be removed from the building at the end of every day.
- ii. Wetting agents or sweeping compounds may be used in the construction area to suppress dust. Dust from the site should be cleaned regularly using a damp rag, wet mop, or vacuum equipped with a high efficiency particulate filter or wet scrubber. All spills or excess applications of solvent-containing products will be removed immediately.
- e. Scheduling
- i. Sequence of Operations: Construction activities will be scheduled to minimize, or even eliminate, the interference of operations in the occupied portions of the building and the impact on the indoor air quality. If necessary, activities may be scheduled during off-hours to allow for off-gassing and dust removal.
  - ii. Absorptive materials will be installed after the prescribed dry or cure time of wet finishes to minimize the detrimental effects on IAQ materials and materials that are directly exposed to moisture from the HVAC system. The application of building materials with significant sources of contaminants will be sequenced to dissipate most emissions prior to the introduction of products that can trap or absorb contaminants. Where protection cannot be provided by sequencing installation, absorptive surfaces will be protected with vapor barriers and will be provided air exchange through ventilation systems.
  - iii. Upon completion of the facility alteration or addition, the Contractor will notify property manager in order that the HVAC and lighting systems can be returned to the design or modified sequence of operations. Property Manager will update the building monitoring system as needed to maintain the design or modified sequence of operations.
  - iv. Special construction scheduling is necessary to ensure dissipation of harmful emissions from finishes during curing. The majority of the application of wet and odor-emitting materials such as paints, sealants, and coatings should be completed before installing materials that act as “sinks” or absorbers such as ceiling tiles, carpets, insulation, gypsum products, and fabric-covered furnishings. The Contractor should refer to manufacturers’ product data (MSDS) to determine the appropriate curing time for each type of finish. Failing to follow each manufacturer’s guidelines can result in emission of these pollutants during occupancy. All areas should receive a final cleaning which shall include the ragging of all latent dust, the mopping of all floors, cleansing of all fixtures, and polishing of all finishes requiring polishes with environmentally sensitive products that do not adversely impact VOC content.

## Implementation - Flush Out

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- a. Requirements: This flush-out procedure is required for all tenant developments and/or build-outs, as well as all facility alterations and/or additions completed by facility staff or ownership. The flush-out procedure will be performed after construction ends, all interior finishes have been installed, and all new filtration media has been installed. It must begin prior to occupancy of the facility alteration or addition.
- b. Procedure: A total outdoor air volume of 14,000 cubic feet per square foot will be supplied, while maintaining an internal temperature of at least 60 degrees F and maintaining a relative humidity no higher than 60% where cooling mechanisms are operated. The affected space may be occupied only after the delivery of at least 3,500 cubic feet of outdoor air per square foot of floor area and the space has been ventilated at a minimum rate of 0.30 cfm per square foot of outdoor air or the design minimum outside air rate (whichever is greater) for at least three hours prior to occupancy until the total of 14,000 cubic feet per square foot of outdoor air has been delivered to the space. The flush-out may continue during occupancy.

## Responsible Party

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The Property Manager shall appoint one individual to perform the duties of the construction IAQ manager. This manager shall be responsible for communicating with the Contractor representative to ensure compliance with the details contained within this document as well as enforcing the requirements contained in this document.

- a. IAQ manager shall be responsible for the following:
  - i. Conducting any required Construction IAQ meetings, and recording of such meetings.
  - ii. Flush out log demonstrating how system was capable of supplying outdoor air, and duration.
- b. The Contractor's representative is responsible for managing and providing the necessary documentation of the following:
  - i. Job-site inspections and photographs of SMACNA guidelines implemented at the jobsite.
  - ii. Coordinating with Property Manager the ordering of duct termination sealing work and/or duct cleaning as required, and documentation of such work evidenced by copies of work orders, visual inspection, or photographs.
  - iii. Maintenance of cut sheets of all filtration media utilized during construction and installed immediately prior to occupancy.
  - iv. All reports, checklists, lists and other required documentation shall be kept on file at the project site. Upon substantial completion and occupancy, the Contractor shall furnish the Owner with a comprehensive Project Construction IAQ report that shall contain all relevant documentation.

## Quality Control

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The Construction IAQ Management Plan shall be discussed at all project planning meetings. Discussions involving this topic shall include the methods to be utilized to prevent and effectively control construction related air pollutants and their related issues. Additionally, construction IAQ measures will be discussed at construction meetings held between the Contractor and each relevant subcontractor. The Contractor shall appoint a representative to provide oversight of the inspection activities and compile compliance documentation required by this plan.



# Indoor Integrated Pest Management Plan

SL Green

## SCOPE

This plan applies to the interior common areas and tenant space of each SL Green building, and provides guidelines for maintaining the operational elements of LEED EB: O+M: IEQc3.6: Integrated Pest Management Plan. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

## CONTACT

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## Goals

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Use **100% integrated strategies** to minimize the impact of pest management practices on indoor environmental quality, and reduce exposure of occupants, staff, and maintenance personnel to potentially hazardous chemical, biological, and particle contaminants.

## Performance Metrics

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Documentation of pest control visits and methods and products used.

- a. Event - **PRODUCTS**
  - i. Date and description of strategies employed by responsible vendor are reported to the property manager. Chemical application must include notes on SF Hazard Criteria or universal notification as required below.

## Implementation

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Integrated methods that make use of monitoring and non-toxic preventative measures (e.g., site inspection and maintenance, cultural controls, pest inspection and population monitoring) will be used to proactively manage and minimize pest issues.

- a. Integrated Methods: Identify root cause and employ structural, janitorial, and operational corrective actions to remedy the root cause without any application of pesticide.
  - i. Eliminate food and water sources
  - ii. Clean spills promptly
    1. Any cleaning products used must meet the requirements in the green cleaning policy
  - iii. Eliminate Clutter to simplify cleaning and minimize hiding places
  - iv. Routine Site Inspection and Maintenance
  - v. Pest Population Monitoring
- b. Least-Toxic Pesticide: If pesticide-free strategies do not eliminate the pest issue, escalate treatment to use least-toxic pesticides. Chemical pesticides are used only as a last resort.
  - i. Least-Toxic pesticides are defined as meeting the criteria of San Francisco's Hazard Tier III criteria (least hazardous)
  - ii. Rodent Bait is never considered least-toxic.
- c. Emergency Conditions: In the event of an emergency, pesticides may be applied on the grounds without complying with the earlier stipulations for use of integrated and least-toxic methods.
  - i. Emergencies are defined as infestations of certain pest species that may directly affect occupancy health or lead to a reduction in the quality of the work environment.
- d. Universal Notification: Each SL Green building has adopted a universal notification system if a pesticide, other than a least-toxic pesticide as defined above, must be applied on site. This strategy requires each SL Green building and its vendors to notify building occupants at least 72 hours in advance of a pesticide application under normal circumstances and no more than 24 hours after an emergency application through posted signs or other means of reaching 100 percent of occupants. This notification system enables occupants and staff, and especially high-risk occupants such as children, pregnant women and the elderly, to modify their plans based on pesticide use at the building.

- i. Notification must include the following:
  1. Pesticide product name
  2. Active ingredient
  3. Product label signal word (e.g., “caution”, “danger”)
  4. Time and location of application
  5. Contact information for persons seeking more information
- e. Every application of any pesticides shall be recorded in a log and include:
  1. The pesticide application log shall include the following information:
  2. Universal Notification to Occupants
  3. Date
  4. Time
  5. Method
  6. Pesticide Application Date and Time
  7. Application Manager
  8. Location
  9. Target Pest
  10. Pesticide Trade Name
  11. Pesticide Active Ingredient
  12. EPA Registration Number
  13. Least-toxic status (Y/N)
- f. Vegetative pests (‘weeds’), fungal, and bacterial disease are inspected and monitored regularly. Manual removal and disposal are recommended. Chemical treatment is a last resort with the use of target-plant based or biological product treatment applications. Spot treatments-following least-toxic and universal notification systems-are employed only as infestation occurs.
  - i. Animal & Vegetation Pest Control IPM Best Practices include:

<b>CHEMICAL STORAGE PRACTICES</b>	
<b>Storage Areas</b>	<ul style="list-style-type: none"> <li>▪ Storage areas must be dry, frost-free, well-ventilated and secure.</li> <li>▪ Storage areas must be situated away from other buildings, especially residential buildings or areas where food or flammable materials are stored.</li> <li>▪ Storage must be built to resist foreseeable accidents, including leakage and spillage, fires and the weather. Ensure there is no risk of spills polluting ground water and local bodies of water. Floors must be impervious to liquids, anti-slip, chemical-resistant, washable and with a means of diverting spills. Drains must lead to sumps or tanks large enough to contain any foreseeable leaks.</li> <li>▪ Shelving must be appropriate for the size of the containers stored in them. Flammable pesticides must be separated from other pesticides. Consideration must be given to possible reactions between chemicals coming in contact with each other.</li> </ul>
<b>Labels</b>	<ul style="list-style-type: none"> <li>▪ Make sure all pest control chemicals are clearly labeled and that the manufacturer's instructions for use are kept with them.</li> <li>▪ Chemicals must never be placed in unmarked containers.</li> </ul>
<b>Product Information</b>	<ul style="list-style-type: none"> <li>▪ Effective first-aid provisions must be available together with data sheets on all the products in the storage room and the chemical safety precautions.</li> <li>▪ Emergency telephone numbers must be listed in a key location in the storage facility. These numbers and other emergency facilities must be checked and updated as necessary.</li> </ul>
<b>Signage</b>	<ul style="list-style-type: none"> <li>▪ Display warning signs without attracting unwanted attention.</li> </ul>

