
DRA Advisors Responsible Investment and ESG Policy

DRA Advisors LLC is a New York-based registered investment advisor with approximately 100 employees specializing in real estate investment management services for institutional and private investors, including pension funds, university endowments, sovereign wealth funds, foundations, and insurance companies. Since DRA was founded in 1986, the firm has opened additional offices in Miami and San Francisco while acquiring more than \$40 billion of real estate in industrial, life science, office, retail and multifamily sectors.

DRA takes pride in its philosophy of being trusted by DRA's employees, joint venture partners, third-party managers, vendors, clients, and prospects, alike, which stems from its deep commitment to driving value for all DRA's stakeholders. This policy is intended to guide a significant portion, encompassing over 50% of DRA's assets under management, aligning with our ESG aspirations.

ESG OVERSIGHT

DRA's ESG strategy is overseen by its ESG Taskforce, which includes the Chief Operating Officer, Director of Asset Management, and ESG Manager. In addition, DRA engages individuals across the Company with roles and responsibilities that touch on ESG issues at the asset-level and operationally.

DRA recognizes the importance of strengthening oversight over ESG matters and plans to extend ESG risk governance to all levels of management, administration, and control.

ESG INTEGRATION

With respect to investments in real estate and real estate-related assets, DRA recognizes that ESG factors can affect the performance and value of its portfolios (to varying degrees across regions and types of properties and over time). DRA also believes that understanding the impact of ESG issues helps identify future opportunities and navigate the increasingly complex regulatory environment in which DRA operates. To act in the best long-term interests of its investors, DRA considers ESG items as appropriate when analyzing real estate and real estate-related investment opportunities, together with other factors consistent with its other obligations as an investment adviser.

DRA is committed to the Principles for Responsible Investment ("PRI"), and we aim to incorporate each of the below Principles into our investment processes:

- 1) We will incorporate ESG issues into investment analysis and decision-making processes.
- 2) We will be active owners and incorporate ESG issues into our ownership policies and practices.
- 3) We will seek appropriate disclosure of ESG issues by the entities in which we invest.
- 4) We will promote acceptance and implementation of the Principles within the investment industry.
- 5) We will work together to enhance our effectiveness in implementing the Principles.
- 6) We will each report on our activities and progress towards implementing the Principles.

APPROACH TO STEWARDSHIP

As an investor in value-add real estate, DRA engages in stewardship by collaborating with and influencing the actions of several third parties throughout DRA's investment process and holding period to maximize long-term value. Through DRA's direct oversight of its assets and its asset managers' close relationship with property managers, DRA aims to ensure that DRA's properties are meeting the business plans outlined for them to the best extent possible. This potentially includes projects to improve energy and water efficiency as well as resilience to climate change impacts.

In the initial stages of the investment process, DRA utilizes its network to assess the reputations of potential joint venture partners. This practice is implemented with the objective of safeguarding investors. The Firm tends to collaborate exclusively with partners boasting a substantial track record of successful operations.

ENVIRONMENTAL

When applicable, DRA aims to weave sustainability and climate-related best practices, considerations, and controls into its value-added investments due diligence, repositioning, rehabilitations, strategic capital investments, operations, and dispositions of real estate to minimize DRA's environmental impact and enhance climate-related resiliency.

- Sustainability could unlock value in commercial real estate. As such, a portion of DRA's investment strategy is focused on acquiring existing and undermanaged buildings that may be inefficient in terms of energy, water, and waste management.
- DRA may rehabilitate or reposition certain investments with strategic capital infusions and cost reduction programs to enhance their efficiency, as well as value to the local community and the overall investment.
- Consideration of environmental factors is included in due diligence processes, which involves utilizing third-party consultants to perform Phase I Environmental Site Assessments (and Phase II if needed), as well as conduct ASHRAE Level II energy and water assessments, waste assessments, and greenhouse gas emissions assessments with decarbonization planning at the asset level.
- DRA may evaluate next steps as needed including remediation, additional testing, or additional insurance coverage.
- DRA may enhance the sustainability of its standing investments through implementing energy efficiency measures. DRA will assess the viability of green building certifications, such as LEED (Leadership in Energy and Environmental Design) and ENERGY STAR certifications, when economically feasible.
- When appropriate DRA shares design guidelines with tenants that indicate energy and water efficiency considerations for tenants to implement including installing ENERGY STAR appliances where possible. DRA also evaluates specific needs and opportunities at properties depending on what is feasible by property type.
- DRA plans to further develop its environmental initiatives tracker that will be used to track greenhouse gas emissions, energy, water, and waste initiatives at the property and fund level .
- DRA will endeavor to work with all tenants to negotiate green leasing provisions, when possible, to support continued operational energy efficiencies by tenants and facilitate the collection of environmental metrics for tenant-controlled spaces.

