

# HUMAN RIGHTS POLICY

Columbia Property Trust 2019

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## Introduction

Respect for human rights and taking care of people are part of our core values. We seek to respect and promote human rights in our relationships with our employees, vendors and tenants. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. To this end, we support and promote the principles of the Universal Declaration of Human Rights and the human rights protections set forth in the laws of the United States, and the states and communities in which we operate.

This policy applies to all of the operations of Columbia Property Trust (CXP) and its direct and indirect subsidiaries, regardless of geographic location, and covers all of our properties. We expect our vendors to uphold these principles and urge them to adopt similar policies within their own businesses.

## Human Rights Policy:

### 1.0 Diversity & Inclusion

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity in workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law. Recruitment, hiring, placement, development, training, compensation, and advancement may not be based on any of these factors, but should instead be based on rational factors such as qualifications, performance, skills, and experience. We do not accept disrespectful or inappropriate behavior, harassment, or retaliation in the workplace or in any work-related circumstance outside the workplace. We provide each of our employees with detailed policies and materials to provide information on equal opportunity, discrimination and harassment, and require participation in training on these matters.

## 2.0 Freedom of Association and Collective Bargaining

We strive to create workplaces in which open and honest communications among all employees are valued. We respect our employees' right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. In the case of employees represented by a legally recognized union, we are committed to bargaining in good faith with that union.

## 3.0 Safe and Healthy Workplace

The safety and health of our employees, vendors, and tenants is of paramount importance. We must not only comply with applicable safety and health laws and regulations, but also address and remediate identified risks of accidents, injury, and health impacts. Our policies regarding health and safety are provided to our employees, vendors, and tenants, and encompass all our facilities and operations. Each of our employees is entitled to a copy of our Employee Handbook, which sets forth detailed instructions regarding safety issues.

## 4.0 Workplace Security

We are committed to a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Each employee is entitled to a copy of our Employee Handbook, which details the standard of conduct regarding workplace security.

## 5.0 Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, whether prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We also evaluate the potential for human trafficking in our supply chain and minimize risks by committing to work with well-established suppliers and vendors who adhere to our Vendor Code of Conduct, which prohibits forced labor and human trafficking. We have a no tolerance policy for employees, suppliers and vendors in violation of our company standards regarding slavery and human trafficking and anyone in violation of those standards is subject to termination.

## 6.0 Child Labor

We comply with all local minimum working age laws and requirements and prohibit the use of child labor.

## 7.0 Work Hours, Wages & Benefits

We compensate our employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements and applicable legal standards. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits and other labor laws. We are committed to paying living wages under humane conditions. Each of our employees is entitled to clear, written information about their employment conditions with respect to wages before they enter employment and as appropriate throughout their term of employment; a copy of our Employee Handbook, which sets forth detailed procedures and rights relating to disciplinary actions (deductions from wages as a disciplinary measure are not permitted unless permitted by national or applicable local law); and a formal review, both in person and in writing, not less than once a year.

## 8.0 Employee Training and Development

Columbia encourages professional growth for all of its employees, and has created a personal development guide in order to provide guidance for employees in planning and budgeting for their career growth. The general philosophy regarding education and association involvement is that such activities are encouraged when they align with an employee's current role and goals within the company and are mutually beneficial to both the employee's personal growth and their role within the company.

## 9.0 Right to Water

We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

## 10.0 Guidance and Reporting for Employees

Our employees should not accept any direction by their supervisor that is inconsistent with this Policy. If there is ever a concern that anyone connected with our company may have engaged or is about to engage in any conduct in violation of this Policy, our employees should promptly bring the matter to the attention of our Chief Accounting Officer. If an employee does not believe that talking to our Chief Accounting Officer is appropriate, if they are uncomfortable doing so, or if it does not result in a response with which they are comfortable, then they should contact any of our other executive officers or any member of the Board of Directors of CXP, either directly or through [www.columbiapropertytrust.ethicspoint.com](http://www.columbiapropertytrust.ethicspoint.com).

## 11.0 Policy Oversight

This Policy is overseen by CXP's ESG Committee and is reviewed annually. Our ESG Committee meets at least quarterly, and the meetings are well attended. Our SVP of Sustainability, who reports to the CEO, is a member of the committee.

We may waive application of the policies set forth in this Policy where circumstances warrant granting a waiver, subject to appropriate terms and conditions. This Policy is not intended to, and does not, grant any rights to any director, officer, employee, tenant, supplier, competitor, stockholder or any other person or entity.