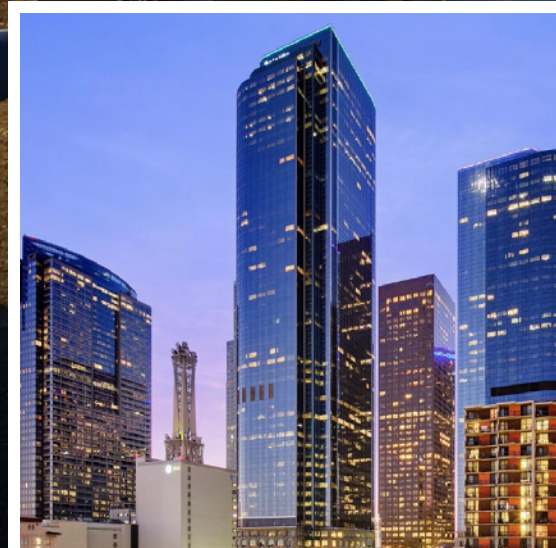


CIM

# CIM Group ESG Policy

Environmental, Social and Corporate Governance  
Updated: December 2020





## CIM GROUP

### Environmental, Social, Governance (ESG) Policy

Most Recently Revised: December 2020

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## **I. Introduction to CIM's Environmental, Social, Governance (ESG) Policy**

Amid economic and environmental changes, we recognize the influence that environmental, social, and governance (ESG) factors can have on investment risk and return. Since 1994, CIM Group (CIM) has focused on creating value and enhancing communities. CIM's community focused investment strategy, in and of itself, is a model for environmentally sustainable real estate investing. Therefore, ESG considerations and risk analysis are natural fundamental factors in CIM's investment analysis.

We also recognize the responsibility we have to minimize the environmental impact of the real assets we own, develop, and operate. CIM strives to change the world for the better by enhancing the lives of people in the communities in which we work, live, and invest. CIM is committed to continuing to incorporate ESG best practices, consistent with CIM's overarching commitment to its partners, stakeholders, and co-investors, into our business strategies and day-to-day operations.

This ESG Policy and its corresponding departmental policies provide a framework surrounding ESG issues to proactively incorporate ESG best practices into CIM's business strategies and investment, development, and asset management activities. This policy is distributed to all CIM employees and is available on the CIM Company Portal.

CIM is a voluntary partner with the U.S. Environmental Protection Agency's ENERGY STAR® Program and a signatory of the United Nations Principles for Responsible Investment (UN PRI). CIM is also a Global Real Estate Sustainability Benchmark (GRESB) member and participant. CIM supports these frameworks as an effective means to foster dialogue among other companies, our partners, stakeholders, and co-investors and to improve disclosure from companies globally. Our ESG considerations serve to complement our ultimate objective of creating value in projects, which ultimately enhances communities.

The requirements of CIM's ESG Policy pertain to directly managed assets, for which CIM has complete operational control. Third-party managed assets and triple net lease tenants are encouraged to comply with CIM's policy; however, third-party managed assets and triple net lease agreements have independent control over operational business decisions.

## **II. Statement of Principles**

More stringent environmental regulations and energy efficiency targets in the real estate industry have brought sustainability into sharp focus. CIM seeks to meet these targets by continuing to proactively integrate ESG considerations into our business strategies and investment, development, and asset management activities. We strive to assess ESG risks and opportunities while maintaining focus on financial implications and responsibilities. This ESG Policy is predicated on the following principles, which serve as the basis for how all departments conduct business on a daily basis:

Since its inception, CIM's investing discipline has been based on our belief that the best way to create or enhance value is to focus on a community as a whole, by investing in varied assets or asset classes within that given community. CIM strives to apply that philosophy to more efficiently realize the benefits of that community's transformation through each of its distinct community

investments. CIM's investment philosophy is driven by the principle that every investment aims to correlate with the needs of the community in both the near- and long-term. By focusing investment and development activities in densely populated communities, CIM facilitates the reuse/repurposing of infrastructure and building stock in response to growth and changing market demands. As a result, CIM's investment and development strategy results in (i) the development of more pedestrian and transit-oriented communities, reducing vehicle miles traveled, (ii) resource recycling, (iii) the preservation of open and agricultural land and natural resources and (iv) energy conservation.

