

INTRODUCTION

At Starwood Capital Group (or “Starwood,” “we” or “our”), we believe that responsible investment practices—including the integration of sustainability considerations into our corporate operating strategy and throughout the lifecycle of our investments—enhance our ability to deliver strong, risk adjusted returns.

This policy sets forth the general framework for our approach to responsible investment, in alignment with and subject to any applicable fiduciary or contractual duties.¹ The initiatives referenced in this policy are informed through periodic assessments of the materiality of various sustainability risks and opportunities relevant to our business operations, our industry, and our stakeholders.

OUR CORPORATE RESPONSIBILITY

Starwood aims to integrate sustainability initiatives that support our growth, enhance our resilience, reduce the environmental impact of our corporate operations, and positively contribute to the well-being of our employees and the communities in which we operate. In pursuit of these goals, we aim to implement the following initiatives in our corporate operations:²

- Measure and seek to reduce the environmental footprint of our corporate operations, including by implementing energy efficiency, water conservation, and waste management initiatives across select offices.
- Foster a strong people-centered culture by promoting an inclusive, positive, and rewarding work environment that supports employee growth, well-being, and professional development.
- Support philanthropic and community service initiatives that align with the causes important to our employees and local communities.
- Uphold the highest standards of business ethics and regulatory compliance through employee training, fair labor practices, respect for human rights, and responsible supply chain engagement.

INVESTMENT PROCESS

Starwood integrates financially material sustainability factors into our investment process to better manage risk, identify value-creation opportunities, and strengthen the long-term resilience of our investment portfolio. We believe that by considering sustainability factors, we enhance our ability to fulfill our fiduciary duty and deliver strong risk-adjusted returns for our investors.

¹ See important information in Scope and Limitations section.

² Unless otherwise noted, the sustainability initiatives included herein do not necessarily apply to Starwood Capital Group’s investment funds or portfolio companies.

While not all sustainability factors are relevant to a particular investment type, strategy, asset class, ownership and/or control structure, the table below provides a sample of common sustainability factors relevant to the real estate industry:³

SAMPLE SUSTAINABILITY FACTORS		
<ul style="list-style-type: none"> ▪ Climate change resilience ▪ Land contamination ▪ Energy management ▪ Water management ▪ Waste and hazardous materials management ▪ GHG emissions ▪ Location and infrastructure ▪ Materials ▪ Pollution ▪ Supply chain environmental impact 	<ul style="list-style-type: none"> ▪ Community development ▪ Diversity & inclusion ▪ Health and safety ▪ Human rights ▪ Modern day slavery ▪ Indoor environmental quality ▪ Access and affordability ▪ Human rights ▪ Labor standards ▪ Stakeholder engagement ▪ Supply chain responsibility 	<ul style="list-style-type: none"> ▪ Anti-bribery and money laundering ▪ Cybersecurity ▪ Board independence ▪ Conflicts of interest ▪ Remuneration policy ▪ Data protection and privacy ▪ Legal and regulatory fines ▪ Sustainability clauses in contracts ▪ Procurement standards and requirements

Investment Due Diligence

For new investments, we aim to incorporate material sustainability factors into our investment due diligence process, and where we determine appropriate, seek external support from specialized consultants on specific matters, such as evaluating potential physical climate risks or the long-term impact that the global energy transition may have on certain investments.

For equity investments, our due diligence process also seeks to identify value creation opportunities that may be included in the investment's business plan. For credit investments, we are focused on considering sustainability factors that are the most relevant for assessing potential downside risks.

When seeking investment committee approval, the investment team will generally include an overview of material sustainability risks and opportunities identified during due diligence in the final investment committee memoranda, when relevant.

Asset Management and Portfolio Company Engagement

Post-investment, Starwood seeks to incorporate sustainability factors into its asset and portfolio management approach, which generally includes working closely with our property management partners and portfolio company management teams to address existing and emerging risks and enhance the long-term value of our assets.

