

## **Kennedy Wilson Business Conduct and Human Rights**

### Policy Against Discrimination

The Company believes that all persons are entitled to equal opportunity and that employment decisions should be based upon merit, qualifications, and the legitimate needs of the Company. The Company wishes to ensure that all employees and applicants are treated equitably and that there is no discrimination based on race, ethnicity, color, nationality, religion, sex, pregnancy, national origin, ancestry, age, marital status, physical or mental disability, medical condition, sexual preference, gender identity, veteran status, or any other characteristic protected by federal, state, or local law. Equal employment opportunity will be extended to all persons in all aspects of the employer-employee relationship, including recruitment, hiring, training, promotion, wages, benefits, work assignments, discipline, termination and any other condition or privilege of employment.

### Policy Against Harassment

In keeping with its policy against discrimination, the Company maintains a strict policy prohibiting harassment of its employees on the basis of sex (including sexual harassment), sexual orientation, gender identity, race, age, religion, disability, marital status, or any other basis prohibited by law. In this regard, it is important to both state and practice Company policy and each employee's responsibility regarding harassment. The guiding principles are good taste, common sense, and sensitivity to the rights and feelings of co-employees. We expect all our employees to be treated with respect, courtesy, and dignity.

Sexual harassment is defined as unwelcomed conduct of a sexual nature that creates an intimidating, hostile, or offensive work environment. Conduct can be physical, verbal, or non-verbal. Physical examples may include, but are not limited to: touching, holding, grabbing, hugging, kissing, intentionally brushing against a person's body, fondling, patting, pinching, sexual assault, and rape; Verbal examples may include, but are not limited to: crude or obscene language, offensive jokes and language, threats, sexual comments or suggestions, conversations filled with sexual innuendo and double meanings, and unwelcomed comments about a person's physical attributes; Nonverbal examples may include: staring at a person's body, offensive gestures or motions, circulating letters or cartoons, and displaying sexually suggestive pictures or objects in the workplace. Company policy prohibits harassment in any form including verbal, physical and visual harassment, or creating an intimidating, hostile, or offensive working environment.

### Non-Discrimination Due to Disability

It is the Company's policy that it shall not exclude from participation, deny benefits to, or subject to discrimination, any otherwise qualified individual by reason of his or her physical or mental disability. Equal employment opportunity will be extended to such qualified disabled persons in all aspects of the employer-employee relationship, including, without limitation, recruitment, hiring, training, promotion, benefits, discipline, and termination. The Company further affirms that it will engage in the interactive process and provide reasonable accommodation for the known physical or mental limitations of an otherwise qualified employee or applicant to enable them to perform the essential functions of the job, unless such accommodation will result in undue hardship to the Company.

### Immigration Law Compliance

The Company is committed to full compliance with federal immigration laws. These laws require that all individuals pass an employment verification procedure within specific time frames after they are hired. This procedure has been established by law and requires that every individual provide appropriate evidence of his or her identity and legal authority to work in the United States no later than three (3) business days after he or she begins work. Accordingly, all new hires must satisfactorily complete this procedure as a condition of employment.

#### Respect for Human Rights

We strive 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 human rights protections set forth in the laws of the United States, and the states and communities in which we operate. We expect our vendors and partners to uphold these principles and urge them to adopt similar policies within their own businesses.

#### 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.

#### Fair Employment Practices

Along with our commitment to human rights and equal opportunity in the workplace, we adhere to employment practices in full compliance with all applicable laws and regulations, and:

- Comply with all applicable labor laws including those related to (i) maximum hours of daily labor; payment of overtime; (iii) minimum working age and child labor laws and requirements.
- Pay living wages under humane conditions which meet, at a minimum, national or applicable local legal standards.
- 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 are also committed to working with well-established suppliers and vendors who adhere to our Vendor Code of Conduct, which prohibits forced labor and human trafficking. We look to screen our suppliers and vendors in order to eliminate any potential of human trafficking and slavery within our supply chain. 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.

As part of Kennedy Wilson's commitment to our workforce, we periodically monitor employee satisfaction and regularly request feedback on our operations and policies.

#### Whistleblower/Code of Conduct Policy

The Company maintains a Whistleblower/Code of Conduct Policy a copy of which is distributed to all employees.

In keeping with the policy of maintaining the highest standards of conduct and ethics and reaffirming that Kennedy Wilson is fully committed to complying with all applicable laws that protect employees against unlawful discrimination or retaliation as a result of their disclosure or reporting of questionable or illegal acts by the Company or its agents, Kennedy Wilson will investigate any suspected fraudulent or

dishonest use or misuse of the Company's resources or property by employees, board members, or consultants.

Kennedy Wilson is committed to maintaining the highest standards of conduct and ethical behavior and promotes a working environment that values respect, fairness and integrity.

#### Safety/Illness and Injury Prevention Program

We consider the safety and security of our employees, our customers, and our workplace to be a top priority. It is the policy of the Company to provide a safe, secure and healthy work environment for all employees, to observe all applicable state and federal safety laws regarding safety in the workplace, and to provide procedures for reporting and reviewing on-the-job injuries and accidents and for responding to emergency situations.

The Company has established an Injury and Illness Prevention Program ("IIPP") to convey its safety policies and reporting procedures. The Company enforces safety practices intended to promote a safe work environment. Violation or disregard of the safety rules may result in discipline up to and including termination of employment. Among other safety practices are the following:

- Report every injury, no matter how minor, to your supervisor.
- Report all unsafe or unhealthful conditions to your supervisor.
- Do not lift or push objects that are too heavy or appear too awkward for you to handle. Ask for help. To lift correctly, bend your knees, keep your body erect, and push forward with your legs.
- Maintain good housekeeping conditions in work areas.
- Leave desk, file, and cabinet drawers firmly closed when not in use.
- Arrange office space to avoid tripping as hazards such as telephone, calculator, and electrical cords.
- Do not remove or neglect machine guards or prescribed safety devices.
- Wear safety glasses, goggles or other protective equipment in accordance with good judgement and supervisor's instructions.
- When working on a computer:
  - Keep head, shoulders, and hips aligned, wrists straight, elbows bent nearly 90 degrees, neck erect, and feet well supported on a flat surface. Elevate your chair to a comfortable working height. Position the back of your chair to provide lower-back support.
  - Position monitor at least an arms distance away and directly in front of you with the top of the monitor a minimum of 15 degrees below horizontal eye level.

Any employee who, in the scope of his or her assigned responsibilities, operates any equipment or uses any materials designated as requiring specialized knowledge to operate or handle, should consult with their supervisor before operating such equipment.

All employees are expected to comply with all safety and health requirements whether established by management or by federal, state, or local law.