## Environmentally Conscious Infrastructure Development

CIM has also focused on and developed expertise in sustainable infrastructure development such as water resource and renewable energy systems. CIM believes this form of resource development will be a key driver behind continued energy efficiency and environmentally friendly development in North America. Environmentally conscious infrastructure development is an extension of CIM's strategy, focusing on public goods and services including transportation, energy and utilities, natural resources, social services and facilities, and communication as the basic pillars of growing communities.

## Bottom Up Awareness/Vertical Integration

CIM believes that focusing on bottom-up awareness of ESG issues and approaches is most likely to result in the identification and implementation of effective sustainable practices that are consistent with CIM's overarching commitment to its partners, stakeholders, and co-investors. To this effect, the Investments (infrastructure and real estate), Development, and Onsite Property Management teams each have individual addenda sustainability policies on how to incorporate the firm's ESG principles into their day-to-day operations. These policies reflect CIM's vertical integration and the firm's ability to identify and manage ESG risk throughout the asset's lifecycle, creating value for the firm's partners, stakeholders, co-investors, tenants, residents, and surrounding communities.

## Operational Efficiency

CIM's sustainability approach is based on its operational efficiency. This approach consists of adherence to environmental best practices and the implementation of preventative maintenance programs. We believe that experienced and knowledgeable on-site Property Managers will result in the identification of operational improvement opportunities and the implementation of effective sustainability best practices across our assets.

Our mission as a firm is to be the premier partner for our partners, stakeholders, co-investors, and users of real assets serving densely populated communities. We seek to accomplish this by:

- Creating attractive investment opportunities in the qualified communities in which we invest over a long-term horizon
- Building, improving, and managing assets to add value to the individual asset and the qualified community
- Conducting our business in the most efficient and flexible manner possible for the benefit of all our stakeholders

### III. ESG Overview

#### A. Environmental

CIM examines how our organization performs as a steward of the natural environment. We evaluate indicators related to actions and efficiency measures undertaken to monitor and decrease the environmental footprint of the portfolio.

CIM's Consumption Tracking Program is facilitated by our external sustainability consultant. The Consumption Tracking Program sets forth environmental targets focused on limiting and reducing CIM's overall carbon footprint. CIM utilizes ENERGY STAR® Portfolio Manager in order to generate Key Performance Indicators (KPIs) which can aid in identifying building-level projects that address energy, water, waste, materials, and opportunities for further assessment and/or audits. Recommendations for building-level projects, assessments, and audits are reviewed on a project-by-project basis by Property Management, Investments, and the ESG Committee for feasibility. CIM provides our onsite Property Managers access to their building profiles in ENERGY STAR® Portfolio Manager and we drive them to proactively review their consumption data to monitor the efficiency of their building and identify any anomalies.

In addition, CIM utilizes EMS software which provides comprehensive data and metrics management, and reporting to support further understanding and identification of risk areas and strategic opportunities for efficiency and cost-savings across CIM's portfolio.

CIM prioritizes the following environmental issues:

##### *Energy and Water*

- Pursue ENERGY STAR® and other sustainability certifications (where eligible and practical)
- Evaluate and implement no or low-cost measures and Capital Expenditure (CapEx) improvements where approved, to integrate best management practices and new technologies to improve key performance indicators
- Comply with local environmental building codes for development projects
- Comply with state and local benchmarking ordinance requirements
- Install renewables and/or evaluate purchase of off-site Renewable Energy Credits (RECs) (where applicable)
- Train employees (property managers) and tenants/residents on environmental issues
- Prepare owned, managed, and developed assets for resilience and climate change adaptation
- Manage energy procurement

##### *Waste*

- Comply with the Sustainable Purchasing & Green Product Guidelines for existing operating assets
- Comply with the Waste Management and Recycling Guidelines for existing operating assets
- Improve waste management programs to include recycling and composting (where applicable) at all possible assets in addition to creating programs for harder to recycle materials (i.e. e-waste, toner/ink, batteries)

CIM has engaged a technology company specializing in waste management and zero waste solutions to help us identify and implement smart, sustainable, and data-driven waste and recycling practices across our portfolio. We are committed to reducing our waste to lessen our impact on the environment and we look forward to improving our waste management programs.