³ The applicability of sustainability factors outlined on this page may vary across investment vehicles managed by Starwood Capital Group and affiliates. Not all factors may be applicable to all investments, and the applicability of each factor will vary based on asset class, investment strategy, fund, and level of control over investment.

For investments where Starwood holds majority ownership and control, our teams work to prioritize and implement sustainability initiatives aimed at improving the long-term value of our properties and portfolio companies. For example, we generally seek to engage with our portfolio company management teams by providing resources, implementation support, and subject matter expertise on sustainability matters. Additionally, we maintain a property-level sustainability program for select real estate equity investments, which includes initiatives such as:⁴

- Providing sustainability training and resources to certain property management partners.
- Implementing property-level sustainability performance data reporting and management processes.
- Identifying and executing projects to improve operating efficiency and resource use.
- Exploring opportunities to procure renewable energy and clean transportation infrastructure, including onsite renewable energy generation equipment and electric vehicle charging stations.
- Seeking to assess exposure to climate-related risks and developing risk mitigation strategies for certain properties.
- Developing tenant engagement opportunities, including by seeking to include sustainability clauses in new lease agreements and lease renewals.
- Evaluating and pursuing green and healthy building certifications for certain properties to enhance asset value.
- Maintaining healthy buildings for our tenants, our business partners, and the community at large.

For investments where Starwood has limited influence or control—including credit investments, public equity investments, and private equity investments where Starwood has minority or joint ownership—we seek to encourage our partners, sponsors, and portfolio companies to implement sustainability best practices where possible and in accordance with our fiduciary duties.

ONGOING MONITORING

Starwood seeks to employ several methods to monitor sustainability factors across certain investments within our global investment portfolio. Our monitoring process generally includes the following:

- **Sustainability Metrics Reporting:** We generate sustainability metrics reports to monitor investment-level sustainability KPIs such as energy and water use intensity, carbon emission intensity, waste diversion rates, energy ratings, and sustainability certifications. These reports help us identify opportunities to mitigate risk, enhance asset performance, and drive long-term value creation.
- **Annual Sustainability Surveys:** We conduct sustainability surveys across certain portfolios to track progress on various sustainability initiatives being implemented at the property-level, including energy efficiency retrofits, water efficiency upgrades, tenant satisfaction, tenant and community engagement, and tenant and worker health & well-being. These surveys also help us monitor property resiliency features that support and strengthen existing risk management protocols.
- **Annual Greenhouse Gas (GHG) Inventory:** Through our GHG inventory process, we measure and monitor annual emissions across select funds, benchmark our portfolio's GHG emissions footprint, and seek to ensure compliance with evolving regulatory requirements.

⁴ Properties in scope of Starwood's property-level sustainability program generally include real estate assets majority owned and controlled by Starwood Capital Group. The example initiatives shown here are generally applicable to those investments in scope of Starwood's property-level sustainability program. Starwood may determine at its sole discretion to exclude certain investments from its property-level sustainability program, including investments majority owned and controlled by Starwood Capital Group.

REPORTING

We seek to ensure openness and transparency by providing regular updates to our investors and stakeholders on our sustainability initiatives. Our Responsible Investment Report, available on our website, provides updates on Starwood's approach to sustainability and details initiatives implemented across the firm and our investment portfolio.

We also report as a signatory to the UN Principles for Responsible Investment (PRI) and participate in the GRESB Real Estate Assessment benchmark through select funds. Further, Starwood may report to its investors on certain sustainability initiatives through various channels, such as our quarterly investor updates, ad hoc investment reports, or during our annual investor meeting.

STEWARDSHIP

We are committed to managing our investors' capital responsibly by actively overseeing our investment portfolio and engaging, where appropriate, with stakeholders and industry organizations to support sound business practices. Our approach is grounded in our fiduciary duty and focused on preserving and enhancing long-term value across our investments.

