



ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PRINCIPLES AND POLICIES

INTRODUCTION

WPT Industrial Real Estate Investment Trust acquires, develops, owns and manages distribution and logistics properties located throughout the United States. We understand our buildings impact the communities in which they are located and the people who work inside them. To ensure our investments deliver long-term value for our investors, partners, and other key stakeholders, WPT is committed to integrating environmental, social, and governance (ESG) policies and practices into our operational, investment, and development strategies. We believe ESG enhances the competitiveness of our business by attracting high-quality tenants, creating competitive advantages, eliminating unnecessary risks, and maximizing long-term stakeholder value. By formalizing our existing sustainable development and operational guidelines under the framework of ESG, we can more clearly demonstrate our commitment to building a sustainable future.

ESG PRINCIPLES

WPT is aligned with the UN Global Compact definition of sustainability, which states: “Corporate sustainability is a company’s delivery of long-term value in financial, environmental, social and ethical terms.” And to ensure we successfully deliver long-term value, our sustainability and ESG strategy is rooted in the following Principles:

- Responsibility: To be responsible corporate citizens through understanding, managing, tracking, and reducing our environmental footprint while delivering value to our tenants, investors, and local communities
- Relationships: To build on a legacy of integrity and strong relationships by integrating ESG into our relationships with tenants, business partners, and suppliers
- Results: To enhance results through embedding ESG into our day-to-day business operations and tracking and reporting ESG performance

ESG LEADERSHIP

WPT understands that a successful ESG program requires oversight and accountability. As such, we have formed an ESG Leadership Team, led by WPT’s Chief Operating Officer, that will meet regularly to discuss companywide ESG strategies, identify opportunities for improvement, and communicate progress regularly to the Board of Trustees (“Board”) and across the organization to facilitate continuous improvement. Under the oversight of the Board, WPT’s ESG Leadership Team will be responsible for:

- Implementing and updating ESG policies
- Reviewing and updating the organizational ESG goals and objectives on an as-needed basis to ensure progress
- Monitoring performance trends as they relate to key performance indicators (KPIs)

- Reporting on ESG initiatives to WPT's Chief Executive Officer and Board of Trustees on a regular basis

This ESG policy applies to all WPT investments and operations, including our corporate offices. Successful policy implementation is the responsibility of all WPT employees and third-party business partners. Therefore, it is the responsibility of the ESG Leadership Team to ensure roles and responsibilities are established, communicated, and executed.

ENVIRONMENTAL POLICIES

As an owner of predominantly triple-net lease properties, WPT has the most potential to improve environmental performance in our own corporate operations and through new development and major renovation projects. However, it is also important to work with our third-party property managers and our tenants, to understand and affect environmental performance of existing assets under management. By implementing the following environmental policies, we aim to reduce our carbon footprint, enhance asset value, and create safer and healthier environments for building occupants and local communities.

WPT Office Spaces

WPT believes that an ESG focus starts within our own corporate operations. For company office spaces, we prioritize buildings that are green-certified, provide health and wellness amenities for employees, and are accessible by transit and other alternative modes of transport. By intentionally selecting a LEED-certified building for our corporate headquarters, we demonstrate our commitment to sustainability while providing the following employee benefits:

- Daylight and views
- Enhanced indoor air quality based on LEED building standards
- Employee lounges and wellness rooms
- Community rooftop spaces
- Fitness classes, individual training sessions, and gym equipment
- On-site bike storage and locker room facilities
- Incentives for lower emission transportation options

New Development & Major Renovations

The decisions we make for new development and major renovation projects have long-term implications for the environment and building occupants. As such, WPT is committed to incorporating LEED or similar sustainability standards into our new developments.

Energy

To ensure our properties are optimized for energy efficiency, and to reduce our environmental impact while providing high-performing buildings for our tenants, our building construction standards include, but are not limited to:

- Installing high-efficiency LED lighting to reduce maintenance and operational costs while increasing efficiency
- Adding lighting occupancy sensors with auto-dimming capabilities, timers, or photosensors
- Installing 90%+efficiency gas-fired make-up air units, where applicable
- Encouraging tenant use of High Volume Low Speed (HVLS) fans for destratification within the space to promote better air circulation

- Evaluating opportunities to use skylights and clerestory windows to increase natural light and reduce electricity use
- Implementing cool or reflective roof technology, where possible, to reduce air conditioning requirements
- Commissioning of mechanical, electrical, and renewable energy systems where applicable