## *Biodiversity & Habitat*

CIM utilizes environmentally sensitive practices in our operations where feasible, to minimize the impact of our buildings upon the biodiversity and habitat surrounding our buildings. We do this through the use of best practices, many of which are monitored through preventative maintenance planning and are also referenced in associated corporate policies and contracts at the asset-level. These practices aim to decrease reliance on chemicals that are harmful to soil health and to the health of employees, tenants, residents, guests, and vendors.

## **B. Social**

CIM is conscientious of the impact of the real assets that we own, develop, and operate on our communities, employees, partners, stakeholders, co-investors, and third parties. We strive to enhance the quality of life of the people in of the communities in which we work, live, and invest.

CIM prioritizes the following social issues:

- Health and well-being, safety, and security of building occupants and visitors
- Accessibility for disabled persons
- Stakeholder engagement
  - Provide tools and resources to engage property management teams (i.e. Sustainability related operations and maintenance trainings, ENERGY STAR standard operating procedures, ENERGY STAR benchmarking, green building certifications, state and local ordinance compliance)
  - Provide employee ESG training (i.e. Informational engagement events, ESG trainings, and informational material)
  - Host and facilitate tenant/resident engagement events (i.e. community clean-up events, donation drives benefiting local charities, e-waste recycling drives, annual Earth Day events and activities, socials, and demonstrations of sustainability-related practices)
  - Engage with the local community (i.e. Volunteering, donation drives benefiting local charities, participating in charitable fundraising activities)
  - Survey commercial tenants via the Kingsley Tenant Experience Assessments (Annually)
  - Survey employee satisfaction and diversity and inclusion in the workplace (Periodically)

## Employees

CIM is committed to creating an entrepreneurial, diverse work environment that rewards motivation, creativity, and integrity. Our professional responsibility begins with a dedication to upholding the standard for integrity and ethics. CIM's values shape our culture and reflect who we

are as an organization. Our values are what we embody and what we believe is a foundation for how we affect the world – they are simple and powerful: RESPECT, INTEGRITY, and DISCIPLINE.

## *Diversity & Inclusion*

CIM established a Diversity and Inclusion Council to help us to be a better partner for our communities, our employees, and for our partners, stakeholders, and co-investors. Members of the Diversity and Inclusion Council consist of employees across the organization representing various departments, offices, and seniority. The Council oversees internal and external diversity initiatives throughout the company. The Council's goal is to support an inclusive workplace that emphasizes fairness, recognizes each individual's unique value, and sees differences as an opportunity to improve the organization. Each CIM employee has the right to be respected as a valuable part of the team. Members of the Council possess conflict resolution skills, understand CIM's history and culture, and demonstrate CIM's values of respect, integrity, and discipline. Members share a common goal of using their varied experiences, thinking, and perspectives to drive innovation and growth at CIM.

We recognize that innovation requires a wide range of perspectives, which is why we routinely seek for diversity among our employees. Diversity of thought begins with a diverse and inclusive workforce. The many valuable perspectives that our employees bring to the work environment and to our projects serve as the genesis of great ideas and innovation. In pursuit of that diversity, we have recognized that removing bias from the recruitment and interview process requires a conscious effort. Participants in the hiring process receive guidance and training in eliminating preexisting biases from the questions, evaluation methods, and hiring decisions. The firm routinely reviews and updates, when appropriate, its policies and guidance for fair pay and performance review methodologies. Breaking down barriers creates an environment that maximizes the contributions of all employees. We firmly believe that continuing to cultivate a diverse and inclusive workforce enables us to better meet the needs of our communities, drive performance and returns, increase innovation, improve decision-making, and recruit and retain employees. CIM has invested substantial time, capital, and resources in building a strong and cohesive team. Ensuring that our workforce consists of persons with diverse backgrounds, varied experiences, thinking and perspectives, improves the overall success of our organization. CIM continues to be especially proud of the diversity of all our hires and we strive to continue this focus on diversity and inclusion.

