

# *INTEGRITY PLEDGE*

***2024***





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# THE PLEDGE

EDENS (the “Company”) was founded more than fifty years ago with an unwavering commitment to integrity. Our Company’s success is reflected in its reputation in the marketplace. Today, led by our reputation, we are entering a period that could be the most exciting in our Company’s history.







Every employee is a custodian of EDENS' reputation. Our Integrity Pledge and its supporting Positions (collectively, the "Pledge") were developed to uniformly convey the Company's core value of Integrity and define our business ethical standards, which we ask all employees to endorse, embrace and embody in all business practices. The Pledge also affirms our commitment to the highest standards of professional conduct and offers guidance in acting or making decisions on behalf of EDENS without compromising integrity.

The Pledge is not intended to address every possible situation that you could encounter while conducting the Company's business. There is no substitute for personal integrity and good judgment. Periodically, you will be required to review the Pledge and acknowledge your understanding of, and compliance with, the Pledge and the supporting Positions, incorporated by reference throughout this document.

The Pledge is built on our corporate values and encompasses six key tenets:

- Avoiding Conflicts of Interest
- Preserving Confidentiality
- Maintaining the Highest Standards of Professional Conduct
- Providing Accurate Information Reporting
- Protecting Company Resources
- Individual Responsibility

Please refer to the following definitions as referenced throughout the Pledge and the supporting Positions:

**Executive Officer**—the Company's Chief Executive Officer, Chief Investment Officer, Chief Development Officer, or Chief Financial Officer

**Officer**—any officer level position (Executive Officer, Managing Director, Sr. VP, Vice President, etc.)

**Manager**—an employee with one or more direct reports or who has management responsibility for a function or department (including an Executive Officer or Officer)

This is NOT AN EMPLOYMENT CONTRACT. Please refer to the Acknowledgement which can be found in the Elly Library.

# AVOIDING CONFLICTS OF INTEREST

The Company's relationships are one of its most valuable assets. Doing business with people we know and trust has always been essential to EDENS' success. However, conflicts of interest must be avoided or properly disclosed to ensure we are always operating at the highest level of integrity.





A conflict of interest can arise when an employee's personal interests (material, financial or otherwise) influence, or appear to influence, that employee's ability to act in the best interest of the Company. Every employee should act with integrity and avoid actual or apparent conflicts of interest between personal and professional relationships. Under no circumstance should you give or accept, directly or indirectly, any gifts, loans or cash payments, other than in accordance with the **Position Regarding Conflicts of Interest**, which can be found in the Elly Library.

Each employee must exercise his or her own good judgment in determining whether any gift or entertainment is acceptable within the parameters of the Pledge. If you are uncertain, seek the approval of an Executive Officer. If you receive a gift that does not clearly fit within this Pledge, promptly report such gift to an Officer.

Please refer to the **Position Regarding Conflicts of Interest** for more specific detail.





# PRESERVING CONFIDENTIALITY

The Company is a leader in our industry. Our information, business processes, technology and people are truly proprietary and provide a tangible competitive advantage.





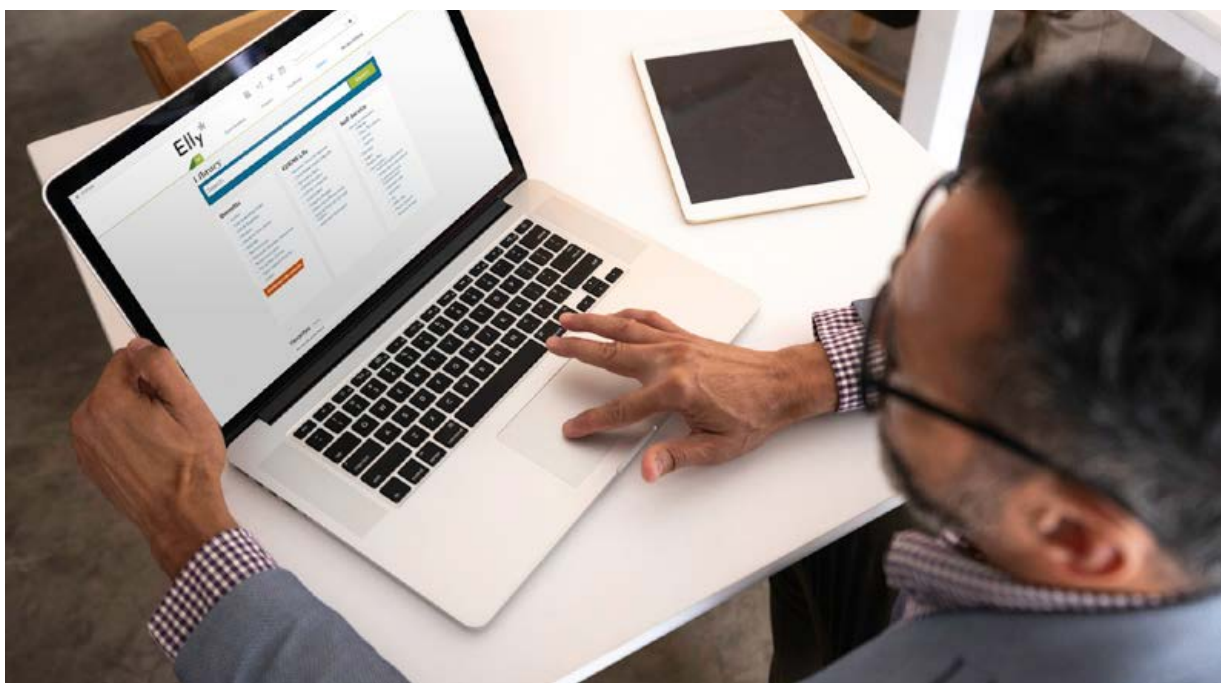
We are highly respectful of each of our stakeholders, and our employees enjoy business transparency that allows us to operate in a clear, communicative and accountable way. We are also confident that our employees understand the sensitivity of internal business information and that confidentiality is of utmost importance.

Confidential business information acquired as a result of your position or in the course of your employment with the Company must be protected. Any disclosure must be authorized by an Officer. Notify an Officer if circumstances or applicable laws or government regulations lead you to believe confidential information must be disclosed. Confidential business information means any data or information that is valuable to the Company and is not generally known to the public or to competitors of the Company, including trade secrets, information that may be of use to competitors, or information that could be harmful to the Company or its investors, lenders, tenants or customers, if disclosed. Care should be taken to

properly shred highly-confidential information before depositing in recycling bins or waste baskets.

Confidential business information should not be shared with anyone outside the Company (except on an as-needed and authorized basis), including family and friends. You remain under an obligation to keep all information confidential even if your employment or position with the Company terminates for any reason. In connection with your termination or separation of employment, you acknowledge and agree that confidential business information remains the property of the Company and that you should promptly return or destroy (at the Company's option) any copies of the Company's confidential business information in your possession.

This policy does not prohibit employees from discussing their wages or terms and conditions of employment amongst themselves or third parties.





# MAINTAINING THE HIGHEST STANDARDS OF PROFESSIONAL CONDUCT

The Company empathizes with all people, including those who may be different from us. Empathy is the root of kindness, compassion, understanding and respect.





We are all expected to treat each other, retailers, investors, lenders, vendors and any other third party with professionalism, integrity and courtesy at all times. We embrace diversity and are respectful of one another's differences and we are committed to creating and fostering a diverse and inclusive organization and culture that allows all members of its community to not only succeed based on merit, but thrive, and appreciate our shared humanity.

Employees are required to comply with all applicable laws and regulations of federal, state and local governments and applicable private or public regulatory agencies.

We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment based on any protected classification under federal, state or local law. Examples of prohibited conduct include comments based on race, ethnic characteristics or sexual orientation and unwelcome sexual comments or advances. All employees should adhere to the Company's **Position Regarding Harassment-Free Workplace**, which can be found in the Elly library.

The Company strives to provide employees with a safe and healthy work environment. Each employee has responsibility for maintaining this environment for all employees by following health and safety rules and practices, and reporting accidents, injuries and unsafe equipment, practices and conditions.

Employees should report to work in condition to perform their duties, free from the influence of alcohol or illegal drugs or marijuana in states where medical and/or recreational use is legal. Reporting to work under the influence of alcohol, the possession or use of illegal drugs, or the use of legal drugs for purposes other than directed by a physician, will result in disciplinary action, up to and including termination.







# DIVERSITY AND INCLUSION

EDENS is committed to creating and fostering a diverse and inclusive organization and culture that allows all members of its community to not only succeed based on merit, but thrive, and appreciate our shared humanity.

Our greatest asset is our people. The collective sum of the individuality, life experiences, knowledge, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievements, as well.

We embrace and encourage our employees' differences in race; color; religion; national origin; sex; sexual orientation; gender identity or expression; pregnancy, childbirth, or related medical conditions; age; disability or handicap; citizenship status; service member status; genetic information; or any other category protected by federal, state, or local law and other protected characteristics that make our employees unique.



Our goals with respect to diversity apply to all aspects of employment. We strive to ensure that our recruiting efforts are designed to identify candidates from all backgrounds, always ensure that our hiring and other employment decisions are based on qualifications and job performance. We strive to encourage:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees:

- Have a responsibility to treat others with dignity and respect at all times.
- Are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored events.
- Are also required to attend and complete annual diversity training to enhance their knowledge to fulfill this responsibility.

All employees should adhere to the Company's Position Regarding Harassment-Free Workplace, which can be found in the Elly library. Please refer to the **Position Regarding Harassment-Free Workplace** for more specific detail.



# PROVIDING ACCURATE INFORMATION REPORTING

The Company believes in a transparent approach to business and endeavors to remove barriers and facilitate effortless access to relevant, accurate and consistent information by its employees, investors, lenders and other constituents.







