



SUSTAINABILITY

REPORT

2021





PRIME US REIT

Prime US REIT ("PRIME") is a well-diversified Singapore real estate investment trust ("REIT") focused on stabilised income-producing office assets in the United States ("U.S."). Listed on the Mainboard of the Singapore Exchange Securities Trading Limited ("SGX-ST") in 2019, PRIME is managed by KBS US Prime Property Management Pte. Ltd. (the "Manager"). PRIME offers investors unique exposure to a high-quality portfolio of 14 Class A freehold office properties, which are strategically located in 13 key office markets in the U.S. PRIME's portfolio has a total appraised value of US\$1.65 billion as at 31 December 2021.

Furthering PRIME's goal to provide Unitholders with long-term and sustainable growth, the Manager is pleased to present PRIME's Sustainability Report ("SR" and/or the "Report") for the Financial Year from 1st January 2021 to 31st December 2021 ("FY2021").

The Manager welcomes all questions and feedback on PRIME's sustainability performance and reporting practices. Please direct queries to info@primeusreit.com.

[102-53]

ABOUT THIS REPORT

REPORTING SCOPE

[102-45] [102-46] [102-50]

This Report covers the sustainability performance of PRIME for FY2021. The scope of this Report relates to the activities of the Manager and property-specific data applicable to PRIME's 14 U.S. properties, unless otherwise stated.

This Report should be read together with PRIME's Annual Report for a more comprehensive view of PRIME's business and performance.

REPORTING STANDARDS

[102-54]

This Report has been prepared in accordance with the GRI Standards: Core Option. The Global Reporting Initiative ("GRI") Standards were preferred as they represent global best practice for the reporting of an organisation's economic, environmental, social and governance ("ESG") impacts and are currently the most widely adopted sustainability reporting standards in Singapore.

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CEO STATEMENT



We look forward to continuing purposeful collaborations with our employees, Unitholders and other stakeholders, with the aim of driving long-term value creation for a more sustainable future.



DEAR STAKEHOLDERS,

We are pleased to present PRIME's 2nd sustainability report, which highlights our ESG performance for FY2021.

The Manager remains committed to building a sustainable future through improving the environmental, social and economic well-being of the communities in which we operate.

In FY2021, despite global economic uncertainty and the Delta and Omicron variants disrupting employers' return-to-office plans, PRIME's portfolio remained resilient, reflecting the quality of our assets and tenants, as well as the strength of our diversified portfolio.

We are delighted to have recorded strong performance for FY2021, with gross revenue and net property income increasing, largely due to our two new acquisitions of high-quality assets in key growth markets in July 2021.

The integration of ESG considerations into PRIME's business strategies and operations is essential in minimising sustainability risks and environmental impact and improving our performance. As part of our growth strategy, we continue to focus on delivering sustainable value to stakeholders through the responsible management of PRIME's ESG factors and a growing emphasis on sustainable design, policies and practices across all properties. This was achieved with

the support of our Board of Directors, who provide invaluable guidance and maintain oversight of the management. We also work closely with our property managers to strategise, implement and monitor sustainable policies and practices to support our future growth.

As we look to further drive growth and deliver value, we will continue to explore ways to further integrate sustainable practices into all aspects of our operations.

In FY2021, the Manager continued to focus on monitoring and reviewing the management of five material ESG topics, which include: Sustainable Economic Value, Energy and Carbon Abatement, Diversity and Inclusion, Health, Safety and Satisfaction of Stakeholders, and Ethical Behaviour and Compliance.

We are grateful for the support from all stakeholders in our sustainability journey, and we look forward to continuing purposeful collaborations with our employees, Unitholders and other stakeholders, with the aim of driving long-term value creation for a more sustainable future.

MS BARBARA CAMBON
Chief Executive Officer and Chief Investment Officer

PRIME'S SUSTAINABILITY APPROACH

[102-16] [102-18] [102-20] [102-26] [102-29] [102-32]

The Manager is dedicated to its goal of delivering sustainable value for the stakeholders of PRIME. As part of the process, the Manager is committed to laying the foundation for high standards of corporate governance and responsible management of PRIME's environmental and social impacts.

To facilitate the integration of sustainable practices into PRIME's business operations, sustainability is a shared responsibility across all functions. The management team develops and refines PRIME's sustainability strategy, while the property managers help to implement, execute, and monitor the policies and practices.