## *Learning & Development*

CIM endeavors to promote and cultivate an environment that values development and growth for all employees to help them maximize their career potential and support the achievement of CIM's Business Objectives. CIM's Learning and Development team does this by promoting, supporting, and leveraging various flexible and adaptable quality learning resources and tools and providing developmental opportunities that enhance productivity, knowledge, develop skills, and enrich both the organization and the individual. CIM has classified learning needs into three categories: skills, development, and compliance learning. The primary delivery method for learning is through CIM's Learning Portal. The Portal provides employees with curated content from a variety of providers based on skill interest and level. Furthermore, employees can explore the various content providers on the Portal, share content with one another, and join groups with similar learning goals. CIM has formal and informal mentoring activities in many of the organization's functional areas. Live remote learning is also conducted throughout the year to assist employees in learning about the company's

business operations and information pertinent to their specific job assignments. CIM's Learning Portal also provides compliance learning on a variety of topics including Harassment Prevention, Code of Conduct and Ethics and, Cyber Security education.

Our teams work collaboratively to promote our organization as well as support individual personal advancement. CIM's culture provides an accessible forum for interaction and creative dialogue. Through a process of goal setting and performance evaluation, all members of our team identify his or her individual ambitions so that the organization can support the achievement of those goals. We believe that maximum productivity is achieved only after acknowledging, developing, and rewarding performance.

CIM is committed to supporting, advancing, and empowering our diverse and inclusive team to grow both at CIM and in the communities we serve.

### *Health, Wellness, and Safety*

CIM seeks to continually improve its health, safety, security, and environmental management. In compliance with California law and to promote a safe and healthy workplace, CIM established an Injury and Illness Prevention Program (IIPP). The key components of our program include management leadership, employee participation, hazard identification and assessment, hazard prevention and control, education and training, and program evaluation and improvement. We strive to promote a safe and healthy workplace environment by continually evaluating our workplace culture, physical environment, and occupational health and safety. CIM promotes supportive work environments and healthy living. CIM considers these matters as critical business activities and sets standards and targets for improvement accordingly. CIM's health and wellness strategies pertain to CIM employees located in corporate offices and management offices within CIM owned/managed assets.

*\*Due to COVID-19 related company and CDC guidelines, certain practices, employer provided conveniences and amenities have been suspended or modified for the health and safety of our employees, tenants, residents, and service providers, and will resume and be updated as permitted.*

- *Clean Water*  
Filtered water is provided to employees at a minimum of one water supply within the workplace (via water coolers or filling stations). CIM periodically distributes reusable drinking containers to employees for workplace and/or personal use outside of the workplace. Where reusable cups are not practical, recycled content cups are provided.
- *Air Quality Monitoring*  
Routine testing of CIM corporate offices and regional offices within assets under CIM's direct management is recommended. Records of the following air quality parameters will be maintained for a minimum of 3 years, including full data from field inspectors or laboratory results. Should levels of indoor contaminants such as particulates, volatile organic compounds, and formaldehyde, exceed acceptable levels, each office will determine the source and create a remediation plan (e.g., adding additional filtration, conducting an air flush, etc.).



- *Activity Incentive Programs*
  - CIM is currently investigating a more robust activities incentive program to encourage employees to be active during the workday
    - CIM's Corporate Headquarters in Los Angeles has a fitness center available to all employees
  - CIM strives to provide at least one stairwell accessible to regular occupants that connects relevant building floors
  - CIM will reasonably accommodate access to active workstations or standing desk converters at individual desks upon request with physician's recommendation
  - CIM provides break areas for employees to take a break during the day to encourage activity, interaction, and rejuvenation during the day
  - CIM organizes employee walking challenges to encourage and promote healthy living, exercise, and physical activity
- *Snacks*
  - CIM provides corporate employees in the Los Angeles headquarters easy access to healthy lunch options by subsidizing fifty percent (50%) of the cost of one (1) lunch per day through an online food delivery service that offers a variety of meals daily
  - Healthy snacks and beverages are provided free of cost to employees at regional offices including fresh fruit and vegetables, nuts, and high protein energy bars
  - CIM Management offices are encouraged to provide healthy snacks and beverages for employees
- *Flexible Time Off*
  - CIM values work-life balance and recognizes that taking time away from work helps make us better contributors. Just as we need to take care of our physical bodies, taking care of our minds and wellbeing is crucial to a healthy lifestyle. We provide an unlimited vacation plan to salaried, exempt level employees
- In addition, CIM's Employee Handbook describes the policies and procedures applicable to employment with CIM and provides information about the following Health & Wellness topics:
  - Cleanliness
  - Meal Periods
  - Rest Periods
  - Time Off
  - Lactation Break Policy
  - Employee Health Benefits
  - Workplace Environment and Employee Conduct

## Tenants/Residents

We provide tenants/residents in our managed properties with the highest level of service and professionalism. We host a variety of social events and holiday donation drives. We require a minimum of one educational event annually to engage our tenants/residents. We solicit feedback from our commercial tenants via the annual Kingsley Tenant Experience Assessments in order to better understand tenant interests and needs so that we can work to proactively and continuously improve tenant satisfaction.

