

# HARRISON STREET ENVIRONMENTAL, SOCIAL, & GOVERNANCE IMPACT POLICY

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**HARRISON STREET**  
*Making an Impact.*

# POLICY SUMMARY

Since inception in 2005, Harrison Street has sought to combine innovation and process rigor to execute differentiated strategies that improve the lives of its stakeholders. In 2013 Harrison Street began a formal effort to expand its focus and reporting of environmental, social, and governance (ESG) aspects of the business, which included its first submission to the Global Real Estate Sustainability Benchmark (GRESB). In January 2020 the Firm established an Impact Department, whose team members, including the Chief Impact Officer, are responsible for the measurement, management, reporting and enhancing of the Firm's ESG initiatives.

The Firm regularly reports on ESG performance and publishes annually, and has since 2014, a Corporate Impact Report which highlights material ESG activities undertaken with respect to the Firm and Fund's investments during the previous calendar year. In addition, robust policies and procedures have been implemented to integrate ESG considerations into investment management processes and ownership practices in the belief that these factors can have an impact on financial performance. Starting in 2021 the Firm has also published a Climate Action Plan that addresses how it can actively reduce the carbon emissions of its assets, how its assets are as resilient as possible to climate change, and what it is doing to protect the health and wellness of its building occupants as it pertains to climate change. These documents, along with this policy are available on the Firm's website.

Today, the Firm seeks to Make an Impact, a vision that encompasses not only the discrete impact of assets but also the positive societal and environmental benefit created through the Firm's investment activities.

## SCOPE OF POLICY

This policy defines the Environmental, Social, and Governance (ESG) procedures within the Firm's investment management processes and ownership

practices. The policy applies across corporate and investment operations and provides a framework for ESG integration. The Firm's approach is defined in two parts, Corporate Operations, and Investment Operations. Within Investment Operations, each investment vehicle follows this framework to define a specific approach to ESG integration that aligns with the investment strategy, control, asset class, investment time horizon, and portfolio construction.

## MATERIAL ESG ISSUES

Stakeholder feedback is collected every three years to update the Firm's priority list of the most material ESG issues. The results of the 2020 materiality assessment are defined below and have been used to create The Firm's Impact Framework.

### *Harrison Street Materiality Assessment, February 2020*

MOST MATERIAL TOPICS	LESS MATERIAL TOPICS
1. Climate Risk & Resiliency	11. Business Ethics
2. Carbon Emissions & Clean Energy	12. Risk Management
3. Diversity & Inclusion	13. Employee Relations, Satisfaction, & Development
4. Governance Structure	14. Cybersecurity
5. Transparency & Audits	15. Reputation
6. Board & Management Diversity	16. Water Conservation
7. Building Energy Efficiency	17. Waste & Resources
8. Income Inequality, Affordability, & Social Services	18. Communication & Management
9. Health, Safety, & Wellbeing	19. Compensation
10. Social Shifts / Aging Demographics	20. Stakeholder Alignment
	21. Community Engagement
	22. Air & Water Quality
	23. Deforestation & Biodiversity
	24. Human Rights
	25. Certification
	26. Education
	27. Shareholder rights

# ESG STRATEGY

The Firm's ESG strategy is composed of two prongs, one which focuses on the Firm level, and the other at the investment level. Key elements of the Firm-level strategy include a dedicated focus to diversity, equity, and inclusion, maintaining the Firm's strong culture so it continues to attract and retain team members and working closely with operating partners to aid in business improvement activities and create market differentiation, typically through sharing of best practices and implementation of new technologies. Elements of note within the Investment strategy include creation of sustainable communities, through job creation and healthy building design and operations, and how investments interact with the climate, ranging from the resiliency of the assets to GHG emissions reduction to investment in renewable energy.

## CORPORATE OPERATIONS



### MANAGEMENT & POLICY

Execute disciplined strategy, reflect on performance and behaviors, and continuously improve.



### DIVERSITY, EQUITY, & INCLUSION

Build an inclusive culture that fosters equal opportunities and continuous development at different career stages.



### GIVING & SERVICE

Promote and provide opportunities for team members and the Firm to dedicate their time, talent, and funds to those in need.



