

# **Sun Communities, Inc**

## **Human Rights and Labor Policy**

As a premier owner and operator of affordable housing and vacation communities, Sun Communities, Inc. ("the "Company" or "Sun") recognizes the impact we can have on employees, residents, guests, and the local communities in which we operate. The Company maintains a strong commitment to the advancement, preservation, and protection of human rights across our operations and supply chain, and conducts its business in accordance with applicable laws, rules, regulations, as well as Sun's core values.

Sun's' Human Rights Principles are guided by the United Nations' Universal Declaration of Human Rights, International Labour Organisation ("ILO") Convention and the Sun Communities Code of Conduct and Ethics. The Company's commitment to protecting human rights extends to all Sun locations and business operations worldwide, and Sun expects those with whom it does business, including suppliers, vendors, and partners, to share the same commitment.

Sun strives to uphold the human rights of all and is committed to: equality among people of all experiences and backgrounds; team member well-being and safety; personal freedom from persecution; privacy protections; preventing the disenfranchisement of basic human rights based on political and religious affiliations; and economic, social, religious, and cultural freedoms.

### **I. Principles**

**a. Non-Discrimination and Anti-Harassment:** Sun is committed to recognizing and appreciating the variety of characteristics that make individuals unique while promoting and celebrating our differences. Sun will not tolerate harassing, discriminatory, or retaliatory conduct that interferes unreasonably with an individual's work performance or that creates an intimidating, hostile, or offensive work environment because of any protected trait. Such discrimination or harassment is prohibited and is inconsistent with our policies, practices, and philosophy. Protected traits include race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, veteran status or any other trait protected under state or federal laws.

Sexual harassment is strictly prohibited, whether specifically directed towards an individual, generally towards a class of individuals, or if it tends to create a hostile work environment.

The Fair Housing Act (Title VIII of the Civil Rights Act of 1968 as amended) guarantees that all protected classes are treated the same relating to housing matters and guarantees residents an equal opportunity to buy or rent a home. The objectives of the Fair Housing Act are embodied in Sun's policies and procedures.

Each team member is educated on their responsibility concerning the Company's fair housing and non-discrimination policies and is expected to treat all persons in a fair and professional manner.

All team members are required to complete non-discrimination, non-harassment, diversity, and fair housing/equality courses annually.

In addition, Sun has a clear reporting policy which gives team members access to Human Resources ("HR") through direct communications with HR, an anonymous hotline, and an online HR portal. Team members can use these resources to report complaints or report violations of our non-discrimination and anti-harassment policy, without fear of retaliation. All reports logged through a case management process and trends are reviewed quarterly by our Chief Administrative Officer.

**b. Workplace Health and Safety:** Sun strives to maintain a safe and healthy work environment for all team members, while providing the proper tools, safeguards, and training to prevent accidents. We work hard to uphold a safe workplace by complying with safety and health laws and regulations, maintaining internal safety requirements, and remediating risks. Each location is inspected several times each year to ensure safety standards are being met, with comprehensive safety inspections completed annually.

We also understand the importance of mental health and aim to provide resources and support to all team members. Through our company intranet, Connect, we deliver educational material and other information to raise awareness of mental health issues and risk factors. Sun team members have access to several resources that offers guidance and support for identifying, monitoring, and managing their mental health.

**c. Forced Labor and Anti-Human Trafficking:** Sun prohibits the use of forced or compulsory labor in any form. We strictly prohibit our team members, vendors, and business partners from engaging in forced labor activities. We are opposed to all forms of slavery and trafficking of persons and are committed to mitigating the risks of trafficking in persons in connection with our operations and hiring practices. Sun is committed to full compliance with all applicable laws, regulations, and policies that prohibit trafficking in persons, including Executive Order 13627.

