

HUMAN RIGHTS POLICY

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

SL Green is committed to reducing human rights risks throughout our operations, our supply chain, and our partnerships. These human rights risks include issues around human trafficking, the use of child and/or forced labor, discrimination, equal remuneration, the right to collective bargaining and freedom of association, poor working conditions, and ensuring a living, fair, and minimum wage. SL Green expects employees, suppliers, and third-party contractors to maintain and enforce our high standards on human rights.

SL Green's operations are primarily concentrated in New York City and the Company is Manhattan's largest office landlord. Due to the location of our operations, SL Green is subject to unique New York State and New York City laws and regulations, including the New York City Human Rights Law. All SL Green contracts stipulate that 100% of new and existing suppliers must be compliant with all local, state, and federal laws, which encompasses the New York City Human Rights Law.

SL Green's Human Rights Policy is informed by stringent international standards including the United Nations (UN) Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, various International Labour Organization (ILO) Conventions, and the New York City Human Rights Law. Additionally, SL Green adheres to the International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

SL Green recognizes that a significant portion of our business impacts could occur in our supply chain and is therefore committed to partnering with our suppliers to manage and control material risks in this area, in the interest of our employees, tenants, and communities. An important part of adhering to this commitment is selecting and working with suppliers that maintain transparency and comply with all applicable standards and regulations regarding ethics, environmental, and social issues. SL Green's [Vendor Code of Conduct](#) is intended to outline the fundamental expectations we have of suppliers in regard to SL Green's primary procurement values: ethics, environmental standards, human rights, and health and safety.

Governance and Oversight

Instituting a cultural focus on human rights and corporate social responsibility begins with an organization's leadership. With full Board of Director oversight of our environmental, social, and governance (ESG) program and executive-level participation on our dedicated ESG Team, these initiatives have top-down support and are a company-wide priority. SL Green's ESG Team oversees compliance with our Human Rights Policy across all SL Green departments which extends to our partners, tenants, and suppliers. Our ESG Team reports into SL Green's Executive team and the Board of Directors.

Compliance with the Human Rights Policy

This Policy is drafted broadly. In that respect, it is SL Green's intent to exceed the minimum requirements of the law and industry practice. We believe that mere compliance with the law is not sufficient to attain the highest ethical standards. Good judgment and great care must also be exercised to comply with the spirit of the law and of this Policy. Employees and suppliers are required to comply with provisions laid out in all corporate policies, including this Human Rights Policy, in alignment with our Corporate Sustainability Policy, Corporate Code of Ethics, and Vendor Code of Conduct. All the previously mentioned corporate policies can be found on the SL Green website, [here](#).

SL Green intends to enforce the provisions of this Policy. Violations could lead to sanctions, including dismissal in the case of an employee or contractor, as well as, in some cases, civil and criminal liability.

Due Diligence and Audits

SL Green implemented a due diligence process to uphold our commitment to human rights and to ensure compliance with regulations and our corporate policies. 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 those of our suppliers. 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.

SL Green's due diligence process is supported by an independent third-party, EcoVadis, who performs mandatory annual audits and assessments on our Critical Suppliers (defined below) to ensure there are no violations of ESG topics, including human or labor rights. This assessment covers impacts to various groups vulnerable to human rights risks including, but not limited to, local communities, children, women, racial and ethnic minorities, and our own employees. This supplier audit assesses material Human Rights topics discussed throughout this Policy, including forced labor, child labor, human trafficking, freedom of association, collective bargaining, equal remuneration, and discrimination. This due diligence process also identifies both actual and potential issues that may occur in our supply chain.

- **Critical Suppliers:** SL Green has identified our "critical suppliers" as those whose spend is over a defined threshold value (cumulatively accounting for at least 60% of current annual spend) and where SL Green displays a level of dependency.

Based on company segment, location, and size, customized scorecards are generated for each supplier. These scorecards evaluate overall ESG performance, which falls under four categories (Environment, Labor & Human Rights, Ethics, and Sustainable Procurement). SL Green leverages these scores to evaluate suppliers' ESG performance and to communicate ESG expectations to suppliers. SL Green then creates corrective action plans to address identified issues and establish monitoring mechanisms. Further, SL Green integrates ESG standards into its contracts, where suppliers are required to meet and exceed regulatory compliance and uphold environmentally and socially responsible standards. The results of this assessment are then reviewed and used to refine our due diligence process to better identify and mitigate ESG and human rights risks in an iterative process. More information on SL Green's Supply Chain Due Diligence Process can be viewed [here](#).

Corrective Action

SL Green expects employees and suppliers to identify, correct, and monitor the continued compliance of their behavior and activities. Employees and suppliers are required to report any serious breaches of contracts, internal codes, applicable laws and regulations, and this Human Rights Policy. If instances are identified of our employees violating human rights standards, including labor practices and cases of harassment, this will result in SL Green taking disciplinary action against the employee(s), and ultimately termination.

