



POLICY	Environmental, Social and Governance Policy
RELATED POLICIES AND FORMS	1. Health and Safety Management System
ISSUE DATE	January 2018 Revised December 2021

1. Introduction

Starlight Group Property Holdings Inc. (together with its affiliates, “Starlight”) is committed to developing and implementing environmental, social, and governance (ESG) best practices across our portfolios, for the betterment of our employees, tenants, residents, stakeholders, and communities in which we operate and develop. Sustainable operations, social impact and inclusive communities, transparency and accountability are core elements of our program. Starlight conducts, and will grow its business, in a manner that respects the environment and strives to protect and conserve our world’s natural resources. For the purposes of this Policy, the term “employee” shall be deemed to include employees of Starlight, individuals retained by Starlight for services and any third-party property management companies that are contracted directly with Starlight and render services to Starlight.

2. Scope

This Policy applies to all employees, vendors, third-party property managers and stakeholders.

3. Core Values

Starlight is continually improving the development and implementation of programs designed to address the environmental and social cost and impact of our activities, products and services. As such, Starlight commits to:

- Complying with applicable municipal, provincial and federal legislation;
- Reducing and minimizing our utility and energy consumption;
- Performing environmental benchmarking of assets with comparable assets of similar geographic location and demographics;
- Using materials and energy efficiently to conserve natural resources;
- Minimizing the emissions that contribute to climate change;
- Developing relationships and collaborating with our community, suppliers, contractors, government agencies, and other organizations engaged in improving the environment;
- Reviewing environmental objectives and monitoring performance, to continually improve our environmental strategy and targets;
- Encouraging construction partners to minimize construction waste and recycle materials; and
- Requiring employees to participate in training and professional development programs.

Starlight considers the following key areas when addressing ESG initiatives:



Social Impact	The opportunity to enhance resident experience and wellbeing and create inclusive communities.
Environmental Impact	The opportunity to create resilient buildings, improve efficiency, reduce operating costs, and future proof our buildings in an evolving low-carbon economy by driving innovation and new technologies.
Brand	The opportunity to enhance our brand and reputation.
People	The opportunity to attract top talent and partners.
Accountability	Proactively respond to future regulatory risks (e.g. carbon pricing, disclosure, social impact).

4. Sustainable Operations

Through the implementation of energy efficient programs, new technologies and sustainability strategies in our buildings, Starlight aims to reduce energy and water consumption, minimize waste generation, and curb greenhouse emissions.

Environmental Technology

Starlight is committed to exploring new environmental technologies which will allow Starlight to reduce its energy consumption and minimize the environmental impact of its business operations through capital upgrades to new energy efficient equipment such as chillers, boilers etc. Starlight employs technologies such as building automation systems, smart thermostats and HVAC equipment, and renewable energy to further this commitment.

Waste Diversion

Starlight is committed to investigating opportunities to reduce the amount of waste generated by our buildings and assist in redirecting waste from landfills. Starlight engages third party property managers and tenants in best practices for recycling and waste reduction and diversion. Starlight supports government and industry initiatives to reduce its waste products and separate products into recycling streams.

Reduce Utility Consumption

Starlight is committed to lowering utility consumption in its buildings through implementing energy and utility retrofits using energy and water-efficient technologies.

Green Products and Services

Starlight encourages third-party property management companies and all vendors to use green products that are less harmful and toxic to the environment and people.

Education and Promotion

Starlight educates its stakeholders and tenants in green initiatives and environmental programs which have been, or will be, implemented throughout its buildings.

A Sustainability Committee was formed to educate the workplace on green initiatives pertaining to energy, water use, waste generation and diversion within Starlight's corporate office, such as organics and battery recycling programs. The Sustainability Committee meets regularly to update Starlight on goal achievement and to set new targets. Knowledge and awareness gained from the work environment are often transferred to our communities and our lives at home. Starlight organizes and participates in community events pertaining to environmental awareness and outreach by holding 'Environmental Day' events.

Risk

Starlight adheres to all applicable laws and evaluates the environmental risks associated with its properties and business operations. Starlight will continue to manage risk through hazard identification, incident management and corrective measures, as outlined in the Health and Safety Management System. Identified risks will be monitored, reviewed and updated according to municipal, provincial and federal regulations.