## *For CIM Managed Buildings*

Best practices that ensure the health and wellbeing of building occupants including tenants, residents, service provides, and employees are integrated into building operations where possible and include:

- Staff training on IAQ/health and wellbeing
- Janitorial Standards that reduce exposure to toxic chemicals (see Sustainable Purchasing Guidelines)
- Green cleaning products and procedures (see Sustainable Purchasing Guidelines): The utilization of green cleaning practices, including the purchase of sustainable products and equipment, chemical handling and storage, staff training, and hand hygiene, unless economically infeasible (exceeds standard cost by 5%) or not aligned with CDC recommendations and industry best practices for COVID-19 safety
- Routine indoor air quality testing
- Indoor Air Quality procedures during tenant fit-out and standard operations to reduce exposure to air pollutants
- Maintaining humidity at an optimal range
- Integrated Pest Management that reduces exposure to toxic chemicals
- Responsible landscaping practices that reduce outdoor chemical use
- Ongoing commissioning of mechanical systems to ensure correct performance

## *COVID-19-Related Recommendations*

- MERV-13 air filters for enhanced filtration to help minimize cross-contamination and capture the majority of airborne particles
- Frequent cleaning and disinfecting of common areas and high-touch surfaces
- Deep-cleaning services for tenants upon request and as needed
- Implement hand hygiene through touchless features, signage, and sanitizer stations
- Hand sanitizer units at all lobby entrances (For in-line retailers or net-lease stand-alone properties, tenants are responsible for their own entrances.)
- Signage throughout building highlighting safety protocols and physical distancing
- Disinfectant coil cleaning
- Running of restroom exhausts for extended hours
- Maximization of outdoor air
- Addition of BMS purge point to draw in 100% outside air
- All staff, residents, and tenants comply with PPE (mask) recommendations in public as recommended by the CDC

## Community

CIM's investing discipline is based on our belief that the best way to create or enhance value is to focus on a community as a whole, by investing in varied assets or asset classes within that given community. CIM strives to apply that philosophy to more efficiently realize the benefits of that community's transformation through each of its distinct community investments. CIM's investment philosophy is driven by the principle that every investment aims to correlate with the needs of the community in both the near- and long-term. By focusing investment and development activities in densely populated communities, CIM facilitates the reuse/repurposing of infrastructure and building

stock in response to growth and changing market demands. As a result, CIM's investment and development strategy results in (i) the development of more pedestrian and transit-oriented communities, reducing vehicle miles traveled, (ii) resource recycling, (iii) the preservation of open and agricultural land and natural resources and (iv) energy conservation.

Since 1994, CIM has worked to enhance communities and create value for our stakeholders. In addition to the positive impact we make through real estate, infrastructure and credit investments, we support communities through philanthropic outreach, partnerships, donations, employee-led initiatives on both local and national levels. CIM strives to be a good corporate citizen and support our employees' desire to make a greater impact in the world and in their local communities. To reaffirm this commitment, CIM established CIMPact. CIMPact is our program of environmental and social support initiatives which outlines CIM's corporate social responsibility objectives for the company, as well as our employees. CIMPact supports, encourages, and offers corporate and employee-led voluntary community service activities on both local and national levels. CIMPact coordinates grassroots initiatives and partners with a wide range of non-profit organizations, including supporting underprivileged families, environmental initiatives, and education.