### PARTNER SERVICES

Promote the acceptance and implementation of business improvement and differentiated practices among partners.

## INVESTMENT OPERATIONS



### EFFICIENT OPERATIONS

Improve and maintain efficient assets through active management and investment in clean technology.



### CLIMATE RESILIENCE & EMISSIONS

Strengthen the resiliency of the portfolio to climate-induced risks; capture opportunities and minimize the contribution to global emissions.



### HEALTH & WELL-BEING

Support the health and well-being of residents, tenants, and staff through healthy building design and operations.



### COMMUNITY IMPACT

Strengthen the economic vitality and health of communities through new and sustained jobs and opportunities.

# CORPORATE OPERATIONS

## MANAGEMENT & POLICY

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Execute disciplined strategy, reflect on performance and behaviors, and continuously improve.

### EXECUTIVE LEADERSHIP & GOVERNANCE

The Firm's fiduciary duty instills sound internal processes for investment decisions which are maintained through superior risk management, due diligence, annual audits, and self-evaluations for compliance, corruption, and disaster readiness.

In addition, the Firm has established several topic focused committees to guide and oversee key aspects of the business. Some of these include:

- The Investment Committee ("IC"), which includes the CEO, the Firm's Principals and select senior leaders, who have final approval authority on investments and disposition through simple majority vote.
- The Executive Committee ("EC"), composed of the CEO, the Firm's Principles, and select Senior Managing Directors, who set the strategic priorities, targets, and direction of the firm.
- The Firm also has several additional committees and initiatives including Global and Regional Operations, Data and Technology, Risk Management, Diversity, Equity & Inclusion, Capital Markets, Compensation, and ESG, of which influence the Firm's strategic direction and overall performance.
- Each new fund has an advisory committee that is created and then meets on an annual basis.
- Finally, appropriate governance structures are incorporated into applicable legal documents to address major decision rights, audit, risk management, conflicts of interest and other policies to align interests.

### ETHICS & CORE VALUES

- The Firm is built on five key company values: Teamwork, Innovation, Passion, Excellence, and Integrity. The latter directs Harrison Street to operate with honesty and transparency to hold the trust of its stakeholders.
- Employees must attest quarterly that they follow the Code of Ethics, and they can share any ethical concerns with Human Resources or the Chief Compliance Officer.
- Trainings on topics such as ethics, anti-corruption, foreign corrupt practices, and cybersecurity are provided annually, during quarterly certifications, and when new regulations or situations arise.
- All new employees receive a background check and anti-corruption training at hire date.
- The Firm uses a sophisticated web-based compliance tracking system to report and monitor Code of Ethics items such as political contributions, personal trading, conflicts of interest, and gifts.

### RESPONSIBLE CONTRACTORS

- The Firm supports and encourages fair wages and fair benefits for workers employed by its partners, contractors, and subcontractors, subject to fiduciary principles concerning duties of loyalty and prudence, both of which further require competitive returns on the Firm's real estate and infrastructure investments.
- The Firm endorses small business development, market competition and control of operating costs. The Firm

believes that a diverse, adequately compensated, and trained workforce delivers a higher quality product and service, thereby providing the Firm with a better opportunity for long-term security of its investments, along with a better opportunity for long-term growth and investment return. Adequate compensation includes fair wages and benefits, including healthcare and retirement plans.

- Where possible, the Firm supports the use of qualified contractors certified as Minority and Women-Owned Business Enterprises by a governmental entity in the local market in which the contractor operates.

## COMPLIANCE & ANTI-CORRUPTION

- HS Investment Advisor Policies and Procedures promote compliance with the SEC's Investment Advisor requirements and assist the Firm in preventing, detecting, and correcting violations.
- Policies against bribery and corruption are maintained, consistent with the US Foreign Corrupt Practices Act and similar laws in other countries.
- Any conflicts of interest are identified and either avoided or reported in accordance with HS Conflicts Policy, and specific restrictions apply to contributions for state and local candidates and officeholders.
- AML/OFAC checks are performed on investors both prior to accepting funds from the investor and on an annual basis.
- Political contributions are reported in accordance with HS Investment Advisor Policies and Procedures, Shareholder right to proxy voting is upheld, if applicable.
- In the event any Supervised Person becomes aware of, or suspects, any activity that is questionable, or a violation or possible violation of law, rules or the firm's policies and procedure, the Firm's Chief Compliance Officer (CCO) is to be notified immediately. Harrison Street will not retaliate or penalize any company employee that in good faith reports a suspected violation of law, rules or HSTA's policies and procedures.