Approach To Climate

DRA recognizes the impact climate-related risks may have on its business and investments and has started to identify climate-related risks as part of its investment due diligence process.

Physical climate risks and structural resiliency issues are assessed on an asset-by-asset basis. Currently, during the due diligence process, DRA engages third-party inspectors as part of the investment process to assess the level climate risk and the resulting financial impact for all assets through a thorough climate change risk and resiliency assessment.

SOCIAL

Human Capital Management and Diversity, Equity, and Inclusion (DEI)

DRA is a multi-year winner of Pensions and Investments' Best Places to Work and takes pride in providing its employees a rewarding and balanced work environment.

DRA strives to continue to actively foster a professional environment that embraces DEI and is focused on supporting employees and the communities in which DRA operates. DRA has a Diversity Committee that includes the Chief Operating Officer, Chief Marketing Officer, ESG Manager, and other roles across the company and is responsible for implementing its DEI Strategic Plan, aligned with themes of fostering a diverse workplace, attracting and retaining diverse talent, and providing educational opportunities. Diversity is sought and celebrated, and DRA will continue to support our employee resource group, DRA Women (DRAW), and programs that support students from underrepresented populations interested in entering the commercial real estate space.

Safe and Healthy Workplace

- DRA's Employee Handbook outlines the expectations and responsibilities of its employees.
- DRA is committed to providing a work environment free of unlawful discrimination, including harassment and sexual harassment for all employees and independent contractors. Annual training for all employees ensures the Discrimination/Harassment-Free Workplace and Retaliation Prevention policy is adopted by all persons involved in the operation of DRA.
- The personal safety and health of all DRA's employees is DRA's top priority. DRA follows the highest health standards, and whenever necessary, will prioritize prevention of injury and disease over operating productivity. DRA will take all proactive steps to protect the workplace in the event of an injury or communicable disease; employees are expected to obey all health and safety rules in place at work.

Human Rights

- DRA Advisors believes that human rights are fundamental rights and is committed to protecting and promoting human rights as outlined in the United Nations Universal Declaration of Human Rights by taking the following actions:
 - Complying with all local laws and regulations, including laws that grant the right to collective bargaining and freedom of association.
 - Prohibiting the use of forced or compulsory labor and human trafficking in all forms
 - Prohibiting the exploitation of children through child labor
 - Providing a safe and healthy workplace with safe working conditions and fair wages for all employees

Tenant and Community Engagement

- DRA conducts an annual tenant engagement survey to evaluate tenant satisfaction and Net Promoter Score. DRA plans to utilize the results of this survey to identify and address any tenant needs.
- The DRA team believes in supporting initiatives that positively impact its community. DRA sees this as an integral facet of its corporate culture across its offices and the properties under management. This approach provides assurance to clients that their investment advisors are working responsibly and with a keen awareness of the world around them.
- DRA is further developing a corporate charitable giving program and contributes to communities by supporting local charitable and actively promoting volunteer activities among its employees. DRA often hosts community events, fundraisers, and city-wide engagements at our properties, with tenants playing an integral role in these activities. Seasonal celebrations, such as holiday events and summer socials, further connect us with our tenants and the broader community. In addition to sponsoring charitable events and matching all donations, DRA matches donations for every individual employee up to \$1,000 each year.

GOVERNANCE

Dedicated to maintaining a high standard for corporate governance predicated on integrity, ethics, diversity, and transparency. Our Code of Conduct and Compliance is predicated on the principle that DRA owes a fiduciary duty to its clients.

- Data security is a top priority and paramount to DRA. As such, DRA has a full-time Cyber Security Analyst and an Information and Cyber Security Policy that describes its approach to managing key security elements, data classification, asset management, risk management, privacy and confidentiality, and compliance with law and policy. Periodical security assessments are conducted with third parties, including vulnerability assessments, penetration testing, and broader information security audits. Cyber Security Training is held for all employees on an annual basis.
- DRA utilizes Prevalent, a third-party risk management software, to monitor and conduct risk assessments on third party service providers. This tool is dedicated to identifying and addressing a diverse array of risks, including cybersecurity, reputational, operational, financial and compliance exposures.
- DRA is a Registered Investment Advisor and has a robust Code of Conduct and Compliance Program which includes but is not limited to, a whistleblower and non-retaliation policy, Anti-Money Laundering Policy, Foreign Corruption Policy, Conflicts of Interest and Political Contributions. Annual certifications by all employees ensure that best practices are understood and followed.
- Relevant DRA employees comply with extensive procedures when handling investor information, including fraud prevention procedures.