



WHITESTONE REIT

# WHITESTONE REIT HUMAN RIGHTS POLICY

Updated April 2022

---

## **Respect for Human Rights**

Respect for human rights is a fundamental value of Whitestone REIT. We strive to respect and promote human rights consistent with the UN Guiding Principles on Business and Human Rights <sup>(1)</sup> in our relationships with our employees, suppliers, contractors, and tenants. Our aim is to help increase the enjoyment of human rights within the company and the communities in which we operate. This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights <sup>(2)</sup>, including those contained within the International Bill of Rights <sup>(3)</sup> and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work <sup>(4)</sup>.

This Policy applies to Whitestone REIT, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. The Company also expects our vendors, suppliers, contractors, and tenants to uphold these principles and urges them to adopt similar policies within their own businesses. We use due diligence as a means to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

## **Governance and Oversight**

Instituting a cultural focus on human rights and corporate social responsibility begins with an organization's leadership. With Board of Director oversight of our environmental, social and governance (ESG) program and executive-level participation on our ESG committee, these initiatives have top-down support and are a company-wide priority.

## **Compliance with the Human Rights Policy**

This policy is drafted broadly. In that respect, it is Whitestone's intent to exceed the minimum requirements of the law and industry practice. We believe that mere compliance with the law is not sufficient to attain the highest ethical standards. Good judgement and great care must also be exercised to comply with the spirit of the law and this policy. Whitestone maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking. Any violation by an employee or contractor will result in disciplinary action, which includes potential termination of the employee or contractor agreement.

## **Community and Stakeholder Engagement**

We recognize that we are part of the communities in which we operate and proactively engage with people within those communities. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business.

## **Diversity and Inclusion**

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. The Company is also committed to protecting the rights of women and minority groups and preventing instances of discrimination and harassment. We work to maintain workplaces, properties and communities that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

## **Safe and Healthy Workplace**

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

## **Workplace Security**

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

## **Forced Labor and Human Trafficking**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

## **Child Labor**

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

## **Water**

Whitestone views access to water and sanitation as a basic human right and is committed to upholding this right.

## **Work Hours, Wages and Benefits**

Whitestone is committed to providing a fair living wage to all employees. We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

## **Healthy Lifestyles**

Through Whitestone REIT's "Building Better Health" program, we promote an active and healthy lifestyle both physically and mentally. Whitestone also offers all associates an Employee Assistance Program through a variety of platforms that are detailed in our Whitestone Sustainability Statement.

## **Cybersecurity**

Cybersecurity protection against cyber threats remains a high priority for Whitestone. As we transmit sensitive data across networks and rely on internet-based systems to run our buildings, we are dedicated to protecting this information and the systems used to process it. We also ensure our employees, processes, systems, and external partners are aligned with cybersecurity best practices. We periodically employ external agencies to test the efficacy of our security protocols and leverage the cloud to employ sophisticated cybersecurity measures. The company has not had a data breach within the last 3 years.

## **Anti-Bribery and Anti-Corruption**

Whitestone is committed to operating our business in accordance with the highest moral, legal, and ethical standards. Our reputation for integrity is an invaluable asset, and each employee must contribute to the care and preservation of that asset. Employees who deal with the Company's borrowers, tenants, suppliers, or other third parties are placed in a special position of trust and must exercise great care to preserve their independence. Whitestone strictly prohibits actions of bribery or corruption from employees and suppliers. Bribery, kickbacks, or other improper payments have no place in our operations. No employee should ever offer direct or indirect political contributions and/or charitable donations as a means of bribery or corruption. To clarify, a "bribe" can include, but is not limited to money, entertainment or gifts, debt forgiveness, excessive gratuities or commissions, kickbacks, rebates, and charitable or political contributions made on the third parties' behalf, and more. Oversight of this commitment to anti-bribery and corruption is the responsibility of the Board of Directors. As a general rule, no employee should ever receive a payment or anything of value in exchange for a decision involving the Company's business. Similarly, no employee of the Company should ever offer anything of value to government officials or others to obtain a particular result for the Company.

## **Guidance and Reporting for Employees**

We strive to create workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to comply with applicable labor and employment laws wherever we operate. The Company also ensures employees are aware of the Human Rights Policy through training and an annual certification process. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she

works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, are encouraged to raise those questions and concerns with local management and our Human Resources Department. Employees can also report suspected policy violations through the Ethics Line secured internet website at:

<http://ir.whitestonereit.com/Cache/1001168117.PDF?Y=&O=PDF&D=&FID=1001168117&T=&IID=4087483>

or by calling the toll-free, Whitestone Ethics Hotline:

(855) 890-3329

which can also be found at:

<http://ir.whitestonereit.com/Cache/1001168117.PDF?Y=&O=PDF&D=&FID=1001168117&T=&IID=4087483> .

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

The Human Rights Policy is aligned with the Company's Code of Business Conduct. This policy, including translations and related information, can be found via the Company's internet site: [www.whitestonereit.com](http://www.whitestonereit.com) .

## **Public Reporting**

We report to the public through our website on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our Whitestone Sustainability Statement. This reporting cross references the UN Guiding Principles Reporting Framework<sup>(5)</sup>.

Notes:

(1) Source: found at: [www.unglobalcompact.org/library/2](http://www.unglobalcompact.org/library/2)

(2) Source: found at: [www.un.org/en/udhrbook/pdf/udhr\\_booklet\\_en\\_web.pdf](http://www.un.org/en/udhrbook/pdf/udhr_booklet_en_web.pdf)

(3) Source: found at: [www.ohchr.org/documents/publications/compilation1.1en.pdf](http://www.ohchr.org/documents/publications/compilation1.1en.pdf)

(4) Source: found at: [www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm](http://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm)

(5) Source: found at: [www.ungpreporting.org/](http://www.ungpreporting.org/)