<b>CHEMICAL PREPARATION &amp; HANDLING PRACTICES</b>	
<b>Choosing Chemicals</b>	<ul style="list-style-type: none"> <li>▪ Identify which pesticides and herbicides are being used and the exact problems they are intended to resolve. The more that is known about the problem, the less chance there is of making a mistake. The words organic, natural and biodegradable in this context do not guarantee that they are safe.</li> </ul>
<b>Mixing Chemicals</b>	<ul style="list-style-type: none"> <li>▪ Accurate measurements must be made during both mixing and application phases. Use the most suitable chemical, in the minimum necessary amount, to achieve the desired results.</li> <li>▪ A safe area must be available for mixing pesticides. This must be done on a concrete pad, with a separate sump or tank to contain any leakage.</li> </ul>
<b>Health Precautions</b>	<ul style="list-style-type: none"> <li>▪ Operators must be provided with and adequately trained in the use of the necessary equipment and protective clothing.</li> <li>▪ Proper health surveillance must be available to all those working with pesticides and herbicides.</li> <li>▪ Neighbors and others in the area must be warned of the spraying program in advance of and during applications.</li> </ul>
<b>Chemical Transport</b>	<ul style="list-style-type: none"> <li>▪ Only the appropriate quantity of pesticide and herbicide must be removed from the pesticide store for immediate use.</li> <li>▪ Do not transport chemicals in vehicles used for carrying people or food.</li> </ul>

<b>CHEMICAL APPLICATION PRACTICES</b>	
<b>User Qualifications</b>	<ul style="list-style-type: none"> <li>▪ In many instances, it will be necessary to call on outside expertise to advice on pest-management problems, particularly in the creation of customized integrated pest management problems, which may require detailed knowledge of the biology and ecology of a particular species.</li> <li>▪ If pesticides are required, the IPM specialist shall communicate with property management to determine the best product and application in accordance with approval requirements.</li> <li>▪ A specialist must supervise and control the preparation and use of chemical applications.</li> </ul>
<b>Species Considerations</b>	<ul style="list-style-type: none"> <li>▪ Time the treatment to coincide with the presence of the pest.</li> <li>▪ Use a selective chemical that has the least effect on non-target species and treat only the area affected.</li> </ul>
<b>User Safety</b>	<ul style="list-style-type: none"> <li>▪ Users must wear protective clothing and headgear, and change clothing and wash thoroughly with soap and water after applying pest control chemicals.</li> <li>▪ Ensure that anyone handling toxic chemicals never works alone and that the work area is well-ventilated.</li> <li>▪ Wear a respirator for outdoor spraying or dusting of organic phosphorus compounds</li> <li>▪ Eating, drinking and smoking must be prohibited when using or handling chemicals</li> <li>▪ Users must be familiar with the effects on the body of the chemicals they are likely to be using, and how the chemicals may enter the body.</li> <li>▪ Users must be aware of the signs and symptoms of acute poisoning related to chemicals they are using. They must stop work if they are feeling ill and seek medical advice.</li> </ul>
<b>Limited Access</b>	<ul style="list-style-type: none"> <li>▪ The area of application must be clearly marked, and unnecessary access prevented while spraying is in progress.</li> <li>▪ Building occupants must be informed of any pest-control management systems. When application or spraying is in progress, they must be warned of this activity and kept away from the area in which it is taking place.</li> <li>▪ Control the reentry of people into the treated area.</li> </ul>
<b>Equipment</b>	<ul style="list-style-type: none"> <li>▪ Equipment must be frequently checked and properly maintained, both for health and safety reasons and to minimize spray drift.</li> </ul>
<b>Weather/Time Restrictions</b>	<ul style="list-style-type: none"> <li>▪ Spraying must not be carried out in unsuitable weather. Anyone operating sprayers must have access to a wind-speed meter and only spray when the wind speed is negligible.</li> <li>▪ Hours of work must be controlled so that building occupants are not exposed.</li> </ul>

<b>CHEMICAL DISPOSAL PRACTICES</b>	
<b>Conditions of Disposal</b>	<p>As most pesticides and herbicides are extremely toxic, proper disposal of unused chemicals is paramount to maintaining the health of building occupants and the safety of the environment. Disposal methods will depend on:</p> <ul style="list-style-type: none"> <li>▪ Quantity of waste for disposal</li> <li>▪ Chemical and biological degradability of the active ingredients</li> <li>▪ Toxic properties</li> <li>▪ Concentration</li> <li>▪ Physical form of the waste</li> <li>▪ Disposal options available</li> </ul>
<b>General Guidelines</b>	<ul style="list-style-type: none"> <li>▪ Always follow the manufacturer's and/or supplier's instructions even when disposing of empty containers.</li> <li>▪ Landfilling or incinerating pesticides and herbicides is not an environmentally sound option.</li> <li>▪ Segregate pesticide/herbicide wastes from general building wastes.</li> </ul>
<b>Containers / Labels</b>	<ul style="list-style-type: none"> <li>▪ Never transfer pesticides to unlabeled or mislabeled containers. Keep the chemicals in clearly labeled containers even when disposing of them.</li> <li>▪ Do not reuse pesticide/herbicide containers.</li> <li>▪ Puncture containers after they have been used to prevent reuse.</li> </ul>
<b>Authorization</b>	<ul style="list-style-type: none"> <li>▪ Use an authorized waste-disposal contractor.</li> <li>▪ Use an authorized disposal site.</li> </ul>

<b>BASIC VEGETATION PEST CONTROL PRACTICES</b>	
<b>Maintenance</b>	<ul style="list-style-type: none"> <li>▪ Keep the building grounds well-maintained at all times.</li> <li>▪ Maintenance personnel shall apply mulch to plant beds, warding off weeds and other pests.</li> </ul>
<b>Plantings</b>	<ul style="list-style-type: none"> <li>▪ Plant at the right time and in the right places. Seedlings must not be planted too early, nor located in unsuitable conditions.</li> <li>▪ Avoid monocultures by mixing plant species in planters and gardens.</li> </ul>
<b>Manual Controls</b>	<ul style="list-style-type: none"> <li>▪ Landscaping shall be hand weeded and chemical control shall be kept to a minimum. This measure prevents human and environmental exposure to hazardous chemicals.</li> </ul>
<b>Chemical Controls</b>	<ul style="list-style-type: none"> <li>▪ When chemical use is necessary, replace hazardous substances with least-toxic chemicals as defined by Hazard Tier Review of Pesticide Products for the City of San Francisco.</li> </ul>
<b>Inspection Schedule and Location</b>	<ul style="list-style-type: none"> <li>▪ The landscape contractor shall visit the site at regular intervals to monitor and apply pest controls operations.</li> </ul>

<b>BASIC ANIMAL PEST CONTROL PRACTICES</b>	
<b>Site/Building Cleanliness</b>	<ul style="list-style-type: none"> <li>▪ Keep garbage containers clean, free of odors and covered at all times. Sanitation measures reduce habitat and food sources for pests.</li> <li>▪ Keep areas around garbage containers free of spillage or garbage to prevent the collection of trash or debris on the ground around or underneath the containers.</li> <li>▪ Keep grounds free of high weeds, trash, old equipment and debris, as these conditions create ideal harborage for rodents.</li> </ul>
<b>Structural Integrity</b>	<ul style="list-style-type: none"> <li>▪ Maintain the building exterior in good repair with no holes or openings larger than ¼ inch including, but is not limited to, windows, doors, fans, vents, etc. Structural repairs prevent pests from entering the building.</li> <li>▪ Address any deficiencies in the building exterior with corrective measures, i.e., cementing, screening, caulking, installing stripping on door bases, etc.</li> <li>▪ Maintain door sweeps on all applicable doors to produce a good seal to the ground.</li> </ul>
<b>Inspection Schedule and Location</b>	<ul style="list-style-type: none"> <li>▪ Visual inspections shall be performed at least 2 times per month, with treatment if necessary. After each visit, the pest contractor shall provide a printed service report that includes written observations, recommendations and details of IPM activities.</li> </ul>

<b>SPECIES-SPECIFIC ANIMAL CONTROL STRATEGIES</b>	
<b>Ants</b>	<ul style="list-style-type: none"> <li>▪ In areas where ants are present, wipe the areas down with soapy water in order to prevent the formation of major scent trails. If there already is an established trail, wipe backwards from the food source to the entrance of the trail.</li> <li>▪ Block all entry points to the building – ants will give up trying to find a way through after 1-2 days. Temporary blockades can be made using: sticky substances such as petroleum jelly, chili powder, or cinnamon,</li> <li>▪ Always keep opened foodstuffs in sealed containers or store them in the refrigerator or freezer. Clean out kitchen cabinets, drawers and shelves to remove crumbs and stains. Keep sinks and worktops clean and dry.</li> <li>▪ Baits are best put in the path of an ant trail and then removed after the ant activity stops, before they lure ants from another colony to the area.</li> <li>▪ Prune branches close to the building and removed fences or anything that might create a bridge for the ants to cross.</li> <li>▪ Low toxicity compounds to control ants include diatomaceous earth (DE), a chalk-like powder consisting of the fossilized remains of diatoms, a type of hard-shelled algae.</li> </ul>

<p><b>Aphids</b></p>	<ul style="list-style-type: none"> <li>▪ Manage sap-sucking pest mites and whiteflies by releasing predatory mites, ladybugs and lacewings onto the grounds several times over a period of weeks.</li> <li>▪ Consider using parasitic wasps to control scales on trees, shrubs and flowers</li> <li>▪ If it is difficult to obtain supplies of beneficial insects for release into the garden, then it is possible to purchase a branded lure that simulates the scent of aphids and attracts ladybugs and lacewings to the area</li> </ul>
<p><b>Bed Bugs</b></p>	<ul style="list-style-type: none"> <li>▪ If a bed bug infestation is detected, the most effective course of action is to enlist professional help to inspect the entire building for the presence of bed bugs and treat the affected areas.</li> </ul>
<p><b>Caterpillars</b></p>	<ul style="list-style-type: none"> <li>▪ Bacterial insecticides derived from natural ingredients are available to control caterpillars.</li> </ul>
<p><b>Cockroaches</b></p>	<ul style="list-style-type: none"> <li>▪ Cockroaches contaminate food with their excrement and secrete and unpleasant odor that can permeate the indoor environment.</li> <li>▪ There are five main species of cockroaches and effective control depends on identifying them correctly.</li> <li>▪ Integrated pest management measures for controlling cockroaches include effective hygiene and exclusion practices, sticky traps lined with pheromones, and insect growth regulators.</li> <li>▪ All food handling areas should be cleaned frequently.</li> <li>▪ Cockroach control is best done by a professional on a contract basis, through the application of least-toxic pesticides.</li> <li>▪ Control is necessary on a regular basis because of the mobility, reproduction, longevity, and behavior of cockroaches.</li> <li>▪ Ensure that you know what pesticides are being used by the professional contractor and do not assume they are using an environmentally appropriate chemical.</li> </ul>
<p><b>Dust Mites</b></p>	<ul style="list-style-type: none"> <li>▪ Fabrics, bedding and carpets attract and generate dust and dust mites. To keep dust mites at bay, keep building well-ventilated and dry.</li> </ul>