Ultimately, the Manager's Board of Directors takes ownership for PRIME's sustainability strategy by setting targets, reviewing management policies and practices as well as PRIME's overall sustainability performance.

PRIME's Value Chain [102-9]

The Manager recognises that much of the environmental footprint of the business lies in its supply chain, its services and the materials used for construction and operation of the buildings. A green purchasing programme is in place to ensure products, such as cleaning supplies that are purchased have low environmental impact, displaying the team's continued commitment to engaging with environmentally and socially responsible suppliers. Essential suppliers to PRIME's business consist of engineering, janitorial, parking, landscaping, security, and waste and recycling suppliers. The Manager maintains close relationships and engages with suppliers through surveys to understand the impacts that their policies and procedures have on social and environmental issues.

PRIME's Affiliations [102-13]

PRIME is a member of the REIT Association of Singapore ("REITAS"), which was formed to promote the growth and development of the S-REIT industry.

SUSTAINABLE MANAGEMENT

STAKEHOLDER ENGAGEMENT AND MATERIALITY

[102-40] [102-42] [102-43] [102-44] [102-47] [103-1]

Understanding and adapting to the needs and expectations of PRIME's stakeholders is an integral factor to PRIME's long-term growth and success. The Manager therefore communicates with PRIME's stakeholders regularly to gain a comprehensive understanding of the ESG topics that matter most to PRIME's stakeholders.

ENGAGING WITH PRIME'S STAKEHOLDERS

Stakeholders	Mode of Engagement	Frequency of Engagement
Regulators	Corporate access events	Ad hoc
	Via emails and phone calls	Ad hoc
Investors	Business and financial updates	Quarterly
	Corporate access events	Ad hoc
	Investor queries via emails and phone calls	Ad hoc
	Annual General Meetings	Annually
Financial Institutions	Meetings for corporate profiling and investor outreach	Ad hoc
Tenants	Discussions in-person, or via emails and phone calls	Daily
Local Community	Tenant events such as socials and webinars, both in-person and virtual	Ad hoc
	Discussions in-person, or via emails and phone calls	Regular
	Corporate social responsibility programmes	Ad hoc
Employees	Discussions in-person or via email and phone call	Daily

From these regular interactions and an assessment of industry-wide sustainability concerns, the Manager identified a list of ESG topics that reflect ESG issues of significant impact to PRIME and its stakeholders.



Category	Material ESG Topics
Economic	<ul style="list-style-type: none"> Sustainable Economic Value
Environmental	<ul style="list-style-type: none"> Energy and Carbon Abatement
Social	<ul style="list-style-type: none"> Diversity and Inclusion Health, Safety and Satisfaction of Stakeholders
Governance	<ul style="list-style-type: none"> Ethical Behaviour and Compliance

SUSTAINABLE ECONOMIC VALUE

[103-2] [103-3] [201-1]

The Manager is committed to achieving sustainable economic growth and delivering long-term value for PRIME's stakeholders. In order to achieve this goal, the Manager laid a foundation for the integration of sustainability into its business strategy and operations. PRIME's sustainability policies, practices and performances, detailed in this report, complement PRIME's overall financial performance by providing a perspective based on its environmental, socioeconomic and governance impacts.

Please refer to PRIME's Annual Report FY2021 for more details on PRIME's FY2021 financial results.



ENERGY AND CARBON ABATEMENT

[103-2] [103-3] [302-1] [305-2] [CRE 8]

Increasingly, investors are placing higher weightage on climate risks. The Manager recognises its role¹ in ensuring PRIME's resilience against the impact of climate risks and other environmental risks while supporting the industry in the transition towards an environmentally sustainable economy. Starting from the next financial year ("FY2022"), the Manager will report on its climate-related progress and management in line with recommendations from the Task Force on Climate-related Financial Disclosures ("TCFD") on a phased approach as required by the Singapore Exchange ("SGX") and the Monetary Authority of Singapore ("MAS").

In preparation for climate-related disclosures, sustainability assessments² have been commissioned in 2021 for the two new acquisitions, Sorrento Towers and One Town Center. These assessments are part of PRIME's acquisition due diligence and aims to provide the Manager a better understanding of the property's environmental footprint while enabling the Manager to identify and address any potential climate-related risks and opportunities across the property's life cycle.