**d. Protection for Rights of Minority Groups and Social Inequalities:** Sun is committed to promoting and encouraging respect for human rights and fundamental freedoms for all. We encourage the free expression and enjoyment of social, religious, and cultural beliefs and practices. This commitment is reinforced through ongoing education and sharing of resources which increase awareness of inequalities that exist and steps all stakeholders can take to make positive change.

**e. Protection of the Rights of Children:** Sun expressly prohibits the use of child labor that violates state and federal laws and abides by the ILO Standards outlined in Convention 138. Strict hiring practices are followed, and all managers who employ minors are required to sign state-specific acknowledgements that comply with applicable labor laws.

**f. Fair Labor Practices:** Sun is committed to conducting its business with honesty, integrity, and in compliance with applicable labor laws, rules, and regulations including those concerning working hours and compensation. Sun allows team members the freedom of association and right to choose collective bargaining representatives, without fear of reprisal, intimidation, or harassment. Team members are made aware of these rights through our team member handbook and through meetings with regional HR representatives. Any concerns regarding freedom of association and collective bargaining can be reported through one or more of our reporting mechanisms, including direct communications with HR, our anonymous hotline, or our online HR portal. We prohibit retaliation against team members who report concerns.

**g. Bribery and Corruption:** Sun prohibits corruption in all forms, including extortion and bribery. Under no circumstances do we tolerate the giving or receiving of money, gifts, or favors to influence improperly the behavior of another individual, organization, government employee, politician, or government body in furtherance of commercial or personal advantage. Sun does not accept or provide individuals or institutions with gifts, services, or hospitality intended to influence a business relationship or induce improper conduct.

**h. Compliance with Laws and Regulation:** The Company is committed to conducting business with honesty and integrity and in compliance with all applicable laws, rules, and regulations. No team member shall engage in any unlawful or unethical activity, or instruct others to do so, for any reason. Team members are required to comply with the insider trading laws which make it unlawful for any person who has material non-public information about the Company to trade stocks or other securities of the Company or to disclose such information to others who may trade, as well as the Company's insider trading policy.

As team members conduct the Company's business, they may encounter a variety of legal issues. If team members have questions on specific laws, rules, or regulations they should contact HR or the Compliance Officer who will determine whether to notify the Company's outside legal counsel.

Sun does not engage in practices such as illegal monopolies or improper trade restrictions. It is Sun's policy not to financially support non 501(c)(3) charities. Sun strives to forge transparent and fair relations with staff members, partnering institutions, vendors, and suppliers while making sure all contributions and donations are in accordance with the laws in the countries where it is in business.

**i. Training & Education** : Sun provides ongoing training programs and educational resources to support team members in their professional development and provide considerable opportunities for career growth. All team members have access to an extensive database of online courses, in-person training courses and curriculum, an online Knowledge Base of tools and information, development plans, and are supported by a team of learning and development professionals. The Company encourages its leaders to promote training opportunities for team members and to work closely with individuals to tailor learning plans to suit their individual needs and career aspirations.

## II. Governance

**a. Monitoring and Reporting** Through our enterprise risk management (“ERM”) process, Sun continues to identify, prioritize, monitor, and mitigate significant risks, including those related to human rights. Additionally, our annual materiality assessment allows us to engage with our stakeholders on developing, implementing, and evaluating our human rights policy and practices.

In the event of any concerns or complaints regarding human rights violations, individuals may report the issue through any of our reporting mechanisms, including through an HR representative, online portal, or anonymous reporting hotline.

Sun also administers ongoing team member surveys to solicit feedback and measure progress made regarding improvements in team member sentiment across several key focus areas including health and safety, commitment to quality service, compensation and benefits, diversity and inclusion, and other topics of focus.

**b. Oversight** Our full Board of Directors receives ESG updates on a quarterly basis from our VP of Sustainability or such other employee designated by the Company. The Nominating and Corporate Governance Committee of our Board of Directors is responsible for Sun Communities’ ESG matters, including review and oversight of Sun’s human rights policy.

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