<p><b>Flies</b></p>	<ul style="list-style-type: none"> <li>▪ Flies reproduce more readily in waste and manure, which is where control should begin. In warm weather conditions, the reproduction cycle – from egg, to larva, to pupa, to adult winged fly – requires approximately one week.</li> <li>▪ Collection of waste and residues should be carried out at least twice a week.</li> <li>▪ Keep refuse areas clean to avoid providing flies with breeding grounds</li> <li>▪ Ensure dustbin lids fit tightly and the interiors of bins are cleaned regularly to keep surfaces free of food material.</li> <li>▪ Use fine mesh window and door screens as a barrier against entry by any flying insect.</li> <li>▪ Ultra-violet (UV) fly killing equipment is very effective so long as it is situated correctly.</li> <li>▪ UV equipment disguised as uplighters in dining and lobby areas are discreet and highly effective because they attract and eliminate flies quickly and silently.</li> <li>▪ In food preparation areas, UV equipment should only be used once all possible precautions have been taken to keep flying insects out.</li> <li>▪ Position the UV equipment close to an entry point, at right angles to the nearest competing light source such as a window. In many catering establishments, poorly-situated UV equipment poses a greater food hygiene hazard than lacking pest repellants altogether. This is because when placed next to the food preparation area, they draw flies to the food which they are likely to contaminate before being killed.</li> </ul>
<p><b>Mosquitoes</b></p>	<ul style="list-style-type: none"> <li>▪ The best control method for mosquitoes is to eradicate their habitat.</li> <li>▪ Because they like moisture and lay their eggs in standing water, it is important not to leave flower pots, buckets, plastic sheeting or other open containers outside collecting water. Ensure that any rainwater collectors are fitted with lids.</li> <li>▪ Clear debris from gutters and drains to ensure there is no standing water after rain and drain unused pools or fountains so that the water cannot become stagnant.</li> <li>▪ Drain or fill depressions, mud flats, and other areas that might hold water.</li> <li>▪ Repair leaking taps and air-conditioning units so that puddles cannot form and ensure that septic tanks and sewage systems are properly maintained and in good working order.</li> <li>▪ Avoid over-irrigating lawns and gardens, and keep weeds and grass (where the insects rest) well-clipped.</li> <li>▪ If you have a pond or lake on the building grounds, fill it with mosquito-eating fish such as top-feeding minnows or goldfish – they will eat the mosquito larvae before they mature into adults.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Some buildings have successfully reduced the number of mosquitoes and other insects by attracting bats to their property. A simply-built bat house will usually accommodate up to 100 bats.</li> <li>▪ To prevent mosquitoes from coming indoors, fit fine-mesh screens to porches, doors and windows.</li> <li>▪ If these measures are insufficient, area repellents such as citronella candles, coils or sprays will repel mosquitoes from porches, patios and other unscreened outdoor areas, although they only work well when the air is still.</li> </ul>
<b>Fabric/Clothing Moths</b>	<ul style="list-style-type: none"> <li>▪ Moth larvae feed on a wide variety of natural and synthetic materials. They can be found in kitchens, food storage areas, clothing, carpets, blankets and upholstery.</li> <li>▪ Fabrics should be washed and then put in bags and placed in a freezer. When taken out to thaw, shake the fabrics vigorously to remove dead larvae.</li> <li>▪ Clean the areas where fabrics have been stored with vinegar and water.</li> <li>▪ Store fabrics in cedar chests or closets. Place cedar chips or blocks or lavender sachets in drawers.</li> <li>▪ For acute moth problems, re-usable traps can be baited with a controlled-release pheromone system to lure moths into the trap and disrupt their mating cycle.</li> <li>▪ Mothballs not only have an unpleasant odor, but they are also poisonous; avoid them if possible. Insect foggers are not recommended as they can pose a health threat and are not always effective.</li> </ul>
<b>Pantry Moths</b>	<ul style="list-style-type: none"> <li>▪ Clean affected areas by vacuuming all surfaces, walls, shelves, cabinets and floors. Scrub hard surfaces rigorously with hot water and detergent, especially in corners and around the edges of removable shelves. Clean all surfaces that come into contact with food.</li> <li>▪ Rinse the affected areas with white vinegar, either in a spray or by wiping with a cloth.</li> <li>▪ Throw away all grain-based food items as well as nuts, raisins, flour and tea, even if it is in sealed containers.</li> <li>▪ Remaining food items and containers should be thoroughly cleaned with a detergent and water solution and wiped down with a vinegar rinse before being put back. Use air-tight containers made of hard plastic, glass or metal and not plastic bags.</li> <li>▪ Kill any moths with a fly swatter or moth traps.</li> <li>▪ After a severe infestation, freezing any new grain products and storing grain products in refrigerators or freezers can prevent re-infestation.</li> <li>▪ Peppermint gum, bay leaves, peppercorns and cloves may also help deter pantry moths.</li> </ul>

<p><b>Rodents</b></p>	<ul style="list-style-type: none"> <li>▪ Rodent control should start with a survey to determine the source of the problem and the conditions that encourage the infestation. Following the survey, implement a program to kill the rodents, removing their sources of food and water, eliminating their place of refuge and making it rodent-proof, and educating and obtaining the cooperation of employees. If the food supply is removed before you eradicate them, the rodents will migrate to other areas, making elimination more difficult.</li> <li>▪ Openings in building foundations and walls should be closed or screened with wire mesh that has holes not more than 1.25 cm (0.5 in) wide. Where pipes enter masonry, force heavy hardware cloth or steel wool into the opening, then fill it with concrete.</li> <li>▪ Continuous surveillance is necessary, and places where rodents have been gnawing to gain entry to a building should be sealed with metal flashing.</li> <li>▪ Doors are particularly vulnerable to rodent entry so ensure that external doors and windows close tightly with no gaps at the bottom.</li> <li>▪ Materials stored in the open, in sheds or in building should be stacked at least 30 cm (1 ft.) above the ground.</li> <li>▪ Stringent waste disposal practices should be observed – secure all waste in closed containers and not just plastic bags.</li> <li>▪ Wash dustbin areas regularly. Make sure composting bins are designed to prevent rodents from entering.</li> <li>▪ Traditional mouse and rat traps, or snap traps, kill instantly. If trapping efforts fail, it is usually due to too few traps being used.</li> <li>▪ Bait should be sticky to ensure that the mouse triggers the trap mechanism even if it only lightly touches the bait. Mice prefer peanut butter or chocolate to cheese. Bacon, oatmeal or apples can also be used as bait.</li> <li>▪ An alternative to snap traps is a battery-operated trap that generates a high-voltage once the rat or mouse is inside. The design is relative safe and can be used in areas where children, pets or wildlife may be present.</li> </ul>
<p><b>Slugs and Snails</b></p>	<ul style="list-style-type: none"> <li>▪ There are various non-chemical solutions to eliminated slugs and snails, including putting salt or sharp shingle around vulnerable plants, drowning them in beer or simply throwing them over a fence. Elemental copper bands also repel snails and slugs.</li> </ul>
<p><b>Wasps and Hornets</b></p>	<ul style="list-style-type: none"> <li>▪ A simple trap can be made by putting beer or a solution of jam or honey and water in an open jar around the grounds. If this does not work, there are branded traps available containing specially formulated attractant baits.</li> </ul>

## Responsible Party

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The Property Manager is responsible for educating external vendors on the goals and performance metrics of this plan.

- a. All external vendors are responsible for reporting their data to the property manager
- b. Contracts with pest and landscape management vendors shall include extensive language describing their role in the building's Plan

## Quality Control

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Property Manager shall review performance logs quarterly to confirm incremental improvement in use of sustainable practices.



# Refrigerant, Greenhouse Gas (GHG), and Climate Change Policy

SL Green

## SCOPE

This plan outlines SL Green's commitments to reduce refrigerant leakage and use, disclose and reduce the direct (Scope 1) and indirect (Scope 2) GHG emissions, and minimize climate change impacts. This policy was established in November 2016, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Goals

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SL Green is committed to protecting the environment by reducing refrigerant leakage and use, mitigating its greenhouse gas emissions at its operations and facilities, and reducing the impacts of climate change.

To minimize environmental impacts concerning our activities, products, services in a way that is appropriate to their nature and scale, we shall:

- Voluntarily participate in CDP and establish a portfolio-wide GHG intensity reduction of 30% by 2025 for Scope 1, Scope 2, and Scope 3 emissions.
- Work to reduce GHG emissions by 30% over a 10-year period by 2026 across 8 million square feet through the NYC Mayor's Carbon Challenge.
- Work to help New York City meet its goal of reducing GHG emissions 80% by 2050, with an interim reduction of 40% by 2030.
- Work to meet the requirements of NYC's Local Law 84 benchmarking mandates and Local Law 97.

## Refrigerant Management Policy & Implementation

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All properties managed by SL Green operate under strict policy adherence that protects the atmosphere and mitigates refrigerant release. SL Green maintains a thorough refrigerant containment program. All equipment is regularly inspected for leaks throughout all preventative maintenance efforts, and any service technician involved in equipment maintenance activities is required to be certified by the EPA in the care and handling of the specific class of refrigerants appropriate for that maintenance activity. Technicians follow the manufacturers' recommendations for the type of maintenance and interval between scheduled services.

