

# SENTINEL ESG POLICY

## Introduction

Sentinel believes that environmental, social responsibility and corporate governance (ESG) factors can have an impact on investment performance and must be considered when evaluating real estate investment opportunities and managing real estate assets. Sentinel's ESG policy and stewardship approach is designed to (i) ensure ESG considerations are incorporated into our decision-making processes, (ii) provide our employees with guidelines for implementing ESG initiatives at our investment properties, (iii) define Sentinel's position on ESG for the benefit of clients, tenants, broader stakeholders and third parties with whom we work and (iv) to advance our stewardship by participating in industry organizations and actively engaging investors, tenants and Sentinel personnel to advance meaningful initiatives on our ESG agenda. This policy applies to all Sentinel entities, employees and affiliates.

Our ESG objectives are integrated into all aspects of our real estate operations and the investment life cycle as a whole. These factors are considered as soon as due diligence on a property begins and throughout the acquisition process, in our construction and development initiatives, in all leasing and property operating policies and in the disposition process.

Our Asset and Property Management teams and the Capital Programs and Sustainability Group regularly evaluate and report property level ESG performance to the ESG Committee, which is charged with formulating our ESG strategy and direction. The Portfolio Management teams, and ultimately the Executive Committee, ensure that this strategy aligns with our clients' real estate investment objectives and their ESG goals.

Sentinel's Executive Committee, in cooperation with the ESG Committee, has established a long-term reduction target of 5% over the next five years, or approximately 1.0% per year reduction in energy, emissions and water.

In addition, Sentinel supports the goal of the Paris Climate Accords to achieve net-zero greenhouse gas emissions by 2050 or sooner. We recognize the responsibility of all real estate investment managers to positively impact the environments in which we invest. We believe that opportunities exist for thoughtful, targeted sustainable investment within the context of each of Sentinel's existing investment strategies that both can enhance the economic returns of our properties and meaningfully reduce our carbon footprint. We have decided to focus our efforts on reducing Scope 1 and Scope 2 emissions from landlord-controlled common areas at our communities, with a provisional goal of reducing carbon emissions by 50% over the next ten years.

## **Net Zero Commitment**

In 2022, Sentinel articulated a formal Net-Zero Policy. Sentinel supports the goal of the Paris Climate Accords to achieve net-zero greenhouse gas emissions by 2050 or sooner. We recognize the responsibility of all real estate investment managers to positively impact the environments in which we invest. We believe that opportunities exist for thoughtful, targeted sustainable investment within the context of each of Sentinel's existing investment strategies that both can enhance the economic returns of our properties and meaningfully reduce our carbon footprint.

Reducing energy, water and waste at our properties is at the heart of Sentinel's approach to sustainable real estate investment and management. We believe that minimizing exposure to these inputs makes for good real estate investing, that will be rewarded with higher cash flows and ultimately increased disposition proceeds.

We have decided to focus our efforts on reducing Scope 1 and Scope 2 emissions from landlord-controlled common areas at our communities, with a provisional goal of reducing carbon emissions by 50% over the next ten years.

While the absence of regulatory and utility support for disclosing tenant utility usage and composition and limiting the access to green energy makes it challenging to set an accurate Scope 3 reduction target for the US multifamily sector at this time, Sentinel is committed to continually reevaluating its sustainability goals as the regulatory environment evolves. As more comprehensive Scope 3 data becomes available and its composition is disclosed, we will explore opportunities to account for these emissions and incorporate them into our reduction strategy. Despite these limitations, we remain ambitious in our pursuit of green energy and sustainable options and are dedicated to collecting and analyzing Scope 3 data to improve our overall emissions performance.

The complete text of Sentinel's Net-Zero Policy can be found in Exhibit A.

## **Environmental Sustainability Policies**

### **Sentinel Green Program**

At the core of Sentinel's environmental sustainability policies that govern the management of our real estate assets is the Sentinel Green Program (Exhibit B). The Sentinel Green Program was developed in 2009 and is augmented each year to ensure Sentinel is incorporating environmentally sustainable best practices into its day-to-day property operations, unit interior renovation programs and community-wide value enhancement initiatives. Utilizing the Institute of Real Estate Management (IREM) Certified Sustainable Property (CSP) program as a framework, the Sentinel Green Program focuses on strategies to measure and reduce energy consumption, water usage, waste disposal and carbon emissions at existing properties within the portfolio. It also incorporates energy & water conservation, health & wellness, waste reduction & recycling into property management, renovation and procurement practices.

Sentinel has expanded its Property Management Policies and Procedures manual in order to ensure the uniform implementation of best practices across the Sentinel portfolio regardless of the market, account or investment strategy.

Sentinel believes that the implementation of practical and cost-effective environmentally sustainable initiatives at our properties not only represents responsible corporate citizenship, but also serves the best interests of our residents and clients through the creation of healthier, more efficient homes with potential to generate additional value for our investors. To reduce Sentinel's environmental footprint and adhere to the Sentinel Green Program, the following actions are required of Sentinel staff:

- All property employees should be familiar with the requirements of the property-level ESG Policies and Procedures.
- Property Managers shall coordinate with Asset Management to complete the ESG section of the annual Asset Plan for the property (a sample of which is provided in Exhibit C) to evaluate property performance and identify opportunities for improving performance.
- Asset Managers and the Architectural Design and Capital Programs and Sustainability Groups shall ensure that all planned renovations comply with the criteria established by the Sentinel Green Program where practicable.
- Property Managers shall provide information to all new and renewing residents to encourage them to pursue sustainable practices during their residency. Where applicable and available, residents will be asked to sign the Sustainable Living Lease Addendum and Utility Lease addendum provided by the National Apartment Association. The Sustainable Living Addendum document addresses aspects of energy efficiency, water efficiency, waste and recycling and indoor environment and wellness. The Utility Lease Addendum serves to inform the tenant of utility payment parameters and Owners request that the Resident may share Residents utility usage data to assist the Owner in Environmental, Social and Corporate Governance ("ESG") reporting and initiatives.
- Property Facebook pages will include posts focused on sustainability, health and wellness and other ESG-related topics.
- Residents shall be provided with the Sentinel Living Green Quarterly newsletter, which contains additional information on ESG-related subjects.
- At move-in, residents shall be directed to the Sustainable Living Guide on the property website.
- Sentinel's ESG Committee and the Sustainability Officers shall meet regularly to review industry best practices and develop new sustainability initiatives. They will coordinate with the Capital Programs and Architectural Design Groups and the Asset Management teams to implement these strategies throughout the Sentinel portfolio.

## **Annual Sustainability Reviews**

Sentinel's Asset Management teams work with our Capital Programs and Sustainability professionals to identify areas of improvement for each property during the annual budget and asset plan process. Many of our funds and accounts have adopted an ESG section to these asset plans, which helps assess changes to the local regulatory environment with regard to sustainability, the property's current sustainable infrastructure and programming as well as and

potential areas of investment for the coming year. Sustainability-focused capital programs include LED lighting, green renovations, HVAC upgrades and other projects. Sentinel's goal is to maximize impact within the parameters of each investment strategy. During this process, the Capital Programs and Architectural Design Groups, along with the Asset Managers, shall:

- Evaluate the capital needs for the coming year, including assessment of energy, water and waste efficiency including but not limited to: lighting upgrades, insulating strategies, replacement of windows/doors, new roofing, HVAC upgrades, repairs to irrigation systems, selection of appropriate landscaping and improvement of pool systems.
- Evaluate resident unit upgrades in alignment with the Sentinel Green Program (previously provided in Exhibit B) and pursue both energy and water efficiency where feasible.
- Complete the ESG section of the annual Asset Plan (previously provided in Exhibit C), if applicable, to confirm the property's ESG attributes and activities and to confirm that best practices are followed for energy, water and waste management. This summary is designed to provide an annual assessment of each property's sustainability risks, efficiency opportunities, market conditions and recent sustainability efforts.

In addition, an ESG section is included in the internal operational audit performed annually at each property to confirm compliance with ESG policies and procedures and assess ESG risks resulting from property operations.

### **Annual Sustainability Reporting**

Sentinel has committed to transparency with respect to its ESG initiatives and results. We publish this ESG Policy and our annual ESG Report on our website and we include specific reporting with respect to ESG matters in the quarterly and annual reports of certain of our funds.

A key component of our stewardship approach is to advance transparency of sustainability performance information available to investors. As such, we participate in industry ESG-related benchmarks, which provide performance comparisons that enable investors to factor ESG matters into investment decisions.

Sentinel has participated in the Global Real Estate Sustainability Benchmark survey since 2011, and currently reports on five of its funds and accounts. It is Sentinel's objective to support the development of tools for benchmarking ESG integration that provide industry/investor insight, encourage the market to keep pace with best practices and standardization of reporting.

In 2020, Sentinel officially became a signatory of the UN Principles for Responsible Investment (PRI) and reported into the PRI framework for the first time in 2021. As a signatory, we are committed to the following principles:

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

## **Sustainable Procurement Processes**

Sentinel encourages its contractors and suppliers to provide energy efficient and sustainable materials for all of its properties to the extent practicable. To improve efficiency and reduce environmental impact at the property level, Property Managers and their maintenance teams shall:

- Purchase “Green” equipment and products whenever it is an available and cost effective replacement for on-site equipment or products requiring replacement.
- Ensure that “Green” equipment and product lists are shared with third-party vendors and contractors and suggested for use during work conducted by third-party teams.
- For ongoing operations, “Green” products are specified and should be used where possible as detailed on our national vendor product lists.
- Carpets containing either recycled materials or that are recyclable should be used, including low chemical emitting adhesives, where applicable.
- Other flooring products should also be selected considering environmental impact as well.
- Purchase recycled paper containing at least 30% post-consumer waste recycled fiber for use in printers and in marketing material.
- Low/no VOC paints must be used.

## **Data Management**

Sentinel values transparency with our investors, tenants and the communities we serve. Measuring the energy, water and waste performance of our assets provides insight into how our assets impact the environment and allows us to identify trends in property performance. With this information, we are able to set baselines and establish goals, analyze opportunities for reducing consumption and cost and explore investments that can improve both resident comfort and investor returns. As such, we are utilizing ENERGY STAR® Portfolio Manager® (ESPM) as the base for tracking property-level performance data within our data management program. Sentinel retained Yardi Energy Services (YES) beginning in 2020 to assist with uploading utility data into the ESPM database in order to bring consistency to the quality and timeliness of data collection across the portfolio. This has facilitated tracking and analysis of this data and is expected to support Sentinel’s efforts to reduce the energy, water and waste

usage and, ultimately, in the carbon footprint of the portfolio. By year-end 2022, a total of 128 properties were participating, representing 80% of our portfolio, and we expect to continue to expand this program in 2023.

In addition, Sentinel's sustainability team is working with YES to gain access to tenant utility data at additional properties to improve our ability to collect whole-building data. YES is engaging utility providers directly on our behalf to determine where such access is feasible and where other avenues will need to be pursued. As new benchmarking ordinances develop, our access to whole-building data will increase. In the interim, in 2022, we also tested a new program with YES to manually review the resident meters for a selection of properties.

In an effort to improve waste reduction and diversion data, Sentinel executed a national contract with Waste Management to implement a companywide analytic platform to track waste data at our properties. This contract both reduces the overall price for waste services nationwide and facilitates more consistent data coverage of waste and waste diversion at all of the properties in the portfolio. Further, this tech-driven platform helps us improve waste and recycling practices by tracking weight and seasonal trends, which allows us to calculate the frequency of needed trash pick-ups as well as the correct dumpster size to prevent loose debris and overspilling. This helps prevent garbage truck pickups before the dumpster is full, which saves on fuel, along with keeping the property litter free and reducing pollution at our properties. The data collected also helps us achieve higher diversion rates from landfill to recycling centers. Waste Management works with Energy Star Portfolio Manager, which helps benchmark our usage to similar assets. Most importantly, this effort is done behind-the-scenes and does not interfere with the residents in our communities. As we take steps in the right direction for our environment, we always encourage our residents to challenge themselves to be conscientious about their individual carbon footprint as well.