Water

We aim to minimize consumption of potable water and reduce runoff from our development properties through standards that may include, but are not limited to:

- Following low-impact development practices to capture and treat water from a 95th percentile storm event for 25% of impervious surfaces on each property
- Ensuring all toilet fixtures are low flow, U.S. Environmental Protection Agency (EPA) WaterSense toilets
- The use of native, drought resistant plantings and xeriscaping is encouraged; if irrigation is required, where feasible, a high-efficiency irrigation system will be installed that may incorporate features like timer controls, weather sensors, and leak detection alerts

Waste

The construction process inherently generates a significant amount of waste, including bulky and heavy materials such as concrete, woods, metals, bricks, glass, etc. WPT is committed to reducing our landfill construction waste through waste management standards that include salvage, reuse, and recycling. Strategies include, but are not limited to:

- Requiring project sites to 1) develop waste diversion plans and goals that target five materials for diversion, and 2) provide WPT with waste and recycling totals, as well as the overall diversion rate, upon completion of the project
- Reusing existing materials, such as brick, concrete, and masonry, as fill or subbase material, where feasible

Materials and Resources

We prioritize the selection materials and products that provide an environmental product declaration, do not contain excessive levels of volatile organic compounds (VOCs), and meet applicable standards for formaldehyde emissions. Specific strategies for materials use include, but are not limited to:

- Prioritizing no/low VOC concrete sealers and densifiers/hardeners
- Using paints with no/low VOC content
- Ensuring flooring material adhesives are water-based with no/low VOC content
- Procuring materials that use recycled content, where feasible, such as recycled concrete, asphalt, and steel
- Supporting local and regional vendors for materials such as concrete and steel

Site / Land Management and Biodiversity

Careful land management strategies are critical to minimize disruption to a site's biodiversity and ecosystem during the building construction process. WPT is committed to construction standards that may include, but are not limited to:

- Pursuing development and re-development opportunities of brownfield sites to remediate contaminated areas while supporting local economic development
- Designing responsible rainwater management strategies that replicate the natural hydrology and water balance of the site, based on historical conditions and undeveloped ecosystems in the region
- Utilizing cool roofing strategies, such as TPO, in the lower 2/3 of the United States to reduce heat island effect

Existing Portfolio

Improving the management and operations of existing assets can reduce our environmental footprint, improve surrounding ecosystems, and create high-quality spaces for tenants. As an owner of distribution and logistics facilities, the customary "triple-net" structure of building leases often limits our ability to affect existing building operations (which fall under the control and responsibility of the building tenant). But WPT is committed to working with our third-party property management teams to optimize all operational aspects within our control. We will also continuously explore opportunities to partner with our tenants to support mutually beneficial projects and initiatives that drive building efficiency and sustainability.

Energy & Greenhouse Gas Management

Our strategy to understand and reduce energy consumption across our portfolio may include, but is not limited to:

- Piloting/utilizing technology that will enable us to easily access and track property utility consumption, including benchmarking usage in ENERGY STAR Portfolio Manager
- Pursuing ENERGY STAR building certifications
- Providing tenants with energy management best practice information and standards
- Exploring tenant partnership opportunities to implement energy efficiency projects and initiatives that will provide both short-term cost savings and long-term value to our stakeholders
- Conducting energy audits for buildings deemed to be poor performers
- Exploring opportunities for installations of renewable energy, such as solar
- Calculating and tracking greenhouse gas emissions for energy usage data collected from our buildings, including any associated offsets from renewable energy installations or other carbon offsets

Water

To support responsible water management and reduce potable water consumption across our portfolio, WPT is committed to the following initiatives that include, but are not limited to:

- Installing high-efficiency irrigation strategies and xeriscaping, where practical
- Requiring third-party property teams to ensure regular maintenance of water fixtures and irrigation systems as applicable

- Exploring feasibility of metering and measuring potable and reclaimed water supplied to each property
- Providing tenants with water management best practice information and standards

Waste

WPT is committed to responsible waste management, and we will work to reduce landfill waste through initiatives that may include, but are not limited to:

- Requiring third-party property managers to implement property-specific policies that promote the safe storage, recycling, and diversion of waste
- Diverting 100% of plant material/landscape waste from landfills via low-impact waste streams
- Providing tenants with waste management best practices and standards so they can establish waste diversion goals and implement recycling programs