New development and buildings will be constructed using HVAC systems that do not use CFC-based refrigerants.

For base building systems that contain CFCs, The annual refrigerant leakage rate of CFC-based refrigerants will be reduced to 5% or less, and the total leakage over the remaining life of the equipment will be reduced to less than 30% of the total refrigerant charge, referencing the EPA Clean Air Act, Title VI, Rule 608 procedures that cover refrigerant management and reporting.

The leakage rate will be calculated following the EPA Clean Air Act, Title VI, Rule 608 procedures and will be based on the most recent amount of refrigerant added. The overall elapsed time will consist of the number of days between the two most recent refrigerant charges. Refrigerant shall be checked on a regular basis (at least monthly).

CFC-based refrigerants will be maintained in base building systems only if third party audits reveal and document that equipment and system replacement or conversion to non-CFC-based refrigerant is not economically feasible within 10 years via a simple payback analysis. If the third party audit reflects a simple payback analysis of less than 10 years, a five-year phase-out plan will be generated for the system's conversion to a non-CFC-based refrigerant type.

Procedures to minimize refrigerant leakage:

- Building Engineering will maintain inventories all equipment and/or storage containers containing more than 0.5 lbs of refrigerant. This inventory is reviewed and updated annually or when equipment changes are made.
- Building Engineering will develop maps identifying the location of refrigerant equipment and/or storage containers containing more than 0.5 lbs of refrigerant. These maps are reviewed and updated annually or when equipment changes are made.
- Leak detection of all equipment or storage containers containing more than 0.5 lbs of refrigerant is conducted monthly, at minimum. This procedure of leak detection is accomplished through inventory and comparison of monthly records to determine losses. The Chief Engineer shall review and sign these records on a quarterly basis.
- If a leak in excess of 5% of the total charge per year is identified, the leak must be repaired immediately, but under no circumstance shall the repair take more than 30 days. If a leak in excess of 5% of the total charge per year is identified and it is not practical to repair the system, a retirement or retrofit program must be implemented within 30 days and completed within one year.
- If a leak is identified and remediation is required, the Chief Engineer will notify building management staff.
- Building management and the Chief Engineer will maintain detailed records of all work performed by contractors on the equipment within the refrigerant inventory. These records must track and detail any refrigerant added or removed while servicing the equipment. These records will be kept in a refrigerant management binder.

Training: All individuals engaged in service of equipment containing any refrigerant will maintain current US EPA certification and have proof of certification available at point of service upon request. Training for service technicians will be conducted on a regular basis to ensure that all procedures are followed, and standards are met. It is the responsibility of building management to inform service technicians of any changes in procedures or regulations that impact their work. It is also the responsibility of management to ensure that all service technicians are trained in the proper maintenance methods for each type of machine, and to provide the proper tools for the prosecution of all maintenance. No waivers or exceptions to this policy will be granted. Union technicians shall all be EPA-certified for proper safe handling of refrigerant per the requirements as outlined in the EPA Clean Air Act, Title VI, Rule 608. Each technician has been trained in Type II & III (high-pressure and low-pressure) refrigerant handling.

## Greenhouse Gas (GHG) Management Policy & Implementation

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SL Green's goal is to reduce portfolio-wide GHG intensity by 30% for Scope 1, Scope 2, and Scope 3 emissions by 2025, reduce GHG emissions by 30% over a 10-year period by 2026 across 8 million square feet through the New York City Mayor's Carbon Challenge, and help New York City meet its goal of reducing GHG emissions 80% by 2050, with an interim reduction of 40% by 2030.

To meet these goals, SL Green has targeted specific parameters, including:

- Optimizing building operations
- Implementing intensive energy management
- Deploying capital investment in state-of-the-art equipment
- Equipping tenants with tools to achieve Scope 3 energy reductions within their spaces, such as:
  - Best practices
  - Data sharing
  - Education
  - Energy Audits
  - Tenant Build-Out Guidelines
  - Utility Incentives
- Encouraging the use of alternative transportation by:
  - Measuring progress through annual transportation surveys.
  - Constructing bike rooms and developing bike plans for tenants.
  - Operating buildings with an average Walk Score® of 99/100.

## Climate Change Policy & Implementation

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SL Green recognizes climate change as a significant environmental challenge to the continued economic vibrancy of New York City. As the largest commercial office owner in New York City, SL Green is committed to reducing greenhouse gas emissions across our portfolio to help New York City meet its goal of reducing GHG emissions 80% by 2050, with an interim reduction of 40% by 2030.

SL Green also manages the risk associated with climate-related weather events by:

- Relocating critical building infrastructure.
- Purchasing insurance plans.
- Installing generators.
- Training building management and security staff on emergency response protocol.
- Allocating funds through 5-year and 10-year capital plans for resiliency and energy efficiency projects.

In addition to reducing the environmental impacts of both new construction and existing buildings, SL Green voluntarily participates in CDP and has established a portfolio-wide GHG intensity reduction of 30% by 2025 for Scope 1, Scope 2, and Scope 3 emissions. We disclose this information to our stakeholders via the Global Real Estate Sustainability Benchmark (GRESB) and the Global Reporting Initiative (GRI).



# Corporate Environmental Targets

SL Green

## SCOPE

This plan outlines SL Green's corporate environmental targets. This policy was established in October 2014, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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Corporate Environmental Targets

SL Green strives to be a model corporate citizen, and our alignment with the UN Sustainable Development Guidelines (SDGs) reflects our commitment to a sustainable future. The UN SDGs are actionable targets designed to help our planet achieve an environmentally and socially sustainable future. The goals address the most pervasive global challenges, including poverty, education, and climate. These global issues have a local context, and we are committed to doing our part in addressing each applicable SDG in the communities where we operate. Alignment of SL Green’s ESG program with the UN SDGs can be found within SL Green’s annual Sustainability Report and on the annual GRI Content Index available at [sustainability.slgreen.com](http://sustainability.slgreen.com).

The UN SDGs are:



## Approach

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SL Green has also developed a six-pronged strategy to sustainability, ensuring that the portfolio is resilient, responsible, and reliable. This approach is integrated through the life cycle of all properties, spanning the acquisition, planning, design, construction, and operational phases:



## Carbon Strategy

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SL Green’s commitment to creating a greener footprint begins with reducing emissions across its properties. Collaboration with tenants, employees, and other stakeholders is critical in realizing these goals by setting targets and implementing effective management strategies.

To further verify its sustainability performance, SL Green participates in a wide variety of external reporting programs such as the Global Reporting Initiative (GRI), CDP, LEED, ENERGY STAR, and the NYC Mayor’s Carbon Challenge.

Specific goals include:

- Voluntarily participating in CDP and establishing a portfolio-wide GHG intensity reduction of 30% by 2025 for Scope 1, Scope 2, and Scope 3 emissions
- Reducing GHG emissions by 30% over a 10-year period by 2026 across 8 million square feet through the NYC Mayor’s Carbon Challenge.
- Working to help New York City meet its goal of reducing GHG emissions 80% by 2050, with an interim reduction of 40% by 2030.

## LEED Strategy

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SL Green has a long history of leading the pursuit of green building designations, with LEED at the core of its strategy. Dating back to 2009, SL Green was among the first owners to adopt LEED for Existing Buildings (EB) in New York City at 100 Park Avenue. When the new version 4 standard was introduced in 2016, 485 Lexington was one of the first buildings in the nation to achieve LEED EB. SL Green earned LEED certifications spanning 20 million square feet historically, and its current portfolio holds certifications across 17 million square feet. Currently, 85% of SL Green’s reporting properties are LEED certified.

## ENERGY STAR Strategy

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ENERGY STAR is foundational to SL Green's energy management program. It is a measurement and verification tool that enhances the quality, competitiveness, and resiliency of the commercial portfolio. ENERGY STAR scores serve as the catalyst SL Green uses to motivate its building operators, property managers, and tenants to pursue capital efficiency projects and implement change. SL Green achieved ENERGY STAR labels across 15 million square feet, representing 9% of all of Manhattan's labels. SL Green prioritizes obtaining ENERGY STAR labels for 100% of eligible properties annually.

In recognition of its operational excellence, the U.S. Environmental Protection Agency (EPA) awarded SL Green the prestigious "Partner of the Year – Sustained Excellence" award in 2018 and 2019.

## Water Strategy

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Conservation is a key priority for SL Green's green building operations. Low-flow fixtures for toilets, urinals, and faucets in bathrooms across the portfolio have been installed to optimize SL Green's water-saving efforts. Additionally, building operators implement an extensive leak-detection program to ensure systems are operating correctly and efficiently, and water consumption is tracked and reported on an annual basis.

SL Green's goal is to reduce water consumption portfolio-wide by 3-5% in 2020.

## Waste Strategy

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SL Green's team has focused on operational efficiencies and educational strategies to drive behavior change and optimize recycling rates across its portfolio. Every year, SL Green's cleaning staff and tenants are receiving training on proper recycling procedures. To evaluate the effectiveness of the program, recycling data is collected monthly and waste audits are conducted annually.

In alignment with the LEED standard, SL Green's waste goal is to achieve a 50% recycling rate across its portfolio by 2025.

## Supply Chain / Materials Strategy

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SL Green's operations are supported by an extensive supply chain that sources materials and services for our business and tenants. Suppliers are strategically evaluated to ensure they are held accountable for upholding SL Green's standards of environmental performance and achieve the supply chain goals of sourcing LEED-compliant, recycled, responsibly-sourced, and nontoxic materials. SL Green's procurement policy is guided by external standards, including FSC (Forest Stewardship Council), ENERGY STAR, and Green Seal.

SL Green's goal is to have 50% of the materials that are supplied by our vendors covered by external certification to ensure responsible sourcing practices.