Additionally, for many of our properties, we utilize web-based software to monitor water and heating consumption and costs.

Specifically, our Property Managers and Asset Managers are responsible for:

- Complying with all local and state benchmarking disclosure ordinances and reporting data prior to the specified annual deadline(s).
- Monitoring the data uploaded by YES and Waste Management into ESPM on a monthly basis, including property-level whole-building energy, water and waste data (where available).
- Where whole-building data is not available, property teams shall monitor the common area (i.e., landlord-paid) utility data on a monthly basis.

## **Climate Risk Assessments**

Sentinel has initiated a climate and transition-related risk assessment for several of its individual funds using the GRESB Reference Guide, in accordance with the TCFD framework, as a basis to determine relevant risk categories for review. Our assessment considers both physical and transition risks at the property level, aggregating the findings for the portfolio and reporting at the entity level. Sentinel takes a holistic approach to risk management, and each Portfolio Management team evaluates climate-related risks throughout the life cycle of each investment. This evaluation begins at acquisition during the due diligence process, and is

continued annually during the asset plan process, which includes a hold/sell analysis. On an annual basis, with the help of Sentinel's insurance consultant, AON Risk Services, each fund's Portfolio Management team prepares a Climate-Related Risk Assessment. In addition to the economic factors that might drive a sale recommendation, climate risk is also a factor that can cause the Portfolio Management team to submit a sale recommendation to Sentinel's Investment Committee.

## **Other Initiatives**

### *Solar Energy*

Since the end of 2020, Sentinel has been working to evaluate the feasibility of introducing solar panels at its properties and the various legal structures available for such an implementation. Ultimately, we entered into contracts for the construction of solar panels at three properties in California. We are moving forward with two additional solar projects that will be completed in 2023. In addition, one of the properties we acquired in 2022 was developed to include solar arrays on the roof-tops of the three apartment buildings.

### *LED Lighting*

In 2013, Sentinel commenced an initiative to retrofit the common area lighting with LED bulbs wherever practicable. Sentinel has been working in partnership with HD Supply on this initiative. HD Supply performs energy audits, which are designed to report on the resulting benefits of these property-wide common area and in-unit LED implementation programs.

### *Flooring*

Sentinel continues to install environmentally friendly carpet where possible throughout its portfolio. We use two different styles of carpet: Home Charm, which has fibers made in part from 30% renewable plant-based material, and Neutral Shrift, which is made from 25% recycled plastic bottles along with 30% renewable plant-based material. Moving forward we will continue to increase the usage of Neutral Shrift carpeting throughout the portfolio to divert as many plastic bottles as possible from landfills. Additionally, where possible, we have eliminated the use of carpeting in the living/dining room areas of our first-floor units and replaced it with vinyl plank flooring or LVT, which has a longer life than carpet (5-7 years compared to 3-5 years). In addition, it can be repaired by replacing individual planks rather than having to replace the entire carpet, reducing overall waste.

### *Freon Replacement*

Sentinel started to convert R-22 HVAC units to R-410A units in 2008 to reduce Freon usage, to mitigate ozone depletion and reduce greenhouse gas emissions. Additionally, R-410A can absorb and release more heat than R-22, which reduces the risk of compressor burnout due to overheating. In addition, it functions at a higher pressure than R-22, so new compressors are built to withstand greater stresses, reducing the chance of cracking.

When repairing or replacing HVAC units at Sentinel properties, the capital programs professionals and on-site maintenance teams shall:

- Purchase only new HVAC equipment that utilizes R-410A.
- Convert existing HVAC equipment from R-22 to R-410A during unit repair or replacement wherever practicable.



### *Drought Tolerant Landscaping*

Sentinel has also been focusing on its water use, particularly in parts of the country encountering droughts. To this end, dry-scape landscaping has been implemented including the use of river rock rather than mulch, drip irrigation systems have been implemented at a number of properties and water sensors have been added to irrigation systems. In addition, low flow toilets and shower heads are utilized in all upgrade programs.

### *Sustainable Materials in Property Operations*

For several years, Sentinel has worked to increase the use of sustainable materials in property operations including appliances, interior paint, environmentally-friendly cleaning products and water saving devices such as faucets, showerheads and toilets.

### *Paperless Operations*

Sentinel has been working for many years to limit the use of paper in daily operations.

- All leasing and renewal activity continues to operate in the “virtual” environment.
- Hardcopy resident lease files are no longer kept on-site. All leases are scanned into our Yardi database.
- All vendor invoices are approved electronically regardless of payment method. Sentinel is working with the few remaining vendors that send paper bills to move to online billing and authorize online bill pay. The goal is to have 100% of billings moved online.
- All leasing staff are now equipped with tablets to facilitate the leasing of units.
- All maintenance staff are now equipped with tablets to facilitate online tracking of work orders.

## **Communicating Sustainability Information**

Sentinel has instituted several methods for communicating sustainability information to its stakeholders:

- The corporate website now includes a comprehensive Sustainability page, which can be viewed here:  
<https://www.sentinelcorp.com/sustainability.aspx>
- Sentinel issues an annual company-wide ESG Report, which is made available on our corporate website on the Sustainability page, along with this policy document.

In an effort to engage our residents in sustainability and educate them in ways that they can reduce their environmental impact, we have initiated several communication tools designed for tenants:

- A Sustainable Living Guide was created for residents and added to every property website. It is also available on the Sentinel corporate website Sustainability page. Residents are directed to this guide at the time of move-in.
- Properties utilize “green” Facebook posts in order to foster a greater dialogue about sustainability and other ESG-related topics.
- Residents are also provided with the Sentinel Living Green Quarterly newsletter via email, which contains additional information on ESG-related subjects. These



newsletters are also available on both the individual property websites and the Sentinel corporate website Sustainability page.

- Sentinel also performs annual resident surveys, including a sustainability section, in order to identify areas for potential improvement.

In an effort to increase communication with our investors on our sustainability efforts, we have included additional information in our financial reporting to detail our ESG activities:

- Many of our funds and accounts have adopted an ESG section to annual Asset Plans prepared for each property, which documents compliance with local sustainable regulatory requirements and implementation of ESG initiatives such as energy and water efficiency efforts, management practices and community outreach.
- Similarly, the ESG section of the quarterly and annual financial reporting to our investors for these funds and accounts provides a detailed discussion of ESG initiatives within the subject portfolio.

## **Social Responsibility Policies**

Sentinel's policies related to social responsibility are included in detail in our comprehensive proprietary Policies and Procedures Manual, which is available to all employees as well as to existing clients upon request. Some of the policies that can be easily summarized are provided below:

### **Diversity and Fair Labor**

Sentinel is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. Our human capital is the most valuable asset we have. We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status and other characteristics that make our employees unique.

Sentinel's longstanding commitment to provide opportunities for women and minorities is evident in the firm's equal employment opportunity policy, the composition of its workforce, as well as its support of a variety of training programs, which develop pools of qualified individuals through training and education.

#### *Equal Employment Opportunity Policy*

The Company will recruit, hire and promote persons in all job classifications without regard to race, color, religion, gender, gender identity or expression, sexual orientation, age, national origin, disability, marital status or veteran's status, reproductive health decisions (including, but not limited to, the decision to use or access a particular drug, device, or medical service), and any additional factors in a manner consistent with all applicable laws and regulations.

The Company will ensure that all personnel actions such as compensation, benefits, transfers, layoffs, returns from layoffs, educational, social, and recreational programs will be administered without regard to race, color, religion, gender, gender identity or expression,

sexual orientation, age, national origin, disability, or veteran's status, reproductive health decisions, and additional factors in a manner consistent with all applicable laws and regulations.

#### *Workforce Composition*

Information on Sentinel's workforce composition is reviewed at least annually by the Executive Committee. Concern for the equal treatment of all Sentinel employees and renters permeates every level of the organization and our non-discriminatory renting policies and robust training programs have contributed to increased diversity within our organization.

The makeup of Sentinel's workforce demonstrates the impact of its longstanding commitment to provide equal opportunity, not only in hiring practices, but also in promotion and advancement of employees. Currently, we have an overall representation of 47% minority employees and 49% female employees. With respect to our senior and mid-level professionals, we have a 30% representation among minority groups and 61% of our senior and mid-level professionals are women.

#### *Slavery, Compulsory Labor and Child Labor*

Slavery and compulsory labor are in violation of Federal law and contrary to Sentinel's policies. Sentinel prohibits any form of behavior or employment practices that could be construed as slavery or compulsory labor. Any violation of our corporate policies or Federal law concerning slavery or compulsory labor would result in termination.

The federal child labor provisions, authorized by the Fair Labor Standards Act (FLSA) of 1938, also known as the child labor laws, were enacted to ensure that when young people work, the work is safe and does not jeopardize their health, wellbeing or educational opportunities. Sentinel abides by these laws, and any violation of our corporate policies or Federal law would result in termination.

#### *Training Programs*

Training for Sentinel's employees begins with the onboarding process, which includes an orientation session that reviews the benefits package, corporate handbook, time off and addresses any questions or concerns the employee may have. This orientation is followed up with an IT Policies and Procedures training session, which is given by Sentinel's Yardi group. The class curriculum addresses electronic mail, voicemail, internet, copyright compliance, computer access, password compliance and other software. The employee is introduced to Sentinel's Remedy system (helpdesk ticketing software), the online property policy and procedures manual (if applicable) and, depending on job function, the required Yardi applications.

The onboarding process also includes required cybersecurity and compliance training classes and acknowledgements, which are also required on an annual basis for all employees. Sentinel has contracted with KnowBe4, a cybersecurity and compliance education provider, to provide Sentinel employees with cybersecurity training and awareness programs for reinforcement of cybersecurity best practices, which includes phishing simulations and online awareness training videos. In addition, this platform is utilized to provide state-mandated sexual harassment prevention training; ethics training; diversity, equity and inclusion classes; privacy and data protection classes; and airborne infectious disease prevention.

All employees are required to verify their understanding and acknowledge their acceptance of Sentinel's Code of Ethics both at onboarding and on an annual basis thereafter. All applicable employees also receive training from our compliance consultant on the contents of Sentinel's Compliance Manual and are required to verify their understanding and acknowledge their acceptance of the Compliance Manual on an annual basis.

Ongoing training for all employees includes access to the Office 365 Training Center, which provides training videos or downloaded templates to be utilized for all applications included in Office 365. Training is available to all users for all applications in the Office 365 suite, including Outlook, Excel, Word, SharePoint and others. In addition, Yardi Systems provides monthly RENTmaximizer and Screening Works Pro classes, and Sentinel's Yardi helpdesk team offers monthly classes on using all aspects of the software. Employees are also able to schedule one-on-one classes based on job function with the Sentinel Yardi support team.

Sentinel also maintains training programs in property management, leasing and property maintenance. Sentinel utilizes Grace Hill for this training, which allows for individualized training of property employees, when it is convenient and in a way that minimizes the loss of time from regular job duties. This training can be used both for new employees and for those who want to revisit subjects previously covered. Beyond courses in property management basics, Grace Hill offers courses on such topics as business etiquette, conflict resolution, customer relationship management, Fair Housing, mold awareness, preventing sexual harassment, diversity and inclusion, bloodborne pathogens, personal protective equipment, etc. Specific courses designed to educate our employees on sustainability practices have been included in the required training, including the Grace Hill Conservation course. All classes completed are tracked within the Grace Hill system.