## CYBERSECURITY

- The Firm follows data privacy and security procedures detailed in HS Investment Advisor Policies and Procedures for IT infrastructure, software, and maintenance.
- Regular training is provided to employees on cybersecurity protocols.
- The Firm's Operating Partner Cybersecurity Program is maintained and followed to mitigate risk at the asset and operating level by evaluating and advising on security improvements.
- Harrison Street's Business Technology Group evaluates risk classifications, provides recommendations to partners, and connects partners to third-party consultants and vendors as needed.

## RISK MANAGEMENT

- Risk assessments are led by the Firm's CCO and are conducted periodically and shared with EC. Risk topics are identified by the CCO team and Firm Directors, with input from industry trends, analysts, stakeholders, and investors. The Firm's Risk Committee identifies top priorities for risk mitigation, which are then addressed by internal teams. Results of this work are presented to Risk Committee and may be further shared with the EC.
- Risk management concepts are incorporated in the investment committee process, which includes at minimum a slide dedicated to risk management and a variety of sensitivity analyses.
- Risk management concepts are incorporated into asset management processes including reviewing strategy, expenses, budget plans, and portfolio management reporting to investors.
- The Firm actively prepares for unforeseen interruption to normal business practices and has established the following policies and procedures: Disaster Recovery, Business Continuity, and "Black Swan" events.

## EMPLOYEE DEVELOPMENT & RETENTION

- Follow occupational safety, worker rights, and labor management regulations as defined in the HS Employee Handbook.
- Provide regular and relevant sustainability training to employees, such as, investor reporting standards, best practices in asset management, ESG risks and opportunities, diligence procedures, etc.
- Integrate sustainability into the corporate office operations, corporate travel, and purchasing. Obtain both LEED and Fitwel Certifications, and site near public transportation options.
- Provide an active, engaging, and ergonomic workspace with abundant natural light, external views, and healthy indoor air quality.
- Support employee wellness by providing access to healthy meals and snacks, coordinated wellness challenges, and access to workout facilities. In addition, provide biometric screening, health coaching, personal action plans, and health incentives.
- Support employee's work/life balance. Provide employees at VP and above unlimited personal time off (PTO). Provide employees with summer and holiday Fridays, where employees have the option to leave at noon.
- Support successful employee growth and retention by providing annual reviews to 100% of employees, reimbursing professional development, and offering a robust employee benefits package which includes a no-deductible health care plan covering 90% of the premium, transit subsidy, and 3% Safe Harbor Contribution.
- Provide a highly competitive and performance-oriented compensation package, comprised of base salaries and annual bonuses, to attract and retain best-in-class team.
- Perform a third-party compensation study every three years to ensure the Firm is offering a compelling economic package to its employees that is competitive to the industry.
- Provide members of the Firm with the title Vice President opportunity to invest personal capital into the Firm's products that allow for an equity investment.
- Evaluate the effectiveness of employee benefit offerings through an annual employee satisfaction survey, return to work rates, and retention figures.

## DIVERSITY, EQUITY & INCLUSION

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Build an inclusive culture that fosters equal opportunities and continuous development at different career stages.

- Dedicate a diversity, equity and inclusion committee to building an inclusive environment which allows everyone to thrive by supporting and celebrating the backgrounds of team members and valuing the unique perspectives they bring to the table.
- Follow equal employment opportunity requirements as detailed in the HS Employee Handbook.
- Implement best hiring practices, such as auditing job descriptions to eliminate unconscious bias, providing accessibility assistance to disabled applicants, presenting diverse candidate slates, and conducting blind resume screening.
- Expand the company's pipeline of potential talent by engaging in aligned foundations and minority internship programs.
- Provide mandatory employee training led by a third-party expert consultant on implicit bias to understand how

unconscious processes undermines recruiting efforts and employee development.