Healthy Green Building Practices

WPT prioritizes the health and wellbeing of its building occupants and is committed to incorporating healthy building practices where feasible. We continue to improve the health impact of our buildings through initiatives that may include, but are not limited to:

- Requiring our buildings to be smoke-free, with designated smoking areas located at least 25 feet from all entries, outdoor air intakes, and any operable windows
- Providing tenants with healthy building best practices and standards, such as green cleaning to improve indoor air quality through reduced VOCs and outdoor walking paths and break areas that encourage physical activity and community building
- Incorporating natural light from skylights and clerestory windows, where practical, to improve occupant comfort and indoor environmental quality

Site Management and Biodiversity

WPT is committed to preserving ecological integrity and utilizing environmentally sensitive site management practices that provide a clean, well-maintained, and safe building exterior while supporting high-performance building operations. Onsite property management teams will work to implement site management best practices that include, but are not limited to:

- Creating and implementing a property-specific responsible site management plan and working with landscapers, where applicable, to ensure practices are in place that:
 - Reduce/eliminate use of harmful chemicals and chemical runoff at all properties, including cleaning chemicals and snow and ice removal
 - Prevent the overapplication of nutrients, including no ammonia-based fertilizers, biosolid-based fertilizers, quick-release fertilizers, or herbicides
 - Use low emission maintenance equipment when feasible
 - Deploy responsible irrigation management strategies such as smart irrigation controllers and xeriscaping

- Establishing and maintaining native or adapted vegetation on 20% of the total site area (including the building footprint), a minimum of 5,000 square feet (465 square meters) to provide habitat and promote biodiversity
- Establishing and implementing an annual inspection program of all rainwater management strategies and facilities to confirm performance and make adjustments where needed
- Evaluating existing exterior lighting conditions to ensure excess lighting/light pollution is reduced/eliminated while maintaining safety considerations

Material Sourcing & Sustainable Procurement

WPT is committed to responsible material sourcing and procurement. In addition to recycled and locally sourced materials used on large capital improvement and development projects, we will work with third-party property managers and tenants to encourage sustainable purchasing practices that may include, but not be limited to:

- Providing tenants with purchasing best practices and standards, such as materials that can be locally sourced, no/low VOC paints, adhesives and cleaning products, and materials with recycled content
- Ensuring any purchases made by third-party property management teams for WPT properties have been evaluated and are the most sustainable purchasing option available for the budgeted amounts

Climate Risk and Resilience

WPT understands that climate change has the potential to affect our properties and local communities. As such, we proactively work to improve our resilience to climate risk through several measures. We identify severe weather risks due to climate change annually as part of our general risk and insurance analysis and, for new investments, as part of our due diligence process. We utilize all ALTA, topographical and wetlands surveys, zoning reports, flood maps and elevation certificates, environmental site assessments, building condition and roof reports, and more, to assess relevant risks for our properties. Additionally, we work closely with our civil engineering and insurance advisors to ensure that properties we develop contain engineering controls that reduce the likelihood of damages resulting from extreme weather events. To prepare for and ensure all WPT buildings are operational as soon as possible after a climate event, we perform preventative measures, including but not limited to:

- Incorporating climate mitigation strategies into our building design and insurance plans
- Ensuring all buildings have emergency preparedness plans in place unique to the building and its geographic location
- Establishing a reliable network of service provider partners ready to bring our buildings back into operations as quickly and safely as possible and provide emergency services as needed

SOCIAL POLICIES

Human Rights

Ethics and integrity are at the center of our core values and culture. We treat all our stakeholders with the highest level of respect and dignity, free of discrimination and harassment of any type, and we expect all our employees, business partners and vendors to do the same. We are committed to protecting human rights and will not tolerate any human rights abuses or complicity in such abuses by our business partners. WPT explicitly prohibits the use of unlawful child labor for our own operations and for or our vendors as part of our

[Vendor Code of Conduct](#). All workers must meet the minimum legal age of employment. In addition to prohibiting unlawful child labor, WPT strictly prohibits any kind of slavery, forced labor or human trafficking. This includes protecting workers who may be uniquely vulnerable because of their status as foreign or migrant workers.