Sentinel also provides intensive training to its personnel in the application of nondiscriminatory renting policies and issues certificates to employees who satisfactorily complete the firm's Fair Housing courses. Our internal auditors also teach many audit and policy courses all over the country each year, which are also recorded. This includes training on ESG aspects of property management, to engage employees in our efforts to address sustainability issues in our day-to-day management and overall business strategy.

### **Anti-Discrimination and Harassment Prevention Policy**

Sentinel is committed to maintaining a workplace free from discrimination or harassment, in accordance with all federal and applicable state and local laws. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. Sentinel's Anti-Discrimination and Harassment Policy (the "Policy") is one component of Sentinel's commitment to a discrimination-free work environment.

Sexual harassment is against the law and all employees have a legal right to a workplace free from sexual harassment. Employees are urged to report sexual harassment by filing a complaint internally with Sentinel's Grievance Committee.

While this policy specifically addresses sexual harassment, harassment of, and discrimination against, persons of all protected classes is prohibited. In New York State, where Sentinel is headquartered, such classes include, but are not limited to, age, race, creed, color, national origin, sexual orientation, military/veteran status, sex, disability, marital status, domestic violence victim status, gender identity, reproductive health decisions and criminal history. Sentinel's harassment policies are tailored to meet the requirements of each location in which it operates.

- This Policy applies in New York State to all employees; applicants for employment; interns, whether paid or unpaid; contractors; and persons conducting business with Sentinel, regardless of immigration status. In the remainder of this document, the term "employees" refers to this collective group.
- Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).
- Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject Sentinel to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.
- Sentinel will conduct a prompt and thorough investigation that ensures due process for all parties whenever management receives a complaint about sexual harassment, in accordance with the firm's established Complaint and Grievance Procedure. Sentinel will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.
- All employees are encouraged to report any harassment or behaviors that violate this policy. Sentinel will provide all employees with a complaint form to report harassment and file complaints.
- Managers and supervisors are required to report any complaint that they receive to one of Sentinel's Grievance Officers.
- This Policy is provided to all employees upon hiring and is posted on Sentinel's corporate portal.
- Retaliation Prohibited: No person covered by this Policy shall be subject to adverse action because the employee truthfully and in good faith reports an incident of discrimination or harassment, provides information, or otherwise assists in any investigation of a discrimination or harassment complaint. Sentinel will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected discrimination or harassment. Any employee of Sentinel who retaliates against anyone involved in a discrimination or harassment investigation will be subjected to disciplinary action, up to and including termination. All employees who believe they have been subject to such retaliation should inform a supervisor, manager, or one of Sentinel's Grievance Officers. All employees who believe they have been a target of such retaliation may also seek relief in other available forums.

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex,

sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature or which is directed at an individual because of that individual's sex. The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body.
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments.
  - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
  - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job.
  - Sabotaging an individual's work.
  - Bullying, yelling, name-calling.

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

If an employee believes that they have been subjected to sexual harassment, they are encouraged to complete the Complaint Form, which can be found on Sentinel's corporate portal and submit it to one of Sentinel's Grievance Officers. Aside from the internal process at Sentinel, employees may also choose to pursue legal remedies with appropriate governmental entities or in court under federal, state, or local anti-discrimination laws.

## **Workplace Violence**

Sentinel is committed to providing a safe, healthy workplace that is free from violence or threats of violence. Sentinel does not tolerate behavior that:

- Is violent;
- Threatens violence;
- Harasses or intimidates others;
- Disrupts the workplace, properties and facilities under our management or the company's ability to operate.

Violent or threatening behavior can include: physical acts, oral or written statements, harassing electronic messages, harassing telephone calls, gestures and expressions or behaviors such as stalking.

Individuals who engage in violent behavior as defined above may be removed from the workplace and managed properties and may be subject to immediate dismissal or other disciplinary action, arrest and/or criminal prosecution.

This policy applies to all work locations including offices, work sites, vehicles, field locations and as may occur during travel on behalf of Sentinel.

## **Remuneration**

Sentinel's corporate level professionals are reviewed annually by their immediate supervisors to evaluate their performance relative to their responsibilities. These evaluations are utilized by the Executive Committee to determine the annual bonus awarded to the employee, as well as to identify candidates for promotion.

On-site managers are reviewed annually on the basis of their overall performance and the performance of the property for which they are responsible. Evaluations are based on a variety of property-level factors, including adherence to the operating budgets, operational improvement, the appearance of the property and the vacant apartments, vacancies and delinquencies, tenant turnover, accuracy of reporting, attitude of property staff and comments from tenants.

Leasing agents are evaluated through monitoring their leasing performance and regular reviews. Each property is "shopped" in person quarterly by an independent service to evaluate leasing skills, and telephone shopping is performed monthly to evaluate the leasing agent's phone presentation.

Remuneration is based upon the objective metrics identified above in order to ensure that the process remains as equitable and unbiased as possible.

## **Performance and Career Development**

Sentinel prioritizes staff training to give employees opportunities for self-improvement and career advancement. As described above, training includes courses that empower Sentinel employees to reflect ESG thinking, on topics such as energy and water conservation; Fair Housing laws; sexual harassment prevention; diversity, equity and inclusion; ethics; OSHA compliance and cybersecurity.

In addition, Sentinel routinely funds job-related educational programs for our on-site employees, including IREM and National Apartment Association courses for property managers and leasing professionals and certification programs for maintenance employees. We encourage our employees to pursue their CPM, CAM and other certifications, and will pay for all classes leading to these designations. In addition, Sentinel supports its corporate professionals in pursuing continuing education credits in their specific areas of expertise, as well as targeted educational opportunities that are directly related to the employee's duties and will pay for all such classes.

## **Health and Safety**

Accident prevention shall be considered of primary importance in all phases of operation and administration at Sentinel. Sentinel's goal is to always provide safe and healthy working conditions and to establish and insist upon safe practices by all employees. The prevention of accidents is an objective affecting all levels of the organization and its activities. It is therefore a basic requirement that each supervisor make the safety of employees an integral part of their regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures. Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt about how to do a job safely, it is their duty to ask a qualified person for assistance.

Employees are expected to assist management in accident prevention activities. Unsafe conditions must be reported. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs. Any injury that occurs on the job, even a slight cut or strain, must be reported to management as soon as possible. In no circumstance, except an emergency, should an employee leave the work site without reporting an injury that occurred.

## **Cybersecurity and Data Protection**

Sentinel has adopted a Cybersecurity and Data Protection Policy that outlines our guidelines and provisions for preserving the security of our data and our technology infrastructure, as well as for protecting the information of employees, clients, tenants, stakeholders and other interested parties ("Key Parties") with the utmost care and confidentiality.

The more we rely on technology to collect, store and manage information, the more vulnerable we become to security breaches. Human errors, hacker attacks and system malfunctions could cause financial damage and may jeopardize our company's reputation.



In addition, the protection of the personal data of Key Parties is an important concern for Sentinel. This Policy sets out Sentinel's commitment to ensuring that any personal data it processes is handled in compliance with data protection law and is intended to ensure that good data protection practice is imbedded in the culture of our staff and our organization.

To accomplish these objectives, we have implemented a number of security measures and controls and have prepared instructions for our employees intended to mitigate security risks and protect personal data. With this Policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

This Policy applies to all Key Parties who provide any amount of information to us. All Sentinel employees must follow this Policy. Additionally, contractors, consultants, partners and any other external entities we collaborate with or who act on our behalf and may need occasional access to data are also covered by this Policy.

#### *Data Retention*

Sentinel is committed to conducting business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct. Due to our international presence, Sentinel must be cognizant of the data privacy laws and requirements in multiple jurisdictions, including, but not limited to: (a) the European Union's General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), (b) the California Consumer Privacy Act of 2018 (last amended in 2019) ("CCPA"), and (c) Australia's Privacy Act 1988 (No. 119, 1988) (as amended) ("the Privacy Act").

The firm's Data Retention Policy sets forth the arrangements of Sentinel to store data, the retention periods of data, oversight controls while data is stored and what action is taken when the retention period expires.

Sentinel's leadership is fully committed to ensuring continued and effective implementation of this Policy and expects all Sentinel employees and third parties to share in this commitment. Any breach of this Policy will be taken seriously and may result in disciplinary actions against individuals.

#### **Responsible Contractor Practices**

Sentinel supports and encourages fair wages, fair benefits and appropriate working conditions for workers employed by contractors and their subcontractors and service providers hired by Sentinel. As Sentinel's portfolio is managed internally by Sentinel employees, maintenance work generally is performed by in-house, non-union workers. With respect to construction activity, contracts are put out to bid to at least three local providers without regard to the makeup of their workforces. Unless otherwise proven to be disqualified, the lowest bidder generally is awarded the work. We do not maintain records indicating which of the successful bidders on such work employed union labor. All contractors and their subcontractors and any service providers are required to observe all applicable local, state and federal employment regulations or laws (including by way of illustration those pertaining to insurance, withholding taxes, minimum wage, labor relations and occupational health & safety).

Sentinel's Policies and Procedures manual sets out the appropriate procedures for selecting contractors:

The General Manager, the General Manager's direct supervisor, the Regional Maintenance Coordinator and the Maintenance Supervisor (working with third party engineers when deemed necessary by the Regional Maintenance Coordinator or as a requirement of the client), are responsible for obtaining bids from local contractors for work to be performed. Whenever possible, no less than three bids should be submitted to the General Manager's direct supervisor for approval with the following attachments:

- Completed Competitive Bid form
- All bid proposals
- Specifications for the work
- Current Certificate of Insurance from the vendor for a minimum of \$1 million, although certain work may require a higher level of insurance coverage. The Regional Director will advise the property if a higher level of insurance is required for a specific project. The expiration date on the Certificate of Insurance should be at least 3 months after the work is scheduled to be completed. If this is not possible, the certificate should be flagged for follow-up as the expiration date approaches. If coverage expires prior to the scheduled or actual completion date of the project, an updated insurance certificate is required upon expiration. Work cannot continue if coverage of the contractor has expired until the replacement insurance certificate is received.
- Current Certificate of Insurance from the vendor for Worker's Compensation
- References Verified
- A memo explaining the purpose of the bid is necessary when a capital item is unbudgeted, or when the expense exceeds budget.

## **Community Engagement**

Sentinel recognizes the impact its corporate and property management personnel can have to support and improve the communities we serve. By engaging with the local community, Sentinel is building impactful partnerships that strengthen the quality of life within these communities.

- A portfolio-wide Sentinel initiative called WeConnect has been implemented whereby each property "adopts" a local service provider to support and sponsor them for the year. The service provider's goals and needs are communicated to residents and action implemented to support the service providers. Example service providers include local schools, local animal shelters, veteran associations, hospitals and emergency services.
- Property employees are encouraged to support community initiatives through approved paid participation hours. All property employees are allowed one day of paid community service.
- Sentinel's Executive Committee has also enacted a formalized community service initiative at the corporate level, which will provide employees with time during the workday to focus on such initiatives. At the corporate office in New York, several

opportunities will be identified for employees to select from each year. Social distancing mandates created challenges with respect to the implementation of this program, but our team is working hard to identify opportunities for the upcoming year.

In order to increase our opportunities to improve sustainability outcomes at our properties, our goal is to roll out community engagement initiatives with a focus on sustainability and to expand outreach efforts within our local communities. The actual implementation of many programs had been delayed due to social distancing guidelines required by the COVID-19 pandemic, but property managers continue to develop these programs and work to share ideas across the portfolio. A sample of events is shown below:

- Toy, Food, Clothing and Blood drives
- Earth Day activities
- Cancer Awareness
- Fitness and Nutrition educational training
- Plant and cooking herbs giveaway
- Potted plant tutorials
- Animal Rescue Event
- Shred-a-Thon Day
- Donating time to Habitat for Humanity
- Cleaning up a local park day
- Shoe collections for local charity
- Medical Supply drives
- School Supply drives

We continue to educate our residents on many aspects of sustainable living, through the Sustainable Living Guide that is provided at the time of move-in and on our property and corporate websites as well as through the “Green Tips” that are posted on the property Facebook pages to encourage residents to live a greener, healthier life. 24 posts per property were posted over the course of the year.