The Manager recognises its importance as a strategic director in enhancing energy efficiency, in order to reduce overall greenhouse gas ("GHG") emissions. To that extent, the Manager is pleased to report that 12 out of the 14 properties in PRIME's reporting scope are U.S. Green Building Council Leadership in Energy and Environmental Design ("LEED") and/or Energy Star certified, demonstrating the Manager's commitment to investing in properties that integrate sustainability into design and operations:

ENERGY STAR³ PERFORMANCE FOR FY2021



PRIME's Energy Savings Certifications

Tower I at Emeryville	• Energy Star Certified and Rated 83 in 2021
222 Main	• LEED Gold (Core & Shell) • Energy Star Certified and Rated 81 in 2021
Village Center Station I	• LEED Gold (Core and Shell) • Energy Star Certified and Rated 84 in 2021
Village Center Station II	• LEED Silver • Energy Star Certified and Rated 92 in 2021
101 South Hanley	Not energy star certified in 2021
Tower 909	• LEED Gold (Operations and Maintenance) • Energy Star Certified and Rated 83 in 2021
Promenade I & II	• Energy Star Certified and Rated 74 (Promenade I) and 67 (Promenade II) in 2021
CrossPoint	• LEED Gold (Core & Shell) • Energy Star Certified and Rated 51 in 2021
One Washingtonian Center	• LEED Platinum (Operations and Maintenance) • Energy Star Certified and Rated 84 in 2021
Reston Square	• LEED Silver (Core & Shell) • Energy Star Certified and Rated 78 in 2021
171 17 th Street	• LEED Silver (Core & Shell) • LEED Platinum (Operations and Maintenance) • Energy Star Certified and Rated 84 in 2021
Park Tower	• LEED Gold (Operations and Maintenance) • Energy Star Certified and Rated 81 in 2021
Sorrento Towers	• LEED Gold (Operations and Maintenance) • Energy Star Certified and Rated 90 (Sorrento Towers North N1) and 92 (Sorrento Towers North N2) in 2021
One Town Center	Working towards achieving Energy Star Certification in 2022

1. Architecture 2030, 'Why the built environment?' (2022). Available at: <https://architecture2030.org/why-the-building-sector/>
 2. Further information regarding the initiatives raised in the sustainability assessment reports will be covered in 2022 plans.
 3. Energy Star score rates the building's energy performance relative to similar buildings nationwide. Expressed on a 1-100 scale, a higher score denotes better energy efficiency. A score of 50 represents median energy performance, while a score of 75 or higher indicates that the building is a top performer. More information available at: https://www.energystar.gov/buildings/benchmark/understand_metrics/how_score_calculated

Since the onset of the COVID-19 pandemic, many of PRIME's tenants have adopted flexible work arrangements, which include staggered working hours and split team arrangements causing office occupancy rate to vary daily. In order to prevent unnecessary energy consumption, the Manager has adopted climate and lighting systems to address the fluctuation in occupancy numbers. The following measures have been adopted to allow PRIME's property managers to easily adapt to the changes and ensure energy efficiency:

PRIME's Energy Savings Initiatives in Response to Occupancy Rate

Tower I at Emeryville	• Optimised heating, ventilation, and air-conditioning ("HVAC"), with monthly assessments to ascertain tenant needs • Monitored daily usage with Gridium, a tool for organising building operations such as energy use, in order to review the rate structure strategies for 2021 usage
222 Main	• Optimised HVAC and lighting usage on unoccupied floors by setting them to on-demand during daytime hours
Village Center Station II	• Optimised HVAC and lighting usage by expanding HVAC set points, allowing for maximum outdoor air circulation
Tower 909	• Reduced chiller operation and run time to reflect the building load • Optimised lighting usage with installation of sensor lighting with auto shut-off
Promenade I & II	• Optimised HVAC and lighting usage on unoccupied floors by adjusting the setpoints and implementing demand response
Park Tower	• Optimised HVAC and lighting usage on unoccupied floors by setting them to on-demand

In response to climate urgency, the Manager is in the process of integrating climate-risk and opportunities into PRIME's strategic business planning. The Manager has a responsibility to ensure that energy efficiency remains a priority when business operations resume and occupancy rates increase to their normal levels. PRIME's property managers have implemented the following longer-term initiatives:

PRIME's Long-Term Energy Savings Initiatives

Tower I at Emeryville	• Replaced 100% of interior lighting and 50% of exterior lighting with motion sensor LED lights, which will switch off automatically when not in use, reducing energy consumption • Digitalised 50% of the building's HVAC control systems, allowing the systems to be monitored through the Building Management System (BMS) and adjusted accordingly, based on the feedback provided
222 Main	• Participated in the Blue Sky programme with Rocky Mountain Power, which aims to reduce carbon footprint associated with energy usage
101 South Hanley	• Replaced all light fixtures outside of tenant's space to LED to increase energy efficiency • Upgraded the building's pneumatics control system to a Direct Digital Control (DDC) system, yielding operational energy savings
Tower 909	• Utilised Energy Management System for remote management, optimal start operations and after-hour temperature selections to reduce energy consumption • Installed lighting that are sound and motion activated in all stairwells and parking garages • Optimised HVAC to only be operated upon tenant request during Saturday business hours • Retrofitted LED lighting for speculative suites which offer move-in ready spaces, common corridors and restrooms
Promenade I & II	• Participated in demand response during the summer months. Demand response refers to voluntarily reducing electricity consumption during conservation events, when statewide demand for power use is at its highest
All properties	• Implemented smart technology by using Energy Star Portfolio Manager benchmarking platform. Usage data is managed by Building Engineers and monitored by Energy Star's Portfolio Manager either on a monthly or annual basis

ENERGY AND CARBON ABATEMENT

[103-2] [103-3] [302-1] [305-2] [CRE 8]

In addition, PRIME's property managers aim to encourage tenants to make greener choices by enabling greener transport options.

Adoption of Electric Vehicles (EV) and EV charging stations in selected properties

Tower 909



Most of our employees and tenants' employees commute to Tower 909 via their personal vehicles (gas/electric) or by public transportation via the DART rail system that directly connects the property to uptown and downtown Dallas, and Dallas Fort Worth Airport. As workers return to the office, PRIME continues to explore opportunities to minimise emissions. In 2021, PRIME purchased a Polaris GEM Electric Shuttle to transport tenant employees to the rich amenity base in the local market and made the decision to move to an EV Shuttle as part of our commitment to our sustainability agenda.

According to the US Department of Energy⁴, electric vehicles can convert more than 77% of electric energy into power while a typical gas-powered vehicle converts less than 30%, making these vehicles significantly more energy efficient. These shuttles are fully charged within five hours and can transport a maximum of five passengers per trip. In addition, as compared to their internal combustion engine counterparts, these electric shuttles are much quieter, making the journey to various venues more comfortable for our tenants, guests, and employees.

171 17th Street, Park Tower, Tower I, 101 South Hanley, CrossPoint, Reston Square, Sorrento Towers and 222 Main



In 2021, there was an impressive return to the electric car market by consumers in the United States, with sales more than doubled going beyond half a million⁵. There has been an increase in adoption rate of electric vehicles ("EV") and to meet this upward demand, PRIME now has charging stations in eight of its properties listed below.

Furthermore, the management is looking to expand its EV charging infrastructure and has plans to install stations at One Town Center in 2022.

222 Main	Two stations
171 17th Street	One dual EV charging station with plans to add two more in 2022 to supplement the EV and Tesla charging stations located on the large, shared parking deck for the overall Atlantic Station complex
Park Tower	Six electric charging stations in the parking garage, including two Tesla stations
Tower I	16 stations with a planned addition of a Tesla station
101 South Hanley	Four stations including two Tesla stations
CrossPoint	Two stations with planned additions
Reston Square	Charging outlets are available in building garage
Sorrento Towers	Two stations with eight more planned

In addition to providing our tenants and guests with electric vehicle charging infrastructure, the increase in availability of charging stations could also encourage building occupants to make a switch to EVs and adopt globally responsible behaviours.

PERFORMANCE

In FY2021, the total electricity consumption across 11 of PRIME's properties⁶ was 52,000.13 MWh (FY2020: 52,138.1 MWh). This translates to energy indirect (Scope 2) GHG emissions of an estimated 18,760.72 tonnes CO₂⁷ (FY2020: 24,409.76 tonnes CO₂).

