Diversity and Inclusion Policy
Corporate and Field

Purpose
Simon is committed to a diverse workforce and acknowledges the value it brings to the businesses and communities we serve. This policy provides guidelines that support our commitment to continually build a diverse workforce and foster a culture of inclusiveness.

Persons Affected
This policy applies to all employees of Simon and its affiliates.

Policy
At Simon, we believe that diversity, respect, and inclusiveness strengthen our company, enables broader perspectives, enhances creativity and innovation, and fosters an environment that promotes employee engagement and increases individual productivity and company success. This policy builds on the foundation of equality and our commitment and approach to diversity and inclusion, including supporting policies, programs, and practices across the organization.

Commitment
Simon is an Equal Opportunity Employer and prohibits discrimination and harassment of any kind. Simon is committed to the principle of equal employment opportunity for all employees. Simon prohibits discrimination based on race, color, creed, religion or belief, national, social or ethnic origin, sex (including pregnancy, childbirth, or related medical conditions), age, physical, mental or sensory disability, HIV status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, veteran or present military status, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate. Simon will not tolerate discrimination or harassment based on any of these characteristics. Simon is also committed to providing equal opportunity to all employees with regard to recruitment, selection, retention, compensation, training and development, advancement and promotion opportunities, benefits, and other terms of employment.

We also recognize and embrace the diversity of individual perspectives based on a variety of work and life experiences, personalities, socio-economic status, knowledge, and skills. The company values the importance of attracting and retaining a broad range of qualified individuals who bring differing viewpoints and innovative ideas to the business.

Our commitment to diversity and inclusion is aligned with the Company’s core values and guiding operating principles. To support this, we are committed to:
• A work environment free from any form of discrimination, harassment, retaliation, or victimization;
• Equal opportunities for recruitment, selection, retention, compensation, training and development, advancement and promotion opportunities, benefits, and other terms of employment;
• Incorporating diversity and inclusion in our policies, procedures, programs, and practices;
• Attracting and retaining diverse talent;
• Recruiting, selection, and compensating process based on skills, qualifications, and experience;
• Fostering an environment of inclusion and understanding to help ensure employees are valued, heard, and respected;
• Promoting an environment of collaboration, teamwork and employee engagement that welcomes and includes diverse perspectives and experiences; and
• Promoting and offering learning or other professional development opportunities that foster career growth.

Approach
We believe that a diversity of background, experience, and thinking among our employees contributes to our ability to create value for our shareholders, our clients, and the consumers and communities we serve.

To maintain a diverse and inclusive work environment, we have the following policies, procedures, programs, and practices.

• **Equal Employment Opportunities** – The company is committed to providing recruitment, selection, retention, compensation, training and development, advancement and promotion opportunities, benefits, and other terms of employment without regard to race, color, creed, religion or belief, national, social or ethnic origin, sex (including pregnancy, childbirth, or related medical conditions), age, physical, mental or sensory disability, HIV status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, veteran or present military status, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate.

• **Code of Business Conduct and Ethics** – Simon is committed to eliminating all forms of discrimination, harassment, retaliation, and victimization. Our Code of Conduct policy supports this commitment.

• **Targeted Recruitment and Selection** – A formal internal and external recruitment, hiring, and retention strategy to effectively generate qualified, diverse candidates for our recruitment pipeline targeted at placing and hiring minority and underrepresented talent at our corporate offices and in the field.

• **Performance Management** – To achieve strategic business objectives of the organization, performance is assessed and measured on goals and priorities mutually set by the manager and employee that promote fairness and improves individual productivity and company success.

• **Career Development** – Employees are engaged in learning programs designed to enhance their strategic and critical thinking skills and core competencies. Simon
further offers leadership programs to high potential employees. These programs are designed to foster career growth.

- **Talent Retention** – Employees are assessed based on skills, abilities, and behavioral indicators to help inform and measure the health of the company's overall talent pipeline and retaining the brightest talent. We help develop plans for individual employee career development and long-term leadership succession.

- **Diversity and Inclusion Learning Series** – A learning series that highlights diversity and inclusion topics which raise collective awareness and helps employees recognize and act upon opportunities to foster inclusion, contribute to the culture at Simon, and enhance individual and organizational success.

- **Diversity and Inclusion Council** – As diversity and inclusion aligns with the guiding principles and core values at Simon, the D&I Council will continuously seek ways to leverage diversity and inclusion to achieve Simon's business objectives. The council will also help foster a culture that promotes awareness and respect, and where valuing diversity is integrated into all aspects of our work life including learning and development, training, communications, hiring, advancement and promotion opportunities, retention and overall employee experience.

- **Succession Planning** – It is the policy of the company to assess the needs of the organization to ensure the selection, retention, development and placement of the highest qualified and capable individuals and who best align with the organization's vision, mission, values, and goals.

**Responsibilities**
All employees are expected to uphold the integrity of this policy.

**Managers Responsibilities**
Managers are responsible for fostering a work environment that is free from discrimination, retaliation, and harassment and where employees have the opportunity to increase their individual productivity and to perform at their fullest potential.

Managers are responsible for demonstrating behavior that promotes inclusion where different perspectives are respected, heard, and valued.

Managers are responsible for proactively addressing conduct in violation of this Policy, taking corrective and prompt action, and contacting Human Resources.

**Employees Responsibilities**
Employees are responsible for conducting themselves in a manner that contributes to a culture of inclusiveness and respect at all times.

Employees who believe they have experienced or witnessed any form of discrimination, retaliation, harassment, or victimization should report the instance to a supervisor, a Human Resources Representative or contact the Company's Hotline immediately.

Employees who violate the company's Diversity and Inclusion Policy may be subject to disciplinary action, up to and including termination.