The Company requires individuals to act in good faith, responsibly, with due care, competence and diligence without knowingly or recklessly misrepresenting material facts and not allowing our independent judgments to be subordinated or compromised. Employees should provide information that is full, fair, accurate, timely and understandable in all reports and documents, whether to internal or external audiences.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls, where applicable.

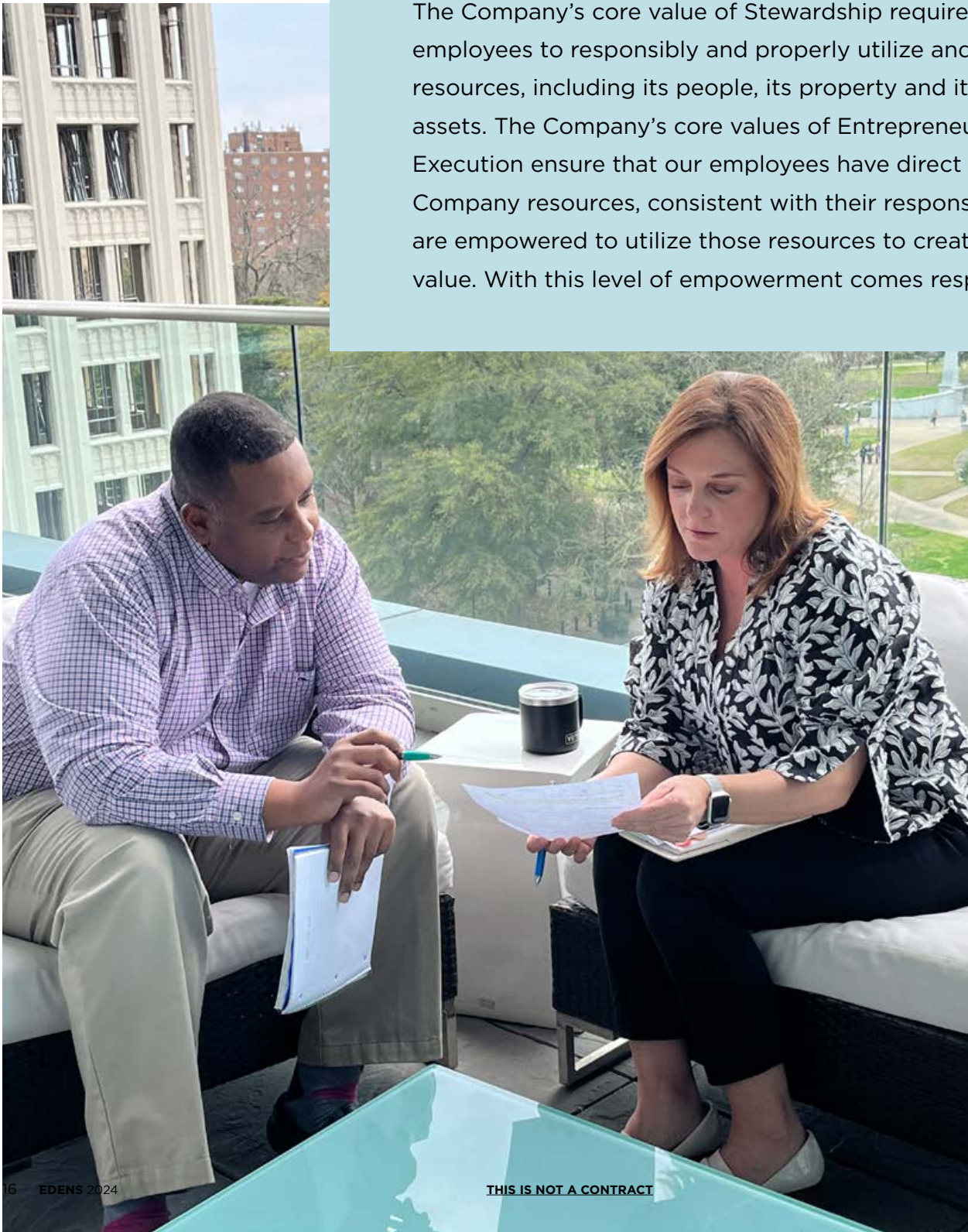
Business records and business-related communications often become public. As a result, we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people, companies or organizations that can be misunderstood or misinterpreted. This applies to all business communication, including e-mail, internal memos and formal reports.

Mistakes should never be covered up; instead, they should be fully disclosed to your Manager. Each Manager should, in turn, make appropriate disclosure to an Officer. Inappropriate access to or modification of any accounting or other business records is prohibited. Falsification of any Company, employee, tenant or third-party record, including lease documents and contracts, is prohibited. Knowledge of any employee falsifying or tampering with Company information must be reported to an Executive Officer. Such falsification will result in disciplinary action, up to and including termination.



# PROTECTING COMPANY RESOURCES

The Company's core value of Stewardship requires all employees to responsibly and properly utilize and develop its resources, including its people, its property and its financial assets. The Company's core values of Entrepreneurship and Execution ensure that our employees have direct access to Company resources, consistent with their responsibilities, and are empowered to utilize those resources to create shareholder value. With this level of empowerment comes responsibility.





Every employee is personally responsible for showing respect for and protecting the Company's property and resources—including safeguarding and accounting for all Company property and personnel data that is entrusted to his or her personal control. No property of the Company should be loaned, sold, taken, given away, intentionally damaged, used for personal benefit or for the benefit of anyone other than the Company, unless specifically approved by an Executive Officer.

Property of the Company includes, without limitation:

- Cash, checks, company credit cards and similar cash equivalents.
- Tangible and intangible property such as real estate, equipment, supplies, records and reports.
- Trademarks and other intellectual property.
- Computer hardware, software and data.

General guidelines for the use of Company property can be found in the Elly library, as follows:

- Legally binding commitments are expected to comply with the Company's **Position Regarding Contracts and Commitments**.
- Business travel expenditures are expected to comply with the Company's **Position Regarding Corporate Travel & Entertainment Reimbursement**.
- Use of technology and information platforms are expected to comply with the Company's **Position Regarding Technology Use**.





# INDIVIDUAL RESPONSIBILITY

The Company promotes a culture of individual empowerment, responsibility, accountability and action. Every employee must comply with the Pledge and supporting Positions and agree to act if they becomes aware of conduct that violates the Pledge or supporting Positions. Managers have additional responsibilities, as described below.







EDENS' Managers are responsible for enforcing the Pledge and are accountable for creating a work environment that fosters adherence to the Pledge. Managers will be receptive and responsive to ethical concerns and issues raised by any employee. Managers are also expected to remain vigilant and sensitive to potential problem areas or perceptions of impropriety, taking appropriate remedial actions promptly. But, above all, Managers are required to serve as positive role models for ethical conduct at all times.

Questions and reports of known or suspected violations of the law, government regulations or this Pledge are approached with sensitivity and discretion. The Company will respect your confidentiality to the extent possible consistent with the law, government regulations and the Company's need to investigate your concern.

## **SEEKING HELP AND INFORMATION**

If you are faced with a difficult business decision that is not addressed in this Pledge, ask yourself the following questions:

- Is it legal?
- Is it honest and fair?
- Is it in the best interest of the Company?
- How does it make me feel about myself and the Company?
- Would I feel comfortable if it was published with my name in the newspaper or on the internet?

If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company's high ethical standards, seek help and guidance. We encourage you to contact your Manager or any Officer or utilize the anonymous Integrity Helpline which is available through a link at [www.EDENS.com](http://www.EDENS.com).

The Company strictly prohibits retaliation against an employee if that employee seeks help or reports known or suspected violations of this Pledge. Reprisal or retaliation against an employee who sought help or filed a report will result in disciplinary action, up to and including termination.

# SUMMARY

Each of us, regardless of location or level, is expected to adhere to this Pledge and is separately responsible for our own actions. Conduct that violates this Pledge cannot be justified by claiming that it was ordered by someone in higher management. Situations where higher management orders conduct that violates this Pledge must be reported to Human Resources and/or an unrelated Executive Officer. Conduct prohibited by this Pledge and its supporting Positions will result in disciplinary action, up to and including termination.

This Pledge sets out the basic professional expectations of all employees and in doing so enhances our relationships with retailers, vendors, contractors, investors, lenders and each other. This Pledge is not meant to restrict how the Company does business, but rather lays out a clear playing field within which each of us has the freedom to conduct business and build a career.

If you have any questions about the application of the Pledge in any situation, you are encouraged to take advantage of the Company's open door and informal environment and raise your concerns with your Manager or any Officer. Additional information can be found in the **Position Regarding Employment Matters**, which can be found in the Elly library.

Because EDENS employees work in a number of different states, these general policies may be supplemented by additional policies in accordance with state law. In addition to reviewing and understanding the general policies, it is EDENS expectation that each employee will review the state addendum applicable to their state of work. State addendum are located on [www.edensbenefits.com](http://www.edensbenefits.com). In any situation in which there is a conflict between the general policies and the state addendum, the state regulations will generally apply.











# POSITIONS

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# POSITION REGARDING CONFLICTS OF INTEREST

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The term conflict of interest refers to situations in which personal and/or financial considerations may compromise, or have the appearance of compromising, an employee's professional judgment in exercising EDENS obligations.

For the purposes of this Position:

- "Family Member" means a child, stepchild, parent, stepparent, grandparent, spouse, domestic partner, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, cousin and any person (other than a tenant or employee) sharing the household of a Company employee.
- "Related Party" means a Family Member or employee.
- "Related Party Transaction" means acting on behalf of the Company in any transaction in which a Related Party has a significant direct or indirect financial interest.