Sentinel has also developed a quarterly resident news-letter with the goal of providing regular communication regarding Sentinel’s ESG efforts to help foster the culture of sustainability throughout our apartment communities. Every quarter we assemble a collection of informative and relatable articles intended to inspire residents towards “putting their green foot forward”. Whether shining a spotlight on an employee who has gone above and beyond in sustainability – either at work or personal – or showcasing how Sentinel properties work to move towards a greener future we endeavor to share our commitment to sustainability with our residents.

## Governance Policies

### Sentinel Compliance Manual and Code of Ethics

Sentinel's Compliance Manual and Code of Ethics (Exhibit D) incorporate all of the key Sentinel governance policies that we expect our employees to abide by. All employees are required to verify their understanding and acknowledge their acceptance of Sentinel's Code of Ethics both at onboarding and on an annual basis thereafter. All applicable employees also receive training from our compliance consultant on the contents of Sentinel's Compliance Manual and are required to verify their understanding and acknowledge their acceptance of the Compliance Manual on an annual basis.

### Whistleblower Policy

Sentinel has established a detailed policy and procedure for employees to register whistleblower complaints as well as other complaints, as described below. This policy is included in Sentinel's Compliance Manual, and is excerpted below:

#### *Introduction*

Compliance is a shared responsibility between the Firm and its Employees. The Firm believes that it is critical to the effectiveness of its compliance program that Employees have the opportunity to report any concerns of improper activity at the Firm by an Employee or any other party confidentially and without retaliation. The Firm will take seriously any report regarding a potential violation of applicable laws, violations of any Firm policy or other improper or illegal activity and recognizes the importance of keeping the identity of the reporting person confidential. Employees should be assured that the Firm will promptly and appropriately investigate and respond to all reported concerns of possible violations of the Firm policy, applicable laws or other possible improper activity in a confidential (except as may be required by law), timely and professional manner and that they will not be subject to retaliation solely as a result of making any report in good faith.

#### *Reporting Violations of the Manual*

All Employees must promptly report any violations of this Manual, the Firm's policies, workplace concerns, violations of law and related issues in accordance with the following provisions. (For purposes of the following, violations of law will be deemed to be included as violations of Firm policy.)

Reports may be made to the Compliance Officer. Should the violation pertain to actions by the Compliance Officer, the complaint should be made to another member of the Compliance Committee. Any violations reported to, or independently discovered by, the Compliance Officer shall be promptly reviewed, investigated and reported to the Firm's Compliance Committee and Executive Committee if necessary.

It is the Firm's policy, notwithstanding any statement in this Manual to the contrary, that nothing prohibits an Employee from reporting possible violations of United States federal law or regulation to any governmental agency or entity, including but not limited to, the United States Department of Justice, the United States Congress, and any Inspector General of any

United States federal agency, or making other disclosures that are protected under the whistleblower provisions of United States federal, state or local law or regulation; provided, that such Employee will use his or her reasonable best efforts to (1) disclose only information that is reasonably related to such possible violations or that is requested by such agency or entity, and (2) request that such agency or entity treat such information as confidential.

Nonetheless, the Firm believes that it is important to the success of its compliance program and compliance efforts that reports of possible laws' violations should first be made internally. This allows the Firm to promptly investigate any problems and take more prompt corrective action, where appropriate.

#### *Responsibility of the Whistleblower*

Employees must be acting in good faith in reporting a complaint or concern under this policy and must have reasonable grounds for believing a breach of this Manual. A malicious allegation made by an Employee known to be false is considered a serious offense and will be subject to disciplinary action, which may include termination of such Employee's employment.

#### *Handling Of Reported Improper Activity*

An Employee of the Firm should promptly report suspected improper activity to the Compliance Officer to enable the matter to be investigated. Once a report has been made, a member of the Compliance Committee will acknowledge receipt in writing to the reporting individual within five business days. The Firm will endeavor to deal with any reports quickly and efficiently. The Firm will review the report to determine whether a full investigation is necessary. If such an investigation is necessary then, depending on the nature of the misconduct, the initial concerns will be either:

- Investigated internally (for example, by the Compliance Committee) or
- Referred to the appropriate external person (for example, external auditors, outside counsel, or law enforcement) for investigation.

Subject to any legal constraints, the Firm will inform the reporting individual of the outcome of the review and whether any further action has been taken.

Any individual who is named in the report or whose conduct may be in question as a result of the report will be prohibited from participating in the review. A written record of a verbal report or a copy of a written report and any related correspondence will be placed in a file maintained by the Compliance Committee. Any action that is taken in response to a report of wrongful conduct will be noted in the file.

#### *Consequences of Non-Compliance*

If an Employee fails to comply with the requirements of this Manual or any law, rule or regulation applicable to the Firm's business, they will be subject to disciplinary action by the Firm, which may include termination of employment. Any non-compliance or violation of law may also result in severe civil and criminal penalties.

The Firm also reserves the right to take disciplinary action against an Employee, including termination of employment, if such Employee engages in conduct deemed to be unethical or illegal, whether or not such conduct constitutes a violation of this Manual or relates to the

Firm's business. The Firm may take such action if, in its sole judgment, the Firm believes that the Employee conduct poses any reputational risk to the Firm whatsoever.

Finally, Employees must report to the Compliance Officer any known or suspected violations of the policies and procedures contained in this Manual or other activities of any Employee that could be construed as a violation of the Firm's policies or any law, rule or regulation applicable to the Firm's business. If an Employee is unsure whether a violation has occurred, they should discuss the matter with the Compliance Officer. Failure to report a violation to the Compliance Officer could result in disciplinary action against any non-reporting Employee, which may include termination of employment.

#### *Retaliation Is Prohibited*

The Firm prohibits retaliation against any employee who truthfully and in good faith reports violations of this Manual, Firm policy, workplace concerns, violations of law and related issues. This prohibition applies whether the complaint is first addressed to the Compliance Officer or to any supervisor.

The Firm also prohibits retaliation against an employee for filing a complaint regarding the Firm with a government anti-discrimination agency. Further, Firm policy bars retaliation against anyone for assisting with the investigation of such a complaint.

An employee who retaliates against another employee for filing a complaint hereunder or for assisting in the investigation of such a complaint by a governmental agency may be subject to disciplinary action up to and including termination.

#### *Rights of Privacy in Respect of Filed Complaint*

Employees who wish to file complaints hereunder may request that their identity or identities be kept confidential. The Firm will make reasonable attempts to comply with such requests; however, any employee making such request should be aware that those about whom such a complaint is made will have certain rights to reasonably understand the nature of the complaint. If the Compliance Committee determines it cannot fairly proceed with its investigation and continue to comply with such requests, the employee who requested confidentiality will be contacted and so informed. At that point, the Committee will suggest that the employee withdraw the request for confidentiality. If the Employee refuses to do so, the Committee will make a determination whether it can or cannot continue with the investigation.

Any employee requesting confidentiality who also alleged suffering or that they may suffer personal detriment should be aware that it is unlikely their identity can be kept confidential in the process of resolving the complaint.

Any employee requesting confidentiality should also be aware that the Firm might be subject to a demand of information from a government agency concerning matters covered by the request for confidentiality. The Firm may feel it necessary to submit such information in response to such a demand. Where appropriate the Firm will consider whether it can first inform the employee who requested confidentiality of the government's demand and proceed accordingly.

### *Responsibility to Assist in Firm Investigations*

It is the responsibility and obligation of all employees to provide reasonable assistance to the Firm in respect of any internal investigation. Failure to comply with this requirement may subject the employee to disciplinary action up to and including termination.

## **Investment Management Process**

Sentinel takes concrete steps to move ESG concerns from corporate strategy to application in property operations. For each residential property, these steps begin prior to acquisition as all properties are evaluated during due diligence to determine the “starting point” of the asset with respect to sustainability. This analysis assesses the in-place physical systems, any potential climate related concerns and risks related to the local regulatory environment. Furthermore, ESG factors are incorporated into planning, management procedures, resident relations, community engagement and other areas of operations.

### *Due Diligence*

During acquisition due diligence, a specified Due Diligence Checklist is completed that documents the process. This includes an ESG component that addresses sustainability items. With the collaboration of a third-party engineer, property management and asset management, the ESG Due Diligence Sustainability Checklist is completed during the acquisition due diligence process and includes a comprehensive review of the sustainable footprint of the property at the time of acquisition. This serves as a helpful starting point for the portfolio and asset management teams to develop a sustainability strategy post acquisition that is effective and properly aligned with the investment strategy of the vehicle. This effort is designed to enable us to track utility data from the outset of ownership, to identify appropriate conservation measures and to evaluate transition risk including local energy and sustainability compliance requirements.

### *Internal Audits*

Throughout its due diligence process as well as its asset and property management processes, Sentinel routinely assesses risks of bribery and corruption and has checks and balances in place to prevent exposure to those risks. Our internal audit staff performs both standard audit procedures and operating reviews. Each property is visited unannounced at least once a year for a thorough financial and management procedures audit. Part of the audit includes compliance with Sentinel controls for approving and executing operating transactions affecting the asset, as well as a review of ESG items. Sentinel’s internal audit group reports to John Zoeller, the firm’s Chief Compliance Officer, and is independent of both the operational groups and the accounting department.

### *Property-Level Financial Transactions*

Every fund account Sentinel manages has segregated cash accounts that are established during the formation period. Investor capital is wired into or out of these segregated accounts. The cash manager has access to initiate such transactions; however, a senior accounting officer and the Portfolio Manager approve all capital transactions. Investment Committee approval is required for all acquisition, financing and sale transactions.



Upon acquisition of a property, the senior transaction officer and accounting officer approve outgoing wires. These wires are supported by Investment Committee authorization and the executed purchase contract and related closing statement from outside counsel.

Each property has its own deposit account. Cash is concentrated to the Fund level concentration account automatically based on pre-established target balances, which sweep excess cash through Sentinel's treasury workstation. Available balances are invested in overnight instruments typically collateralized by treasury securities, commercial paper, other government securities, certificates of deposit, time deposits, banker's acceptances and repurchase agreements.

Sales are communicated between the Portfolio Manager, senior transaction officer, senior accounting officer and cash manager. Closing statements are provided ahead of time from outside counsel in order for the cash manager to ensure the proper sales proceeds are received.

#### *Collecting Rent*

Rents received via credit card or ACH payment are imported into the accounting system and electronically deposited into the local bank account for each property. Rental checks received in the leasing office are electronically scanned on site and deposited in the local bank account. These local bank account amounts are swept into our concentration bank and invested. The cash receipts are recorded in the accounting system by the on-site bookkeeper. There are no petty cash accounts maintained at the properties.

Resident rental and other charges are documented in the tenant ledger on the accounting system (Yardi). Payments received are recorded against the open ledger charges at the property. The ledger is automatically updated into the property general ledger. Each day, the property manager reconciles amounts received against charges in the ledger balance using reports generated in Yardi.

#### **Organizational Audit**

In addition to the routine annual audits of the financial statements of its funds and accounts, Sentinel also performs a SOC1 (System and Organizational Controls) audit on an annual basis. This report is prepared in accordance with SSAE No. 18.