## C. Governance

CIM examines our company's leadership, audits, internal controls, and stakeholder rights; we evaluate indicators related to the entity's relationship with and impact on its stakeholders and direct social impact of its activities. CIM's corporate governance structure is constructed such that each level of management is held accountable for the proper execution of all company's goals and targets. CIM prioritizes the following governance issues:

- Standard of care in all fund documents (ensuring that CIM exercises due skill, care, and diligence in the course of making and allocating its investments).
- Adoption of the CIM Code of Business Conduct and Ethics (ensuring that CIM conducts itself with integrity and according to best practices).
- Ensuring accountability with its partners, stakeholders, and co-investors - principals and other personnel make themselves available to meet with advisory board members and other investor representatives both at regularly scheduled meetings and at any other time upon investor request.
- Ensuring transparency and dissemination of information (institutional financial reporting and valuation process).
- Alignment of CIM's interest with partners, stakeholders, and co-investors in the form of (a) meaningful CIM investment in each project, (b) key-person clauses, and (c) affiliate transaction prohibitions/limitations; and (vi) imbedding of/participation by compliance personnel (chief compliance officer and general counsel) in all key CIM activities including the investment decision process (ensuring compliance with both applicable laws, regulations and investor covenants).
- Transparency: Disclosure of ESG strategy and performance through GRESB and UN PRI; provision of ENERGY STAR® and LEED certifications for assets under management.
- Commitment to a high level of integrity and ethics which include disclosures and whistleblower mechanisms to mitigate bribery and corruption issues.
- Responsible Contractor Policy (RCP) requires that all subcontractors and employees receive a "fair wage" and "fair benefits" (based on state and local laws).

- To the extent commercially reasonable and consistent with the best interests of the investment vehicle and maximizing returns for all partners, stakeholders, and co-investors, CIM will generally:
  - Refrain from doing business with any borrower, tenant/resident, vendor, or supplier that is known to have engaged in any human rights violations or abuses.
  - Consider the ethical ramifications of proposed investments, based on the United Nations Principles for Responsible Investments (UN PRI).
  - Not to knowingly invest in a company that deliberately and repeatedly violates, in a material respect, the material laws of the jurisdictions in which such company operates that are applicable to such company.
  - Avoid making investments in countries or entities in which other investors, or partners are representatives or instrumentalities of governments that (a) are subject to economic or similar sanctions pursuant to applicable resolutions or decisions of the United Nations Security Council or the United Nations General Assembly or (b) are not recognized by the United Nations.

## Compliance

- Achieve compliance with all applicable local building standards codes, benchmarking, and energy auditing/retro commissioning ordinances.
- Achieve compliance with all environmental regulations.
- Prevent significant fines or non-monetary sanctions regarding environmental compliance.
- CIM provides mandatory compliance learning on a variety of topics including Harassment Prevention, Code of Conduct and Ethics and, Cyber Security education. CIM tracks learning completions to ensure that CIM is meeting its legal obligations.

## **IV. Resilience**

CIM attempts to forecast and understand strategic implications of physical and transition risks by utilizing a combination of strategies and tools to protect the value of our portfolios and the health of the environment. In the face of growing social, economic, and environmental shocks and stressors, CIM is working to proactively identify risks and the mitigation measures that will effectively address those risks. We are committed to the ongoing development of our resilience program.

CIM has historically defined resilience as the management of recovery or continuity in the event of a natural or manmade disaster. Our resilience programs prepare us to respond to actual emergency situations as well as the planning of actions to prevent or mitigate adverse environmental impacts resulting from emergency situations. Actions to prevent or mitigate the consequences of emergency situations are appropriate to the magnitude of the emergency and potential related environmental impact. The resilience program is tested, reviewed, and revised periodically and as new resources become available. Information and training related to emergency preparedness and response are provided to relevant parties, including those providing roles necessary to the success of the program.

## Existing Assets

CIM establishes, implements, and maintains the processes needed to prepare for and respond to potential physical risks and/or transition risks from climate change and other emergencies. This



includes CIM Emergency Action Plans and preventative maintenance programs. Our preventative maintenance programs are designed to prolong the asset's life in the most cost effective and sustainable manner. Resilience items are included within these programs. CIM pro-actively monitors and seeks to implement efficiency measures, where applicable, at all assets.

## Development Projects

It is our policy to ensure that our development projects address resilience issues by meeting the highest standards to protect against natural disasters and/or climate change. (See Addenda Development Policy & Development Sustainability Checklist)

## **A. Climate Change**

In 2017, CIM developed its Environmental Management System (EMS) to govern the tracking of energy, GHG emissions, water, waste, and sustainable purchasing at the majority of CIM's assets, and to provide an action plan for reducing CIM's environmental footprint. In 2018, CIM launched its Consumption Tracking Program and has committed to tracking and reducing carbon emissions at all possible assets. By tracking emissions data, CIM attempts to better understand and manage potential climate-related risks and implements practices to address GHG emission reduction.