4. The Harvard Gazette, 'On the road to a fossil fuel-free future' (2021). Available at: <https://news.harvard.edu/gazette/story/2021/02/electric-buses-put-harvard-on-road-to-fossil-fuel-free-future/>
 5. International Energy Agency, 'Electric cars fend off supply challenges to more than double global sales' (2022)
 6. In FY2021, 101 South Hanley and the two new acquisitions in 2021 – Sorrento Towers and One Town Center, were excluded from the scope of electricity consumption and scope 2 emissions due to the limited data available. PRIME will include all properties in the scope for future reports.
 7. Emissions factors are obtained from the U.S. Government Environmental Protection Agency ("US EPA") Emissions and Generation Resource Integrated Database ("eGRID").

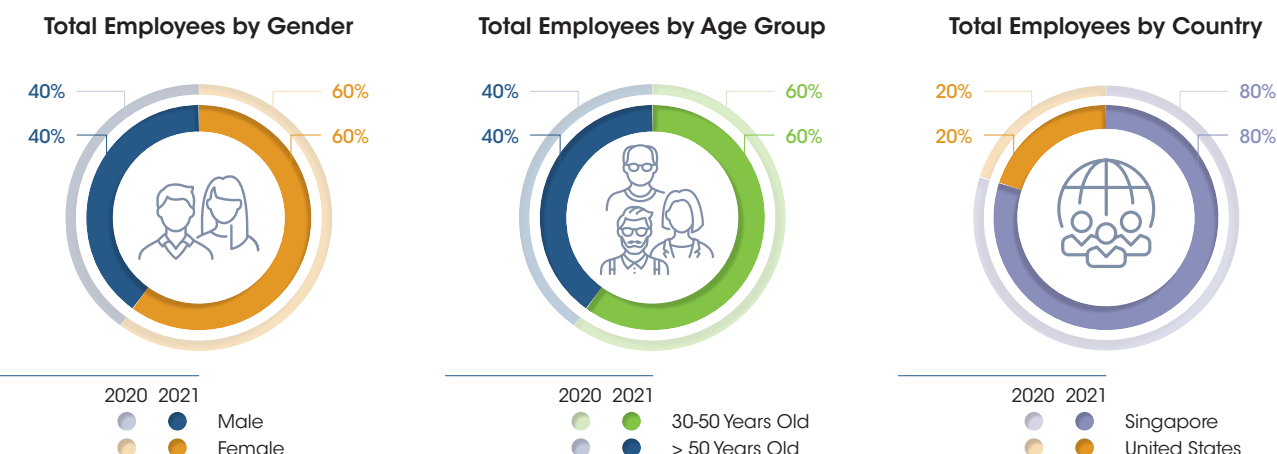
DIVERSITY AND INCLUSION

[102-8] [103-2] [103-3] [405-1]

Diversity and inclusion in the workforce encourages innovation and increases employee satisfaction. The Manager therefore views diversity and inclusion as an important key to PRIME's success and is committed to maintaining a workplace culture where people with a variety of skills, backgrounds, knowledge and industry experience can thrive.

In FY2021, the Manager employed five people on a full-time, permanent basis. Each individually-selected employee is highly valued, and the Manager places an emphasis on providing equal treatment and opportunities for growth. The Manager does not tolerate any form of racial and ethnic, gender, or age discrimination. There were no reported incidents of discrimination in FY2021. The Manager aims to maintain this record going forward.

DIVERSITY OF EMPLOYEES PROFILE⁸



At the Board level, each Director was also selected for their extensive and diverse experience and expertise. The Manager's Board Diversity Policy provides clear guidance for merit-based appointments, and the provision of equal opportunities regardless of age, gender, culture, nationality, ethnicity, and tenure. Under the Board Diversity Policy, the Board's structure, size, balance, and diversity are reviewed annually to assess the objectives and progress made in achieving an appropriately diverse board composition. Please refer to PRIME's Corporate Governance Report in Annual Report FY2021 for more details on PRIME's Board Composition, and the Board Diversity Policy.