An employee should disclose to their Manager any material transaction or relationship that reasonably could be considered a Related Party Transaction or could be expected to give rise to a conflict of interest. Any such transaction is prohibited unless expressly approved in advance in writing by an Executive Officer. Significant transactions with Related Parties may need to be approved in writing by the Audit Committee of the Board of Directors. **Please reference the Conflict of Interest and Excessive Gifts Disclosure Form, which can be found in the Elly Library.**

In determining whether to approve a Related Party Transaction, an Executive Officer will consider the following factors to the extent relevant to the Related Party Transaction:

- Whether the terms of the Related Party Transaction are fair to the Company and on the same basis as would apply if the transaction did not involve a Related Party;
- Whether there are business reasons for the Company to enter into the Related Party Transaction;
- Whether the Related Party Transaction would impair the independence of the Company employee; and
- Whether the Related Party Transaction would present an improper conflict of interest for any employee of the Company, taking into account the size of the transaction, the overall financial position of the Company employee and the direct or indirect nature of the Company employee or Related Party's interest in the transaction and the ongoing nature of any proposed relationship.

- Other factors as determined by the Executive Officer.

Annually, the Executive Officers will be provided with the details of each new and existing Related Party Transaction, including the terms of the transaction, the business purpose of the transaction and the benefits to the Company and to the relevant Related Party.

## GIFTS & ENTERTAINMENT (PERMITTED IF REASONABLE)

The exchange of business courtesies, such as reasonable entertainment and gifts, with persons or entities with whom the Company does or may do business ("Clients") are generally permissible; however, you must use good judgment in giving and accepting such entertainment and gifts and should adhere to the following general guidelines:

- Gifts and entertainment with Clients must support the legitimate business interests of the Company and should be reasonable and appropriate.
- Individuals should use good business judgment when giving and/or receiving gifts or entertainment. The items must be of reasonable value, business related and neither an inducement nor a reward for any particular business decision.
- As it relates to the acceptance of gifts and entertainment from Clients:
  - Employees may not accept compensation or monetary gifts of any amount.
  - Employees may not accept tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$150 (individually or in the aggregate) unless approval is obtained from an Executive Officer.
- As it relates to the giving of gifts and entertainment:
  - All gifts and entertainment other than reasonable business meals must be preapproved by an Officer.
  - All gifts or entertainment given in excess of \$150 must be preapproved by an Executive Officer. All gifts and entertainment expenses must be properly accounted for in expense reports.

All gifts and entertainment given or received in the course of business (including tickets or invitations to events or venues) should exemplify and maintain the highest standards of the Integrity Pledge.



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## OTHER (EXPRESSLY PROHIBITED)

- Personally (includes Family Members) benefiting from opportunities that are discovered through your position or employment with the Company, including but not limited to the use of Company property, contacts, information or non-public, tenant or vendor information.
- Accepting employment or engaging in a business (including consulting or similar arrangements) that may conflict with the performance of your duties or the Company's interest while employed by the Company. Other examples include, but are not limited to: outside employment which prevents the employee from being able to work beyond normal working hours (when such availability is a regular part of the employee's job); conducting outside employment during the employee's work hours; utilizing EDENS telephones, computers, supplies, or any other resources, facilities or equipment other than as part of your employment with the Company; working with another organization which has contracts with or does business with the Company; or engaging in activity that may be reasonably perceived by members of the public as a conflict of interest or otherwise discredits the Company. This policy may not apply in all jurisdictions where these restrictions are prohibited by state or local law. Please see State Addendum section on [www.edensbenefits.com](http://www.edensbenefits.com).
- Competing, or preparing to compete, with the Company. This policy may not apply in all jurisdictions where these restrictions are prohibited by state or local law. Please see State Addendum section on [www.edensbenefits.com](http://www.edensbenefits.com).

## OTHER

- When doing business with a Company vendor personally (includes Family Members), employees must ensure that products and services are being exchanged on an arms-length, market basis.
- Employment of Family Members, regardless of position or department, must be approved in advance by the CEO. A conflict of interest may exist when one Family Member would approve, oversee, or influence decisions by or about another Family Member.

# POSITION REGARDING HARASSMENT-FREE WORKPLACE

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Every employee of EDENS, vendor, customer, and anyone else that interacts with our employees has the right to a work environment free of unwelcome verbal or physical conduct that harasses, disrupts, or interferes with their work performance. Harassment is unwelcome conduct that discriminates against you or another employee, unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. This would include harassment based upon an individual's race; color; religion; national origin; sex; sexual orientation; gender identity or expression; pregnancy, childbirth, or related medical conditions; age; disability or handicap; citizenship status; service member status; genetic information; or any other category protected by federal, state, or local law.

Because EDENS' employees work in a number of different states, these general policies may be supplemented by additional policies in accordance with state law. In addition to reviewing and understanding the general policies, it is EDENS expectation that each employee will review the state addendum applicable to their state of work. State addendum are located on [www.edensbenefits.com](http://www.edensbenefits.com). In any situation in which there is a conflict between the general policies and the state addendum, the state regulations will generally apply.

If you have any questions about what constitutes harassing behavior or what conduct is prohibited by this policy, please discuss the questions with Human Resources.

At a minimum, the term "harassment" as used in this policy includes:

- Offensive remarks, comments, jokes, slurs, or verbal conduct pertaining to an individual's race; color; religion; national origin; sex; sexual orientation; gender identity or expression; pregnancy, childbirth, or related medical conditions; age; disability or handicap; citizenship status; service member status; genetic information; or any other category protected by federal, state, or local law.
- Offensive pictures, drawings, photographs, figurines, or other graphic images, conduct, or communications, including e-mail, faxes, and copies pertaining to an individual's race; color; religion; national origin; sex; sexual orientation; gender identity or expression; pregnancy, childbirth, or related medical conditions; age; disability or handicap; citizenship status; service member status; genetic information; or any other category protected by federal, state, or local law.

- Offensive sexual remarks, sexual advances, or requests for sexual favors regardless of the gender of the individuals involved.
- Offensive physical conduct, including touching and gestures, regardless of the gender of the individuals involved.

Consistent with this position, patronizing a strip club or similar venue while on Company business is strictly prohibited.

**Report Procedure: If you become aware of a situation involving unwelcome and inappropriate behavior directed toward you, or another employee, whether it is by a fellow employee, a member of management, a business partner, a vendor or a member of the general public, you should report it immediately to Human Resources ([hr@edens.com](mailto:hr@edens.com)). If for any reason you do not feel that you can speak to Human Resources about the situation, or if you feel Human Resources has not properly handled your report, you should report the problem to an Executive Officer or utilize the anonymous Integrity Helpline available through a link at [www.EDENS.com](http://www.EDENS.com).**

Upon receipt of a report under this policy, the Company will investigate the situation and take prompt, appropriate action. Confidentiality of all parties will be respected to the extent possible consistent with our investigation. Any disciplinary action taken in response to the findings of a harassment report will be based on the individual circumstances of each situation. If management concludes that a report of harassment has merit, it will result in disciplinary action, up to and including termination.

The Company prohibits retaliation against employees who have filed reports of harassment or who participate in an investigation of harassment. Employees should immediately report any retaliation to Human Resources, an Executive Officer, or through the Integrity Helpline available at the link at [www.EDENS.com](http://www.EDENS.com).

The Company is serious about enforcing its policy against harassment. We cannot resolve a potential policy violation unless we know about it. You are responsible for reporting possible policy violations to us so that we can take appropriate actions to address your concerns.



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## MANAGERS

EDENS Managers will be held responsible for acts of harassment that are committed, condoned, tolerated or not investigated. Therefore, Managers who know of harassment and fail to report it to higher management, place themselves and the Company in jeopardy.

Managers must immediately report any act or allegation of harassment to Human Resources, an Executive Officer or utilize the anonymous Integrity Helpline available through a link at [www.EDENS.com](http://www.EDENS.com). Managers must support appropriate corrective action, including investigation of the claims, and shall not penalize any person who has reported the existence of such improper conduct or participated in an investigation.

Managers may not make sexual advances, welcome or unwelcome, toward any employee, and should conduct themselves in accordance with the Company's policies at all times. Managers may not date or have any romantic or sexual relationship with any employee working in the same department or chain of command. Managers with such relationships must immediately report them to HR. Managers are also strictly prohibited from retaliating against employees who report harassment or who participate in an investigation of harassment.

Managers who violate any aspect of this policy may be subject to termination and may be held personally liable.

# POSITION REGARDING CONTRACTS AND COMMITMENTS

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As part of the normal course of business EDENS regularly enters into contracts, transactions and other legally binding commitments with a wide array of external constituencies, including tenants, joint venture partners, lenders, contractors and vendors. We have a responsibility to ensure sound stewardship of all Company resources and assets. Therefore, risk management processes are in place to support effective and informed decision-making, as well as to provide for consistent accountability throughout the Company.

In general, any contract, financial commitment or legally-enforceable agreement made on behalf of the Company should be authorized by an Officer of the Company. No person is authorized to sign any document that creates an obligation or undertaking on behalf of the Company unless the contract, transaction or agreement has been reviewed and approved in accordance with the appropriate departmental process/procedure. If no departmental process exists for a given type of commitment, then approval will default to an Executive Officer.

To protect the Company's reputation in the marketplace and ensure adherence to this position, verbal commitments resulting in significant financial obligations are strongly discouraged. Additionally, it is the responsibility of all officers to ensure that the Company does not knowingly enter into contracts and commitments that are not in compliance with the Position Regarding Conflicts of Interests.

All departmental processes and procedures relative to a contract, transaction and/or commitment (a "Contract") must include an approval process ensuring the following:

- Contract has been subject to competitive bidding, in accordance with Company policies.
- Contract is considered to be an arm's-length transaction.
- Contract evaluation has considered cost, quality, schedule and any terms and conditions that are different from those identified in the Company's specific policies or industry standards.
- Contract is in compliance with the Pledge and its associated positions.
- Confidential information received from third parties has been and will be protected.