CIM has identified climate-related physical and transition risks which include temperature increases, extreme weather, resource availability, and regulatory and policy changes. We research and assess potential ESG risks and their impacts during our detailed underwriting and due diligence process for all investments. Any risks or opportunities would be provided within the Investment Memo presented to the Investment Committee for deliberation.

Moreover, CIM attempts to forecast and understand strategic implications of climate-related risks and opportunities by conducting risk assessments at various properties within our portfolio. Properties are generally subject to inspection through a 3-year rotation for FM Global Loss Control so that we ensure that onsite management is practicing loss prevention and that we are sufficiently covered to the extent there are any changes in flood zones or other natural disaster risk. CIM prioritizes the construction of efficient buildings and retrofits buildings for efficiency.

CIM also utilizes preventative maintenance programs designed to prolong the asset's life in the most cost effective and sustainable manner. CIM pro-actively monitors and seeks to implement efficiency measures, where applicable, at all assets.

## **B. Information Security Program and Cybersecurity**

CIM maintains specific policies and guidelines for safeguarding the security of our data and technology infrastructure. These policies and guidelines apply to all users including employees (full time and temporary), contractors, consultants, interns or any person with a network ID on the CIM network. While addressing and mitigating risks by implementing the following security measures, we continue to evolve our security awareness, capabilities and response tactics over time.

CIM's cybersecurity compliance requirements are detailed in the internal Cybersecurity Policy document and employee responsibilities are outlined in our Acceptable Use Policy, which is reviewed and agreed to by all employees.

## Safeguards and Controls

- Administrative controls
  - Vendor due diligence and confidentiality agreements
  - Quarterly cybersecurity campaigns and annual training programs
  - Onboarding/offboarding processes and controls
- IT controls
  - Workstation virus scanning and protection
  - Dual authentication required for all single sign-on enabled applications and services
  - Firewalls filtering all traffic in offices and data centers with VPN access/encryption for remote user access
  - AD password complex policy enforcement
  - Email scanning, filtering and encryption
  - Automated active network threat detection and response program
- Physical controls
  - Access to offices
  - Access to datacenters
  - Passwords on servers and appliances
  - Incident Response
  - Breach Remediation and Communication Protocol

## Policies and Compliance

CIM's Acceptable Use Policy outlines the acceptable use of computer equipment at CIM and its subsidiaries and affiliates. This policy is intended to ensure compliance with applicable law and minimize the risk of degradation of our network and computer systems as a result of inappropriate use, virus attacks, or breaches of our systems and security. Review and agreement with the Acceptable Use Policy is part of every employee's annual Code of Ethics agreement.

## Training & Testing – Security Awareness Program

- The CIM cybersecurity training program
- The CIM cybersecurity quarterly campaign program
- Penetration Testing

## **C. Business Continuity**

CIM maintains a business continuity plan (BCP) to ensure the continuation of business for CIM, and its affiliates, during and following any significant business disruption such as, localized natural disaster, regional power or network outage, property damage, pandemic etc. and to mitigate risks based on threat awareness and prevention. The plan is established to ensure that personnel and assets owned or managed by CIM are protected and can operate efficiently during and after a business disruption.

CIM reviews and updates the plan annually to maintain accuracy and reflect major changes inside or outside the business. CIM's BCP includes four key elements:

- Business Assessment and Impact Analysis

- Risk Management and Monitoring
- Incident Response and Communication Plan
- Recovery Plan

## Business Assessment and Impact Analysis:

CIM utilizes its Business Impact Analysis (BIA) to assess the identified risks and impacts in relation to critical business activities to 1) prioritize business functions and process, 2) assess dependencies of each critical function, 3) identify the legal and regulatory requirements, 4) establish the maximum allowable downtime and acceptable level of data loss to identify the basic recovery requirements, and 5) assess the Company's current recovery capability. This analysis includes estimated Recovery Time Objectives (RTO) and Recovery Point Objectives (RPOs) for each business function.

