



## HUMAN RIGHTS POLICY

### RESPECT FOR HUMAN RIGHTS

Retail Opportunity Investments Corp. ("ROIC") aims to conduct operations that are consistent with the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights which encompass three pillars:

1. The state duty to protect human rights;
2. The corporate responsibility to respect human rights;
3. The need for greater access to remedy for victims of business-related abuse.

We want to fulfill society's expectation of business: that it should treat people conscientiously and with dignity. We are committed to help increase the enjoyment of human rights within the communities in which we operate; and to engaging with our stakeholders in developing, implementing, and evaluating the policy's effectiveness.

ROIC complies with the employment and labor laws in every state and county in which we operate. We support fundamental human rights for all people. Should we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation.

### DIVERSITY AND INCLUSION

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, religion, color, national origin, ethnicity, sex, sexual orientation, gender identity, gender expression, age, disability, veteran status, marital status, genetic information, or any characteristic protected by law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills, and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

### SAFE AND HEALTHY WORKPLACE

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury, and health impacts.

### WORKPLACE SECURITY

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

## **FORCED LABOR AND HUMAN TRAFFICKING**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking. Additionally, we are committed to complying with all applicable child labor laws.

Operational excellence by our vendors is a vital component of our success. We recognize that low-wage and unskilled workers, and those without legal immigration status, are most vulnerable to falling prey to modern day slavery.

Although ROIC does not directly employ such workers, we hire third party operators that provide landscaping, janitorial services, and building maintenance, among other services. These industries are identified as posing at least some risk of trafficking according to the [National Human Trafficking Hotline](#). We have updated our policies to ensure heightened awareness, detection, prevention, and reporting of human trafficking to our employees, managers and our third-party operators. The National Human Trafficking Resource Center Hotline is: (888) 373-7888.

## **WORK HOURS, WAGES, AND BENEFITS**

We compensate employees competitively relative to the industry and local labor market. We ensure full compliance with applicable wage, work hours, overtime, and benefits laws. We are committed to complying with applicable labor and employment laws.

## **WATER RESOURCES**

We recognize that the right to water is a fundamental human right.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

The right to freedom of association is proclaimed in the United Nations Universal Declaration of Human Rights. We respect the freedom of association, and employees are required to comply with all applicable labor and employment laws, regulations and policies related to freedom of association and collective bargaining. We adhere to the conventions of the International Labor Organization, including Freedom of Association and Protection of the Right to Organise.

## **EMPLOYEE TRAINING AND REPORTING**

We strive to create workplaces in which open and honest communications among all employees are valued and respected.

Annually, at our employee training workshop, we ensure our employees are aware of this Human Rights Policy. This training is followed-up with a written acknowledgement of review and education.

## **REPORTING VIOLATIONS OF THIS POLICY**

If any officer or employee of ROIC has concerns or complaints regarding questionable human rights violations, then he or she should submit those concerns or complaints to their supervisor or to the Human Resources department. Any employee who would like to confidentially report a potential violation of this policy should raise his or her concerns (a) to our Compliance Officer, or (b) to our Whistleblower Hotline email address at [auditcommitteehotline@roireit.net](mailto:auditcommitteehotline@roireit.net). We believe that employee feedback is critical to our organization's growth and progress. Employees are encouraged to provide input via their managers and/or our Human Resources department at any time and, when offered, are invited to participate in employee satisfaction surveys to help identify specific areas of improvement.

In order to encourage reports of observed violations of this policy, we keep all reports strictly confidential to the extent reasonably possible within the objectives of this policy and law. We do not allow retaliation for reports made of misconduct by others. Specifically, ROIC will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such an officer or employee in the terms and conditions of his or her employment. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

This Human Rights Policy applies to ROIC and our affiliated entities. The Nominating and Corporate Governance Committee of our Board of Directors is charged with considering and advising the Board on social responsibility matters, reviewing and recommending appropriate social responsibility goals, policies and practices, and reviewing and monitoring key performance metrics relating to social responsibility matters.

In accordance with the foregoing, this Policy Statement on Human Rights was approved by the executive management team on June 1, 2020 and is overseen and reviewed at least annually by the Nominating and Corporate Governance Committee of our Board of Directors.

Version 1.0

Adopted: *June 1, 2020*