Additionally, SL Green leverages the scores from the EcoVadis assessment to evaluate suppliers' ESG performance and to communicate ESG expectations to suppliers. Where instances of non-compliance are identified, SL Green works with these suppliers to formulate corrective action plans to address identified issues and establish monitoring mechanisms. Suppliers are also reevaluated for continued use in SL Green's portfolio. We reserve the right to terminate or suspend any agreements and relationships with suppliers who are unable to comply with our expectations for human rights and ESG performance, or suppliers who demonstrate disregard for our corporate policies.

Reporting a Concern

All employees and suppliers have a responsibility to prevent and report human rights violations. SL Green's Board Audit Committee established procedures for the receipt, retention, and treatment of complaints received by the Company. Any such communications may be made anonymously. SL Green's Whistleblower Policy is available to employees, suppliers, customers and other third parties and includes a substantive non-retaliation clause. For more information on our whistleblower program and reporting a concern, please see our [Code of Ethics](#).

Employee Training and Awareness

SL Green employees undergo annual trainings on the topics covered in our Code of Conduct including a mandatory anti-harassment training course each year. Additionally, all SL Green-contracted security personnel are required to complete, at a minimum, an 8-hour training course annually. The topics covered in these trainings include human rights, ethics, conduct, active shooters, terrorism, emergency events, building evacuations, weapons, and more.

Human Rights Commitments

Human Trafficking and Forced Labor

SL Green is strictly committed to using voluntary labor only and engaging in any form of human trafficking or forced labor is prohibited in any part of our operations and our supply chain. SL Green adheres to the Protocol of 2014 to the ILO Forced Labor Convention ([P029](#)).

Child Labor

SL Green is opposed to child labor in any form among, but not limited to, our employees, suppliers, and union partners. SL Green adheres to the ILO Conventions in these areas, including the Minimum Age Convention ([C138](#)) and the Worst Forms of Child Labour Convention ([C182](#)).

Diversity

SL Green is committed to workplace diversity in all its forms, with an employee population that reflects this commitment. SL Green is dedicated to ensuring a diverse workplace where employees feel valued and accepted, regardless of race, color, religion, national origin, sex, sexual orientation, age, disability, veteran status, or other characteristic protected by law. As an expression of SL Green's commitment to diversity, the Company is also committed to protecting the rights of women and minority groups and preventing instances of discrimination and harassment. See more about our commitment to non-discrimination and equal opportunity below.

We believe that our diverse pool of talent reflects the market and customers we serve in New York City. Our workplace diversity also strengthens the Company's position in a highly competitive environment by providing 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 who will provide a desired mix of expertise, experience, reputation, and diversity. For more information on SL Green's efforts to promote diversity, please see our [Nominating and Corporate Governance Committee Charter](#) and our [Corporate Sustainability Policy](#).

Non-discrimination and Equal Opportunity

SL Green is committed to ensuring equal opportunity and fair treatment to all individuals throughout our operations 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 should govern all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits. SL Green's non-discrimination policy is in full compliance with the *Civil Rights Act of 1964*, as amended by the *Civil Rights Act of 1991*, and all other applicable federal, state, and local equal employment laws. SL Green also adheres to the ILO Convention on Discrimination ([C111](#)). For more information on our anti-discrimination policy, please see SL Green's [Corporate Sustainability Policy](#).

Fair Wages and Equal Remuneration

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. 100% of employee compensation exceeds the minimum wage. SL Green is also committed to ensuring equal pay for equal work, and SL Green performs analyses to assess any gender pay gaps or disparities. SL Green adheres to the ILO Convention on Equal Remuneration ([C100](#)).

This commitment extends to suppliers of SL Green, who are expected to pay all employees in accordance with union agreements (as applicable), the labor laws of the State of New York, and all other governmental regulations. SL Green reserves the right to request evidence from the supplier to ensure that the supplier has properly paid subcontractors and material and equipment suppliers with respect to amounts paid by SL Green to the supplier for subcontracted work.

Working Hours

The hours during which work may be performed may be restricted and variable, based upon the requirements of governmental authorities, building management, the supplier's contract with SL Green, and the nature of the work. All overtime work hours are taken on a voluntary basis, and eligible workers are compensated for voluntary work hours designated as overtime.

Violence Prevention and Weapons

For SL Green, the safety and security of employees is vitally important. SL Green will not tolerate violence or threats of violence in, or related to, the workplace. SL Green does not permit any individual to have weapons of any kind in Company property or vehicles, while on the job or off-site while on Company business. This is true even if you have obtained legal permits to carry weapons.

SL Green has a zero-tolerance policy for harassment of all types, and are committed to preventing incidents of noncompliance. Employees and suppliers who experience, witness, or otherwise become aware of a violent or potentially violent situation that occurs on the SL Green's property or affects the SL Green's business must immediately report the situation to their supervisor or the General Counsel.

