



First Capital Real Estate Investment Trust

HUMAN RIGHTS POLICY

February 6, 2024

Most recently revised: February 6, 2024

Most recently reviewed: October 28, 2024

Last Board Annual Compliance Acknowledgment: February 11, 2025

FIRST CAPITAL REAL ESTATE INVESTMENT TRUST

HUMAN RIGHTS POLICY

First Capital Real Estate Investment Trust (“FCR”) is committed to respecting all human rights and recognizes the organization’s responsibility to establish a standard of expected conduct in all our business functions – for our colleagues, tenants, partners, supply chain and our communities.

Our policies and practices, including this Human Rights Policy (the “Policy”), are guided by international standards and best practices in the area of human rights, including the United Nations’ Guiding Principles on Business and Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and employment and human rights laws and regulations applicable in the regions in which we operate.

SCOPE

This Policy supplements and supports the standards of conduct expected of FCR, including all employees, officers, trustees or directors of FCR and its subsidiaries, through its Code of Conduct and Ethics and all relevant policies and procedures. This expectation extends to our contractors, suppliers, consultants, agents and other third parties as supported by our Supplier Code of Conduct and Ethics.

OUR COMMITMENT

FCR is committed to our responsibility to respect the human rights of all individuals and groups that may be affected by our operations and our supply chains. We recognize that businesses have an important role in promoting the respect for human rights and to prevent and reduce the risk of forced or child labour used in their operations and supply chains. At FCR, we aim to:

- a) avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur; and
- b) seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if we have not contributed to those impacts.

GENERAL

Safe and Healthy Working Environment

FCR complies with laws and regulations in the communities in which we operate to ensure safe working conditions. We have policies and procedures in place to foster a safe and healthy work environment, including the Code of Conduct and Ethics, Occupational Health and Safety Policy, and various training programs.

Discrimination and Harassment Free Environment

FCR is committed to fostering, cultivating and preserving a culture of equity, diversity and inclusion where all employees feel valued and are respected. We believe that the collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent of our employees represents our achievements, reputation and our culture. FCR has specific policies in place to prevent any discrimination based on the protected grounds in any employment, stakeholder or external personnel matter.

Prohibition of Forced Labour and Child Labour

FCR prohibits the use of all forms of forced, compulsory labour or child labour, including modern forms of slavery and human trafficking, and also seeks to prevent and reduce the risk that any such labour is used in its supply chains. Employment of individuals below the minimum age permitted by local law is strictly prohibited.

Transparency in the Supply Chain

FCR recognizes the difficult task of ensuring that our supply chains are free from human rights abuses. Our Supplier Code of Conduct sets out our principles and expectations as to how organizations that supply goods and services to FCR, including their representatives and employees, are to conduct business with us.

Freedom of Association

FCR respects the right of all workers to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests without fear of intimidation or reprisal, in accordance with local law.

Rule of Law

FCR will always comply with the applicable laws where we operate and strive to respect the human rights that have been internationally recognized. If local laws conflict with the principles or standards set out in this Policy, our Code of Conduct and Ethics, and/or related policies and practices, we will comply with local laws, while seeking ways to uphold our principles.

Monitoring and Reporting

This Policy is reviewed and approved at the most senior level of our business enterprise through FCR's People and Compensation Committee (the "**Committee**") and the Board of Trustees (the "**Board**") on an annual basis, or more frequently as required. Management is accountable to the Board for maintaining the highest standards of integrity and ethical behaviour and for creating working environments that support our principles. Management is also responsible for assessing the effectiveness of this Policy on an annual basis. Under FCR's governance and compliance program, regular updates are made to the Board or its committees, as applicable. This Policy will be communicated to all employees at the time of hire and on an annual basis thereafter.

Anyone who becomes aware of any human rights violation, breaches, or any concerns, has a duty to submit a report through FCR's Ethics Hotline which is operated by an independent third party (Clearview Connects) and allows for anonymous reporting.

The FCR Ethics Hotline can be accessed through:

Website:	http://www.clearviewconnects.com (English) http://www.connexionsclearview.com (French)
Toll-free number:	1-844-282-0851
Mail:	P.O. Box 11017 Toronto, Ontario M1E 1N0

Details relating to our ethics reporting process are set out in our Ethics Reporting Policy.