All departmental procedures entering into Company commitments must be approved by an Executive Officer prior to implementation.



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# POSITION REGARDING CORPORATE TRAVEL & ENTERTAINMENT REIMBURSEMENT

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## OVERVIEW

At EDENS, we have an entrepreneurial spirit which allows for flexibility to be creative and innovative. However, this entrepreneurial spirit does not lessen our fiduciary responsibility to our investors or to the Internal Revenue Service Rules & Regulations for travel and entertainment reimbursements. In our commitment to excellence, expense reports must be:

- Submitted monthly.
- Accompanied by all expense receipts and/or necessary documentation.
- Inclusive of appropriate detail related to the business purpose of the expense or reimbursement.

The review process and the reimbursement turnaround timing are greatly improved when employees submit timely, well documented and organized expense reports. Our ability to identify and dispute card-fraud is significantly impacted when expenses are not submitted timely. Additionally, the Audit Committee and the Company require that all expense reports must be reviewed and approved by Managers.

EDENS will reimburse employees for all reasonable and necessary business expenses incurred during travel for Company business. Each employee is responsible for complying with these travel guidelines and Managers are required to review expense reports for compliance.

- A Manager approving an expense report that does not comply with the Travel & Entertainment Reimbursement Guidelines may be subject to disciplinary action, up to and including termination.
- To ensure approval of and to expedite payment of expense reports, please provide the business purpose of the expense and list all attendees when applicable (i.e., meals).
- Receipts are required for ALL cash expenses (excluding reasonable tips) and must be included with the expense report; unsupported cash expenses will generally not be reimbursed.
- Receipts are required for ALL Company card expenses and must be included with the expense report when submitted.
- Expense reports must be submitted monthly. Company cards are subject to revocation if expense reports are not submitted timely.

A basic value of the EDENS culture is Stewardship. Included in the guidelines are more eco-friendly travel practices that will minimize negative environmental impacts.

## AIRFARE

- All airfare must be booked through the Company's Travel Coordinator or directly through the Concur Travel system and charged to a Company credit card.
- Options such as the use of video and teleconferencing should be considered as an alternative to travel. )))
- Whenever possible, business trips should be planned at least seven days in advance; 21 days in advance is preferred for greatest cost savings.
- Within reason, travelers are expected to use the lowest logical airfare available and consider alternate airports when available.
- Changes to original flight reservations should occur only when there is a business purpose that necessitates the change.
- All air travel must be in "Coach" class, unless pre-approved by an Executive Officer.
- Refundable tickets should be the exception and should be purchased only when there is a valid business purpose.
- Dues and/or initiation fees for airline clubs are not reimbursable.
- The Company will not reimburse for personal points used to book business airfare. Personal points can be applied for upgrades after airfare has been booked through Concur Travel, but is the sole responsibility of the employee.
- In-flight wireless service is not reimbursable, unless justified by a specific business purpose. Recurring in-flight wireless subscription services are not reimbursable.



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## LODGING

- All hotel reservations should be booked through the Company's Travel Coordinator or directly through Concur Travel unless:
- The traveler is participating in a meeting or conference that offers a group rate.
- Trip necessitates a stay at a small, independent hotel that does not participate in global reservation systems.
- Personal costs such as in-room movies and laundry service are not reimbursable.
- Reasonable hotel fitness room fees are reimbursable.
- Charges for meals incurred at a hotel should be itemized within the hotel entry on expense reports.
- Travelers are responsible for canceling hotel room reservations when it is known that the accommodations will not be needed. Charges that are the result of not canceling a reservation within the hotel's policy will not be reimbursed unless sufficient proof of unavoidable circumstances is provided.

## CAR RENTAL

- All rental car reservations must be booked through the Company's Travel Coordinator or directly through Concur Travel.
- A full-size / standard car is the preferred rental vehicle class.
- Travelers should opt for a smaller, more fuel efficient vehicle class for an environmentally-friendly option.
- If an SUV, van or other upgrade is chosen, provide the business purpose and list all passengers.
- Additional insurance should always be declined; Company insurance policies cover this risk.
- Travelers should decline fuel purchase options and refill the car prior to return.
- Dues and/or initiation fees for car rental clubs are not reimbursable.
- Personal vehicles can be used, subject to mileage reimbursement; to the extent it makes better economic sense for the Company.

## MEALS

- Expense report details must include the names of all individuals in attendance and the business purpose. Individuals must use proper business judgment for employee only meals.

## NEWSPAPER SUBSCRIPTIONS

- Individual newspaper or periodical subscriptions and purchases are not reimbursable. Reasonable office reception area subscriptions are an appropriate business expense.

## CONTRIBUTIONS

- Political contributions are never reimbursable to employees (i.e., local, state and federal elections, ICSC PAC and State Issues contributions, etc.). See Position Regarding Conflicts of Interest.
- All charitable contributions by the Company require pre-approval by the Chief Executive Officer. They should be processed for payment through Accounts Payable and not through expense reimbursement.

## MOBILE DEVICES

- See Position Regarding Technology Use.

## MILEAGE

- The standard IRS business mileage rate should be used for mileage incurred with your personal vehicle for business travel, in excess of your normal commute. Mileage to and from the airport is reimbursable, less your normal commute.

## GIFTS & ENTERTAINMENT

- See Position Regarding Conflicts of Interest.

# POSITION REGARDING CORPORATE TRAVEL & ENTERTAINMENT REIMBURSEMENT (CONT.)

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## CORPORATE TRAVEL CARDS

- Approved employees will be issued a card upon submission of a signed Company card agreement. A monthly credit limit is established based on the individual employee's anticipated monthly travel spend. If a higher credit limit is required, the cardholder should contact the Company card program administrator. Business expenses should be charged to the card whenever possible. Cardholders must file monthly expense reports with card activity via the Company's expense reporting system. Failure to file timely reports may result in card revocation.
- The card is not to be used for personal expenses. Inadvertent personal charges must be immediately reported to the Company card program administrator and reimbursed via personal check or payroll deduction. Failure to report and reimburse personal expenses could result in disciplinary action, up to and including termination. If the card is lost or stolen, the cardholder must immediately report it by contacting the Company card program administrator.
- The cardholder must resolve disputed transactions with the vendor and the issuing bank. The cardholder must also notify the Company card program administrator when there is a charge in dispute.
- The card must be immediately surrendered to your Manager or Human Resources upon separation of employment. The cardholder must reconcile all outstanding charges on a final expense report. Any personal and/or un-documented charges will be deducted from the terminated employee's final pay check to the extent allowed by law.
- All non-travel expenses (i.e. permits, utility payments, etc.), should be reviewed with Accounts Payable before any payments are made with a corporate card to ensure expenses are being recorded appropriately.

## NON-REIMBURSABLE EXPENSES (NOT EXHAUSTIVE)

- In-room/in-flight movies
- Laundry service charges
- Mobile device apps and accessories
- Personal toiletries
- Club memberships (Airfare, Car Rental, etc.)
- Newspapers and magazines while traveling
- Excessive employee only meals
- Personal employee celebration activities (i.e., birthdays, showers, etc.)
- Political contributions
- Penalties, fines or tickets, etc.
- Car rental satellite radio
- In-flight wireless recurring subscription services
- Subscriptions (newspapers, periodicals, digital applications, etc.)

# POSITION REGARDING TECHNOLOGY USE

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## OVERVIEW

All Company electronic devices, not limited to: PCs/printers/tablets/scanners; communication systems, not limited to e-mail/IM/voicemail systems; networks including internet access; and mobile computing devices (collectively, the “Company’s Electronic Devices”) are the Company’s property to be used to facilitate the business of EDENS. All information that is temporarily or permanently stored or transmitted with the aid of the Company’s Electronic Devices, remains the sole and exclusive property of the Company and may not be copied or transmitted to any outside party or used for any purpose not directly related to the business of the Company. As such, employees should have no expectation of privacy in connection with their use of the Company’s Electronic Devices.

Employees should use these tools in the execution of their job duties and should not use or access the Company’s Electronic Devices in any manner that is not consistent with the Company’s policies and procedures, including the Integrity Pledge and its underlying positions. Limited, incidental personal use of the Company’s Electronic Devices that does not violate the previously noted prohibition above, does not affect employee productivity, and does not impact Computer System performance is permitted; however, excessive personal use will result in disciplinary action, up to and including termination.

Employees may only use personal mobile devices to access corporate information, when approved by a manager, and only if the device has company authorized mobile-device-management (“MDM”) software installed and is used for appropriate business purposes. Employee may use personal computers to access corporate information as long as the access is made via an IP connection utilizing corporate authorized VPN software or via the Portal. In either case, corporate information must not be stored on a personal computer and may only be stored on personal mobile devices in authorized corporate applications.

Employees are accountable for Company Electronic Devices, and personal computers/mobile devices used for business purposes, and must use reasonable means to protect these devices and minimize the possibility of loss or theft, unauthorized use, or tampering. In the event that any of the above devices are lost or stolen the employee must report the loss immediately to the Technology Service Desk. Theft of equipment should be reported to the authorities and a police report obtained.

At the end of employment, an employee shall not remove any software or data from Company Electronic Devices, and shall completely remove and return all data relating to Company business that is collected, downloaded, uploaded, copied or created. At the request of the Company, a separating employee may be asked to provide proof and/or provide a written statement that all such data has been removed and returned from personal computers or other electronic devices or media used for Company business. The Company has the right to remotely wipe corporate data on personal mobile devices upon separating of employment.