# Institute for Market Transformation (IMT) Standards Review Policy

SL Green

## SCOPE

This policy outlines SL Green's ongoing review of the standards listed within the Institute for Market Transformation (IMT). This policy was established in October 2019, is reviewed annually, and shall continue indefinitely or until amended and/or replaced by a subsequent policy.

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## Introduction

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Green Lease Leaders was created by the Institute for Market Transformation (IMT) and the U.S. Department of Energy's (DOE) Better Buildings Alliance to recognize landlords and tenants who have implemented energy efficiency in a portfolio of leased spaces. SL Green's goal is to conduct an annual review of operational practices in order to align our leases with the best practices outlined within the Green Lease Leader standard.

## Overview of Requirements

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Green Lease Leaders Green Lease Leaders recognizes two levels of achievement—Silver and Gold. The Silver level recognizes the establishment of foundational policies and business practices that encourage reduced energy and water consumption in leased spaces, while the Gold level builds on Silver level achievements, and recognizes execution of green leases and energy-efficient tenant fit-outs.

SL Green is committed to implementing the following green lease best practices:

- 1) Provide sustainability contact to tenants
- 2) Implement cost recovery clause for energy efficiency upgrades benefiting tenant
- 3) Track common area energy use
- 4) Track common area water use
- 5) Disclose whole-building ENERGY STAR score to tenant annually
- 6) Ensure brokers have energy training
- 7) Implement landlord energy management best practices
- 8) Meter tenant spaces that are greater than 5,000 square feet
- 9) Request annual tenant energy disclosure
- 10) Requirement minimum energy efficiency fit-out for tenants
- 11) Demonstrate innovation in leasing

SL Green will continue to conduct regular reviews of green leasing best practices and will incorporate new protocols wherever possible.

## CORPORATE SUSTAINABILITY POLICY

### Environmental Policy

#### 1. Environmental Protection

(GRI 301, GRI 302, GRI 303, GRI 306)

SL Green is committed to protecting the environment surrounding each of our properties and the local communities where we operate. This includes minimizing our impact by reducing waste and emissions, the use of water, natural resources and raw materials and promoting environmental responsibility in collaboration with our tenants, employees and contractors.

#### 2. Creating Environmental Awareness

SL Green is committed to regularly promoting environmental awareness among our tenants, employees, industry, local communities and other stakeholders. SL Green strives for industry and market leadership in this area by sharing experiences and expertise and cultivating participation, collaboration, and sustainable relationships.

#### 3. Implementing an Environmental Management System

SL Green is committed to implementing, maintaining and improving our environmental management system (EMS) which is based on best practices, includes elements of the ISO 14001 EMS, and is customized for buildings within our portfolio.

#### 4. More Efficient Use of Natural Resources

(GRI 301, GRI 302, GRI 303, GRI 306)

SL Green is committed to environmentally sustainable initiatives and innovation that deliver energy and natural resource efficiency across new and existing buildings in our portfolio. We continue to introduce a broad platform of market-leading initiatives to address energy usage and natural resource consumption that deliver value for our business, tenants and community.

For more information on how we seek to use natural resources more efficiently, please see pages 5 and 22-23 of our [2019 Proxy Statement](#).

#### 5. Emissions Reduction

(GRI 305)

As New York City's largest commercial landlord, our commitment to creating a greener footprint includes reducing emissions across new and existing buildings in our portfolio. We work with tenants, employees and other stakeholders to realize these goals by setting targets, providing resources, building awareness, supplying tools, creating effective monitoring strategies, and monitoring our progress and achievements. SL Green has set a target for a 30 percent intensity reduction in Scope 1, 2, and 3 (downstream) CO<sub>2</sub>e per square foot, with a baseline of 2012, and a target year of 2025.

For more information on our efforts to reduce emissions, please see pages 5 and 22-23 of our [2019 Proxy Statement](#).

#### 6. Waste Reduction

(GRI 306)

As New York City's largest commercial landlord, SLG is committed to reduce waste and environmental toxicity by minimizing land filling and/or incineration. Under the OneNYC Plan, the City government aims to send zero waste to landfills by 2030 and SL Green became responsible for ensuring compliance with this new legislation across 22 million square feet of our base building space, janitorial operations and tenant procedures. Partnering with our tenants, employees and union stakeholders is a cornerstone of our ongoing efforts to achieve this ambitious goal, which SL Green manages by measuring waste intensity per square foot of property.

#### 7. Monitoring Environmental Performance

(GRI 307)

As part of our ongoing sustainability initiatives, SL Green is committed to monitoring our environmental performance through metrics for greenhouse gas emissions and energy, water and waste consumption with the goal of reducing our impact on the environment.

## **8. Regular Reporting on Environmental Issues**

(GRI 307)

SL Green is committed to reporting on environmental issues by publishing an annual sustainability report which includes our strategy and performance utilizing the Global Reporting Initiative (GRI) Standards.

## **9. Consulting with Stakeholders on Environmental Issues**

(GRI 307)

SL Green is committed to consulting with stakeholders on environmental issues and policy. Stakeholder engagement is essential to operating a profitable and sustainable real estate Business and SL Green strives to incorporate key environmental and social priorities into its business practices.

## **10. Senior Management & Board of Director Approval**

(GRI 307)

With executive-level participation on SL Green's Sustainability Team, and Board oversight of the program, environmental responsibility has top- down support and is a company-wide priority.

The sustainability team presents annually to the Executive Team regarding SL Green's sustainability status and progress and provides the senior team with periodic updates throughout the year. Executives and Board members participate in mission and goal-setting for SL Green's sustainability program, which is structured around efficiency, tenant experience and industry leadership. CEO and Chairman-elect Marc Holliday has committed to have the company consistently deliver superior performance to conserve finite resources, incorporate citywide initiatives and uphold our responsibility to the community.

For more information on the roles of executive management and board of directors in SL Green's environmental policy, please see pages 5 and 22-23 of the [2019 Proxy Statement](#).

## **11. Disclosure on Policy & Management – Energy Efficiency**

(GRI 302)

SL Green is committed to environmentally sustainable initiatives and innovation that deliver energy efficiency. We continue to introduce a broad platform of market-leading initiatives to address energy usage that deliver value for our business, tenants and community.

## **12. Green Building Policy**

(GRI 301, GRI 302, GRI 303, GRI 306)

SL Green is committed to implementing green building practices and certifications (i.e. LEED, ENERGY STAR) throughout the lifecycle of new and existing properties within our portfolio. This commitment includes managing energy consumption, water use, indoor environmental quality, material selection and the building's effects on its site throughout the planning, design, construction, and operational phases.

## **13. Waste Reduction Policy**

(GRI 306)

SL Green is committed to environmentally sustainable initiatives and innovation that reduce waste through natural resource efficiency across new and existing buildings in our portfolio. We continue to introduce a broad platform of market-leading initiatives to address waste reduction that deliver value for our business, tenants and community.

## **14. Water Policy**

(GRI 303)

SL Green is committed to reducing its water consumption by implementing water efficiency equipment, fixtures and initiatives. We regularly evaluate our water consumption in order to identify, manage and improve water use in our existing and development properties and collaborate with our tenants to incorporate specified sustainability measures into the design of leased space, including water conservation measures.

## **15. Climate Change**

(GRI 301, GRI 302, GRI 303, GRI 306)

The daily business operations of organizations in the real estate sector generate direct and indirect GHG emissions, which are widely acknowledged contributors to climate change. SL Green regularly considers and discusses the financial implications and other risks and opportunities related to climate change, including proactively analyzing climate change risk and resiliency through life cycle assessments, from asset acquisition through disposition.

## **16. Water Efficiency**

(GRI 303)

SL Green is committed to reducing its water consumption across new and existing buildings in our portfolio by implementing water efficiency equipment, fixtures and initiatives. We regularly evaluate our water consumption in order to identify, manage and improve water use in our existing and development properties and collaborate with our tenants to incorporate specified sustainability measures into the design of leased space, including water conservation measures.

## **17. Energy Efficiency Policy**

(GRI 302)

SL Green is committed to environmentally-sustainable initiatives and innovation that deliver energy and natural resource efficiency. We continue to introduce a broad platform of market-leading initiatives to address energy usage and natural resource consumption that deliver value for our business, tenants and community.

## **18. Sustainable Packaging Policy**

*Sustainable Packaging is not relevant to SL Green's business.*

## **19. Environmental Supply Chain Policy**

(GRI 308)

SL Green recognizes that a significant portion of our company's environmental footprint exists within our supply chain, which includes vendors of supplies and services as well as contractors. SL Green seeks to partner with qualified vendors and to collaborate with tenants to reduce the demand on virgin resources, re-use and recycle durable materials, and reduce the source of indoor air contaminants.

## **20. Emissions Reduction Policy**

(GRI 305)

As New York City's largest commercial landlord, our commitment to creating a greener footprint includes reducing emissions across new and existing buildings in our portfolio. SL Green has set a target for a 30% intensity reduction in Scope 1, 2, and 3 (downstream) CO<sub>2</sub>e per square foot, with a baseline of 2012, and a target year of 2025.

## **21. Biodiversity Protection**

(GRI 304)

SL Green is committed to protecting biodiversity and reporting on its activities to reduce the company's impact on this vital resource. We continually 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 impact of real estate development, management and services on biodiversity and seek to avoid or customize development within defined critical areas.

## **22. Reducing Impact On Biodiversity**

(GRI 304)

SL Green is committed to protecting biodiversity. We are aware of the impact of real estate development, management and services on biodiversity and seek to avoid or customize development within defined critical areas. In order to reduce the environmental impact of development, SL Green is committed to green building certifications across all greenfield developments.

## **23. Renewable Energy Policy**

(GRI 302)

SL Green is committed to minimizing GHG emissions by implementing or purchasing renewable energy sources to replace fossil fuel-fired generation wherever feasible throughout our portfolio.

