



# Human Rights Policy

Elme Communities (“Elme”) is committed to protecting and respecting the human rights and dignity of all persons impacted by our business and to ensuring that all operations function with integrity. Respect for human rights is a fundamental component of our commitment to engage in ethical business conduct and practices to best serve our residents and associates.

This Human Rights Policy, and the principles herein, are part of a wider group of governance documents for our company, including but not limited to, our Code of Conduct and Ethics and our Vendor and Supply Chain Code of Conduct.

In line with the UN Guiding Principles on Business and Human Rights, we took direction from the United Nations (UN) International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work to inform our approach in developing this Human Rights Policy. However, this policy is our own and reflects our own standards.

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

## A safe and inclusive community

**Health, Safety and Wellbeing.** Elme is committed to fostering a safe and healthy work environment, compliant with all applicable health and safety laws, regulation, and internal directives. As part of that policy, we encourage each employee to also be individually responsible for maintaining a safe and healthy workplace for all by following, and encouraging others to follow, safety and health rules and practices by and reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Elme offers a variety of employee benefits, which can be found on the recruitment page of our website. Additionally, we provide an overarching wellness program that supports and encourages employees to continuously improve their physical, mental, and financial wellbeing. Some aspects include biometric screenings, personal finance check-ups, and healthy lunch challenges. Also, our technological capabilities allow our employees the flexibility to work from anywhere at any time. This allows us to easily meet our residents’ needs, as well as support the work-life balance of our employees.

**Discrimination:** Elme believes a diversity of backgrounds, experiences, cultures, ethnicities, and interests leads to new ways of thinking and drives organizational success. We provide

equality of opportunity and treatment for purposes of eliminating discrimination. Elme makes employment decisions (e.g., hiring, promotions, terminations) without regard to a person's race, ethnicity, color, religion, sex, national origin, sexual orientation or gender identity, pregnancy, age, disability, military status, or any other status protected by the law or other status of individuals unrelated to the individual's ability to perform work.

To demonstrate our commitment to diversity and inclusion, we formed a Diversity, Equity, Inclusion, and Belonging Council (the "Council") to spearhead our diversity and inclusion initiatives. With direct oversight by the Senior VP and CIO, the Council both tracks and monitors our diversity metrics and facilitates learning and training opportunities for the company.

At the corporate office and at our properties, all employees are provided training on the prevention of housing discrimination under the Fair Housing Act.

***Discipline:*** Elme forbids any form of corporal punishment, mental or physical coercion, or verbal abuse.

***Harassment:*** Elme is committed to providing a workplace free from discrimination, harassment, or any other form of abuse. We encourage reporting of all incidents of discrimination and sexual harassment, and we promptly investigate each complaint.

## **An ethical workplace**

***Child Labor:*** Elme expressly prohibits the use of child labor in accordance with ILO Convention 138.

***Forced Labor:*** Elme does not condone nor does Elme permit forced or compulsory labor. We are an at will employer and are committed to a workplace that is free from any form of human trafficking, slavery, abuse, and/or exploitation.

***Working Hours and Compensation:*** Elme is committed to treating employees fairly and fully complies with applicable labor standards and applicable laws, including those that relate to minimum wage requirements, standard working hours, overtime hours and wages, and holidays.

***Anti-Corruption/Anti-Bribery/Conflicts of Interest:*** Per our Code of Conduct and Ethics Policy, Elme prohibits corruption, including extortion and bribery. All employees must avoid any situation in which personal interest conflicts, or has the appearance of conflicting, with the best interests of the company.

## **Remedy and Accountability**

Elme strives to create a workplace in which honest and open communications among all employees are valued and respected.

Elme continually evaluates and reviews how best to strengthen our approach to addressing human rights and is committed to continuing to increase the capacity of Elme's management to effectively identify and respond to concerns.

Elme also ensures employees are aware of this Human Rights Policy by requiring all employees to acknowledge compliance with Elme policies annually. Any concerns about violations of or misconduct related to this Human Rights Policy may be reported in confidence and without retribution to our Human Resources group, our Legal group, or through Elme's anonymous reporting hotline.

## **Oversight**

The Corporate Governance/Nominating Committee (the "Committee") of our Board of Trustees (the "Board") is charged with advising management and the Board on corporate social responsibility and human capital matters, such as this policy. This policy shall be reviewed at least annually by the Committee.