- Report employee and management statistics quarterly, showing trending gender and ethnicity data to evaluate the effectiveness of hiring practices and employee retention.
- Provide full-time employees paid parental leave, regardless of gender. The parental leave policy is 16 weeks, and employees are not required to exhaust their PTO during their leave.
- Provide a phased return to work plan to support parents after parental leave. Upon returning to work, nursing mothers are provided a dedicated sanitary, equipped, secure, and comfortable room for pumping. To help offset childcare costs for working parents, employees are provided a subsidized Dependent Care Account.

## **GIVING & SERVICE**

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Promote and provide opportunities for team members and the Firm to dedicate their time, talent, and funds to those in need.

- Evaluate local community needs annually and determine how philanthropic donations should be invested.
- Offer volunteer opportunities to employees to engage with the community each quarter and coordinate a company-wide Annual Day of Service.
- Develop the next generation of talent through a structured and proven successful internship program.
- Provide an annual Charitable Gift Match program to employees.

## **PARTNER SERVICES**

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Promote the acceptance and implementation of business improvement and differentiated practices among partners.

- Fully understand each operating partner's culture, management team, business processes, and company strategy to adequately tailor solutions that support their continuous improvement.
- Evaluate opportunities to improve asset operations and solve common issues experienced in the Firm's asset classes.
- Evaluate and compare the performance of operators within the same asset class reveal best practices that can be applied to underperforming assets.
- Facilitate network engagement among operators in the same asset space and connect operators to industry experts and research.
- Provide annual guidance documentation of ESG procedures.
- Facilitate identifying, learning, and sharing of operators' best practices.

# INVESTMENT OPERATIONS

## INVESTMENT LEVEL ESG STRATEGY & DECISION MAKING

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In addition to focusing on ESG at the company level, the Firm aims to assess and manage material ESG opportunities and risks across the investment lifecycle.

- Portfolio Management and the Impact Team define the material ESG objectives, initiatives, data tracking, and reporting strategy for the applicable investment vehicle.
- Funds invest in the areas of Education, Healthcare, Life Science, Infrastructure and Storage in accordance with the investment restrictions as outlined in each Fund's respective Limited Partnership Agreement. The company generally seeks to exclude investments in assets involved with armaments (manufacture or storage), tobacco and tobacco-related products, gambling, pornography, prostitution, child labor, endangered wildlife, or prohibited substances.
- The degree of information access, influence, and control that Harrison Street has differs amongst the investment vehicles, enabling and requiring various levels of monitoring and management.

### UNDERWRITING & DILIGENCE

- Present known environmental, social, and governance attributes at the asset, likely opportunities, and climate risks into investment committee memo. Physical climate risks shall be defined using an approved third-party climate risk software.
- Perform ESG diligence as defined In the ESG Transactions Procedure, performing activities such as third-party assessments of environmental risk, property condition, efficiency, solar, and climate risk resiliency, and including material findings into asset business plan.
- Conduct robust diligence and background checks on new partners to ensure alignment on compliance criteria. For new deals with an existing partner, background checks are conducted every three years.
- Maintain internal due diligence policy, procedures, and checklists for specific asset classes and investment vehicles detailing the above activities.

## EFFICIENT OPERATIONS

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Optimize assets for efficiency through active management and investment in clean technology.

### NEW DEVELOPMENT

- New developments will seek to incorporate enhanced efficiency standards, carbon emissions goals, and wellness standards consistent with the applicable investment strategy and defined in the [HS Development ESG Policy](#).
- Provide education and access to expert consultants where needed to developers to evaluate sustainable building strategies and promote long-term economic benefit and tenant wellbeing.



- Collaborate with development partners to integrate viable sustainability strategies into project proforma and design plans on a case-by-case basis, considering market, building type, tenant population, and portfolio goals.