## **Supply Chain Management Policy**

### **1. Product & Process-Related Requirements**

(GRI 204)

SL Green is committed to green procurement of products and processes by actively managing material supply chain and contractor-related environmental risks. We aim to achieve this by implementing processes that build awareness of, and manage, material risk throughout our supply chain. SL Green seeks to partner with qualified vendors and to collaborate with tenants to reduce the demand on virgin resources, re-use and recycle durable materials, and reduce the source of indoor air contaminants.

### **2. Commitment to Address Office Products**

(GRI 306)

At SL Green, we believe that sustainable office supplies and products help to facilitate a safer, healthier and more productive environment for our employees. Office products are purchased through our green procurement process, which prioritizes spending on products that are environmentally-sound and socially beneficial wherever possible. As part of our commitment to obtain sustainable office supplies, SLG aims to eliminate 80% of single-use plastic in corporate offices in 2018.

### **3. Commitment to Engage with Suppliers on Environmental Performance**

(GRI 204, GRI 308)

As part of our green procurement policy and process, SL Green is committed to partnering with our vendors to reduce their environmental impact wherever possible. Our vendors are expected to procure LEED-compliant materials, including environmentally preferable deicers and construction materials, and green cleaning products.

### **4. Policy Describing How The Company Accomplishes Resource Efficiency**

(GRI 301, GRI 302, GRI 303, GRI 306)

SL Green recognizes that a significant portion of our company's environmental footprint exists within our supply chain, which includes vendors of supplies and services as well as contractors. We encourage that vendors should manage, measure and report on their environmental impact and continuously seek to improve their performance in this area. In addition to identifying vendors committed to reducing their environmental impact, SL Green partners with vendors during their contracts to monitor and minimize waste and the use of hazardous substances and materials, and to increase recycling, energy and water efficiency. For more information on how we engage with vendors to control environmental impacts, see item #3.

### **5. Partnership Termination**

(GRI 204, GRI 308)

SL Green seeks to partner with its vendors in order to improve environmental performance and ensure compliance with our internal codes and policies, as well as all laws and regulations relevant to the jurisdictions where they operate. We expect vendors to identify, correct and monitor the continued compliance of its activities and to report any serious breaches of contracts, internal codes and applicable laws and regulations.

SL Green reserves the right to terminate or suspend any agreements and relationships with a vendor that is unable to comply with our expectations for environmental performance or demonstrates repeated or serious disregard for these expectations.

### **6. Company-Wide Managerial Responsibility**

(GRI 204, GRI 308)

SL Green's environmental policies, including those pertaining to vendors and procurement processes, are available to employees throughout our organization. The facility managers and chief engineers of each of our properties are stewards of our corporate strategy in this area, and work closely with tenants, vendors and other stakeholders to meet our goals for recycled, responsibly-sourced and non-toxic content and procedures.

### **7. Systematic Consideration of Suppliers' Environmental Performance During Procurement**

(GRI 204, GRI 308)

SL Green is committed to driving resource efficiency through systematically considering prospective suppliers' environmental performance during the procurement process and the contract period. Vendors that are not compliant are re-evaluated for use in our portfolio.

## **8. Compliance with Environmental Standards Included in Legally Binding Agreements with Suppliers**

(GRI 204, GRI 308)

SL Green and its properties are subject to a wide range of environmental codes and regulations. We are committed to selecting and working with suppliers that exemplify transparency and comply with all applicable federal, state and municipal standards and regulations regarding environmental issues in all of the jurisdictions where they operate. Environmental compliance is required in all of our vendor contracts and we seek to implement and to ensure this compliance through regular engagement and monitoring.

## **9. Monitoring of Suppliers' Environmental Performance**

(GRI 204, GRI 308)

SL Green is committed to driving resource efficiency through systematically considering prospective suppliers' environmental performance during the procurement process and the contract period. Vendors that are not compliant are re-evaluated for use in our portfolio.

## **10. Engagement with Suppliers to Address Non-Compliance or Improve their Environmental Performance**

(GRI 204, GRI 308)

SL Green seeks to partner with its vendors to improve environmental performance and ensure compliance with our internal codes and policies, as well as all applicable laws and regulations relevant to the jurisdictions where they operate.

We expect vendors to identify, correct and monitor the continued compliance of its activities and to report any serious breaches of contracts, internal codes and applicable laws and regulations. As part of our partnership approach to vendors within our supply chain, SL Green works with vendors to formulate corrective action plans in the event of non-compliance and in order to improve environmental performance.

## **11. Targets & Deadlines for the Environmental Improvement of Suppliers**

(GRI 204, GRI 308)

SL Green seeks to partner with its vendors in order to improve environmental performance and ensure that they are in compliance with the company's sustainability goals. Our facility managers and chief engineers collaborate with tenants and vendors to meet our objectives for having environmentally-preferable material and/or products for ongoing consumables, durable goods, facility alterations and additions, and use of mercury-containing light bulbs. Post-consumer and rapidly-renewable materials are examples of sustainable purchases, as are materials that have been harvested, processed or extracted within 500 miles of a project or property.

## **12. External Certification (ISO 14001, Organic, etc.) Covering over 50% of the Company's Suppliers**

(GRI 204, GRI 308)

SL Green aims to reduce the exposure of building occupants and maintenance personnel to potentially hazardous chemical, biological, and particle contaminants which could adversely impact air quality, health, building finishes, building systems, and the environment. External certification is a cornerstone of our procurement policy, which seeks to purchase products and services that adhere to a variety of standards such as those designated by the Forest Stewardship Council, ENERGY STAR, Green Seal and the CRI Green Label.

## **13. Engagement with NGOs or Industry Peers to Address Environmental Issues in the Supply Chain**

(GRI 204, GRI 308)

SL Green is committed to engaging with non-governmental organizations (NGOs) and industry peers to raise awareness and address environmental issues within the real estate development and management supply chain. We believe that this dialogue and collaboration allows us to share and learn best practices and advance the sustainability and long-term viability of our business and properties. We have been widely recognized for our participation and contribution to these organization, including:

- U.S. Green Building Council - Gold Level Membership
- Urban Green Council - Board Member; Supporter of HQ2050 Westchester Green Business Council - Member (NY)
- Real Estate Board Of New York - Board Member; Sustainability Committee; Management Committee
- Stamford (CT) 2030 District-Founding Member

## **15. Fair Trade Policy**

*Fair Trade is not relevant to SL Green's business.*

## Human Rights & Labor Management Policy

### 1. Child Labor & Forced Labor

(GRI 408, GRI 409)

SL Green is committed to upholding the highest level of ethics and responsibility when it comes to employment and labor practices. We are opposed to child and forced labor in any form among, but not limited to, our employees, vendors and union partners. **SL Green adheres to the conventions of the International Labor Organization principles 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](#).**

### 2. Freedom of Association

(GRI 407)

SL Green respects the freedom of association, and employees are required to comply with all applicable labor and employment laws, regulations and policies related to freedom of association and collective bargaining. **SL Green adheres to the conventions of the International Labor Organization, including [C087 – Freedom of Association and Protection of the Right to Organise](#).**

### 3. Fair Wages & Equal Remuneration

(GRI 405)

SL Green is committed to providing a fair wage and equal remuneration to all company employees. We aim to provide competitive compensation rates in the New York City market and meet or exceed the minimum wage in all cases. **SL Green adheres to the conventions of the International Labor Organization, including [C100 – Equal Remuneration Convention](#).**

### 4. Anti-Discrimination Policy

(GRI 406)

SL Green is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status or other characteristic protected by law. This policy of non-discrimination governs all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination and access to benefits. SLG's nondiscrimination 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, including [C111 – Discrimination](#).**

For more information on our anti-discrimination policy, please see page 24 of our [2019 Proxy Statement](#).

### 5. Diversity Policy

(GRI 405)

SL Green cultivates a diverse workforce that is inclusive and encourages employees to collaborate and contribute, regardless of race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status, or other characteristic protected by law. We believe that our diverse pool of talent reflects the market and customers we serve in New York City and strengthens the company's position in a highly competitive environment by providing a broader perspective and experience on strategic and operational issues. This approach is also part of our Board of Directors' ongoing director succession planning, which features a strong focus on recruiting candidates that will provide a desired mix of expertise, experience, reputation and diversity necessary for SL Green to continue to deliver superior performance.

For more information on our efforts to promote diversity, please see pages 4-5 and 15-16 of our [2019 Proxy Statement](#) and our [Nominating and Corporate Governance Committee Charter](#).

### 6. Supply Chain Management Policy

(GRI 204, GRI 308, GRI 412, GRI 414)

SL Green is committed to reducing social risks throughout its supply chain, including poor working conditions, the use of child or forced labor and the lack of a living, fair and minimum wage. SL Green expects vendors and third-party contractors to maintain and enforce high standards on human rights and labor practices surrounding environmental health and safety and business ethics and responsibility.

## **7. Human Rights Policy**

(GRI 407, GRI 408, GRI 409)

SL Green is committed to protecting human rights, in accordance with the [New York City Human Rights Laws](#) and international standards such as the [UN Guiding Principles on Business and Human Rights](#) and in the interest of its employees, vendors and society as a whole. This includes, but is not limited to, opposition to child and forced labor in any form, fair compensation and compliance with federal, state and local regulations designed to protect human rights.

## **8. Employee Health & Safety**

(GRI 403, GRI 401)

SL Green is committed to protecting, and aims to improve, the health, safety and well-being of our employees, tenants, vendors and communities through engagement, education and deployment of various programs and resources. This includes providing regular health and wellness workshops, OSHA training and green cleaning plans that minimize exposure to hazardous chemicals and reduces risk of injury and health. Employee health and safety is a strategic priority for SL Green and the company continues to pursue excellence in this area that goes beyond compliance with federal, state and municipal regulations.

For more information on our efforts to promote employee health and safety, please see page 24 of our [2019 Proxy Statement](#).