## **Exhibit A – Sentinel Net Zero Policy**

*As of year-end 2022*

### **Net Zero Commitment**

Sentinel supports the goal of the Paris Climate Accords to achieve net-zero greenhouse gas emissions by 2050 or sooner. We recognize the responsibility of all real estate investment managers to positively impact the environments in which we invest. We believe that opportunities exist for thoughtful, targeted sustainable investment within the context of each of Sentinel’s existing investment strategies that both can enhance the economic returns of our properties and meaningfully reduce our carbon footprint.

### **Strategy - Rules & Procedures**

Evaluating the sustainable attributes of each property is becoming a requirement of institutional investing. For Sentinel, this process begins prior to acquisition regardless of property type or investment account. All new real estate acquisitions are evaluated during due diligence to determine the “starting point” of the asset with respect to sustainability. This analysis assesses the in-place physical systems, any potential climate related concerns and risks related to the local regulatory environment.

Following acquisition, we prioritize obtaining as much energy, water, and waste information for the property as is feasible. Data is the essential first ingredient for accurately determining the scope and effectiveness of any carbon, water, and waste reduction measures. Once essential data is available, an individualized sustainability strategy can be designed for the asset in the context of the underwritten investment strategy and the overall mandate of the account. The sustainable strategy is revisited annually, during the asset plan review of each property.

At each property, we evaluate opportunities to access “green” energy from the utility grid both for landlord-controlled common areas as well as tenant-controlled areas. In addition, we analyze the economic feasibility of on-site “green” investment, primarily solar power installations, and assess the property’s key capital needs including HVAC improvements, lighting, windows, insulation, EV charging stations and any number of other capital requirements depending on the property type and vintage of the asset.

Regardless of strategy, certain overriding sustainability principles guide our day-to-day management, operations, and tenant engagement at all Sentinel properties. These include minimizing use of paper in daily operations, utilizing exclusively “green” cleaning materials, where practicable, prioritizing vendors that have made commitments to sustainability (where feasible) and regularly engaging tenants in educational opportunities and events related to sustainability. The goal at each Sentinel property is to create a culture of sustainability that starts with our team but pervades our relationships with all stakeholders.

### **Roles & Responsibilities**

In 2020, Sentinel formed an ESG Committee to oversee the ongoing implementation of Sentinel’s ESG program at the corporate and property levels. Comprised of senior leadership from across Sentinel’s departments and lines of business, the Committee is responsible for the Company’s overall ESG Agenda including the development and oversight of ESG policies and procedures, the uniform implementation of best practices company-wide including providing guidance on Net Zero commitments and targets,

evaluation of all new ESG initiatives and recommendations to Sentinel's Executive Committee. Sentinel has three sustainability officers on its team responsible for the oversight of ESG activities with portfolio, asset, and property management. Sentinel also works with a range of consultants in the ESG arena.

## Reduction Targets

Reducing energy, water and waste at our properties is at the heart of Sentinel's approach to sustainable real estate investment and management. We believe that minimizing exposure to these inputs makes for good real estate investing, that will be rewarded with higher cash flows and ultimately increased disposition proceeds.

We have decided to focus our efforts on reducing Scope 1 and Scope 2 emissions from landlord-controlled common areas at our communities, with a provisional goal of reducing carbon emissions by 50% over the next ten years.

While the absence of regulatory and utility support for disclosing tenant utility usage and composition and limiting the access to green energy makes it challenging to set an accurate Scope 3 reduction target for the US multifamily sector at this time, Sentinel is committed to continually reevaluating its sustainability goals as the regulatory environment evolves.

As more comprehensive Scope 3 data becomes available and its composition is disclosed, we will explore opportunities to account for these emissions and incorporate them into our reduction strategy. Despite these limitations, we remain ambitious in our pursuit of green energy and sustainable options and are dedicated to collecting and analyzing Scope 3 data to improve our overall emissions performance.

## **Exhibit B – Sentinel Green Program**



## Sentinel Green Program



## Index

Green Program Framework

Green Program

Renovation & Operations Guidance

Green Communities

## Green Program Framework



The Sentinel Green Program utilizes the IREM Certified Sustainable Property (CSP) program as a framework to incorporate energy & water conservation, health & wellness, waste reduction & recycling into property management, renovation and procurement practices.



Energy



Water



Health



Recycling



Purchasing



## Green Program

Management

Energy

Water

Health & Wellness

Waste Reduction & Recycling

Procurement

## Management

- **Market assessment**

Property Managers shall coordinate with Asset Management to assess market demand for sustainability initiatives.

- **Communication of sustainability and investment goals**

Property Managers will work with Asset Management to elaborate on the sustainability and investment goals in the ESG section of the annual Asset Plan.

- **Monitor progress on sustainability programs**

Property Managers to meet with Asset Management quarterly to discuss progress on sustainability initiatives.

- **Measure the effect of sustainability on property financials**

Property Managers and Asset Management will work with the Capital Projects and Sustainability Group to monitor sustainability expense and related savings on a project-by-project basis.

- **Plan for marketing sustainability success**

Property Managers shall coordinate with Asset Management to promote sustainability success in conjunction with social events for residents and the wider community.

## Energy

- **Energy management policy**

The Capital Programs and Sustainability Group will analyze opportunities for reducing energy consumption and cost and will explore investments that can improve both resident comfort and investor returns through our energy management policy, which includes measurable and achievable goals:

- Commit to ongoing training on energy management for maintenance team
- Hold periodic site manager-maintenance supervisor meetings
- Conduct walk-throughs to detect malfunctioning equipment and opportunities for improvement
- Provide information to residents on energy management
- Commit to installing Energy Star equipment and appliances where practical
- Conduct an energy meter inventory check
- Install electric vehicle charging station where feasible
- Commit to improve energy performance

- **Benchmark energy use**

Each property will participate in the Yardi Energy Services (YES) program on ENERGY STAR® Portfolio Manager® to track energy, water and waste metrics, as available.

## Water

- **Water management policy**

The Capital Programs and Sustainability Group will analyze opportunities for reducing water consumption and cost and will explore investments that can improve both resident comfort and investor returns through our water management policy, which includes measurable and achievable goals:

- Commit to ongoing training on water management for maintenance team
- Consistently check for water leaks and engage in prevention measures
- Provide information to residents on water management
- Improve water efficiency in landscaping
- Install high efficiency plumbing fixtures
- Conduct water meter inventory check
- Install water reuse system where practical
- Commit to reduce water consumption

- **Benchmark water use**

Each property will participate in the Yardi Energy Services (YES) program on ENERGY STAR® Portfolio Manager® to track energy, water and waste metrics, as available.

## Health & Wellness

- **Health & IAQ management plan**

Sentinel's Preventive Maintenance Program provides for regular inspection, cleaning and service of items critical to provide a healthy and comfortable environment. The program has 7 major aspects: HVAC, Moisture Control, Pest Management, Pollutant Control, Housekeeping, Tobacco Smoke Policy & Chemical Storage:

- Engage residents in health and wellness
- Provide filtered water for residents and guests in common areas
- Provide healthy options in vending machines, if available
- Routinely inspect filters and exhaust systems
- Establish a smoke-free policy
- Use low-emitting materials
- Employ green cleaning products for common areas
- Pest Management policy
- Onsite fitness facility and wellness-inspired amenities for residents

- **Conduct an IAQ walk-through in areas under management control**

Maintenance staff use IAQ Inspection checklist for routine walk-through

## Waste Reduction & Recycling

- **Assess recycling practices and options**

The Property and Asset Management teams will re-evaluate the property's recycling program annually and perform the following:

- Install recycling signage
- Provide information on recycling program to residents
- Establish a construction waste management plan for renovations and unit turnovers
- Establish recycling services, where practical
- Hold regular recycling/donation drives for residents
- Commit to improve diversion rate on recycling

- **Conduct a waste and recycling container audit**

Auditing the community's waste and recycling containers

## Procurement

- **Establish a sustainable procurement policy**

Sentinel encourages its contractors and suppliers to provide energy efficient and sustainable materials for its properties to the extent practicable:

- Use green-certified products in common areas
- Use sustainable products for copier operations
- Use reusable or compostable products for management operations
- Reduce paper use
- Monitor use of sustainable products by contractors and vendors

- **Assess & evaluate purchasing practices and options**



## GREEN Renovation & Operations Guidance

Green Apartment Home

Green Kitchen

Green Bathroom

Green Bedroom

Green Living & Working

# GREEN Apartment Home

## General Design and Renovation/Operation Strategies

- ■ ID—Ensure durability
- ■ ID—Manage noise
- ■ ID—Renovate with air quality in mind
- ■ ID—Renovate for a sustainable lifestyle
- ■ MR—Manage construction and demolition waste
- ■ IEQ—Control the spread of pollutants
- ■ IEQ—Test for, and appropriately handle, hazardous materials where applicable
- ■ IEQ—Conduct lead-safe work
- ■ ID—Provide appropriate insect control
- ■ ID—Design and maintain a practical and useable recycling system, where possible

## Building Energy Conservation

- ■ EA—Optimize energy performance
- ■ EA—Install attic insulation where practical
- ■ EA—Consider an additional radiant barrier in the attic where possible
- ■ EA—Upgrade existing windows when renovating
- ■ EA—Upgrade existing exterior doors when renovating
- ■ EA—Weather strip doors and windows when renovating or performing turnkey work
- ■ EA—Air seal and insulate rim joist

## Wall and Ceiling

- ■ MR—Install environmentally preferable interior sheathing
- ■ IEQ—Use non-paper-faced gypsum board in moist areas
- ■ IEQ—Use low- or zero-VOC construction adhesives, grouts, caulking and sealants
- ■ MR—Use high-recycled content, formaldehyde-free insulation
- ■ MR—Use FSC-certified wood



### Renovation

ID=Innovative Design  
MR=Materials & Resources  
IEQ=Indoor Environmental Quality

### Operation

EA=Energy & Atmosphere  
WE=Water Efficiency  
AE=Awareness & Education

## GREEN Apartment Home

### HVAC

- EA—Install programmable thermostats, where practical
- EA—Properly seal and insulate HVAC distribution system
- EA—Make sure ducting is clean
- IEQ—Install CO and smoke alarms where necessary

### Plumbing

- EA—Choose a high-efficiency water heater
- EA—Evaluate insulation of hot water pipes
- EA—Insulate water heater

### Lighting and Electrical

- EA—Install energy-efficient lighting fixture/light bulbs
- EA—Encourage management of phantom loads; unplug unused devices

### Use

- AE—Educate residents for green living
- AE—Take advantage of any city/State green rebate program



#### Renovation

ID=Innovative Design  
MR=Materials & Resources  
IEQ=Indoor Environmental Quality

#### Operation

EA=Energy & Atmosphere  
WE=Water Efficiency  
AE=Awareness & Education

## GREEN Kitchen

### Renovation and Operation Strategies

- ID—Ensure durability
- ID—Manage noise
- ID—Employ universal design
- ID—Design for storage and include pantry space where possible
- MR—Manage construction and demolition waste
- IEQ—Control the spread of pollutants

### Plumbing

- EA—When possible reconfigure plumbing to distribute domestic hot water efficiently
- WE—Install low water-use kitchen faucet
- MR—Include a plumbing access panel
- WE—When practical install water shut off valves
- EA—When possible install on-demand hot water recirculation system

### HVAC

- IEQ—Provide effective kitchen ventilation
- IEQ—Provide appropriate venting of all combustion-based heating and water heating equipment
- EA—Make sure ducting is clean

### Wall and Ceiling

- IEQ—Limit use of wall coverings in high moisture areas
- IEQ—Use low- or zero-VOC interior paints and finishes  
IEQ
- MR—Use appropriate sheens for paints and finishes
- IEQ—Use low- or zero-VOC construction adhesives, grouts, caulking and sealants