## ACCEPTABLE USE

The Position Regarding Harassment-Free Workplace, which can be found in the Elly library, extends to the use of Company Electronic Devices and personal computers and personal mobile devices used for Company business. Any employee who uses Company Electronic Devices, personal computers or personal mobile devices for Company business in violation of these policies or in any other improper manner will be subject to disciplinary action, up to and including termination. It is not possible to identify every type of inappropriate or impermissible use of the Company’s Electronic Devices. Employees are expected to exercise good judgment and common sense at all times when accessing or using the Company’s Electronic Devices. The following conduct, however, is strictly prohibited:

- Employees may not transmit, retrieve, download, or store inappropriate messages or images relating to race, color, religion, national origin /citizenship status, sexual orientation, marital status, gender, family status, service member status, age, creed, physical or mental disability, pregnancy, childbirth or related medical conditions (or other protected classifications) in accordance with applicable federal, state and local laws.
- Employees may not use Company Electronic Devices in any way that violates the Company’s Position Regarding Harassment-Free Workplace. By way of example, employees may not transmit messages that would constitute sexual harassment; may not use sexually explicit or suggestive screen savers or backgrounds; may not access, retrieve, transmit or print pornographic, obscene or sexually offensive material or information; and may not transmit, retrieve, download, store or print messages or images that are defamatory, off-color, sexual in content or otherwise in violation of our Position Regarding a Harassment-Free Workplace. Employees are also prohibited from making or sending threatening or harassing statements to another employee, vendor, tenant or other outside party.



# POSITION REGARDING TECHNOLOGY USE (CONT.)

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- Employees are prohibited from altering, transmitting, copying, downloading or removing any confidential business information of the Company, or of its vendors or tenants. In addition, employees may not transmit, copy, or download proprietary software, databases and other electronic files without proper and legally binding authorization.
- Employees may not use or allow another individual to use the Company's Electronic Devices for any purpose that is either competitive with the Company or detrimental to its business interests.
- Employees must comply with all laws applicable to trademarks, copyrights, patents and licenses to software and other electronically available information. Employees may not send, receive, download, upload or copy software or other copyrighted or otherwise legally protected information through the Company's Electronic Devices without prior authorization.
- Employees may not solicit personal business opportunities or conduct personal advertising through the Company's Electronic Devices.
- Employees may not engage in gambling of any kind through the Company's Electronic Devices.
- Employees may not test, or attempt to compromise computer or communication system security measures.
- Employees may not engage in day trading, or otherwise regularly purchase or sell stock, bonds or other securities through the Company's Electronic Devices.

## SOCIAL MEDIA USAGE

Social Media includes all forms of public, electronic communication and expression that bring people together by making it easy to publish content to many audiences.

Examples of Social Media:

- Social networking sites (Facebook, Google+, LinkedIn)
- Video and photo sharing sites (Flickr, YouTube, Instagram, TikTok)
- Micro-blogging sites (X, formerly known as Twitter)
- Blogs
- Forums and discussion boards (Yahoo! Groups, Google Groups)
- Collaborative publishing (Wikipedia, Google Docs)

This policy is not limited to these platforms as it covers all forms of social media whether they existed at the time of this policy's creation or not.

EDENS recognizes that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

## KNOW AND FOLLOW THE RULES

Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Care must be taken in ensuring that any posts are in line with the Company's policies and procedures, including the Integrity Pledge and its underlying positions. Discriminatory remarks, harassment, threats of violence, and unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

- Never disclose confidential business or proprietary information on any social media site.
- Only express your personal opinion. Never represent yourself as a spokesperson for EDENS. If you do publish a blog or post online related to the work you do or subjects associated with EDENS, make it clear that you are not speaking on behalf of EDENS. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of EDENS."
- This policy will not be interpreted or applied so as to interfere with the protected rights of employees to discuss or share information related to their wages, benefits, and other terms and conditions of employment amongst themselves or with third parties.

## USING SOCIAL MEDIA AT WORK

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your Manager. Do not use EDENS' email address to register on social networks, blogs or other online tools utilized for personal use.

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## **UNSOLICITED EMAIL**

Significant financial costs are incurred to filter and remove unsolicited email from our system. To eliminate the receipt and transmission of unsolicited Commercial email, the Company complies with federal Anti-SPAM laws. All employees are required to comply with these regulations as well, and should not transmit unsolicited email promoting the Company's business without prior authorization. In addition, to help the Company eliminate receipt of unsolicited commercial email and to further prevent the receipt of offensive or undesired outside email, you should permanently delete unfamiliar or suspicious email from outside the Company without opening it.

## **INFORMATION SECURITY**

Employees are responsible for familiarizing themselves with and complying with all Company policies, procedures and standards dealing with information security. Questions about the appropriate handling of a specific type of information or reports of suspected information security incidents should be directed to either your Manager, the owner of the involved information or the VP - Technology.

## **PASSWORDS**

It is the responsibility of all Company employees to change their password regularly and keep it secret. Passwords should not be stored in non-password protected readable forms either electronically or physically. If employees need to share computer data, they should use appropriate electronic e-mail or shared directories. Passwords should never be shared with or revealed to others, other than authorized Technology personnel. If an employee is informed that their EDENS account or third party application has been compromised, he/she is required to change the password immediately. Every employee is personally responsible for the usage of his/her user-ID and password.

## **COMPUTER VIRUS ERADICATION**

All employees are responsible for taking reasonable measures to protect against virus infection. Employees must not attempt to either alter or disable anti-virus software installed on any computer attached to the company network without the express consent of the Technology department. Any activities with the intention to create and/or distribute malicious programs onto the Company network (e.g. viruses, worms, Trojan horses, e-mail bombs, etc.) are strictly prohibited.

If an employee receives what he/she believes to be a virus or suspects that a computer is infected with a virus, it must be reported to the Technology department. No employee should attempt to destroy or remove a virus, or any evidence of that virus, without direction from the Technology department. Any virus-infected computer will be removed from the network until it is verified as virus-free.

## **ENFORCEMENT**

Violations of the policy may result in disciplinary action, up to and including termination and may be subject to criminal prosecution and/or civil monetary damages.

Please review the full list of IT policies, which can be found on Elly: Library/ Self Service/ Policies/ Technology.

# POSITION REGARDING EMPLOYMENT MATTERS

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## EQUAL EMPLOYMENT OPPORTUNITY AND HIRING

EDENS strives to provide equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, national origin / citizenship status, sex, sexual orientation, marital status, gender identity, family status, service member status, age, creed, physical or mental disability, pregnancy, childbirth or related medical conditions (or other protected classifications) in accordance with applicable federal, state and local laws. The Company complies with applicable state and local laws governing non-discrimination in employment in every Company location. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training.

## EMPLOYMENT AT WILL

It is the desire of EDENS that the employment relationship be a rewarding one. However, the Company recognizes that circumstances change with the passage of time. An employee may leave at any time with or without notice. In some instances, it may be necessary for the Company to end the relationship.

**All employees of EDENS are EMPLOYEES AT WILL. You may terminate your employment at any time for any reason. Likewise, the Company reserves the right to terminate your employment with or without notice and with or without cause.**

## OPEN DOOR POLICY

Employees are always encouraged to discuss suggestions, problems or concerns they have with their Manager or Human Resources. After discussing with their Manager or Human Resources, should a concern not formally be resolved, the employee should request a meeting with an Officer. If the problem or concern still remains unresolved, the issue may be raised to the Chief Executive Officer (if the Chief Executive Officer is involved, the issue must be raised to Human Resources or the Chief Financial Officer).

This open door policy is available for all employees to seek review of any matter, including any incident of employee discipline, personnel decisions, termination from employment or any other Company or job related concerns.

## WORK HOURS AND ATTENDANCE

The Company's normal business hours are 8:30 a.m. to 5:30 p.m., Monday through Friday. Employees are considered full-time if they are regularly scheduled to work 30 hours or more per week. Employees are considered part-time if they are scheduled to work less than 30 hours a week. Meal Period and rest break requirements are followed according to federal, state or local law.

Employees must alert their Manager directly and immediately in the event of an unexpected absence. Employees who are absent from work without notifying his/her Manager are considered unexcused and could lead to disciplinary action, up to and including termination. If an employee who is absent unexpectedly fails to contact his/her Manager three or more days in a row, then the employee will be considered to have abandoned the job and will be terminated.

## COMPENSATION SCHEDULE

Unless otherwise required by law, all employees are paid by direct deposit every two weeks on Friday no later than 5 p.m. on each of the 26 pay periods per year.

## TIME RECORDING

Federal law requires that we keep complete records of hours worked by non-exempt (those who are eligible for overtime compensation) employees. In order to be properly paid, a non-exempt employee must record his/her time worked by completing and submitting a time sheet using our online system showing accurately the number of hours worked each day. Regardless of method, the record of time must be submitted to payroll on the last Friday prior to a payday. Electronic and paper time sheets are Company property, and falsifying time records will result in disciplinary action.

You must never work "off-the-clock." Employees must report any direction to work off the clock immediately to Human Resources. Working off the clock will result in discipline up to and including termination.



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## OVERTIME

The Company will pay overtime to non-exempt employees as required by Federal and State Wage and Hour laws.

- All overtime hours worked must be approved in advance by your Manager.
- Overtime will be paid to non-exempt employees at the rate of one and one-half (1-1/2) times the employee's regular rate of pay for all hours worked in excess of forty (40) hours in a work week (and as otherwise required by state and local law). Holidays and other paid time off during a week do not contribute towards the overtime threshold.
- Hours worked on a company holiday will be paid at the employee's regular rate of pay (and overtime if applicable) and the employee will be given another day off with pay to be used by the end of the calendar year with Manager approval.
- The Company will not count the hours credited to an employee on paid leave as hours worked for purposes of computing overtime.