## **9. Supply Chain Health & Safety**

(GRI 403, GRI 414)

SL Green is committed to protecting, and aims to improve, the health, safety and well-being of our employees, tenants, vendors and communities through active engagement, education and deployment of various programs and resources. SL Green's vendor contracts stipulate that vendors must comply with applicable laws and regulations regarding health and safety. Cleaning is a large part of the supply chain for our buildings, and we implement a green cleaning plan for SLG properties that minimizes exposure to hazardous chemicals and reduces the risk of injury and health.

## **10. Customer Health & Safety**

(GRI 416)

SL Green is committed to protecting, and aims to improve, the health, safety and well-being of our employees, tenants, vendors and communities active engagement, education and deployment of various programs and resources. For SL Green, this begins with the design of our properties, which include one-of-a-kind amenities and state-of-the-art features that significantly improve the quality of life for our tenants and their employees. Our efforts to improve indoor air quality and implement a green cleaning program also reduce health and safety risks for building occupants.

## **11. Employee Training & Career Development**

(GRI 404, GRI 401)

SL Green recognizes that the quality of its workforce is a critical factor in the company's growth and success. We seek to enhance employee performance and attract talent through training and career development opportunities. In addition to OSHA, workplace harassment, anti-discrimination, information security awareness and ethics training, SL Green employees also participated in courses and workshops focused on building key capabilities and skills from a wide range of organizations, including the Local SEIU 32BJ, Building Operation and Management Association and the U.S. Green Building Council. Employee training and career development opportunities such as certifications and degree programs are covered by tuition reimbursement benefits for all full-time employees.

For more information on our employee training and career development initiatives, please see page 5 of the [2019 Proxy Statement](#).

## **12. Employee Engagement & Feedback**

(GRI 404-3)

SL Green is committed to annually administering an employee satisfaction survey to 100 percent of its corporate employees. SL Green carefully reviews the employee feedback for possible adjustments to established policies and practices. In addition, 100 percent of corporate employees receive regular performance and career development reviews on an annual basis.

## **13. Equal Opportunity Policy**

(GRI 405)

SL Green is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status, or other characteristic protected by law.

#### **14. Business Ethics Policy**

(GRI 205, GRI 206)

SL Green is committed to operating our business in accordance with the highest moral, legal and ethical standards. Our reputation for integrity is an invaluable asset, and each employee must contribute to the care and preservation of that asset. Our Code of Business Conduct and Ethics applies to our directors, executive officers and employees and addresses compliance with applicable laws, conflicts of interest, use and protection of the Company's assets, confidentiality, as well as communications with the public, accounting matters, records retention, fair dealing, discrimination, harassment, and health and safety.

For more information on our business ethics policy, please see page 24 of the [2019 Proxy Statement](#).

#### **15. Anti-Bribery & Corruption Policy**

(GRI 205)

SL Green is committed to operating our business in accordance with the highest moral, legal and ethical standards. Our reputation for integrity is an invaluable asset, and each employee must contribute to the care and preservation of that asset.

Employees who deal with the Company's borrowers, tenants, suppliers or other third parties are placed in a special position of trust and must exercise great care to preserve their independence. As a general rule, no employee should ever receive a payment or anything of value in exchange for a decision involving the Company's business. Similarly, no employee of the Company should ever offer anything of value to government officials or others to obtain a particular result for the Company. Bribery, kickbacks or other improper payments have no place in the Company's business.

#### **16. Employee Protection / Whistle Blower Policy**

All employees have a responsibility to guard against and report unethical business practices and actions (including questionable accounting and auditing matters) that could subject the Company or its employees to civil or criminal liability. The Company has adopted a Whistleblowing and Whistleblower Protection Policy to deal with such matters and the Company's Audit Committee has adopted the following procedures set forth in this Policy for: (1) the anonymous and confidential submission by employees of complaints or concerns regarding questionable accounting and auditing matters; and (2) the receipt, retention and treatment of employee complaints or concerns regarding such matters.

For more information on our employee protection and whistle blower policy, please see page 24 of the [2019 Proxy Statement](#).

#### **17. Fair Competition Policy**

(GRI 206)

SL Green is committed to dealing fairly with its tenants, contractors, real estate brokers/agents, partners, lenders, customers, suppliers, competitors, employees, and other third parties.

#### **18. Data Privacy & Security Policy**

(GRI 418)

At SL Green we respect your right to privacy. We will guard the personal information that you share with us to ensure the content and services that we provide on SL Green are always tailored to your current, designated preferences. For more information please see our on-line privacy policy here: <https://slgreen.com/slgreen/privacy>.

Our business-related data represents SL Green's intellectual capital and is critical to the efficient operation of the company. We have put in place a suite of data security and privacy protection practices throughout all levels of our organization to secure private and sensitive data.

Our employees are updated on a regular basis about risks and avoidance techniques to reduce vulnerabilities. SL Green maintains a plan of action in the event of a data breach in order to quickly respond, minimize damage, and clearly communicate about its scope to parties affected.

The responsibility of Data Privacy and Security policies and activities are overseen by the board of directors and executive team, with highly-qualified, cyber-professional staff members continuously analyzing, improving and applying latest methodologies to assure protection of data and security of private information.

## **19. Responsible Marketing Policy**

(GRI 417)

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 in regards to defects.

## **Community Involvement Policy**

### **1. Community Spend**

SL Green is committed to meaningfully contributing to the development of local communities where we operate, in order to ensure resiliency and create long-term value for all of our stakeholders. SL Green invests in these communities in a variety of ways, including employee volunteering drives for food, clothes, school supplies and toys; park clean-ups; and, creating spaces in and around our buildings that enhance visitor and occupant experiences and are publicly accessible.

For more information on our commitment to investing in our communities, please see messages from our [CEO](#).

### **2. Community Involvement Policy – Reputation Management**

At SL Green, we recognize myriad benefits of our strong reputation in local communities as a developer with integrity and high standards, including maintaining our license to operate and access to resources and services in the highly competitive New York City market. We manage our engagement and reputation within local communities by assessing community stakeholder and objectives and concerns through dialogue and ongoing consultation, then addressing those concerns that are most material to both the company and local communities; and, finally, consulting with local communities to evaluate progress and improve approaches and management as necessary. This approach allows to actively manage our reputational risk, which strengthens our business, industry and value for all stakeholders.

### **3. Employees Community Work – Fostering Employee Volunteering**

As members of the local communities where we operate, SL Green employees are key representatives of our company's values and reputation and are highly encouraged to volunteer their time and expertise to various causes and organizations. SL Green offers numerous opportunities for our employees to participate in community-building activities, such as mentoring students; managing drives for clothing, food and school supplies, and, cleaning up public parks.

### **4. Corporate Responsibility Awards – Awards for Community Performance**

SL Green strives for excellence in all facets of our business and development, including our approach to community involvement. The company is proud to have been recognized several times over the years for its commitment to partnering with, and improving, the communities where we operate. These accolades include the Urban Green Council's EBie "It Takes A Village" Award, which celebrates sustainability of retrofit buildings across the country; the Building Owner and Managers Association (BOMA) of New Jersey's "Outstanding Building of the Year Award", which considers community impact, among other qualities; and recognition for our Energy Desk, a real-time energy management platform.

### **5. Product Responsibility Monitoring – Impacts of Products and Services on the Community**

(GRI 203, GRI 417)

Considering the impact of our projects on surrounding communities is an integral part of SL Green's processes encompassing project management, design, construction, operation and maintenance. Community impacts are factored into all stages of our buildings' lifecycles and include creating and maintaining ongoing consultation with community stakeholders, as well as ensuring that marketing and communications are accurate and comply with all applicable laws and regulations. SL Green aims to provide reasonable access to grievance mechanisms for local communities and to address these issues in a manner amenable to all relevant stakeholders and their interests.

### **6. Community Involvement Programs – Policy Commitment to Consult with Local Communities**

(GRI 413, GRI 419)

Many of our projects are subject to public review and approvals and SL Green consistently seeks to consult with local communities in order to reflect the character and needs of the local communities in our properties. This entails proactively connecting our properties to the local community and engaging with, and incorporating feedback from, city and neighborhood leaders, law enforcement, transportation and public safety officials, planners, local business groups, chambers of commerce, schools, libraries, charities, resident associations, and philanthropies. Ongoing consultation methods and topics include discussions and collaboration on reducing waste, traffic, emissions and noise pollution, local job creation and training, support for local schools, security and safety issues, water and erosion management, and reviews and approvals on plans for development, retrofits and renovations.

## **7. Community Involvement Programs – Executive Responsibility for Community Relations**

SL Green's Community Involvement Policy is a cornerstone of our robust Sustainability program, which is overseen by our Executive team and Board of Directors. This oversight includes regular review of stakeholder engagement processes and outcomes to ensure that local communities maintain their important role in helping us develop vibrant, resilient and inclusive properties that enhance value for all of our stakeholders. As New York City's largest landlord, this top-down approach means that local community engagement is a company-wide priority and that we take responsibility for implementing best practices, operating at the highest efficiency standards and increasing our city's resiliency.

For more information on our commitment to investing in our communities, please see pages 5 and 24 of our [2019 Proxy Statement](#).

## **8. Community Involvement Programs – Community Consultation Guidelines**

(GRI 413)

Because each of our developments is unique, SL Green frequently customizes its approach to consulting with local communities on a project-by-project basis in order to best reflect the communities needs and impacts.

For more information on our commitment to investing in our communities, please see page 5 of our [2019 Proxy Statement](#).

## **9. Community Involvement Programs – Operations-Specific Responsibility for Community Relations**

(GRI 413)

SL Green's Community Involvement Policy is a cornerstone of our robust Sustainability program, which is overseen by our Executive team and Board of Directors. As New York City's largest landlord, this top-down approach means that local community engagement and relations is a company-wide priority and that we take responsibility for implementing best practices, operating at the highest efficiency standards and strengthening our city's resiliency. Members of our operations, maintenance, facilities, finance and construction teams are among our employees who regularly engage with local community stakeholders and are stewards of our Community Involvement Policy and approach.

