

## CORPORATE SUSTAINABILITY POLICY

### Environmental Protection

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. The commitments detailed below apply to all SL Green employees, partners, suppliers and throughout our operations (GRI 301, GRI 302, GRI 303, GRI 306)

#### 1. 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.

#### 2. 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.

#### 3. 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 6 and 24-26 of our [2020 Proxy Statement](#).

#### 4. 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 6 and 24-26 of our [2020 Proxy Statement](#).

#### 5. 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.

#### 6. 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.

## **7. 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.

## **8. 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.

## **9. 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 6 and 24-26 of the [2020 Proxy Statement](#).

## **10. 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.

## **11. 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.

## **12. 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.

## **13. 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.

## **14. 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.

## **15. 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.

## **16. 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.

## **17. Sustainable Packaging Policy**

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

## **18. 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.

## **19. 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.

## **20. 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.

## **21. 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.

## **22. 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**

SL Green depends on a diverse pool of vendors to provide products and services that are critical to the growth and success of our enterprise. We recognize that a significant portion of the impacts of our business could occur in our supply chain and we are committed to partnering with our vendors to manage and control material risks in this area, in the interests of our employees, tenants and communities. Guided by the policies outlined below, we work with our vendors on a variety of issues within the supply chain including, but not limited to, responsibly sourcing, building materials, office products and equipment, systematically engaging with contractors at work sites, and reporting on environmental performance. (GRI 102-9)

### **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

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. These commitments detailed below apply to all SL Green employees, partners, suppliers and throughout our operations. 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. (GRI 407, GRI 408, GRI 409)

### 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 27 of our [2020 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 5-6 and 17-18 of our [2020 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, partners 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. 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 27 of our [2020 Proxy Statement](#).

## **8. 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.

## **9. 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.

## **10. 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 6 of the [2020 Proxy Statement](#).

## **11. 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.

## **12. 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.

## **13. 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 27 of the [2020 Proxy Statement](#).

#### **14. 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.

#### **15. 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 27 of the [2020 Proxy Statement](#).

#### **16. 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.

#### **17. 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.

#### **18. 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 regard to defects.

## **19. Human Rights Due Diligence Framework**

(GRI 412)

We have implemented a due diligence process as part of SL Green's commitment to human rights. This framework allows us to meet our human rights commitments by proactively identifying where human rights issues may occur in both our own operations and our suppliers. It also identifies what actual or potential issues may occur. SL Green's due diligence framework is guided by the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the New York City Human Rights Law. These multilateral frameworks were used to identify several key human rights issues in our supply chain such as forced and child labor, freedom of association, and non-discrimination.

We do this by engaging a third party to perform mandatory assessments on our suppliers to ensure there are no violations of human or labor rights. The assessment focuses on identified tier 1 critical suppliers. This assessment covers various groups at risk of human rights abuses including, but not limited to, children, indigenous groups, migrant laborers, and racial and ethnic minorities.

Based on identified human rights issues, scorecards are generated for each supplier. These scorecards show both overall ESG performance and broken out into four categories (Environment, Labor & Human Rights, Ethics, and Sustainable Procurement).

With this information, SL Green evaluates the ESG performance of suppliers and communicates ESG standards/expectations to suppliers. The company then works with stakeholders to address identified issues and establish monitoring mechanism. To prevent identified issues from recurring, the company integrates ESG standards into contracts, with an emphasis on preventing identified human rights issues in our supply chain.

The results of this assessment and engagement are then reviewed and used to refine our due diligence process to better identify and mitigate human rights risks in an iterative process.

## **Community Involvement Policy**

SL Green is committed to contributing to and enhancing the local communities where we live, work, and operate. SL Green supports local communities by investing in initiatives and events and encouraging employees to volunteer with various organizations and causes throughout the year according to the policies outlined below.

### **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 6 and 27 of our [2020 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 6 of our [2020 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**

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 apply to both the Board of Directors and company management.

### **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 32 of our [2020 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 48 of our [2020 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 34 of our [2020 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 46 of our [2020 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 34 of our [2020 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 72 of [2020 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 70 of the [2020 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 70 of the [2020 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 [2020 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, national origin, 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 18 of the [2020 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 18 of the [2020 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 17 of the [2020 Proxy Statement](#).