## DRESS GUIDELINES

At EDENS, employees have the option to wear either business dress or business casual dress throughout the year. Business casual dress can include dressy jeans that are free from rips. The Company prefers to rely on every employee's good judgment to dress appropriately. However, please be mindful that we are a professional organization with frequent guests including investors and retailers and business casual dress (including jeans) may not always be appropriate. We ask that you present a neat, professional and well-groomed appearance at all times. Employees may request accommodations to the dress code by contacting Human Resources. This dress policy will not be enforced in a manner that discriminates against any employee based on any protected category, as described in the Equal Employment Opportunity policy.

## ANTI-PRIVACY DISCLAIMER

All equipment issued, used or made available to employees, including but not limited to, computer files, PCs, PDAs, cell phones and tablets, workspace furnishings and employee work areas, are the property of EDENS, and the Company reserves the right to search anything within its physical or cyberspace purview. Employees should not have an expectation of privacy with Company property.

## PERFORMANCE APPRAISALS

EDENS knows that morale and productivity are direct functions of clear communication and mutual understanding between the Manager and employee. One element of developing this understanding is through a periodic performance appraisal in which the Manager reviews each employee's performance with the employee.

Employee annual compensation reviews are to take place in March, following completion of the year-end financial statements and February/March Board Meeting, with salary increase, if applicable, to be retroactive to January 1.

Employees who have completed six months of service but have not completed a full year of service at the time of the appropriate scheduled review process should be included in the review process.

To be eligible for the incentive bonus program, an employee must be employed by the Company as a full time employee for at least six months prior to December 31st of the applicable year and, additionally, must continue to be employed through the date on which incentive compensation is paid. Incentive bonus awards may be made on a discretionary basis, with Executive Officer approval, to employees who do not have six months of service prior to December 31, provided they meet all other criteria for bonus award.

Bonuses are determined based on Company, regional/departmental and personal performance metrics from the prior year and are paid as soon as administratively possible after the first board meeting of the year.

The success of the Company in achieving its financial goals and other business considerations as determined by management, including your individual performance, determines the available bonus pool. Bonus payments are subject to all legally required federal, state, and local payroll deductions and withholdings.

Employees must be employed at the time of the bonus payout in order to earn. Employees who separate from the company, regardless of the reason, before the award payout date will not have earned the payment.

# POSITION REGARDING EMPLOYMENT MATTERS (CONT)

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## COMPANY BENEFITS

EDENS is proud of the opportunities we offer to our employees. The following are some of the benefits currently available for EDENS employees:

- 401(k) Plan
- Flexible Spending Accounts (FSA)
- Group Health Insurance
- Long-Term Disability
- Wellness Program
- Employee Assistance Program
- Life and Disability Insurance

The entire benefits program, including plan features, summary plan descriptions, contact information, forms and policies can be found on our benefits website at [www.EDENSbenefits.com](http://www.EDENSbenefits.com). Please note, because EDENS employees work in a number of different states, these general policies may be supplemented by additional policies in accordance with state law. In addition to reviewing and understanding the general policies, it is EDENS expectation that each employee will review the state addendum applicable to their state of work. State addendum are located on [www.EDENSbenefits.com](http://www.EDENSbenefits.com). In any situation in which there is a conflict between the general policies and the state addendum, the state regulations will generally apply. All summary plan documents are controlling.

## TIME AWAY FROM WORK

Employees have various paid and unpaid leave options. Paid Leave Options may include:

- Vacation
- Paid Holidays
- Bereavement Leave
- Sick Leave
- Short-term Medical Leave (STML)
- Military Leave
- Jury Duty

## VACATION AND SICK LEAVE

All employees and interns are eligible for paid sick leave and only full-time employees are eligible for vacation (interns are not eligible for vacation). Our policy incorporates and meets or exceeds all local sick and safe leave requirements. Full time employees are those working regularly scheduled 30+ hours per week. The award of vacation begins with the first full pay period worked by the employee after their start date of employment. Sick leave is awarded at the beginning of each calendar year. Tracking of an employee's time away from work is the responsibility of the employee, barring manager approval of time away, and should be accurately reported in the timekeeping system. The Manager, subject to Human Resources review, will be responsible for confirming final vacation and sick leave usage to Payroll upon the employee's termination of employment. To the extent that these policies are inconsistent with any state or local laws, the Company shall modify the policy and comply with the applicable legal requirements.

## SICK AND SAFE LEAVE

An employee may use paid sick leave in the following circumstances, or any other reasons allowed by state or local law:

- to care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventive medical care;
- to care for the employee's family member, who is suffering from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis, care or treatment, or preventative medical care; or recovery from, a physical or mental illness, injury, medical condition, or other adverse health condition;
- to attend a routine medical appointment or a routine medical appointment for the employee's family member;
- to address the psychological, physical or legal effects of domestic violence; time needed for the care or services related to stalking, sexual abuse/violence, including to obtain medical attention, services from a designated domestic violence agency or victim services organization, psychological or other counseling, relocation, or legal services; and
- to travel to and from an appointment, a pharmacy, or other location related to the purpose for which the time was taken.

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An employee may also use paid sick leave for the following reasons:

- Closure of the employee's workplace or the school/childcare of an employee's child by order of a public official due to a public health emergency; or
- Attendance at a school-related conference, meeting, function or other event requested or required by the employee's child's school or to attend a meeting regarding care provided to the child in connection with the child's health conditions or disability.

"Family member" includes a spouse, domestic partner, or civil union partner; parents, parents-in-law; children (including foster); grandchildren; children's spouses; siblings; siblings' spouses; children living with the employee and for whom the employee permanently assumes and discharges parental responsibility; grandparents of the employee or a spouse, domestic partner, or civil union partner; spouse, domestic partner, or civil union partner of an employee's parent or grandparent; sibling of an employee's spouse, domestic partner, or civil union partner; a person who has shared a mutual residence and committed relationship with the employee for at least the preceding 12 months; or any other individual related by blood to the employee or whose close association with the employee is the equivalent of a family relationship.

All employees will receive 80 hours of sick leave at the beginning of the calendar year. Employees who begin their employment after the start of the calendar year will receive a pro-rated amount of sick leave. Part time employees will receive a pro-rated sick leave at a rate of 1 hour for every 30 hours worked. EDENS will supplement paid sick leave, for full time and part time employees, as required by law, during a public health emergency.

Sick leave under this policy is paid at the employee's regular rate of pay at the time that the leave is used. To the extent allowed by state or local law, the Company may require the employee to provide medical certification of the need for sick leave. Sick leave does not count as hours worked for the purposes of determining eligibility for or calculation of overtime. Sick leave may not be used to extend vacation leave.

Employees may roll over up to 80 hours of unused sick leave to the next calendar year for a maximum sick leave allowance (rollover plus current year award) of 160 hours, unless state or local law requires otherwise.

Employees may only use a maximum of 80 hours of sick leave per calendar year. However, after the annual limit has been reached, employees may use up to 80 additional hours as a paid benefit while on approved FMLA leave or to bridge the STML elimination period.

Employees should report sick leave taken in the payroll system, even if they have taken no sick leave at all and will therefore report zero hours taken. Upon termination for any reason, unused sick leave is forfeited and will not be paid to the employee. If a departing employee has taken more sick leave than has been awarded as of the last day of employment, this advance of wages will be deducted from the employee's final pay, consistent with federal and state law. Employees who separate from the Company and return within a certain time period may have their unused sick leave restored if required under state or local law.

The Company prohibits threatening or taking any adverse action or discrimination against an employee for exercising in good faith his or her rights under this policy.

## **PREGNANCY ACCOMMODATION**

The Company does not discriminate against employees who have known limitations due to pregnancy, childbirth, or a related medical condition (including, but not limited to breastfeeding). The Company will also provide reasonable accommodations to enable such employees to continue to perform the essential functions of their jobs, unless doing so would result in an undue hardship to the Company. In certain circumstances, the Company will provide reasonable accommodations to such employees who cannot perform the essential functions of their jobs so long as their inability to do so is for a temporary period, the essential job functions can be performed in the near future, and the inability to perform the essential functions can be reasonably accommodated. Reasonable accommodations may include, but are not limited to: allowing more frequent breaks or periodic rest; assistance with manual labor; modifying job duties; modifying work hours/schedules; temporary transfer to a less strenuous or less hazardous position; or providing a temporary leave of absence. The Company will not require employees to take leave if another reasonable accommodation is available. If you need to request an accommodation, contact Human Resources. The Company does not tolerate any form of retaliation against employees for requesting an accommodation under this policy. The Company will follow all applicable federal, state, or local laws that provide greater protections than those set forth in this policy.



# POSITION REGARDING EMPLOYMENT MATTERS (CONT)

## RELIGIOUS ACCOMMODATIONS

It is the Company’s policy to provide equal employment opportunity to employees without regard to their religious beliefs and practices (or lack thereof). The Company will make reasonable accommodations to an individual’s sincerely-held religious beliefs or practices (or lack thereof) that would resolve a conflict with a work requirement, unless doing so would result in an undue hardship to the Company. If you believe that you need a reasonable accommodation, please immediately contact Human Resources. Upon receipt of an accommodation request, the Company will engage in an interactive process with the employee to view possible reasonable accommodation options. The Company prohibits any form of retaliation against employees for requesting an accommodation under this policy.