Health and Safety

SL Green is committed to protecting, and aims to improve, the health, safety, and well-being of our employees, tenants, suppliers, and communities through 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 aim to improve the quality of life for our tenants and employees. SL Green ensures best-in-class health and welfare standards, through mandatory Occupational Safety & Health Administration (OSHA) trainings that includes parameters for life, fire, electrical, and scaffold safety, as well as, identifying potential biological, chemical, or physical hazards such as asbestos, vermiculite, and legionella.

- SL Green Forward is a comprehensive plan that stemmed from COVID-19 as an extension of our best-in-class operating platform to provide a healthy environment throughout our portfolio. COVID-19 highlighted the critical role that our surroundings play in supporting the health, safety, and well-being of all building occupants. SL Green implemented solutions that uphold the most stringent health and safety standards in office buildings. We also applied this precautionary approach to develop long-term preparedness strategies for future health and safety priorities. More information on our approach and commitments to health and safety can be found on SL Green Forward, available [here](#).

Right to Organize

SL Green respects the freedom of association and collective bargaining. Employees and suppliers 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 ILO Conventions on Freedom of Association and Protection of the Right to Organise ([C087](#)) and Right to Organise and Collective Bargaining Convention ([C098](#)).

Responsible Marketing Policy

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.

Data Privacy and Security Policy

SL Green respects the right to privacy. We will guard the personal information shared with our Company to ensure the content and services that we provide at SL Green are always tailored to an individuals' current, designated preferences. For more information, please see our online privacy policy [here](#).

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. SL Green maintains a plan of action in the event of a data breach to quickly respond, minimize damage, and clearly communicate about its scope to parties affected.

The responsibility of data privacy and security activities are overseen by the Board of Directors and executive team, with highly qualified, professional cybersecurity staff members continuously analyzing, improving, and applying the latest methodologies to assure protection of data and security of private information.

Cybersecurity

Protection against cyber threats remains a high priority for SL Green. As we transmit sensitive data across networks and rely on Internet-based systems to run our buildings, we are dedicated to protecting this information and the systems used to process it. We also ensure our employees, processes, systems, and external partners are aligned with cybersecurity best practices. SL Green's Board and executive management team regularly assess our program and are positioned to respond to security and privacy risks, identify vulnerability gaps, and assess data governance programs. We conduct quarterly mandatory training for employees, constantly scan our systems for vulnerabilities and ensure that any identified risks are immediately addressed. We also periodically employ external agencies to test the efficacy of our security protocols, maintain cyber liability insurance coverage, and leverage the cloud to employ sophisticated cybersecurity measures.

If a supplier of SL Green uses or has access to our Company computers, databases, networks, or other similar systems used for the storage or transmission of electronic data and information, or electronically stores any of SL Green's information or data, then the supplier is expected to fully comply with SL Green's cybersecurity requirements as outlined in the supplier's contract. In relation to SL Green's data and systems, these suppliers are expected to comply with the guidelines outlined in the [Vendor Code of Conduct](#) (page 3).

Confidentiality

Any information obtained by a supplier or its employees in the performance of an agreement shall be deemed to be confidential and proprietary information. Suppliers are expected to hold such information in strict confidence and not to disclose such information to third parties or to use such information for any purpose whatsoever other than what is outlined in the project contract.

Business Ethics

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 all employees and suppliers must contribute to the care and preservation of that asset. SL Green's [Code of Ethics](#) 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. Mandatory compliance with our Code of Ethics applies to all SL Green employees, partners, and suppliers.

Fair Competition

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. More information on SL Green's policy on anti-competitiveness can be found in the [Code of Ethics](#) under "Fair Dealing".

Anti-Bribery and Anti-Corruption

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.

SL Green strictly prohibits actions of bribery or corruption from employees and suppliers. Bribery, kickbacks, or other improper payments have no place in our operations. No employee should ever offer direct or indirect political contributions and/or charitable donations as a means of bribery or corruption. To clarify, a "bribe" can include, but is not limited to money, entertainment or gifts, debt forgiveness, excessive gratuities or commissions, kickbacks, rebates, and charitable or political contributions made on the third parties' behalf, and more. Oversight of this commitment to anti-bribery and corruption is the responsibility of the Board of Directors.

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. Additional details related to anti-bribery and anti-corruption can be found in our [Code of Ethics](#).

Suppliers must not directly or indirectly violate any applicable law, rule, regulation, or order relating to anti-bribery or anti-corruption (governmental or commercial), or otherwise use any unlawful or improper means of obtaining business or any

improper advantage. Suppliers must use reasonable efforts to obtain appropriate anti-corruption covenants, representations, and warranties from all service providers or subcontractors. Suppliers are expected to cooperate with any compliance audit or investigation required by SL Green.