Green Building Certifications

Starlight will continue evaluating the feasibility of having its buildings certified for LEED and BOMA BEST certifications as well as new certifications when introduced. Starlight undertakes and implements a wide number of energy conservation measures as part of its overall certification process.

5. Monitoring and Tracking

Starlight continually tracks and monitors utility consumption and cost. Tracking and monitoring consumption allows Starlight to review the overall consumption and ensure the correct rates and consumption are being processed. Starlight tracks the metrics of implemented energy savings programs on a regular basis to ensure savings are being achieved. Starlight benchmarks new and existing buildings against similar building types and in a comparable geography to not only measure the success of its implemented programs but to target buildings with a high utility consumption.

6. Community Engagement

Starlight organizes and participates in various community events pertaining to a wide range of causes relating to environmental, social and charity. Starlight is committed to attending events pertaining to the environment and energy sectors within the real-estate industry.

7. Social Impact

Starlight conducts its business operations with corporate social responsibility in mind. This is accomplished through conducting business in a socially responsible and ethical manner, supporting human rights and engaging, learning from and respecting the communities and cultures in which Starlight operates. Starlight leaders ensure that appropriate organizational structures are in place to effectively identify, monitor and manage corporate social responsibility.

8. Health and Safety

Starlight has an established Health and Safety Management system (the “System”), based on OHSAS 18001. The System is comprised of multiple components which formulate Starlight’s strategy for ensuring health and safety in the workplace. These components include: planning, implementation, corrective actions and management review.

At the planning stage of the System, management and leadership are committed to planning for situations that have the potential to have an adverse effect on the health and safety of employees. A health and safety plan is devised that meets all regulatory requirements. The plan incorporates hazard identification and risk assessments, which are conducted prior to the implementation of the plan.

In the implementation and operations stage, resources are allocated to health and safety related initiatives. All processes are documented, provisions are made for emergency planning, employees are educated in emergency response planning and contractors are managed and trained to mitigate risk. Health and safety is a prerequisite for Starlight’s contractors, vendors and third party property management companies. Contractors are evaluated for their compliance with Starlight’s health and safety guidelines.

After implementation, Starlight audits and evaluates the plan and corrects any issues that may have occurred that resulted in an incident and measures the performance of contractors and vendors. Management reviews the System on an ongoing basis and seeks out ways to improve upon it.

9. Environmental and Social Programs

Environmental Programs

Starlight employs numerous environmental programs to improve the efficiency and reduce the carbon footprint of its properties. To conserve water and electricity, Starlight retrofits high consumption toilets, showerheads and faucet aerators and implements lighting upgrades and controls, carbon monoxide system optimization, electric heating, voltage harmonizers, cooling equipment, sub-metering, electrical vehicle charging stations and co-generation at its properties. In addition, mechanical upgrades have been made which include boiler plant upgrades and replacement, building automation systems and reflector panels.

In order to reduce the amount of waste that each property produces, waste diversion strategies have been undertaken in the way of waste equipment optimization, remote compactor monitoring, tenant engagement/education programs and diversion of construction materials such as structural steel, rebar, railing and concrete.

Social Programs

Employees actively participate in giving back to charitable organizations throughout the year. Some prior highlighted social programs include: The Daily Bread Food Bank, Princess Margaret Run/Walk, World Wildlife Fun, CN Tower Climb, Children’s Wish Foundation, Ronald McDonald House Charity and the Holiday Helper’s Charity.

10. Governance

Starlight’s executive leadership team is responsible for developing ESG strategies and procedures in order to implement policies which govern Starlight’s activities in this area.



Starlight's ESG strategy is led by the Director, ESG. Starlight's Chief Operating Officer chairs the ESG Steering Committee, consisting of senior leaders from each business line. Starlight's ESG Steering Committee is responsible for driving strategy, overseeing execution, and reviewing performance. Starlight's asset management teams and third-party property management companies are responsible for executing against the strategy and targets.

Starlight's Vice President of Procurement and Technical Services executes the energy management and technical services procedures and monitors their progress and success.

Starlight also employs energy project managers to review the performance of utility consumption at its properties. Findings are reported to the executive leadership team and improvements are made where necessary.

11. Approval and Review

This policy is reviewed annually by the Director, ESG. All recommended changes are forwarded to the Chief Operating Officer for final review and approval. This policy is shared with all employees and applicable stakeholders where required.