Industry Engagement

Starwood is a signatory to the UN Principles for Responsible Investment (PRI), a GRESB participant, a supporter of the Taskforce on Climate-Related Financial Disclosures (TCFD), and a partner to the EPA's ENERGY STAR Commercial Buildings program. We are also a signatory to the Institutional Limited Partners Association (ILPA) Diversity in Action Initiative. Our participation in these initiatives is intended to enhance our access to industry insights, support operational best practices, and strengthen our ability to manage long-term investment risks and opportunities on behalf of our investors.

Stakeholder Engagement

We believe that maintaining regular communication with our stakeholders supports effective investment management and informed decision-making. Starwood engages with investors, employees, portfolio companies, property managers, tenants, policymakers, and other relevant parties as appropriate to share information, understand perspectives, and support the execution of our investment strategies.

Proxy Voting

While Starwood primarily focuses on private investments and has limited exposure to public securities, we are committed to following our Proxy Voting Policy which is designed to align our voting decisions with the best interests of our investors.

OVERSIGHT AND IMPLEMENTATION

Under the leadership of our Chairman and CEO, Starwood's Executive Committee provides strategic direction and maintains ultimate oversight of our firm's sustainability efforts. Starwood's global Sustainability Steering Committee, which includes senior leaders from the firm's primary business segments and affiliate entities, also meets periodically and provides oversight and strategic guidance on sustainability matters.

Further, Starwood has a dedicated sustainability team responsible for supporting the development and implementation of the firm's sustainability strategy. This team also provides resources, support, and training to Starwood's investment professionals, supports sustainability priorities across the investment portfolio, and leads sustainability reporting initiatives for the firm.

RELATED POLICIES AND PROCEDURES

Starwood maintains various policies and procedures within the firm's compliance manual and employee handbook which cover various topics, including but not limited to anti-corruption, ethics, and anti-harassment. This Responsible Investment Policy is intended to be complementary to these other policies and procedures. In certain cases, Starwood maintains tailored processes specific to certain funds or investment strategies. If any fund, investment strategy, or affiliate has additional or different processes than the ones in this Responsible Investment Policy, we will first seek to follow such processes and thereafter, to the extent applicable, this Responsible Investment Policy.

TRAINING

Starwood employees receive periodic training on the firm's policies and procedures and are expected to understand and comply with the firm's guidelines, including this Responsible Investment Policy. Additionally, Starwood provides ongoing sustainability training to certain employees, in addition to more focused sessions on specific sustainability topics. We continue to look for ways to improve and expand on our sustainability training initiatives.

SCOPE AND LIMITATIONS

This Responsible Investment Policy outlines Starwood's general framework for integrating sustainability factors throughout the lifecycle of its investments and applies to the funds and entities managed by Starwood Capital Group, including its private investment funds and affiliated REITs. While Starwood seeks to incorporate material sustainability issues into the investment process for all investments as applicable, Starwood may determine in its sole discretion that it has limited ability to conduct diligence, access data, or to influence and control the consideration of sustainability issues in connection with an investment, whether at the investment or at the fund-level. In such cases, Starwood will apply those elements of this Responsible Investment Policy that it deems practical and applicable. Examples of such instances include scenarios where Starwood jointly manages a fund or investment, is a public equity shareholder with limited or no influence or control, is a minority investor, lender, or debt holder, possesses limited governance rights, or lacks direct control. For the purposes of this policy, "material" sustainability risks and opportunities are those that Starwood, in its sole discretion, determines to have, or have the potential to have, a significant impact on its ability to create or preserve economic value. Importantly, Starwood does not anticipate compromising any fund's or investor's investment returns or increasing investment risks as a result of considering sustainability factors, in alignment with this Responsible Investment Policy. This Responsible Investment Policy was last updated in May 2025 and has been reviewed and approved by Starwood's senior executive management team. Starwood reviews this Responsible Investment Policy annually.