GID HUMAN RIGHTS STATEMENT

INTRODUCTION

GID is a vertically integrated real estate investor, operator, developer, and fiduciary, that operates a diverse portfolio of multifamily, industrial, and mixed-use developments.

We have prepared this Human Rights Statement to guide us in our own operations, those of our subsidiaries, affiliates, partnerships, joint ventures, and to such entities' shareholders, directors, officers, employees and agents.

COMMITMENT TO RESPECT HUMAN RIGHTS

We recognize that while governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions, we are committed as an organization to respect human rights and are committed to complying with the legal frameworks of the jurisdictions within which we operate.

This statement is uniquely our own. However, in its development, we considered for purposes of guidance, several international instruments, including the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Respect for our workforce

Consistent with our commitment, at GID we:

- strive to eliminate forced labor, child labor, and discrimination in the workplace;
- work to establish safe and healthy working conditions;
- value diversity as part of our corporate culture;
- seek to compensate employees competitively and fairly; and,
- respect the rule of law in the jurisdictions within which we operate and the principles of freedom of association, the freedom not to associate, and the right to employer and employee collective bargaining in accordance with applicable national law and practice and the right to work laws, where applicable.

We believe one of the best ways to respect human rights is to build a culture of trust and respect throughout our organization. We seek to achieve this in many ways and are continuously looking for ways to improve our efforts.

We work hard to make GID an outstanding employer and corporate citizen, and we encourage dialogue and engagement throughout our organization with internal and external stakeholders.

Respect for our communities

As a vertically integrated real estate investor, operator, developer and fiduciary with a diverse portfolio of multifamily, industrial, and mixed-use developments, respect for the communities in which we operate is part of our commitment to respect human rights. We are passionate about enhancing the communities in which we invest, live and operate. To that end, we have a strong commitment to promote the health and well-being of the residents and tenants in these communities.

Respect for the environment

We are committed to the environmental sustainability of our developments and properties, as well as the sustainability of assets within investment vehicles. Through this commitment we strive to reduce energy usage, water consumption and carbon footprint in a data-driven and fiscally-responsible way. We strive to promote resiliency and assess climate risks across our entire operational portfolio. We work to ensure these activities align with our fiduciary duty to our investors.

OUR NETWORK

We have a large and diverse network of suppliers, customers, investors, business partners and other external stakeholders. We recognize the roles they play in helping us fulfill the objectives to which we aspire to respect human rights.

Recognizing that each entity in that network should seek to undertake its own efforts to respect human rights, we are committed to working with them in connection with their own efforts on this subject. Where we become aware of inadequate efforts, we may undertake measures to mitigate adverse human rights impacts to the extent there may be a direct linkage to GID.

OPERATIONALIZING OUR COMMITMENTS

As part of our commitment to respect human rights, we have undertaken to establish mechanisms to help identify, address and mitigate potential adverse human rights impacts that may have direct linkage to our actions, although such mechanisms are already integrated into our operations through established policies and procedures. We strive to periodically review our efforts with a goal of continuous improvement of our ability to fulfill our commitments to respect human rights.

As part of our commitment to respect human rights, we engage in reporting in which we disclose what we are doing to further our commitment to respect human rights and to operationalize our commitments.

STAKEHOLDER ENGAGEMENT

Consistent with our commitment to dialogue and engagement, we periodically consult with relevant internal and external stakeholders to understand human rights-related concerns and issues, and to assess and escalate them as appropriate.

REPORTING ISSUES OR CONCERNS

We encourage the reporting of any issues or concerns related to actual or potential adverse human rights impacts. Those reporting should have no concern with regards to retaliation or other adverse action taken as a result of good faith reporting. We will strive to evaluate the issues or concerns reported and to act where appropriate.

Consistent with this commitment, we have established the following means of communication.

• By telephone: 1-844-965-3493

• By email: <u>HR@GID.com</u>

Gregory & Bates

• Mobile URL: http://gidmobile.ethicspoint.com/

• Webform URL: http://gid.ethicspoint.com/

Gregory S. Bates President & CEO

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