

**1. Respect for Human Rights**

Respect for human rights is one of our fundamental values. We strive to respect and promote human rights in our relationships with our employees, vendors and tenants. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. To this end we support and promote the principles of the Universal Declaration of Human Rights and the human rights protections set forth in the laws of the United States, and the states and communities in which we operate.

This policy applies to all of the operations of Douglas Emmett, Inc. (DEI) and its direct and indirect subsidiaries, regardless of geographic location, and covers buildings we own or manage. We expect our vendors to uphold these principles and urge them to adopt similar policies within their own businesses.

**2. Diversity and Inclusion**

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity in workplaces 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, political opinion or any other status protected by applicable law. Recruitment, hiring, placement, development, training, compensation and advancement may not be based on any of these factors, but should instead be based on rational factors such as qualifications, performance, skills and experience.

We do not accept disrespectful or inappropriate behavior, harassment or retaliation in the workplace or in any work-related circumstance outside the workplace. We provide each of our employees with detailed policies and materials to provide information on equal opportunity, discrimination and harassment, and require participation in training on these matters.

**3. Protection of Minority Groups' and Women's Rights**

Minority Groups' and women are integral to our business model and growth ambitions. We respect the rights of minority groups' and women and seek to manage and grow a socially responsible business where minority groups' and women participate on an equal basis. To achieve these goals, we provide minority groups' and women with the training and education necessary to expand their opportunities within our Company.

**4. Freedom of Association and Collective Bargaining**

We strive to create workplaces in which open and honest communications among all employees are valued. We respect our employees' right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. In the case of employees represented by a legally recognized union, we are committed to bargaining in good faith with that union.

**5. Safe and Healthy Workplace**

The safety and health of our employees, vendors and tenants is of paramount importance. We must not only comply with applicable safety and health laws and regulations, but also address and remediate identified risks of accidents, injury and health impacts. Our policies regarding health and safety are

provided to our employees, vendors and tenants, and encompass all our facilities and operations. Each of our employees is entitled to a copy of our Safety Handbook, which sets forth detailed instructions regarding safety issues.

#### **6. Workplace Security**

We are committed to a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Each employee is entitled to a copy of our Safety Handbook, which details the sets forth detailed standards of conduct regarding workplace security, and participates in our formal Illness and Injury Prevention Program.

#### **7. Forced Labor and Human Trafficking**

We prohibit the use of all forms of forced labor, whether prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We also evaluate the potential for human trafficking in our supply chain and minimize risks by committing to work with well-established suppliers and vendors who adhere to our Vendor Code of Conduct which prohibits forced labor and human trafficking. We have a no tolerance policy for employees, suppliers and vendors in violation of our company standards regarding slavery and human trafficking and anyone in violation of those standards is subject to termination.

#### **8. Child Labor**

We comply with all local minimum working age laws and requirements and prohibit the use of child labor.

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

We compensate our employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements and applicable legal standards. We work to ensure full compliance with applicable wage, work hours, overtime and benefits and other labor laws. We are committed to paying living wages under humane conditions. Each of our employees is entitled to clear, written information about their employment conditions with respect to wages before they enter employment and as appropriate throughout their term of employment; a copy of our Employee Handbook, which sets forth detailed procedures and rights relating to disciplinary actions (deductions from wages as a disciplinary measure are not permitted unless permitted by national or applicable local law); and a formal review, both in person and in writing, not less than once a year.

#### **10. Right to Water**

We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

#### **11. Guidance and Reporting for Employees**

You should not accept any direction by your supervisor which is inconsistent with this Policy. If you are ever concerned that anyone connected with us may have engaged or is about to engage in any conduct in violation of this Policy, you should promptly bring the matter to the attention of our Chief Operating



## Douglas Emmett Human Rights Policy

Officer. If you do not believe that talking to our Chief Operating Officer is appropriate, if you are uncomfortable doing so, or if it does not result in a response with which you are comfortable, then you should contact any of our other executive officers or any member of the Board of Directors of DEI, either directly or through [confidential@douglasemmett.com](mailto:confidential@douglasemmett.com).

The Policy is overseen by the Board of Directors of DEI, and may be amended by it or its Governance Committee. We may will waive application of the policies set forth in this Policy where circumstances warrant granting a waiver, subject to appropriate terms and conditions. This Policy is not intended to, and does not, grant any rights to any director, officer, employee, tenant, supplier, competitor, stockholder or any other person or entity.