



Responsible Development Guidelines

Introduction

Simpson Housing LLLP (“Simpson”) is committed to adopting ESG policies and initiatives that promote sustainability, enhance quality of life for employees, increase resident satisfaction and reduce its carbon footprint organization-wide, encompassing all assets whether owned or managed.

Simpson’s approach to our development projects is to work with our JV partners to integrate sustainability into the design and execution of these multifamily buildings. To that end we have drafted the following Responsible Development Guidelines as a tool for discussion and collaboration.

1 – Site Design and Construction Requirements

Planning and Design

Through project planning and design, we encourage the following:

- Articulate the sustainability strategy and how it advances the development strategy.
- Consider local community preferences and market dynamics in aesthetics, form, and function.
- Site selection strategies that consider prioritizing locations for projects in existing developed areas and restoring brownfield sites.
- Site selection strategies that implement land conservation (including protecting, restoring and conserving aquatic ecosystems, farmland, floodplains, endangered or native species and historical/heritage sites, as applicable).
- Transit-oriented development considerations.
- Pursue designs that achieve market appropriate sustainability performance certifications such as NGBS bronze or above rating, LEED Silver rating, BREEAM Good rating, or higher level of certification and/or secure ENERGY STAR® Designed to Earn recognition or other green building certification as applicable.
- Evaluate and consider the adoption of intelligent or “smart” building systems that lead to improved efficiencies and enhanced occupant comfort (see Exhibit A - Energy Efficient Measures and Smart Technologies).
- Incorporate design strategies with specific performance targets that exceed minimum codes standards, when appropriate, and that result in energy, water, and waste consumption reductions.

- Specify and incorporate building materials, systems, and practices that minimize impacts to occupant health and improve the environment including the consideration of regional, rapidly renewable, certified wood, or low-emitting materials; materials with recycled content; materials with publicly available ingredients and/ or known hazards and effects; and materials for which life-cycle impacts are public.
- Evaluate the site for renewable energy installation and storage feasibility including solar/photovoltaic panels, wind turbines, geothermal or hydro energy, and biofuels.
- Consider designing to net zero carbon standards.

Construction

During construction, we encourage project teams to apply the following practices:

- Ensure project team members are educated and held accountable for environmental goals and processes, product standards, sustainability targets, and community engagement requirements.
- Develop and implement a safe and healthy construction site and comply with all applicable regulations.
- Perform an environmental site assessment.
- Manage waste by diverting construction and demolition materials from disposal through recycling and reuse of materials, and fully utilize all available local resources and programs.
- Protect air quality, surface water quality, and aquatic ecosystems by managing potential construction pollutants.
- Restore habitats, soils, and site conditions disturbed during construction. Re-use disturbed vegetation and rocks wherever possible.
- Manage and minimize light and noise pollution to the surrounding community.
- Monitor hazardous waste on-site.
- Monitor and report on environmental and social risks and impacts, in addition to mitigation strategies, to ensure compliance with project targets/goals, procedures, practices, and all applicable regulations.

2 - Health & Well-Being Considerations

Occupant Health

Simpson and its partners will take measures to incorporate occupant health and well-being into its development projects

The following guidelines from the Urban Land Institute's (ULI) Building Healthy Places Toolkit¹ represent best practices that Simpson and its development partners will strive to implement into new design and construction whenever feasible. The ULI categorizes these practices in relation to the top three health needs of building occupants- physical activity, food and water, and environment.

¹ Building Healthy Places Toolkit. (n.d.). Urban Land Institute. <http://bhptoolkit.uli.org/>

Physical activity

- Provide sidewalks and enticing pedestrian-oriented streetscapes
- Provide accessible stairways
- Install signage to prompt taking stairs
- Incorporate fitness facilities and/or common area multi-purpose rooms that can be used for wellness activities and on-site exercise
- Provide infrastructure that supports biking
- Provide outdoor space amenities to encourage time outdoors

Food and water

- Enhance access to drinking water
- Test water quality regularly
- Install water purification if necessary
- Install water bottle filling stations where feasible
- Provide the ability to host a farmer's market
- Install composting and community gardens where feasible
- Provide healthy vending machine/food options where applicable