## Risk Management and Monitoring:

The goal of risk management is the preservation of the physical and human assets of the organization and the minimization of the destruction/damage caused by a significant business disruption. CIM has various risk monitoring functions that oversee and identify compliance, insurance, financial, operational, and business risks.

To prevent and minimize the negative impact (both financial and non-financial) caused by an unexpected disaster, CIM maintains an Enterprise Risk Assessment program that identifies financial and business risks and mitigating factors and is overseen by the Internal Audit Department. To ensure that CIM's business continuity plan remains viable, the Company performs annual enterprise business continuity testing. Results of the annual testing are used to enhance the CIM BCP.

## Incident Response and Communication Plan:

CIM utilizes its Incident Response Plan to prepare for a timely response to critical incidents, reduce the impact of those incidents on previously identified business operations, and to provide an effective response to ensure minimal disruption to operations in the event of emergency.

CIM maintains evacuation procedures for both staff and visitors for all corporate locations. These procedures are outlined in our Emergency Action Plan for each of the regional corporate offices, which provides a set of procedures to be used by site occupants in the event of a critical incident.

All CIM managed properties have Emergency Action Plans. These plans outline procedures for building emergencies and critical incidents including, but not limited to, fire, earthquake, medical emergency, bomb threat, toxic hazard, and civil disturbance. The plans are distributed to all tenants upon occupancy and are available in the Management Office. The Prepara Portal is used to track CIM's disaster preparedness plan for CIM managed properties. All CIM managed properties have been set up on the Prepara Portal, which enables two-way communication with tenants in the event of an emergency. All of the plans are comprehensive, and include the Emergency Action, Fire Prevention and All Hazards Plans to comply with all OSHA and International/National/Local Fire codes.

CIM's Technology department also maintains a Technology Disaster Recovery Plan to ensure our data is well protected/maintained and technology infrastructure continues to operate during and after an unexpected disruption.

## Recovery Plan:

This plan has been put in place for the purpose of performing critical activities as soon as possible after a critical incident. The recovery process includes developing strategies, identifying resources, RTOs & RPOs of each application, and designated responsibilities for recovering business activities. CIM's BCP incorporates the Technology Department Disaster Recovery Plan that details CIM's data security and backup strategy, which includes data center redundancy, for ensuring business continuity.

## **V. Targets and Goals**

CIM utilizes various tools and programs designed to aid in measuring, managing, and reporting on our sustainability performance. We are committed to continuing to measure our impact through benchmarking, meaningful KPIs, sustainable operations, and tracking progress against our targets and goals to identify opportunities for improvement.

CIM's Consumption Tracking Program sets forth environmental targets focused on limiting and reducing CIM's overall carbon footprint and identifies opportunities for building-level projects that address energy, water, materials, and waste.

CIM's Environmental Management System (EMS) governs the tracking of energy, GHG emissions, water, and waste, and provides a roadmap for CIM to integrate sustainability practices across our business and to organize and direct our sustainability strategy.

CIM's ESG management and sustainability approach is based on a commitment to continuous improvement and it sets forth a four-stage sustainability strategy for continuous improvement: Assess, Act, Implement, and Review (AAIR). CIM's year-over-year improvement process aligns with industry standards for materiality of ESG as a risk management strategy and we report through both GRESB and UN PRI.

Current targets and goals can be reviewed in CIM's Environmental Management System (EMS).

## **VI. Organizational Roles, Responsibilities, and Authorities**

### ESG Committee

The committee is led by an Executive Management Team, representing various departments across the Firm. The ESG Committee oversees the Firm's ESG practices, including the establishment of sustainability goals and providing guidance to CIM's Sustainability Team through the oversight of education, communication, reporting, awareness efforts, and strategic planning. The committee also reviews proposed initiatives and opportunities to improve the performance of the assets and the program.



### Sustainability Team

The sustainability team is comprised of the sustainability manager and external sustainability consultants. The sustainability manager serves as the main point of contact for ESG related questions and information, is responsible for working with CIM's various departments, fostering awareness, and promotion of programs. The sustainability manager and external consultants are responsible for the development and maintenance of the ESG policy and Environmental Management System (EMS), identification of opportunities to implement sustainable practices, tracking of key performance indicators at both the asset and entity-level, reporting on sustainability performance, providing necessary training, facilitating the implementation of programs, and submitting CIM's annual GRESB assessment.