## LACTATION BREAKS

The Company supports nursing employees who choose to breastfeed their infants by furnishing reasonable break time to enable them to express breast milk for up to one year following the birth of the child, or longer if required by state or local law. Team Members will be provided a location, other than a bathroom, that is sanitary and shielded from view and free from intrusion from co-workers and the public that may be used for lactation breaks. The length and frequency of lactation breaks should be reasonable but could vary based on the needs of the Team Member requesting the breaks. To the extent possible, Team Members are asked to schedule their lactation breaks to minimize any impact on operations. Team Members may use any paid breaks for lactation breaks. Team Members will not be discriminated against or harassed for taking lactation breaks. Contact Human Resources if you need to take advantage of this policy to ensure that appropriate arrangements can be made. The Company does not tolerate any form of retaliation against employees for requesting lactation breaks under this policy. The Company will comply with applicable federal, state or local laws that provides greater protections to breastfeeding employees than those set forth in this policy.

## VACATION

Vacation awards increase the first pay period after the employee’s anniversary date. Vacation is awarded according to the schedule below.

Years of service	Full time (40 hours) awarded per pay period	Maximum days per year full time 40 hours	Full time (30 hours) awarded per pay period	Maximum days per year full time 30 hours
0 to 3	3.08	10	2.31	10
4 to 9	4.62	15	3.46	15
10 to 14	5.54	18	4.15	18
15+	6.15	20	4.62	20

Vacation is only awarded for periods of active work or periods when the employee is compensated by sick leave or vacation. Vacation is not awarded for unpaid time or periods during which the employee receives compensation through an insured program. Officers may take paid vacation at their discretion and are not required to track vacation usage, but it will be expected that officers take no more than 15 days of vacation per year. Upon reaching 10 years of service, Officers may take additional vacation according to the schedule above. Officer exceptions to this policy are noted below.

Vacation should be used in the calendar year in which it is awarded, and up to one week (40 hours) of unused vacation may be rolled over into the next calendar year, except as otherwise provided by state or local law. Exceptions to this policy include:

- In California, all accrued but unused vacation will roll over to the next calendar year, but California employees may not accrue any vacation above 1.75 times the applicable annual cap (i.e., 17.5 days for 0-3 years, 26.25 days for 4-9 years, 31.5 days for 10-14 year, and 35 days for 15+ years), at any given time. Once your unused and accrued vacation reaches the applicable maximum, you will not become eligible to accrue any additional vacation time until prior vacation time has been used and your accrued balance falls below the maximum accrual cap.
- In Colorado, may roll over any unused vacation to the next calendar year, but may not accrue any vacation above the applicable annual cap (i.e., 10 days for 0-3 years, 15 days for 4-9 years, 18 days for 10-14 years, 20 days for 15+ years) at any given time. Once your unused and accrued vacation reaches the maximum cap, you will not become eligible to accrue any additional vacation time until prior vacation time has been used and your accrued balance falls below the maximum accrual cap. Officers in Colorado must follow this rule and therefore must report vacation taken in payroll system by the end of the year, even if they have taken no vacation and will record zero hours taken.

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Vacation rollover must be used before vacation awarded during the next calendar year. In order to roll over unused vacation, employees must report vacation taken in payroll system by the end of the calendar year, even if they have taken no vacation and will record zero hours taken.

Employees may be advanced current calendar year vacation before it is awarded, provided they obtain Manager approval. Vacation taken or advanced before it is awarded will be an advance of pay. If a departing employee has taken more vacation than has been awarded as of the last day of employment, the differential will be deducted from the employee's final pay, to the extent allowed by federal and state law.

Upon voluntary resignation, any awarded but unused vacation time will be paid out to the departing employee, provided that the employee has submitted a written notice of at least two weeks and has reported and had approved all current vacation time taken in payroll system. For all other separations, unused awarded vacation is forfeited and will not be paid to the departing employee unless approved by an Executive Officer. State or local law may require vacation time be paid out regardless of the notice period or reason for termination.

## **PAID FAMILY LEAVE**

EDENS participates in all local and state PFL programs. See specific state addendum for more information.

## **UNPAID LEAVE**

In exceptional circumstances or in accordance with applicable law, employees may be granted unpaid leaves of absence. Requests must be submitted in writing to your Manager and all unpaid leave requests must be approved by Human Resources. Each request will be reviewed on its own merits, taking into account the staffing and service requirements of the Company. An Executive Officer and Human Resources must approve requests exceeding ten aggregate days of unpaid leave. There is no guarantee of continued employment or reinstatement following approved unpaid leave, unless otherwise required by law. FMLA runs concurrently with all other leave programs.

## **THE FAMILY & MEDICAL LEAVE ACT**

The Family and Medical Leave Act provides up to 12 work weeks (and in certain cases, 26 weeks) of job-protected leave to any eligible employee for certain family and medical reasons. Employees are eligible if they have worked for EDENS for at least one year, and for at least 1,250 hours over the previous 12 months. During the FMLA leave, EDENS maintains eligible employees' pre-existing health coverage during FMLA qualified leave and restores eligible employees to their same or equivalent position at the end of their FMLA qualified leave. EDENS requires eligible employees to exhaust all paid leave, if any, as part of their FMLA leave before the FMLA leave will be designated as unpaid. A detailed FMLA policy is available at <https://edensbenefits.com/leave/fmla/>.

For more detailed information about these benefits, and any applicable state or local leave benefits, visit [www.EDENSbenefits.com](http://www.EDENSbenefits.com) or contact the Payroll and Benefits Specialist.

The foregoing summaries of the employee benefit programs maintained by the Company are qualified in their entirety by the plan summaries and descriptions available at [www.EDENSbenefits.com](http://www.EDENSbenefits.com). The benefit programs maintained by the Company may be amended or eliminated at the Company's discretion, subject to any applicable state or local leave benefits, laws and government regulations.

## **SEPARATION**

In the event of employee separation, voluntary or otherwise, employees are compensated through the last date worked at the Company. All keys, access cards, company credit or purchasing cards, electronic equipment, documents and other Company materials will be collected at that time.

Upon voluntary resignation, any awarded but unused vacation time will be paid out to the departing employee, provided that the employee has submitted a written notice of at least two weeks and has reported and had approved all current vacation time taken in payroll system. For all other separations, unused awarded vacation is forfeited and will not be paid to the departing employee unless approved by an Executive Officer. State or local law may require vacation time be paid out regardless of the notice period.

# POSITION REGARDING EMPLOYMENT MATTERS (CONT)

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## **CONTINUATION OF BENEFITS / COBRA**

Consistent with applicable law, if an employee resigns or is terminated from the Company's employ or if work hours are reduced, and if this event makes an employee or his or her dependents no longer eligible to participate in one of the Company's group health insurance plans, the employee and his or her eligible dependents, including children born or adopted during the continuation period, may have the right to continue to participate in the group health insurance plan for up to eighteen (18) months at his or her (or their dependents') expense, all in accordance with applicable law.

If an employee or his or her eligible dependents elect to continue as members of the Company's health insurance plan, the participant will be charged the applicable premium charged to the Company by the Company's carriers plus an additional two percent (2%) administrative fee. The premium is subject to change if the rates being charged to the Company increase or decrease.

The Company's third-party claims administrator will contact departing employees concerning these options at the time termination of employment or a reduction in work hours occurs. All COBRA documentation will be provided to the employee by the Company's third-party benefits administrator.

## **WORKERS' COMPENSATION**

The Company contributes to workers' compensation insurance as required by law to protect each employee in the event of a work-related accident, injury, or illness. This insurance is designed to reimburse each employee for medical expenses incurred and income lost as a result of a covered injury or illness. To be sure that each employee receives benefits on a timely basis, any work-related accident, injury, or illness, regardless how trivial, must immediately (within twenty-four (24) hours) be reported in writing to a supervisor and Human Resources. If the incident involves more than one individual, each employee must report the incident to the Supervisor and Human Resources immediately and a written report must be submitted. Each employee injured on the job may be required to see a physician and submit a doctor's report regarding the injury and the employee's ability to return to work.

## **VIOLENCE AND INAPPROPRIATE BEHAVIOR IN THE WORKPLACE**

The Company is committed to providing a safe, violence-free workplace in which all employees are treated with respect. The Company cannot tolerate behavior on the part of any employee that could be interpreted as a threat to a fellow employee or to Company property, or such behavior on the part of any consultant, customer, vendor or anyone else on Company premises or engaging in Company activities. Employees engaging in such behavior will be subject to disciplinary action, up to and including termination.

In some instances, an employee's behavior and actions away from work might create an undue and unacceptable risk to the Company if that employee were allowed to return to work. The Company reserves the right to determine whether an employee's off-duty/off-premises conduct creates an unacceptable risk to its operations, employees and reputation. Such activities may result in termination.

## **WEAPONS POLICY**

In order to ensure a safe environment for employees and visitors, EDENS prohibits the possession, transportation, storage or presence of firearms or other dangerous weapons on our premises, including in parking lots, to the extent allowed by federal, state or local law. Under no circumstances is an employee authorized to store a firearm and/or other dangerous weapon in an employer-owned vehicle, unless otherwise allowed by law or specifically authorized by EDENS as a part of employee job duties. Anyone who violates this policy will be subject to discipline up to and including discharge.

Subject to applicable state and local laws, EDENS reserves the right at any time and at its discretion to search all company-owned or leased vehicles and all personal vehicles, plus packages, containers, briefcases, purses, desks, enclosures and persons entering its property, for the purpose of determining whether any weapon is being, or has been, brought onto its property or premises in violation of this policy, to the extent allowed by law. Employees who fail or refuse to promptly permit a search under this policy will be subject to discipline up to and including termination. If an employee believes, in good faith, that an employee, client or other member of the public is in violation of this policy, he/ she must contact his/her Manager, any Officer, Human Resources or utilize the anonymous Integrity Helpline which is available through a link at <http://www.EDENS.com>. Employees who make a report



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pursuant to this policy will not be subject to retaliation. If a report is substantiated, local law enforcement will be contacted and the employer and any employees with knowledge of the report shall cooperate with the authorities during their criminal investigation. The Company will comply with all applicable state laws concerning employee rights to possess and carry firearms and shall be interpreted and enforced accordingly.