### Lighting and Electrical

- EA—Provide day lighting/Not blocking windows
- EA—Install energy-efficient electric lighting

### Appliances

- EA—Install an energy-efficient refrigerator
- EA—Choose an energy-efficient dishwasher
- EA—Install energy-efficient cooking appliances
- EA—Encourage management of phantom loads; unplug unused devices

#### Renovation

ID=Innovative Design

MR=Materials & Resources

IEQ=Indoor Environmental Quality

#### Operation

EA=Energy & Atmosphere

WE=Water Efficiency

AE=Awareness & Education

## GREEN Kitchen

### Floors and Flooring Products

- ■ • MR—Consider reuse of existing flooring and subflooring
- ■ • MR—Refinish wood floors using environmentally preferable processes and products
- • IEQ—Choose hard-surface flooring
- • MR—Consider flooring made from certified or reclaimed wood
- • MR—Consider flooring made from natural or rapidly renewable materials
- ■ • IEQ—Avoid carpeting in high moisture areas or where spills could occur

### Furniture and Fittings

- ■ • MR—Select cabinets made from greener materials
- ■ • MR—Evaluate use of cabinetry made from particleboard or MDF(Medium Density Fiberboard)
- • MR—Install environmentally preferable countertops that are bacteria resistant
- ■ • MR—Select materials that are easy to clean

### Use

- ■ • EA—Set water temperature no higher than necessary
- ■ • IEQ—Use environmentally preferable cleaning materials and strategies
- ■ • EA—Properly maintain equipment
- ■ • IEQ—Install CO and smoke detectors where necessary



#### Renovation

ID=Innovative Design

MR=Materials & Resources

IEQ=Indoor Environmental Quality

#### Operation

EA=Energy & Atmosphere

WE=Water Efficiency

AE=Awareness & Education



# GREEN Bathroom

## Renovation and Operation Strategies

- ■ ID—Ensure durability
- ■ MR—Manage construction and demolition waste
- ■ ID—Manage noise
- ■ ID—Design for storage
- ■ IEQ—Control the spread of pollutants

## Lighting and Electrical

- ■ EA—Provide day lighting/Not blocking window
- ■ EA—Install energy-efficient lighting fixture/light bulb
- ■ EA—Manage phantom loads/Unplug unused

## Plumbing

- ■ WE—Install toilets with low gallon per flush
- ■ WE—Install low-water-use showerheads
- ■ WE—Install water-conserving bathroom faucet aerator
- ■ MR—Where possible include a plumbing access panel
- ■ EA—Choose a high-efficiency water heater with drain and drain pan
- ■ EA—When practical reconfigure plumbing to distribute domestic hot water efficiently

## Floors and Flooring Products

- ■ MR—Consider reuse of existing flooring and subflooring
- ■ IEQ—Avoid carpeting in high moisture areas
- ■ IEQ—Choose hard-surface flooring

## HVAC

- ■ IEQ—Install effective bath ventilation
- ■ EA—Make sure ducting is clean

## Wall and Ceiling Finishes

- ■ MR—When necessary frame for installation of future grab bars
- ■ IEQ—Limit use of wall coverings in high moisture areas
- ■ MR—Consider tile and tile trim pieces with recycled content
- ■ IEQ—Use low- or zero-VOC interior paints and finishes
- ■ MR—Use appropriate sheens for paints and finishes
- ■ IEQ—Use low- or zero-VOC construction adhesives, grouts, caulking and sealants



### Renovation

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## GREEN Bathroom

### Laundry

- MR—Install readily-accessible single-throw shut-off valve
- EA—Install drain and drain pan for clothes washer
- EA—When practical select a high-efficiency, H-axis clothes washer
- EA—Provide air-lock dryer vent
- EA—Minimize dryer duct length and number of turns

### Furniture and Fittings

- MR—Evaluate use of cabinetry made from particleboard or MDF
- MR—Select materials that are easy to clean
- MR—Select cabinets made from greener materials
- MR—Install environmentally preferable countertops

### Use

- EA—Set water temperatures no higher than necessary
- IEQ—Use environmentally preferable cleaning materials and strategies



#### Renovation

ID=Innovative Design  
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#### Operation

EA=Energy & Atmosphere  
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## GREEN Bedroom

### Renovation and Operation Strategies

- ID—Ensure durability
- ID—Manage noise
- ID—Renovate with air quality in mind
- ID—Renovate for a sustainable lifestyle
- MR—Manage construction and demolition waste

### HVAC

- IEQ—Provide fresh air as part of ventilation system
- EA—Make sure ducting is clean

### Lighting and Electrical

- EA—Provide day lighting/Not blocking window
- EA—Install energy-efficient electric lighting
- IEQ—Provide controllable window shading
- EA—Manage phantom loads/Unplug unused appliances

### Wall and Ceiling

- MR—Select environmentally preferable interior doors
- IEQ—Use low- or zero-VOC interior paints and finishes
- MR—Consider natural finishes
- MR—Use appropriate sheens for paints and finishes
- IEQ—Limit use of VOC emitting wall-coverings

### Furniture and Fittings

- MR—Support local artisans where feasible
- MR—Select furniture from suppliers that practice fair, safe and green manufacturing process

- IEQ—Minimize use of porous materials
- IEQ—Select window treatments with health considerations in mind

### Floors and Flooring Products

- MR—Consider reuse of existing flooring and subflooring
- MR—Select wood subflooring that is FSC-certified and low-formaldehyde
- IEQ—Choose hard-surface flooring
- MR—Consider flooring made from certified or reclaimed wood
- MR—Consider flooring made from natural or rapidly renewable materials
- MR—Refinish wood floors using environmentally preferable processes and products
- MR—Choose environmentally preferable carpet and rug products
- MR—Select carpet cushion that does not contain brominate flame retardants

### Use

- IEQ—Use environmentally preferable cleaning materials and strategies

Renovation	Operation
ID=Innovative Design	EA=Energy & Atmosphere
MR=Materials & Resources	WE=Water Efficiency
IEQ=Indoor Environmental Quality	AE=Awareness & Education



## GREEN Living & Working

### Renovation and Operation Strategies

- ■ • ID—Encourage bike use and install bike racks
- ■ • ID—Encourage electric or hybrid vehicles use and consider installing electric car charging stations
- ■ • IEQ—Establish smoke-free common areas
- ■ • MR—When renovating, plan for the future with wiring and cabling needs

### Landscape

- ■ • WE—Install soil moisture irrigation sensors
- ■ • WE—Plant xeriscape where applicable
- ■ • MR—Use nontoxic additives in lawn care and snow/ice removal

### HVAC

- ■ • IEQ—Provide fresh air as part of ventilation system
- ■ • IEQ—Provide for additional ventilation and air conditioning needs in certain activity areas
- ■ • EA—Make sure ducting is clean

### Lighting and Electrical

- ■ • EA—Provide day lighting/Not blocking windows
- ■ • EA—Install energy-efficient lighting fixture/light bulb
- ■ • EA—Provide adaptable lighting for multi-use spaces
- ■ • EA—Manage phantom loads/Unplug unused appliances
- ■ • IEQ—Provide controllable window shading

### Floors and Flooring Products

- ■ • MR—Consider reuse of existing flooring and subflooring
- ■ • MR—Select wood subflooring that is FSC-certified and low-formaldehyde
- ■ • IEQ—When possible, choose hard-surface flooring
- ■ • MR—Consider flooring made from certified or reclaimed wood
- ■ • MR—Consider flooring made from natural or rapidly renewable materials
- ■ • MR—Refinish wood floors using environmentally preferable processes and products
- ■ • MR—Choose environmentally preferable carpet and rug products

### Use

- ■ • AE—Provide recycled or recyclable bag with company logo when lease signed
- ■ • AE—Paper reduction
- ■ • IEQ—Use real plants in offices and clubhouses
- ■ • AE—Encourage recycling
- ■ • AE—Plan “Green” activities for residents, i.e. recycling days, guest speakers for environmental topics, newsletter articles on energy conservation

Renovation	Operation
ID=Innovative Design	EA=Energy & Atmosphere
MR=Materials & Resources	WE=Water Efficiency
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## GREEN Communities- Nona Park Village Apartments, Orlando FL



IREM CSP &  
NGBS Bronze



## GREEN Communities- Nona Park Village Apartments, Orlando FL





## GREEN Communities- Avant on Market Center, Dallas TX



NGBS Bronze



## GREEN Communities- Avant on Market Center, Dallas TX





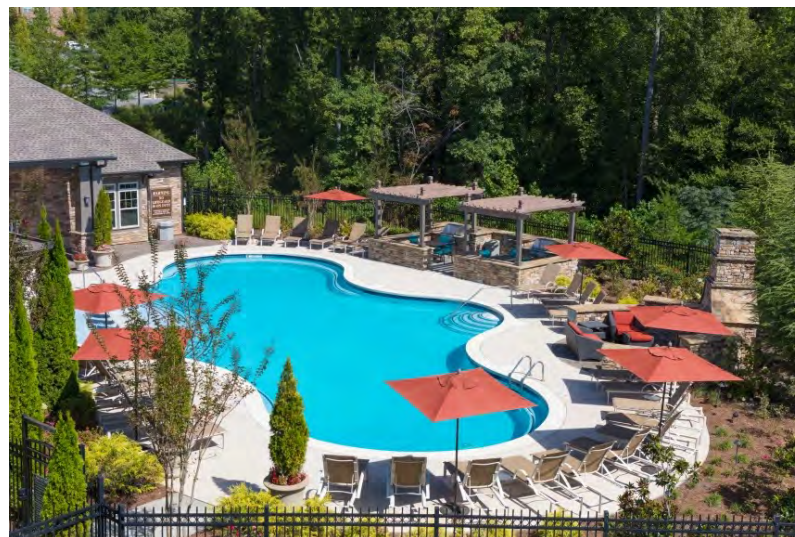
## GREEN Communities-The Oaks at Johns Creek, Johns Creek GA



NGBS Bronze



## GREEN Communities-The Oaks at Johns Creek, Johns Creek GA



**Exhibit C – ESG Section of Annual Asset Plan**



## SECTION IV: **ENVIRONMENTAL, SOCIAL AND GOVERNANCE**

### **A. Market Commentary/Building Policy**

- *Green Building Policy:*  
Tampa's Energy Efficiency and Conservation Plan, released in 2011, articulates some of the city's energy-related activities for its internal government operations, however, the city does not have any overall energy or emissions reduction goals for its operations. Tampa has not yet adopted a policy requiring efficient outdoor lighting, such as the International Dark-Sky Association's Model Lighting Ordinance. A policy in Tampa's Comprehensive Plan (Policy 40.1.7) calls for Tampa to pursue energy-saving options for exterior lighting of municipal buildings. Nevertheless, there are no formal efficiency focused lighting replacement programs in place in this city.
- *Green Building Market Analysis:*  
Ordinance 17.5-203 requires all new construction of municipal buildings of at least 5,000 square feet to be built to LEED Silver standards. Renovations of existing municipal buildings must incorporate building materials recognized by the US Green Building Council.
- *Public Commitment to Climate Action:*  
Palm Harbor and Tampa are not members of 100 Resilient Cities, the C40 Cities, or the 2030 District Project.

### **B. Property Information**

- *Green Building Certificates & Ratings/Energy Star:*  
Egret's Landing Apartments was built in 1995 and was not constructed to meet the requirements of any green building standards. In 2019, the property commenced use of Energy Star Portfolio Manager to track the property's common area energy and water usage. Due to the property's location in the City of Palm Harbor outside of Tampa, it is not yet required to benchmark utility data and tenant data is not publicly available. The property does not currently have an Energy Star rating or an Energy Star certification.