## PROPERTY MANAGEMENT

- Communicate ESG expectations to operators through regular engagement, webinars, and through the [HS Property Manager ESG Policy](#)
- The Firm expects each operator to optimize tenant health, safety, and emergency preparedness and supports operators in following the [HS Emergency Preparedness Guidelines](#).
- Property managers shall track utilities, carbon, waste, and certifications at the investment level. They shall seek to reduce consumption and cost through audits and retrofits, and actively participate in energy benchmarking.
- Capital expenditures and refurbishments shall seek to improve the asset ESG performance. ESG improvement projects shall document the investment opportunity, payback, and valuation prior to execution.
- Include ESG factors in annual business plans and “Hold Sell” Analysis if material to the sector and market.

## HEALTH & WELL-BEING

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Support the health and well-being of residents, tenants, and staff through healthy building design and operations.

- The Firm seeks to integrate relevant clauses to support ESG objectives in Tenant leases.
- Tenants and residents are engaged in an annual satisfaction survey as required by HS Property Manager ESG Policy. Based on survey results, programs are implemented to ensure tenants are engaged in meaningful dialogue to promote satisfaction with the asset and property management.
- Support operators in providing wellness amenities and programming for tenants such as: outdoor spaces, fitness programs, community outings, etc.
- Pursue third-party healthy building certification on buildings that are applicable and occupied so investments meet a certain standard of health.
- Work alongside operators to review policies and procedures and to help implement new tools to enhance and expand health and safety programs.
- Provide guidelines to operators for enhanced Emergency Preparedness and Response Plans for cybersecurity, active shooters, infectious disease control, resident evacuation/relocation procedures, etc.

## CLIMATE RESILIENT & CARBON EMISSIONS REDUCTION

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Strengthen the resiliency of portfolio to climate-induced risks; capture opportunities and minimize the contribution to global emissions.

- Assess material climate risk indicators across investment entities and assets, including but not limited to wildfires, inland flooding and severe storms, hurricanes and storm surge, and sea level rise.
- Evaluate factors such as rising energy prices, energy generation regulation, and water price/scarcity to identify on-site generation or aligned efficiency measures that should be included in asset design.
- Assess asset resiliency to natural disasters and prioritize measures such as energy backup systems,

mitigation/adaptation strategies, and insurance coverage.

- Analyze existing assets and new developments to determine the economic viability of renewable energy installations to reduce GHG emissions and hedge increasing energy prices.
- Track climate-related metrics; including but not limited to: Greenhouse Gas Emissions, Energy Usage, Water Usage, Natural Disaster Risk, and Risk Adaption Capex.

#### CARBON EMISSIONS REDUCTION COMMITMENT AND PATHWAY TO NET ZERO

- Maintain net zero carbon emissions operations for Scope 1, 2, and 3 at the Firm's corporate offices.
- Implement the carbon emissions reduction pathway across the investment portfolio as outlined in the Firm's Climate Action Plan, which consists of energy efficiency programs, on-site solar, procurement of renewable electric, tenant engagement, and decarbonizing of new construction and major renovations.
- Maintain alignment with SBTi and the Paris Climate Accord by tracking to the Firm's 2025 portfolio goal of 70% carbon emissions reduction over the 2020 baseline for Scope 1 and Scope 2 emissions.
- Pursue strategies to reduce Scope 3 tenant emissions through supporting the efficiency improvements in tenant spaces and the strategic installation of EV chargers.

## ESG REPORTING & DISCLOSURE

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Track and report ESG management procedures, KPIs, and financial indicators for the Firm and select funds.

- Report ESG material activities quarterly in an Impact Dashboard by Firm and select Funds.
- Track ESG value add projects and monitor the monetary impact on asset NOI and valuation.
- Monitor material ESG issues and climate-related financial risks that may impact the value of the portfolio and report following guidance from the Task Force for Climate-Related Financial Disclosures (TCFD).
- Report annual ESG management and performance data to the Global Real Estate Sustainability Benchmark (GRESB) and the Principles of Responsible Investing (PRI).
- Report annual ESG management and performance data for the Firm and key funds through a Corporate Impact Report aligned with the GRI reporting framework.
- Track ESG Goals & KPIs for each fund per the entities' ESG investment strategy.

## CONTACT

For more information, contact the Harrison Street  
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