

The HUB  
2128 Oxford St. & 2132-2154 Center St.

### 5.B Anti-Discriminatory Housing Statement

1. Does the applicant or sponsor, including the applicant or sponsor's parent company, subsidiary, or any other business or entity with an ownership share of at least 30% of the applicant's company, engage in the business of developing real estate, owning properties, or leasing or selling individual dwelling units in states or jurisdictions outside of California?

**Yes.**

2. If the answer to (1) is yes, which?

**Core Spaces is currently developing two student housing projects in Los Angeles, adjacent to the University of Southern California. Our first project is set to deliver late this year and our second in July of 2023.**

3. If the answer to (1) is yes, does the applicant or sponsor, as defined in (1), have policies *in individual states* that prohibit discrimination based on sexual orientation, gender identity, and/or gender expression in the sale, lease, or financing of any dwelling units enforced on every property in the state or states where the applicant or sponsor has an ownership or financial interest?

**Yes.**

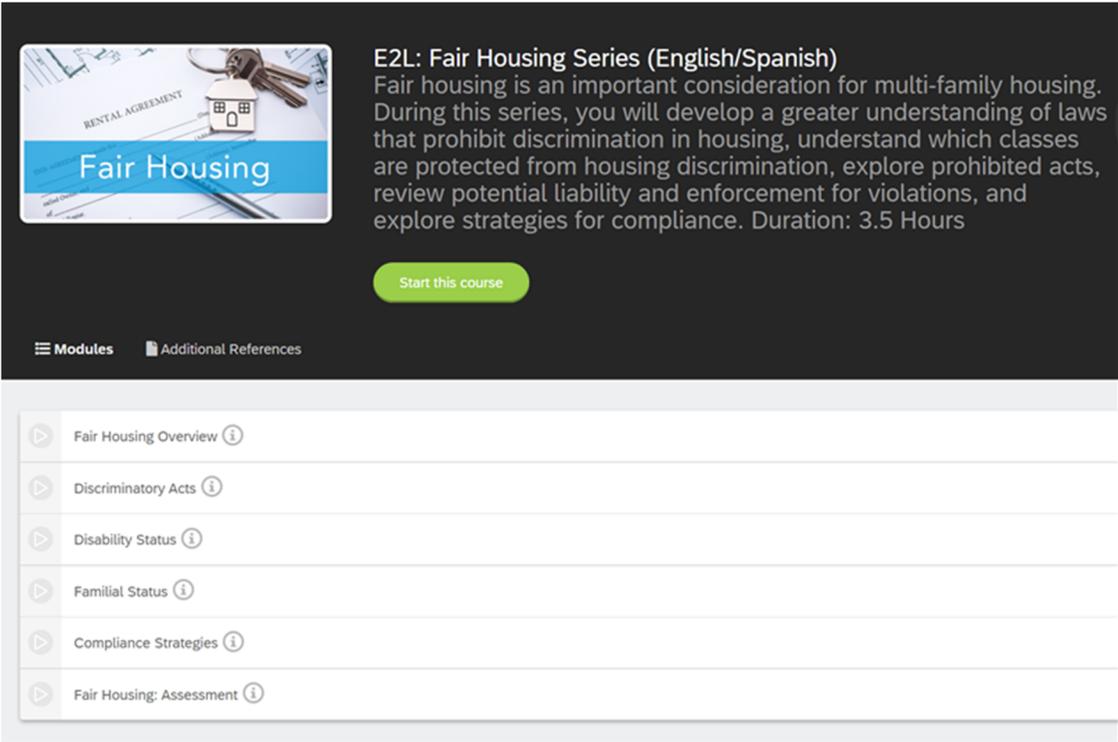
4. If the answer to (1) is yes, does the applicant or sponsor, as defined in (1), have *a national policy* that prohibits discrimination based on sexual orientation and gender identity in the sale, lease, or financing of any dwelling units enforced on every property in the United States where the applicant or sponsor has an ownership or financial interest in property?