Health & Wellbeing

WPT understands that for our employees to perform their jobs to the best of their abilities, their mental, emotional, and physical health must come first. In addition to the health and wellbeing benefits afforded by our LEED certified offices, we offer full-time employees a benefits package that includes:

- Medical, dental, and vision coverage
- Educational assistance
- Comprehensive time off policy that includes holidays, paid time off, parental leave, short- and long-term disability, school activities, jury duty, voting, and more
- Access to free and confidential mental health resources

Safety

We are committed to maintaining a safe work environment for our employees, tenants, and customers. We strive to keep everyone safe through the following practices:

- All employees are encouraged to report hazardous conditions and threats of violence to their supervisor
- Vendors are expected to abide by WPT's guidelines for conduct in the workplace, including, but not limited to, equal opportunity and safety

Workplace Culture

WPT is committed to creating an inclusive workplace that is free from discrimination and harassment. We abide by the following policies to ensure all employees feel safe and are on equal footing with respect to the conditions of their employment:

- Zero tolerance policy for any form of sexual harassment
- U.S. Equal Employment Opportunity Commission (EEOC) guidelines, including that we do not discriminate against applicants or employees based on race, religion, national origin, sex, sexual orientation, gender identity, veteran status, or any other classes protected under the law
- Other federally mandated policies surrounding child labor, forced and compulsory labor, and other working conditions standards.

Employee Engagement

The growth and evolution of WPT would not be possible without the dedication of our employees. As such, we are focused on creating a challenging, enriching, and rewarding work environment that allows our employees to excel. Our commitments to employee engagement include, but not be limited to:

- Conducting employee satisfaction surveys
- Offering regular training and career development, including 24/7 access to hundreds of online skill building courses

- Providing rewarding opportunities to give back to the local community through company-sponsored volunteer events and paid time off for volunteering

Employee Benefits

All employees who work more than 30 hours a week are eligible for the following:

- Comprehensive healthcare
- 401K plan
- Educational assistance
- Paid time off (non-exempt and part time employees may be eligible for paid time off, depending on the circumstances of the contract)

Diversity, Equity, & Inclusion

WPT is committed to integrating principles of diversity, equity, and inclusion (DEI) in our everyday business practices. This expanded DEI policy builds from our [Diversity Policy](#), which considers diversity when nominating candidates for the Board and executive officer appointments. We take the following steps to ensure diversity is integrated into all aspects of our business:

- Employees and senior management are required to participate in annual diversity and inclusion training
- We are working to actively engage employees in initiatives that illustrate how diversity and inclusion support our business practices
- We are working to track metrics related to diversity and inclusion, such as employee and vendor demographics and the impact of philanthropic efforts on increasing social equity

Community Engagement

WPT is committed to making a meaningful difference in the communities in which we operate. We are committed to engaging with and supporting these communities through our policies and practices, including:

- Our volunteer time off (VTO) policy, which allows employees to take paid time off to volunteer in their communities
- Providing financial assistance to communities by making charitable contributions to organizations, selected by employees, with a focus on supporting social and environmental advocacy organizations

GOVERNANCE POLICIES

Data Protection, Cybersecurity, & Privacy

WPT takes data protection and privacy seriously and expects its employees to:

- Use all company-issued equipment and software for business use only, including the internet
- Be mindful of any views expressed on employees' blogs and/or social media accounts and otherwise act in accordance with WPT's [Social Media Policy](#).
- Carefully consider before sharing information online that may be compromising to WPT, its tenants, vendors, employees, or partners

- Participate in routine training on cybersecurity best practices

Bribery & Corruption

All WPT employees are expected to obey the laws of the jurisdictions in which WPT operates. It is expected that employees will:

- Disclose any conflicts of interests that may interfere with WPT's best interests
- Comply with all policies and procedures that WPT adopts, including our [Code of Business Conduct and Ethics](#)

Fraud & Political Contributions

WPT Industrial expects its employees to follow all laws and regulations, both at the company level and within the jurisdictions in which WPT operates. All personnel should strive to:

- Protect WPT assets, including proprietary information such as intellectual property, databases, and unpublished financial data
- Comply with all laws and company policies surrounding illegal contributions to domestic and foreign government officials

Remuneration and Alignment

To encourage all employees to embrace WPT's ESG policies and expectations, we utilize ESG-related criteria in employee performance reviews. These criteria are tied to employees' bonus incentives and will help distribute responsibility for ESG implementation across the organization. Criteria are tailored to each position and may vary based on property-level opportunities and performance.

This policy was adopted by the Board of Trustees on March 10, 2021