## **10. Community Involvement Programs – A Formal System for Identifying Local Stakeholders or Communities of Interest**

(GRI 413, GRI 419)

As with our other stakeholder, SL Green's Sustainability team identifies priority local community stakeholders as those who have the potential to affect SL Green's business, and those who are potentially affected by the business. This includes local communities in relationship to individual projects and properties as well as our entire portfolio. SL Green's local community stakeholders raise a wide range of sustainability topics for discussion on an ongoing basis as part of our engagements as we strive to create properties that are vibrant, resilient and more inclusive. We aim to regularly review and improve our approach for identifying local community stakeholders and their material issues, as well as the outcomes from engagement.

## **11. Community Involvement Programs – Consultation Conducted at Early Stages of a Project**

(GRI 413, GRI 419)

SL Green aims to engage with local community stakeholders throughout the entire lifecycle of a property, from planning and development to maintenance and renovations. Preparing for consultation includes considering potential local community stakeholders and their concerns and the most effective methods of engagement that promote dialogue, incorporate feedback and create resolutions that build value into respective projects ahead of initialization. When a project commences, stakeholder identification is followed by:

- 1) Establishing engagement methods and schedules;
- 2) Identifying material topics and opportunities within the project design and plan to incorporate local community feedback.
- 3) Incorporating local community feedback wherever feasible and reviewing the results.

## **12. Community Involvement Programs – Ongoing Consultation Mechanisms**

(GRI 413)

SL Green recognizes the value of local communities in its business operations and development projects and is continuously strengthening its relationships with these shareholders in order to improve the areas where we operate. Given our growing portfolio in the metropolitan New York City market, our engagement with local communities is ongoing. We consult with stakeholders on a variety of issues. These typically include reduction of waste, traffic, emissions and noise pollution, local job creation and training, support for local schools, security and safety issues, water, and erosion management. These are all part of the review and approval process for development, retrofits and renovations. Because each of our developments is unique, SL Green often customizes its approach to consulting with local communities on a project-by-project basis. Examples of consultation methods include public meetings and approval processes, discussions and collaborations, site visits, job training, park clean-ups, charity drives, and other events.

## **13. Community Involvement Programs – Accessible Mechanism to Collect, Record and Address Complaints or Grievances**

(GRI 413)

SL Green aims to provide reasonable access to grievance mechanisms for local communities and to address these issues in a manner amenable to all relevant stakeholders and their interests.

### **Corporate Governance Policy**

#### **1. “Say on Pay” Provision**

SL Green complies with all applicable laws and regulations on executive compensation, including Item 402 of Regulation S-K under the Securities and Exchange Commission. This rule requires a public company to include in its proxy statement a separate resolution, commonly known as “say-on-pay”, subject to a non-binding stockholder vote to approve the compensation of named executive officers, not less than every three years.

For more information on our Say-on-Pay provision and shareholder voting results at our 2017 annual stockholder meeting, please see page 27 of our [2019 Proxy Statement](#).

#### **2. Clawback or Malus Provisions**

SL Green imposes a clawback policy with regards to incentive payments to our executives. Under this policy, adopted by the Board of Directors, any incentive payments made to a named executive officer on the basis of having met or exceeded performance targets during a period of fraudulent activity for which the executive is found personally responsible may be recouped by SL Green.

For more information on our clawback policy, please see page 43 of our [2019 Proxy Statement](#).

#### **3. Performance Oriented Compensation**

(GRI 201)

SLG adopted an executive compensation philosophy that rewards the achievement of annual and long-term goals of both the Company and individual executives. Our executive compensation programs are designed to provide performance-based incentives that create a strong alignment of management and stockholder interests. Our primary business objective of maximizing TRS through growth in FFO while seeking appreciation in the value of our investment properties, demands a long-term focus. Therefore, on both a current and historical basis, our executive compensation programs are based on the achievement of both annual and multi-year performance measures.

For more information on the performance orientation of our executive compensation policy, please see page 32 of our [2019 Proxy Statement](#).

#### **4. ESG-Related Executive Compensation**

Although a significant portion of our executive’s compensation is performance-based and “at-risk,” we also consider non-financial and other qualitative performance factors in determining actual compensation payouts. We provide a significant portion of incentive compensation in the form of Long-Term Incentive Awards, which are tied to how we perform over a multi-year period and focuses senior management on sustaining our company’s long-term performance.

For more information on how non-financial and qualitative performance factors into executive compensation, please see page 41 of our [2019 Proxy Statement](#).

## 5. Executive Retention Practices

SL Green has adopted an executive compensation philosophy that rewards the achievement of annual and long-term goals of both the Company and individual executives. Our executive compensation programs are designed to attract and retain top talent in a geographic market (New York City) that is highly competitive for attracting and retaining commercial real estate management. We also seek to motivate our executives to achieve, and reward them for achieving, superior performance through our executive compensation programs.

For more information on approach to executive retention through structured compensation programs, please see page 32 of our [2019 Proxy Statement](#).

## 6. Proxy Access Provision

In March 2016, SL Green adopted a proxy access bylaw, enabling our stockholders to include their own director nominees in our proxy materials along with candidates nominated by the Board, so long as stockholder-nominees meet certain requirements, as set forth in our bylaws. A stockholder, or a group of up to 20 stockholders, owning three percent (3%) or more of outstanding common stock continuously for at least three years may nominate and include in our proxy materials director candidates constituting up to the greater of two individuals, or 20% of total members of the Board of Directors.

For more information on our proxy access bylaw, please see the section entitled “Other Information—Other Matters—Stockholder Proposals and Nominations” on page 68 of [2019 Proxy Statement](#).

## 7. Restrictions on Legal Actions by Shareholders

SL Green has currently not adopted exclusive forum bylaws or charter provisions requiring stockholders to make claims against the company and its officers in specified courts.

For more information on the company’s bylaws, please see all articles in the [Fourth Amended and Restated Bylaws](#) filed with the Securities and Exchange Commission.

## 8. Equal Voting Rights

At SL Green’s Annual Meeting, each outstanding share as of the record date entitles its holder to cast one vote for each matter to be voted upon and, with respect to the election of directors, one vote for each director to be elected.

For more information on the purpose, structure and process of SL Green’s Annual Meeting, please see page 66 of the [2019 Proxy Statement](#).

## 9. Shareholder Engagement

As per the rules of the Securities and Exchange Commission, stockholders are permitted to submit proposals to be included in our proxy materials if the stockholder and the proposal satisfy the requirements specified in Rule 14a-8 under the Exchange Act. For a stockholder proposal to be considered for inclusion in our proxy materials for the 2018 annual meeting, the proposal must be delivered to our Secretary by January 1, 2018.

For more information on Stockholder Proposals and Nominations, please see page 68 of the [2019 Proxy Statement](#).

## 10. Whistleblower Programs

Our Board Audit Committee has established procedures for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters and the confidential and anonymous submission by our employees of concerns regarding questionable accounting or auditing matters. Any such communications may be made anonymously. SL Green’s Whistleblower Policy is available to suppliers, customers and other third parties in English and includes a substantive non-retaliation clause.

For more information on our Whistleblower Program, please see our Code of Ethics.

Link: <https://slgreen.gcs-web.com/static-files/7d819b95-90ab-4421-a488-c41e4809c213>

## 11. Board Size Policy

At any regular meeting or at any special meeting called for that purpose, a majority of the entire Board of Directors may establish, increase or decrease the number of directors, provided that the number thereof shall never be less than the minimum number required by the Maryland General Corporation Law, nor more than 15, and further provided that the tenure of office of a director shall not be affected by any decrease in the number of directors.

For more information on bylaws governing the Board of Directors, please see page 16 of the [Fourth Amended and Restated Bylaws](#) filed with the Securities and Exchange Commission.

## **12. Board Independence Policy**

Our Governance Principles provide that a majority of our directors serving on the Board must be independent as required by the listing standards of the New York Stock Exchange and the applicable rules promulgated by the Securities and Exchange Commission. In addition, the Board adopted director independence standards that assist the Board in making its determinations with respect to the independence of directors.

For more information on Director Independence, please see page 19 of the [2019 Proxy Statement](#).

## **13. Board Diversity Policy**

(GRI 405)

In making recommendations to the Board, the Nominating and Corporate Governance Committee considers diversity (including diversity of knowledge, skills, professional experience, education, expertise and representation in industries relevant to the Company), ability to bring new perspectives, and add to Board discussion and consideration. These factors are among those that the board considers as it deems appropriate regarding prospective director candidates. Such matters are considered in light of the skills, qualifications and diversity of the other members of the Board. Our Board represents diversity in its broader sense. This means diversity of knowledge, skills and education, as well as diversity of age, gender and outlook. 33% of our independent directors are female, and for our commitment to board diversity, we were recognized as a 2020 Women on Boards Winning 'W' Company for 2017.

For more information of Identification of Director Candidates, please see page 16 of the [2019 Proxy Statement](#).

## **14. Board Experience**

In making recommendations to the Board, our Nominating and Corporate Governance Committee considers such factors as it deems appropriate. These factors may include experience with businesses and other organizations comparable to the Company (including experience managing public companies, marketing experience or experience determining compensation of officers of public companies), the interplay of the candidate's experience with the experience of other Board members and the candidate's industry knowledge and experience, among several other factors.

For more information of Identification of Director Candidates, please see page 16 of the [2019 Proxy Statement](#).

## **15. Board Re-Election Provisions**

If a nominee who currently is serving as a director receives a greater number of votes "against" his or her election than votes "for" such election in an uncontested election, Maryland law provides that the director would continue to serve on the Board as a "holdover director."

However, under our Governance Principles, any nominee for election as a director in an uncontested election who receives a greater number of votes "against" his or her election than votes "for" such election must, within ten business days following the certification of the stockholder vote, tender his or her written resignation to the Chairman of the Board for consideration by the Nominating and Corporate Governance Committee.

For more information on Majority Voting Standard and Director Resignation Policy, please see page 15 of the [2019 Proxy Statement](#).