A comprehensive ESG operations evaluation was conducted in December 2019 by a third-party consultant. A few tips were learned and implemented to improve energy and water efficiency, however, overall, the results indicated that the property had many good controls and procedures already in place.

In 2019, Yardi Energy Services ("YES") was engaged to provide a comprehensive and integrated energy management solution. The services provided by YES include energy data aggregation directly from utility providers to YES, energy, water and waste usage tracking and exception reporting, resident billing including new move-in account tracking (resident usage recovery), automated bill pay and Energy Star Portfolio Manager account management and reporting. This system integrates with our existing Yardi products creating a seamless platform for resident, owner and reporting purposes. Insights gained from energy, water and waste data collection will help inform future sustainability initiatives and capital programs.

At the end of 2021, Egret's Landing achieved the IREM Certified Sustainable Property certification by attaining goals in energy, water, health, recycling and purchasing.

- *Neighborhood Information:*

Egret's Landing Apartments is situated in the Tampa suburb of Palm Harbor, which is bounded by the Gulf of Mexico to the west and Lake Tarpon to the east. The property offers convenient highway access to Tampa International Airport as well as the cities of Clearwater and St. Petersburg.

## C. Physical Systems

- *Community-Wide and Unit-Specific Efficiency Measures:*

Egret's Landing Apartments was constructed with environmental efficiency in mind. All units have (i) low-flow toilets and shower heads, (ii) energy efficient appliances and (iii) energy efficient ceiling fans and LED track lighting in dining rooms. LED lighting is used in all building exteriors, common areas and units at time of turnover, when replacement is necessary. Additionally, when replacement is necessary, recyclable carpeting is being installed.

Measure Implemented	Category (Energy/Water/Waste)	Status (Complete/Planned)
Recyclable carpet in units	Waste	Implemented when carpet replacement necessary on unit-by-unit basis
In 2017, LED lights installed in breezeways	Energy	Complete
Window/roof/wall insulation or replacements. All roofs replaced in 2016 and 2017	Energy	Complete
Water sensors/irrigation. Full sprinkler on timers twice a week	Water	Complete
Replacement of mulch with rock. Several areas throughout the property possess rock	Water	Ongoing
Installation of drought tolerant/native landscaping	Water	Completed as new beds are installed
Installed LED lights in units upon turn	Energy	Ongoing
Replace hvac units with R410A units	Energy	Ongoing

- *ESG in Community Operations/Tenant Engagement:*

The Egret's Landing Apartments' Green Program provides residents with "green" lifestyle tips and environmentally appropriate programs that include:

- Regularly changing air filters on the HVAC systems.
- Reusable shopping bags with the property logo provided as a move-in gift to residents.
- In the fitness center the property offers a filtered water bottle filling station.
- There is an automatic electric motion sensor in the model to conserve electric when not in use.
- Bike storage is offered for residents' personal bikes.
- Usage of personal coffee mugs at coffee bar is encouraged and promoted, saving on the disposal of one-use cups.
- Use of recycled carpeting when replaced.
- Monthly Green Tips are posted on the Facebook page to encourage residents to live a greener life.

- A Sustainability Living Guide is made available to all residents to increase awareness of good ESG practices.
- Annual event hosted by property where residents can recycle bulk unused electronics, batteries and light bulbs.
- Community food drive is sponsored at the clubhouse in December.
- The property participates and collects donations for local charities (St. Jude's and Breast Cancer Awareness Month-Paint the Town Pink).
- A rainwater collection container was installed at the property and water from it is used to water clubhouse plants.
- On-site recycling service was added to the community in 2021.
- At the end of 2021, Egret's Landing achieved the IREM Certified Sustainable Property certification.
- Electric car charging stations were added to the community.

Sentinel, in general, and Egret's Landing Apartments, in particular, are working to limit the use of paper in daily operations.

- Rents checks are scanned and shredded (eliminating trips to the bank).
- Online payments are accepted from applicants and residents.
- Payables are scanned and approved online.
- Collection files are digitally saved and transmitted.
- Bids and contracts are reviewed and approved on a company portal.
- Tablets are utilized for online leasing.
- The property website allows residents to place a work order request online.
- Maintenance team utilizes tablets to complete and close out work orders.
- Communication with residents is electronic whenever possible.
- Electronic leases for new move-ins and renewals.

All employees of Egret's Landing are encouraged to participate in community service initiatives including the Sentinel-initiated community service sponsorship program called "WeConnect." The program allows each property employee to dedicate eight company paid hours per calendar year towards volunteer work for a local community organization.

The community has chosen our WeConnect partner to work with a local food pantry.

*Local service provider chosen:* Oldsmar Cares Food Pantry.

*Program:* Collecting food, cleaning supplies, personal hygiene, clothes and toys for those in need.

*Resident engagement:* Residents donated items to the school in August, pet supply drive in October, a toy drive in December and a food drive in March.

*Employee engagement:* The staff is available to assist with performing miscellaneous tasks at the pantry as well as dropping off supplies.

*Cost to property:* Minimal time and effort. Property will supplement up to \$500 per quarter of supplies.

*Follow-up:* We have a consistent contact with Oldsmar Cares Food Pantry for any additional needs they might have.

#### **D. Current Year Achievements**

- Added one bike storage in centrally located area.
- Added river rock and replaced mulch (ongoing program).
- Converted HVAC units to higher energy-efficiency 410A system as needed (ongoing).
- Installed LED lighting in units as needed on turnover (ongoing).
- Installed LED lighting in all exterior amenity areas.
- Installed digital thermostats in all amenities to improve energy usage during non-business hours.
- Employees participate in periodic volunteer projects at McDonald Elementary School.
- Organized a semi-annual electronic and battery recycling pick up.

#### **E. Potential Future ESG Projects**

- Better utilize analytical tools in Energy Star Portfolio Manager and YES to improve the property's energy, water and waste use.
- Execute Sentinel's WeConnect community outreach program and promote outreach to residents for participation.
- Install native and drought tolerant landscaping in key areas throughout the property (ongoing).
- Install LED lighting in units as needed on turnover (ongoing).
- Increase the quantity of community events specifically focused on ESG.
- Continue the conversion of HVAC systems to higher energy-efficient 410A systems as needed.
- Continue monthly "green" Facebook posts.
- Continue to encourage online leasing and correspondence in effort to limit the use of paper.
- Initiate quarterly community events specifically focused on ESG.

## **Exhibit D – Sentinel Code of Ethics**



# **CODE OF ETHICS**

**June 30, 2022**

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## INTRODUCTION

Sentinel's philosophy is to be a good, profitable, and enduring company. In achieving these goals, integrity and moral fiber are just as important as technical competence and work ethics to advance within the firm. The highest trust, confidence and responsibility is placed in each Employee, and it is believed that his/her fundamental integrity and honesty is essential in daily relations with customers, the public and fellow employees. Sentinel will not tolerate any Employee who achieves results by violating laws, being involved in dishonest or unscrupulous business practices, or who jeopardizes Sentinel's reputation.

Through these policies and actions, Sentinel seeks the very best that can be achieved: a firm that creates both economic value and acts on ethical principles. It is the responsibility of Sentinel's leaders to make ethical behavior and efficient performance complementary. Sentinel measures excellence by qualitative values as well as by quantitative results, motivating employees to "do the right thing" while "doing things right." All employees are encouraged to be alert to ethical ambiguity and to respond promptly to concerns about possible violations of laws and regulations.

Sentinel also looks to its leadership to uphold these policies and standards and to set an example by instilling a spirit of honor in the workplace. With this in mind, the Company and its employees are expected to comply with the following standards to the best of their ability.

- i. Quality and Fairness: All employees will pursue quality in every service provided by Sentinel and will strive to earn the clients' trust. Therefore, employees will endeavor to deliver the product promised and what the customer expects.
- ii. Assets and Funds: Each employee with responsibility for the use of Sentinel's physical assets or funds will be accountable and responsible for his/her proper conduct in relation to the use or protection of those assets.
- iii. Internal Financial Reporting: Each employee has ethical and legal responsibilities for the proper use and protection of assets and for reporting financial and other important Sentinel information. Sentinel has established, and all employees must maintain, high standards of accuracy, honesty, integrity, completeness and confidentiality in regard to Sentinel's financial records and reporting.
- iv. Selection of Suppliers: Sentinel selects suppliers on the basis of the needs of its business. Consequently, only reputable, qualified individuals or firms under market compensation agreements that are reasonable in relation to the services required will be employed. No employee may select a supplier for any reason other than its ability to fulfill Sentinel's needs. Further, no employee may own an interest in a business, which is a supplier to or a creditor of a supplier, unless the interest is represented by a publicly traded security and the employee does not own more than 5% of the outstanding securities of any class.
- v. Improper Payments: Sentinel expects all employees to use only legitimate practices in commercial operations and in promoting Sentinel's position on issues before governmental authorities. Kickbacks, fees, commissions, or any forms of "bribes" intended to induce or reward favorable decisions and/or governmental actions are unacceptable and prohibited.

These provisions are not intended to apply to routine, reasonable business entertainment or gifts of minor value, which are customary in local business relationships, provided that no laws or Sentinel policies are violated and full disclosure is made to the immediate supervisor.

No employee will distribute any payment or anything of value, whether directly or indirectly to an individual or firm employed by, or acting for or on behalf of:



- any customer, whether private or governmental, for the purpose of inducing or rewarding any favorable action by the customer in any business transaction; or
  - any governmental entity, for the purpose of inducing or rewarding any favorable action or withholding action, by a governmental entity in any governmental matter.
- vi. Confidentiality: Each of our employees has a responsibility not to misuse privileged or confidential information for any purpose or for “passing on” to outsiders. We have an obligation to keep our clients’ business confidential; care should be taken in discussing business in elevators, airplanes or in other public places. Unauthorized disclosure of information relating to a client’s or the Firm’s affairs may result in dismissal.

This Code is applicable to each Employee (as defined below) of the Firm and is intended to govern the activities and conduct of Employees on behalf of the Firm, as well as certain personal activities and conduct of Employees. The Code does not attempt to serve as a comprehensive guide regarding the conduct of Employees, but rather is intended to establish general rules of conduct and procedures applicable to all Employees.

The designated Compliance Officer is responsible for administering and implementing this Code with the assistance of the Compliance Committee. All Employees are required to be thoroughly familiar with the Firm’s standards and procedures as described in this Code. Any questions regarding this Code, or other compliance issues, must be directed to the Compliance Officer. The Compliance Officer may, from time to time, appoint a designee to carry out certain responsibilities.

The Firm will review its business practices periodically as part of its Annual Assessment and update the Code of Ethics as needed.

The following defined terms are used throughout the Code:

**“Employee”** means any Employee of the Firm.

**“Compliance Officer”** means John Zoeller, Managing Director or such other person as may be designated from time to time.

**“Compliance Committee”** means the Compliance Officer and Michael F. Streicker, President; Leland J. Roth, Chief Financial Officer; and Connell Watters, Senior Vice President and Corporate Counsel (Chair).

**“Firm”** means Sentinel and each affiliated entity under common control, which are engaged in the business of providing investment advisory or management services.

**“Vehicles”** are the pooled investment funds and direct investment accounts that invest in real estate.

## SECTION I - General

### *STATEMENT OF GENERAL PRINCIPLES*

This Code of Ethics and the Appendices attached thereto (collectively, the “Code”) describes the policies and procedures of Sentinel and its subsidiaries and affiliates (collectively, the “Firm”) covering a wide range of activities applicable to Employees. It is critical that Employees avoid any situation that might present, or appear to present, any actual or potential conflict of interest with the interests of the Clients, or compromise or appear to compromise, Employees’ ability to exercise fully their independent best judgment for the benefit of the Clients.