**Yes.**

5. If the answer to (3) or (4) is yes, please provide a copy of that policy or policies as part of this application.

Core Spaces is an equal opportunity employer and encourages candidates from a diverse set of backgrounds. Core does not discriminate on the basis of race, religion, disability, gender, nationality, ethnicity, sexual orientation, or any other prohibited category. We will ensure that individuals with disabilities are provided reasonable accommodation to participate in the job application or interview process, to perform essential job functions, and to receive other benefits and privileges of employment. Please see the attached which is part of our employee handbook.

Core Spaces posts non-discriminatory signage in every office, corporate or site level. Additionally, all employees participate in a 3.5 hour Fair Housing Training program upon hire and on an annual basis thereafter. A course description is below:



**E2L: Fair Housing Series (English/Spanish)**  
Fair housing is an important consideration for multi-family housing. During this series, you will develop a greater understanding of laws that prohibit discrimination in housing, understand which classes are protected from housing discrimination, explore prohibited acts, review potential liability and enforcement for violations, and explore strategies for compliance. Duration: 3.5 Hours

Start this course

Modules Additional References

- Fair Housing Overview ⓘ
- Discriminatory Acts ⓘ
- Disability Status ⓘ
- Familial Status ⓘ
- Compliance Strategies ⓘ
- Fair Housing: Assessment ⓘ

### ***Reasonable Accommodation***

An employee should advise their manager if he or she requires accommodation to enable the employee to perform the essential tasks of the job. The Company will work with the employee to find a reasonable accommodation for the disability. HR may request that the employee obtain medical documentation from the employee's health care provider describing the nature, severity and duration of the condition, how it affects the employee's ability to perform the job, and how, if at all, it can be reasonably accommodated. Reasonable options that may be available for a disability include modified duty, part-time work, re-assignment to a vacant position, acquisition or modification of equipment or assistive devices, or additional leave if the employee can provide a reasonable return-to-work date.

### ***Religion Accommodation***

The Company will also reasonably accommodate the religious needs of its employees, including those related to appearance and observance of holidays. An employee should advise their manager, HR or a member of senior management if he or she requires accommodation for religious reasons.

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## ANTI-HARASSMENT AND DISCRIMINATION

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The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment, particularly on the basis of race, color, religion, sex, pregnancy, age, national origin, disability, genetic information or any other characteristic protected by law. Therefore, the Company prohibits acts that constitute an unlawful hostile work environment as well as other inappropriate conduct.

### ***Definitions of Harassment***

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature when, for example: (i) submission to such conduct is an explicit or implicit term or condition of an individual's employment; (ii) employment decisions are based on an employee's submission to or rejection of such conduct; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Making unsolicited and unwelcome written, verbal, physical, and/or visual contact with sexual overtones. (WRITTEN EXAMPLES: suggestive or obscene letters, notes, and invitations. VERBAL EXAMPLES: derogatory comments, slurs, jokes, epithets including conduct or comments

consistently directed at only one gender, even if content is not sexual. PHYSICAL EXAMPLES: assault, touching, impeding or movement. VISUAL EXAMPLES: leering, gestures, display of sexually suggestive objects or pictures, cartoons, posters, or magazines.)

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, visual or physical conduct that (a) denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, sex, age, national origin, disability, genetic

information or any other characteristic protected by law or any such characteristic of his/her relatives, friends or associates, and that (b) (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to, epithets (inappropriate or demeaning name-calling), slurs or negative stereotyping; threatening, intimidating or hostile acts; and jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

### ***Anti-Bullying***

Workplace bullying can also be considered a form of harassment. The Company prohibits acts of bullying in the workplace. Bullying, like other offensive or violent behaviors, disrupts the operation of the workplace and the organization's ability to provide a safe, respectful work environment. All employees are expected to treat others with civility and respect, refuse to tolerate bullying, and report instances of bullying including, but not limited to, the following:

- Abusive and offensive language
- Insults
- Teasing
- Spreading rumor and innuendo
- Unreasonable criticism
- Trivializing of work and achievements

### **Work Environment Manipulation**

- Isolating people from normal work interaction
- Excessive demands
- Setting impossible deadlines

### **Psychological Manipulation**

- Unfairly blaming for mistakes
- Setting people up for failure
- Deliberate exclusion
- Excessive supervision
- Practical jokes
- Belittling or disregarding opinions or suggestions

- Criticizing in public

Any employee who feels he or she has been victimized by bullying is encouraged to report the matter to his or her supervisor, or with HR immediately. Employees should understand that where appropriate, an investigation will be undertaken, and disciplinary measures will be taken as deemed necessary.

### ***Retaliation***

The Company prohibits retaliation against any individual who reports discrimination or harassment or

participates in an investigation of such reports. The Company strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to the Company's policy or who have concerns about such matters should file their complaints with HR or a member of senior management. Individuals should not feel obligated to file their complaints with their immediate manager first before bringing the matter to the attention of one of the other Company-designated representatives. Employees who experience repeat harassment after telling their harasser to stop, or who experience what they believe to be retaliation, are also expected to report their complaint to a member of senior management or HR.

Workplace harassment can take many forms, but it is essentially workplace conduct by supervisors and/or co-workers that is directed at an employee because of the employee's legally protected status. Not all actions or activities may be deemed harassment and whether an incident was severe and pervasive or considered an isolated incident will be considered if an allegation is made.

Employees who have experienced or witnessed conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

If sexual harassment is proven, prompt and effective remedial action will result. This action includes the following: (a) the harasser will be disciplined up to and including termination and the complainant notified; (b) steps will be taken to prevent any further harassment and (c) other appropriate remedial action will be taken. Any harassment complaint found to be frivolous or based upon false information will be a serious violation and may result in disciplinary action, up to and including termination.

### ***Reporting Harassment, Discrimination or Retaliation***

The Company strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to the Company's policy or who have concerns about such matters should file their complaints with human resources or a member of senior management. Individuals should not feel obligated to file their complaints with their immediate manager first before bringing the matter to the attention of one of the other Company-designated representatives identified above. In fact, if an employee tells an offending manager to stop harassing behavior, such activity does not constitute a valid report of a complaint under this policy; the complaint instead must be made directly to a member of senior management or human resources. Employees who experience repeat harassment after telling their harasser to stop, or who

experience what they believe to be retaliation, are also expected to report their complaint directly to the highest level of senior management, including the President. Employees should report all harassing behavior, even if others also witness the conduct.

Employees who have experienced or witnessed conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

### ***The Investigation***

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Employees are expected to cooperate fully and honestly in the investigation process. Confidentiality will

be maintained throughout the investigation process to the extent consistent with adequate investigation and appropriate corrective action.

### ***Responsive Action***

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as the Company believes appropriate under the circumstances. If an employee making a complaint does not agree with its resolution, the employee may appeal to the Company's President.

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## CONFIDENTIALITY POLICY

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The Company considers certain types of information about our products, processes, employees and customers to be confidential data. Disclosure of this information to our competitors, suppliers, customers, or other members of the public could significantly harm the interest of the Company and its employees. The rule of thumb to remember is that all information gathered by, retained or generated by the Company related to intellectual property of the company, clients or personal employee data is confidential.

It is the employee's responsibility to safeguard company information. This includes the dissemination of information by any available means, including but not limited to phone, fax, Email or electronic transfer of data or uploaded to a personal cloud-based storage. Employees should take reasonable precautions to prevent disclosure and to protect confidential information of the Company and the Company's customers. Confidentiality of privileged information should never be used for personal advantage or improperly divulged to anyone outside the Company.

The restrictions of this policy carry forward with the employee post-employment. Violations of the policy may result in disciplinary action up to and including termination of employment, without further warning, or legal action against former employees