



PENNROSE

Bricks & Mortar | Heart & Soul

Human Rights, Anti-Harassment, and Anti-Discrimination Policy

This code serves as a guide to the high standards of professional conduct to which we hold all Pennrose associates. Developed by the legal council at Pennrose, this code represents our commitment to prevent issues of harassment and discrimination, promoting the equal human rights of all.

Updated August 2024



Pennrose Human Rights, Anti-Harassment, and Anti-Discrimination Policy

Introduction and Purpose

Our Human Rights, Anti-Harassment, and Anti-Discrimination Policy underscores our commitment to treating everyone with respect and fairness, strictly prohibiting any behavior that undermines these values. We actively support diversity, equity, and inclusion, believing that a diverse workforce enhances creativity and innovation. By adhering to all relevant laws and fostering an ethical culture, we aim to create a supportive atmosphere where everyone has the opportunity to flourish.

a. Safety and OSHA Compliance

Pennrose is dedicated to the safety and health of our staff and our business partners. Associates shall make project safety and accident prevention the primary priority in all phases of operations and administration. Associates shall follow all aspects of a project's safety plan.

b. Contract Diversity Compliance

Pennrose has a long history of achieving racial and economic diversity in its development projects. We encourage Small Business Enterprise, Minority Business Enterprise, and Woman-owned Business Enterprise (collectively "MWDBE") participation on all of our projects, and we expect our associates to share this commitment.

Associates shall comply with all MWDBE laws and shall ensure that all representations and certifications concerning project inclusion are honest, accurate and complete.

c. Non-Discrimination

Pennrose conducts business with complete respect for diversity and social responsibility and is committed to providing equal employment opportunities. Pennrose prohibits any form of unlawful employee discrimination or harassment by its associates, who shall not discriminate in any decision with regard to race, color, gender, language, religion, union membership or affiliation, political opinion, national origin, sexual orientation, health status, age, disability, marital status or other characteristics protected by law. Harassment and any form of physical or verbal abuse also shall be prohibited. Further requirements are set forth in the Pennrose policies on Harassment and Familial Status.

Pennrose associates also shall follow all applicable Fair Housing laws, including using standard, non-discriminatory criteria in leasing and serving residents. Further requirements are set forth in the Pennrose policy regarding Fair Housing.

Statement on Diversity, Equity, and Inclusion

Pennrose embraces the rich culture diversity brings to our organization. We view and define diversity broadly. Diversity in race, skin color, ethnicity, gender, personal and sexual preference; difference in thought, education, experience, and background.

Pennrose is committed to eliminating discrimination and creating an inclusive culture based on merit where everyone has an equal chance to succeed, and where collectively we can advance equality and fairness. We recognize that by attracting, recruiting, and developing staff with different life experiences and perspectives, we can generate greater creativity in anticipating and meeting the needs of all our employees and our business associates. We want all our employees to work and be free to perform at their very best. To make that a reality, we aim to eliminate bullying, harassment, victimization, and discrimination in our workplace.

Pennrose's employment practices (which include pay, promotion, access to training opportunities, recruitment, disciplinary and grievance procedures) aim to be fair, objective and allow all staff to feel valued, respected, supported, and engaged in their work.

All employees need to comply with the requirements of relevant equality legislation. Any breaches of this Code of Conduct will be managed in accordance with Pennrose's Disciplinary Policy.

Reporting Potential Violations

Pennrose associates who suspect a violation of this Business Conduct Code, any Pennrose policy or any law shall immediately report such information to the associate's immediate supervisor or Senior Management. You also may report such information to Human Resources or Vice President Compliance & Legal, who must then, in turn, report it to Senior Management. No associate will be subject to any form of retaliation because of a good faith report of a suspected violation.

Hotline/Reporting Procedures

Significant concerns are reported to our Audit Committee on a quarterly basis.

Pennrose has a private and confidential "hotline" phone service that may be used by associates to make good faith reports of suspected improper conduct and workplace concerns without fear of retaliation. This hotline is dedicated to recognizing the sensitivities associated with lodging a concern as an employee. Associates may choose to remain anonymous when calling the hotline. If you do give your name, Pennrose will do all we can to protect your identity consistent with conducting a thorough investigation.

Employee Assistance Program (EAP) Hotline: 1-800-386-7055 (Available 24/7)

Non-Retaliation

Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation. Therefore, Pennrose associates shall not interfere with the good faith report of suspected improper conduct. Penrose associates shall not retaliate in any way against any person making a good faith report of suspected improper conduct.

Cooperation

Pennrose associates must cooperate fully and truthfully in all investigations of potential violations of the Business Conduct Code or any law, regulation, or procedure. This includes situations where associates are an involved party, a witness, or are asked to provide information as part of an investigation. Any attempt to withhold information, sabotage or otherwise interfere with an investigation may be subject to any level of disciplinary action up to and including dismissal. Remember, investigations are confidential company matters. To protect the integrity of the investigation, you are not allowed to discuss any aspect of an investigation, even the fact that an investigation is being conducted with other Pennrose associates or the public.

It is a violation of our Code to knowingly provide false information to Pennrose or refuse to cooperate with Pennrose during an investigation of violations of this policy.

Violation of the Business Conduct Code

Associates who do not comply with this Business Conduct Code or other company policies, standards or procedures may face disciplinary action, including employment termination. Pennrose also may refer criminal acts to appropriate authorities for evaluation and potential prosecution.

Compliance Certifications

Pennrose associates may be asked to complete an annual certification, indicating that the associate has read the Business Conduct Code and is following its contract obligations and the Business Conduct Code.