Failing to comply with the Code may lead to disciplinary action, up to and including termination of employment. The Compliance Officer and Compliance Committee will determine, in consultation with the Executive Committee, what disciplinary and remedial action is warranted, taking into consideration the relevant facts and circumstances, including the severity of the violation, possible harm to the Vehicles and their investors and whether the Employee has previously engaged in any improper conduct.

The contents of this Code are strictly confidential. Employees may not duplicate, copy or reproduce the Code in whole or in part or make it available in any form to non-Employees without prior approval in writing from the Firm’s Compliance Officer.

### *INITIAL AND ANNUAL ACKNOWLEDGMENT*

Each Employee upon hire is required to certify the Code of Ethics Certification and Acknowledgment Form (**Appendix A**) acknowledging that he or she has received a copy of the Code and certifying that he or she has read and understands the Code and agrees to abide by its provisions. Thereafter, each Employee shall, at least annually, reaffirm, among other things, that he or she continues to abide by the Code’s provisions, by signing the Code of Ethics Certification and Acknowledgment Form (**Appendix A**).

### *REPORTING VIOLATIONS OF THE CODE OF ETHICS*

All Employees must promptly report any violations of the Code, the Firm’s policies, workplace concerns, violations of law and related issues in accordance with the following provisions. (For purposes of the following, violations of law will be deemed to be included as violations of Firm policy.)

Reports may be made to the Compliance Officer. Should the violation pertain to actions by the Compliance Officer, the complaint should be made to another member of the Compliance Committee. Any violations reported to, or independently discovered by, the Compliance Officer shall be promptly reviewed, investigated and reported to the Firm’s Compliance Committee and Executive Committee if necessary.

It is the Firm’s policy, notwithstanding any statement in this Code to the contrary, that nothing prohibits an Employee from reporting possible violations of United States federal law or regulation to any governmental agency or entity, including but not limited to, the United States Department of Justice, the United States Congress, and any Inspector General of any United States federal agency, or making other disclosures that are protected under the whistleblower provisions of United States federal, state or local law or regulation; provided, that such Employee will use his or her reasonable best efforts to (1) disclose only information that is reasonably related to such possible violations or that is requested by such agency or entity, and (2) request that such agency or entity treat such information as confidential.

Nonetheless, the Firm believes that it is important to the success of its compliance program and compliance efforts that reports of possible laws’ violations should first be made internally. This allows the Firm to promptly investigate any problems and take more prompt corrective action, where appropriate.

## *RESPONSIBILITY OF THE WHISTLEBLOWER*

Employees must be acting in good faith in reporting a complaint or concern under this policy and must have reasonable grounds for believing a breach of the Code. A malicious allegation made by an Employee known to be false is considered a serious offense and will be subject to disciplinary action, which may include termination of such Employee's employment.

## *HANDLING OF REPORTED IMPROPER ACTIVITY*

An Employee of the Firm should promptly report suspected improper activity to the Compliance Officer to enable the matter to be investigated. Once a report has been made, a member of the Compliance Committee will acknowledge receipt in writing to the reporting individual within five business days. The Firm will endeavor to deal with any reports quickly and efficiently. The Firm will review the report to determine whether a full investigation is necessary. If such an investigation is necessary then, depending on the nature of the misconduct, the initial concerns will be either:

- Investigated internally (for example, by the Compliance Committee) or
- Referred to the appropriate external person (for example, external auditors, outside counsel, or law enforcement) for investigation.

Subject to any legal constraints, the Firm will inform the reporting individual of the outcome of the review and whether any further action has been taken.

Any individual who is named in the report or whose conduct may be in question as a result of the report will be prohibited from participating in the review. A written record of a verbal report or a copy of a written report and any related correspondence will be placed in a file maintained by the Compliance Committee. Any action that is taken in response to a report of wrongful conduct will be noted in the file.

## *CONSEQUENCES OF NON-COMPLIANCE*

If an Employee fails to comply with the requirements of this Code or any law, rule or regulation applicable to the Firm's business, they will be subject to disciplinary action by the Firm, which may include termination of employment. Any non-compliance or violation of law may also result in severe civil and criminal penalties.

The Firm also reserves the right to take disciplinary action against an Employee, including termination of employment, if such Employee engages in conduct deemed to be unethical or illegal, whether or not such conduct constitutes a violation of this Code or relates to the Firm's business. The Firm may take such action if, in its sole judgment, the Firm believes that the Employee conduct poses any reputational risk to the Firm whatsoever.

Finally, Employees must report to the Compliance Officer any known or suspected violations of the policies and procedures contained in this Code or other activities of any Employee that could be construed as a violation of the Firm's policies or any law, rule or regulation applicable to the Firm's business. If an Employee is unsure whether a violation has occurred, they should discuss the matter with the Compliance Officer. Failure to report a violation to the Compliance Officer could result in disciplinary action against any non-reporting Employee, which may include termination of employment.

## *RETALIATION IS PROHIBITED*

The Firm prohibits retaliation against any employee who truthfully and in good faith reports violations of this Code, Firm policy, workplace concerns, violations of law and related issues. This prohibition applies whether the complaint is first addressed to the Compliance Officer or to any supervisor.

The Firm also prohibits retaliation against an employee for filing a complaint regarding the Firm with a government anti-discrimination agency. Further, Firm policy bars retaliation against anyone for assisting with the investigation of such a complaint.

An employee who retaliates against another employee for filing a complaint hereunder or for assisting in the investigation of such a complaint by a governmental agency may be subject to disciplinary action up to and including termination.

#### *RIGHTS OF PRIVACY IN RESPECT OF FILED COMPLAINT*

Employees who wish to file complaints hereunder may request that their identity or identities be kept confidential. The Firm will make reasonable attempts to comply with such requests; however, any employee making such request should be aware that those about whom such a complaint is made will have certain rights to reasonably understand the nature of the complaint. If the Compliance Committee determines it cannot fairly proceed with its investigation and continue to comply with such requests, the employee who requested confidentiality will be contacted and so informed. At that point, the Committee will suggest that the employee withdraw the request for confidentiality. If the Employee refuses to do so, the Committee will make a determination whether it can or cannot continue with the investigation.

Any employee requesting confidentiality who also alleged suffering or that they may suffer personal detriment should be aware that it is unlikely their identity can be kept confidential in the process of resolving the complaint.

Any employee requesting confidentiality should also be aware that the Firm might be subject to a demand of information from a government agency concerning matters covered by the request for confidentiality. The Firm may feel it necessary to submit such information in response to such a demand. Where appropriate the Firm will consider whether it can first inform the employee who requested confidentiality of the government's demand and proceed accordingly.

#### *RESPONSIBILITY TO ASSIST IN FIRM INVESTIGATIONS*

It is the responsibility and obligation of all employees to provide reasonable assistance to the Firm in respect of any internal investigation. Failure to comply with this requirement may subject the employee to disciplinary action up to and including termination.

## SECTION II - Employees' Conduct

### *CONFLICTS OF INTEREST*

The Firm strives to identify and mitigate, to the extent practicable, all perceived, potential and actual conflicts of interest that may affect the Firm's and its Employees' provision of investment management services to the Vehicles. To this end, all Employees should promptly report to the Compliance Officer any situation or circumstance which may give rise to a conflict of interest.

### *GIFTS AND ENTERTAINMENT*

The following Gifts and Entertainment policy imposes limits on, and monitors the nature and quantity of, "business-related" gifts, gratuities and entertainment, as this is another area where conflicts of interest may arise. "Business-related" gifts, gratuities and entertainment are those that the Firm's Employees give to, or receive from, a person or firm that: (i) conducts business with or provides services to the Firm; (ii) may do business with or is being solicited to do business with the Firm; or (iii) is associated with an organization that conducts or seeks to conduct business with the Firm. In addition, Employees may not be compensated, directly or indirectly, except by the Firm or when otherwise approved by the Firm (including approval by the Compliance Officer or others, as provided elsewhere in this Code).

This policy is not intended to prevent Employees from giving or receiving gifts, gratuities or entertainment, provided that such gifts and entertainment are not extravagant, costly, lavish or excessive. The policy is intended to ensure that the practice of giving and accepting gifts, gratuities or entertainment is not abused and does not compromise the integrity, objectivity or other responsibilities of the Firm or its Employees, create an appearance of impropriety or raise potential conflicts of interest. Gifts and entertainment given among Employees are not subject to the guidelines set forth below.

### *PREAPPROVAL PROCESS AND PROHIBITIONS*

#### **Gifts**

A "gift" refers to any object or thing of value provided for the recipient's personal use or enjoyment. If, for example, the giver of tickets for an event does not intend in advance to be present at such event, then the tickets will be deemed a gift. Each Employee may offer or accept business-related gifts that are not lavish or excessive in value to or from any third party with whom the Firm conducts business, or could reasonably expect to conduct business, without the prior written approval of the Compliance Officer. For individual gifts that are lavish or excessive, Employees must submit a Gift and Entertainment Approval Form (**Appendix B**) to the Compliance Officer upon receipt of or prior to offering such gift. Lavish or excessive could mean different amounts in different geographical areas and industries, Employees should work with their managers/supervisors to determine what is lavish or excessive. Questions can also be directed to the Compliance Officer, as needed.

#### **Entertainment**

"Entertainment" refers to meals, sporting events or other entertainment events where the giver intends to participate in or attends the event with the recipient (e.g., accompanies the recipient of baseball tickets to the game). If the giver intends to participate in the event, then such an event will be deemed entertainment. Each Employee may offer or accept occasional business-related entertainment, so long as the provider of the entertainment is present at the dinner or event, and such entertainment is not conditioned on doing business with the Firm and is neither so frequent nor expensive as to raise questions of propriety. For entertainment that exceeds this threshold, Employees must submit a Gift and Entertainment Approval Form (**Appendix B**) to the Compliance Officer upon receipt of or prior to offering such entertainment.

**Prohibited Conduct**

No gift or entertainment should ever be accepted with the expectation of any *quid pro quo* from the Firm or any Employee. Employees are prohibited from giving outside the normal course of business, and must tactfully refuse, any gift of cash, gift certificate or cash equivalents.

Furthermore, to ensure compliance with the Foreign Corrupt Practices Act (“FCPA”), Employees are prohibited from directly or indirectly paying or giving, offering or promising to pay, give or authorize or approving such offer or payment, of any funds, gifts, services or anything else of any value, no matter how small, or seemingly insignificant, to any “government official” (as defined under the FCPA) for any business or Firm-related reasons.

**APPENDIX A**  
**Code of Ethics Certification and Acknowledgment Form**

**Sentinel**

The undersigned Employee (the “Employee”) of Sentinel (the “Firm”) acknowledges that he or she received a copy of the Code of Ethics and the Appendices attached thereto (collectively, the “Code”) and certifies that he or she has read and understands all provisions of the Code and agrees to abide by the provisions contained therein. The Employee hereby certifies that they have reported all outside business activities. The Employee understands that observance of the provisions contained in the Code is a material condition of his or her employment by the Firm and that any violation of such provisions by the Employee may subject the Employee to immediate termination by the Firm as well as possible civil or criminal penalties. Any capitalized terms not defined herein shall have the meanings ascribed to them in the Code.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

**APPENDIX B**  
**Gift and Entertainment Approval Form**

**Sentinel**

Employee: \_\_\_\_\_

Date: \_\_\_\_\_

Type:

Gift ☐

Entertainment ☐

Description:

Provider:

Did provider participate?

Yes ☐ No ☐

Recipient:

Did recipient participate?

Yes ☐ No ☐

Estimated value: \_\_\_\_\_

I certify that this description is a true and accurate depiction of the gift or event and that receipt of this gift or attendance of this event shall create no conflict of interest.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Signature of Compliance Officer

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Print Name

\_\_\_\_\_

\_\_\_\_\_