## **NO WEAPONS IN THE WORKPLACE**

Possession, use or sale of weapons, firearms, or explosives on work premises, while operating company machinery, equipment, or vehicles for work-related purposes or while engaged in company business off premises is forbidden except where expressly authorized by the company and permitted by state and local laws. This policy applies to all employees, including but not limited to, those who have a valid permit to carry a firearm.

If you are aware of violations or threats of violations of this policy, you are required to report such violations or threats of violations to Human Resources immediately.

Violations of this policy will result in disciplinary action, up to and including discharge.

## **IN AN EMERGENCY**

Human Resources should be notified immediately when an emergency occurs. Emergencies include all accidents, medical situations, bomb threats, other threats of violence, and the smell of smoke. In the absence of Human Resources, contact the nearest company official.

Should an emergency result in the need to communicate information to employees outside of business hours, your manager will contact you. Therefore, it is important that employees keep their personal emergency contact information up to date. Notify Human Resources when this information changes.

When events warrant an evacuation of the building, you should follow the instructions of management. You should leave the building in a quick and orderly manner. You should assemble at the predetermined location as communicated to you by your manager to await further instructions or information.

Please direct any questions you may have about the company's emergency procedures to Human Resources.

## **DRUG AND ALCOHOL USE**

EDENS is a drug-free work place. Drug and alcohol use is detrimental to the safety and productivity of employees in the work place.

EDENS prohibits possession or being under the influence of alcoholic beverages, illegal drugs (including misuse of legal drugs) or marijuana in states where medical and/or recreational use is legal while on Company premises; Company-owned, managed, or leased property; while on duty; or while operating any vehicle for Company-related business. Additionally, employees cannot use any drugs (even if lawfully prescribed) that could impair their ability to safely perform their job functions. These behaviors are strictly prohibited and may lead to disciplinary action, including termination. Under limited circumstances and if preapproved by an Executive Officer, alcoholic beverages may be served on Company premises.

Employees who are required to have a valid driver's license to perform the duties of their job and who are convicted of a DUI, and consequently have their driver's license suspended and are not able to secure a provisional license, may be immediately terminated.

When appropriate, the employer may refer the employee to the Company's Employee Assistance Program (EAP) for counseling or rehabilitation.

EDENS may test for the presence of alcohol or drugs in those employees involved in an on-the-job accident involving either physical or property damage or "near-miss" accidents. The Company may also test employees if there is a reasonable suspicion to believe that an employee is under the influence of alcohol or drugs. Employees who refuse to be tested or who interfere with the testing procedures may be subject to termination. This policy will be administered in accordance with state and local laws.

## **SMOKING IN THE WORKPLACE**

Smoking, vaping, e-cigarettes, and tobacco use of any kind is not permitted by any employee inside buildings. Tobacco use and smoking is only allowed in authorized areas.

# POSITION REGARDING EMPLOYMENT MATTERS (CONT)

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## **SAFETY ON THE JOB AND WHILE ON BUSINESS TRAVEL**

Our Company has a deep concern for the safety of its employees and will do everything reasonably within its control to ensure a safe environment and compliance with federal, state and local safety regulations. Employees should obey all rules involving safety and housekeeping and exercise caution and common sense in all their work activities.

All employees must report any on-the-job injuries, accidents, arrests and fines that occur while engaged in Company business to the Corporate Benefits Manager as soon as possible. If treatment by a physician is required, please obtain a "Report of Injury" form from the Corporate Benefits Manager as soon as possible.

Whenever an employee drives on Company business, we have a concern not only for the safety of the employee but also for those around them. All employees who must drive a personal or rented vehicle while on Company business must maintain at least the minimum level of auto insurance required by their state of residence.

## **MEDIA RELATIONS**

EDENS is frequently contacted by newspapers, online media outlets and trade publications for interviews or comments related to the Company or a specific center or project. Responses to these requests can have far-reaching implications, including effects on our national and local reputation. So that we provide a consistent message under no circumstances should an employee respond on behalf of the Company to a media request regarding the Company's business, a specific center, project or any other Company-related event, occurrence or circumstance.

All media requests should be directed to [media@edens.com](mailto:media@edens.com) or by phone at 202.902.2600.

## **EMPLOYMENT AUTHORIZATION**

The Immigration Reform and Control Act requires that the Company ensure employees are authorized for employment in the United States. Therefore, only individuals lawfully authorized for employment in the United States will be employed. In connection with the Immigration Reform and Control Act, the Company must collect certain information and review certain documentation concerning the employment authorization of individuals hired within three days of hire. Failure to provide valid documentation will result in the employee being removed from EDENS's payroll.

This information and documentation will be used only for compliance with the Immigration Reform and Control Act and not for an unlawful purpose. If employment authorization changes or terminates after the start date of employment, please inform Human Resources immediately.

## **REASONABLE ACCOMMODATIONS**

To assist our employees who are or who become disabled, we will make reasonable accommodations as to enable such employees to continue performing the essential functions of their jobs or to enable them to enjoy all the benefits of employment. The specific accommodation offered will depend on the specific facts and circumstances of the employee's job and any actual limitations. Possible accommodations include but are not limited to modification of job duties to comply with medical requirements or restrictions, modification of policies and procedures, leaves of absence for a definite duration or reduced schedules for a finite duration. Transfer to a vacant position for which the employee is qualified also may be appropriate, depending upon specific facts and circumstances of individual situations.

Obviously, there are limits to the accommodations which we can realistically make. For example, where an accommodation would cause an undue hardship to the Company, we would be unable to make the particular accommodation. Similarly, where placing an individual in a position, with or without accommodation, would cause the employee to be a direct threat to the employee or others, we may be unable to place the employee in a particular position.

If you need to request a reasonable accommodation because of a disability or on-the-job injury, please contact Human Resources. We will discuss the matter with you and attempt to reasonably accommodate you.

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## **GARNISHMENTS**

When an employee's wages are garnished by a court order, our company is legally bound to withhold the amount indicated in the garnishment order from the employee's paycheck. Our company will, however, honor applicable federal and state guidelines that protect a certain amount of an employee's income from being subject to garnishment.

## **CHANGES IN PERSONAL DATA**

To aid you and/or your family in matters of personal emergency, we need to maintain up-to-date information.

Changes in name, address, telephone number, marital status, number of dependents or changes in next of kin and/or beneficiaries should be given to Human Resources promptly.

Any penalties, fees, or taxes due because of failure to notify the company of change of address are the responsibility of the employee.

## **EMPLOYMENT VERIFICATION REQUESTS**

All requests for employment verification on current or former employees should be referred to Human Resources, which has the sole responsibility of replying to such requests. No other individual should give verbal or written reference directly to an inquiring party. Without the receipt of a written release from the employee, information given by phone will be limited to verification of employment dates and position title. In response to written requests, information such as salary, dates of employment, and job position may be provided after an authorization signed by the employee is provided.



# ACKNOWLEDGEMENT – OUR INTEGRITY PLEDGE AND SUPPORTING POSITIONS

Our Integrity Pledge and its supporting Positions incorporated by reference (collectively, the “Pledge”) sets out the basic professional expectations of all employees. It is NOT AN EMPLOYMENT CONTRACT, rather it is a summary of fundamental beliefs and expectations of all employees. By signing and initialing below, I acknowledge that I understand and am in compliance with all aspects of the Pledge. I understand that engaging in conduct prohibited by the Pledge or failing to notify the appropriate personnel could subject me to disciplinary action, up to and including termination.

PLEASE NOTE: The Pledge is NOT an employment contract or a guarantee of continuing employment. All employment at EDENS is at-will, and the employee or the Company has the right to end the employment relationship at any time, with or without notice. The approval of the Chief Executive Officer is required in connection with any employment agreement. EDENS reserves the right to amend, revise or interpret the Pledge in its sole discretion. All prior policies and handbooks issued prior to the January 2021 version are revoked and are replaced with The Pledge and its supporting positions.

	Initial	Version
Our Integrity Pledge		January 2024
Position Regarding Conflicts of Interest		January 2024
	*Yes	No
1. I (or a related party of mine) am an employee of, or hold, a direct or indirect financial interest in an outside party with which EDENS does business or from which secures goods or services. Outside parties include, but are not limited to: vendors, tenants, lenders, joint venture partners and investors that do business with EDENS. <sup>a, b</sup>		
2. I have received excessive gifts as defined within the Position Regarding Conflicts of Interest. <sup>c</sup>		
3. I have given excessive gifts as defined within the Position Regarding Conflicts of Interest. <sup>c</sup>		
	Initial	Version
Position Regarding Harassment-Free Workplace		January 2024
Position Regarding Commitments and Contracts		January 2024
Position Regarding Corporate Travel and Expense Reimbursement		January 2024
Position Regarding Technology Use		January 2024
Position Regarding Employment Matters		January 2024
Acknowledgment of Integrity Helpline		January 2024

- a.** The term conflict of interest refers to situations in which personal and/or financial considerations may compromise, or have the appearance of compromising, an employee’s professional judgment in exercising EDENS obligations.
- b.** Related Party means a Family Member or employee and Related Party Transaction means acting on behalf of the Company in any transaction in which a Related Party has a significant direct or indirect financial interest. An employee should disclose any material transaction or relationship that reasonably could be considered a Related Party Transaction or could be expected to give rise to a conflict of interest.
- c.** Excessive Gifts. Employees may not accept or give tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$150 (individually or in the aggregate) unless approval is obtained from an Executive Officer.

More information can be found in the Position Regarding Conflicts of Interest.





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New York | San Diego | San Francisco | Seattle | Washington, DC

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