Environment

- Incorporate nature and nature-inspired (biophilic) design
- Incorporate Acoustic comfort
- Incorporate daylight/or blue-enriched light where practical without introducing glare
- Provide adequate lighting in stairwells, emergency egress points, parking lots and entryways
- Use only low emitting materials and finishes
- Avoid installing outdoor air intakes at street level or near other outdoor sources of pollutants
- Facilitate proper air flow through design and managing building to meet or exceed ASHRAE 62.1 ventilation standard or applicable local code, whichever is more stringent
- Effectively control construction dust and particulates through increased filtration
- Use only no/low VOC paints and finishes
- Institute a green cleaning policy
- Use high efficiency filter vacuums
- Conduct regular IAQ testing
- Ensure separate ventilation for chemical storage areas
- Conduct regular building maintenance and resolve comfort issues promptly
- Conduct regular inspections of roofing, plumbing, and HVAC equipment to identify sources of moisture and condensation and address issues immediately
- Utilize an integrated pest management plan
- Meet fire safety and carbon monoxide monitoring standards
- Incorporate tobacco free signage as appropriate

On-site Construction Safety

Simpson and its partners will take measures to promote the safety of on-site construction personnel by incorporating worker safety and health strategies into its development plans.

The following guidelines from the Occupational Safety and Health Administration's (OSHA) Recommended Practices for Safety & Health Programs in Construction publication² represent best practices that Simpson and its development partners will require at all construction sites. These are the core elements of our safety and health program for construction.

Management Leadership

- Top management demonstrates its commitment to eliminating hazards and to continuously improving workplace safety and health, communicates that commitment to workers, and sets program expectations and responsibilities.
- Managers at all levels make safety and health a core organizational value, establish safety and health goals and objectives, provide adequate resources and support for the program, and set a good example.

Worker Participation

- Workers and their representatives are involved in all aspects of the program—including setting goals, identifying and reporting hazards, investigating incidents, and tracking progress.
- All workers, including contractors and temporary workers, understand their roles and responsibilities under the program and what they need to do to effectively carry them out.
- Workers are encouraged and have means to communicate openly with management and to report safety and health concerns or suggest improvements, without fear of retaliation.
- Any potential barriers or obstacles to worker participation in the program (for example, language, lack of information, or disincentives) are removed or addressed.

Hazard Identification and Assessment

- Procedures are put in place to continually identify workplace hazards and evaluate risks.
- Safety and health hazards from routine, nonroutine, and emergency situations are identified and assessed.
- An initial assessment of existing hazards, exposures, and control measures is followed by periodic inspections and reassessments, to identify new hazards.
- Any incidents are investigated with the goal of identifying the root causes.
- Identified hazards are prioritized for control.

Hazard Prevention and Control

- Employers and workers cooperate to identify and select methods for eliminating, preventing, or controlling workplace hazards.

² <https://www.osha.gov/sites/default/files/OSHA3886.pdf>

- Controls are selected according to a hierarchy that uses engineering solutions first, followed by safe work practices, administrative controls, and finally personal protective equipment (PPE).
- A plan is developed that ensures controls are implemented, interim protection is provided, progress is tracked, and the effectiveness of controls is verified.

Education and Training

- All workers are trained to understand how the program works and how to carry out the responsibilities assigned to them under the program.
- Employers, managers, and supervisors receive training on safety concepts and their responsibility for protecting workers' rights and responding to workers' reports and concerns.
- All workers are trained to recognize workplace hazards and to understand the control measures that have been implemented.

Program Evaluation and Improvement

- Control measures are periodically evaluated for effectiveness.
- Processes are established to monitor program performance, verify program implementation, and identify program shortcomings and opportunities for improvement.
- Necessary actions are taken to improve the program and overall safety and health performance.

Communication and Coordination for Employers on Multiemployer Worksites

- General contractors, contractors, and staffing agencies commit to providing the same level of safety and health protection to all employees.
- General contractors, contractors, subcontractors, and staffing agencies communicate the hazards present at the worksite and the hazards that work of contract workers may create on site.
- General contractors establish specifications and qualifications for contractors and staffing agencies.
- Prior to beginning work, general contractors, contractors, and staffing agencies coordinate on work planning and scheduling to identify and resolve any conflicts that could impact safety or health.

Exhibit A - Energy Efficient Measures and Smart Technologies