At the property level, all of PRIME's buildings are built to be accessible to tenants who may require additional support. PRIME's buildings are all ADA compliant⁹, with ADA requirements varying according to each building's needs. Examples of how PRIME's buildings have been equipped according to building requirements are:

Examples of Compliance With ADA Requirements at PRIME's buildings

Fire and Life Safety	Equipped buildings to administer both sound and visual flashes to accommodate both visually and hearing-impaired individuals
Restrooms	Installed ADA compliant restrooms, where restroom stalls provide space for wheelchairs and sinks, counters, and paper towel dispensers are within ADA height to accommodate ADA individuals
Parking	Ensured that all buildings have ADA parking in accordance with city, local, and county codes
Water Fountains	Retrofitted water fountains to a lower height
Ramping	Constructed and retrofitted buildings and parking garages to achieve compliance with ADA requirements related to slope, width, handrails and landings of ramps
Entrances	Equipped buildings with separate automatic doors with buttons at ADA height

Further accommodations are also made for tenants who require additional care upon request.

⁸ Total number of employees remain unchanged from 2020
⁹ Refers to Americans with Disabilities Act ("ADA") Standards for Accessible Design

HEALTH, SAFETY AND SATISFACTION OF STAKEHOLDERS

[103-2] [103-3][403-2] [403-5] [403-9]

The Manager recognises the importance of prioritising the health, safety and well-being of employees and aims to achieve zero workplace injuries and fatalities each year. In FY2021, there were no workplace injuries or fatalities.

To ensure that health and safety remain of utmost importance at all of PRIME's properties, the Manager strives to build thriving communities and create sustainable social impacts that provide value to all tenants. A strong foundation of health and safety policies are in place to protect employees and tenants. These policies are reviewed regularly and cover building safety inspection and assessments, incident response and investigation procedures as well as reporting guidelines. Training was also provided for the property manager teams to ensure that the property managers are able to identify and respond to health and safety threats, such as Fire Safety Training and Asbestos Awareness Training. The Manager also provides health benefits to its employees and employees are encouraged to share health concerns and suggestions with the C-Suite.

MANAGING COVID-19

With the persistence of the COVID-19 pandemic, health and safety measures such as increasing indoor air ventilation and maintaining the highest level of sanitation have been essential in reducing transmission of the virus. The safety and well-being of all of our stakeholders remain a key priority. Additional precautions and measures were put in place to address emerging issues and to safeguard the health of our employees, tenants, and community. The following table provides examples of the responses and initiatives adopted by the various properties:

Initiatives to Manage COVID-19 at PRIME's Properties

<p>Providing hand sanitisers</p>	<ul style="list-style-type: none"> Installed at all main building entrances and main elevator lobbies and refilled daily by janitorial staff Provided individual bottles of hand sanitisers to tenants
<p>Ensuring high air quality</p>	<ul style="list-style-type: none"> Utilised MERV air filters at our properties, with MERV 15 filters being the highest-rated filter used with the ability to filter down to 0.3-1.0 micron particle size Installed Ultraviolet (UV) light air purifiers at 222 Main and 101 South Hanley properties Installed Global Plasma Solutions (GPS) Ionisation system, which actively target contaminants in the airfield, in Tower I at Emeryville and Tower 909 Installed an outside air economiser in VCS II for better air circulation Conducted indoor air quality testing at all PRIME properties. No issues were reported from the tests and all properties received a certification by UL Healthy Building Installed energy recovery ventilators, which continuously replace stale indoor air with fresh outdoor air, in 171 17th Street Installed fresh make-up air for humidifiers set to 130% of design ratio in Park Tower
<p>Ensuring social distancing</p>	<ul style="list-style-type: none"> Leveraged technologies such as Maptician software to analyse risks associated with developing socially distanced layouts for seating within the offices, facilitate work schedules for space planning, and assist with proximity contact tracing Monitored building occupancy and controlled foot traffic throughout buildings Installed signs reminding tenants and employees that social distancing must be enforced
<p>Increased cleaning frequency</p>	<ul style="list-style-type: none"> Arranged for additional cleaning protocols and staffing during the daytime shift to focus on disinfecting high-touch areas such as door handles, elevator buttons, restrooms, etc. Dedicated one full-time staff to communicating COVID-19 measures Used UV sterilisation to disinfect common areas and upon request in tenant spaces.
<p>Communication of updates related to COVID-19</p>	<ul style="list-style-type: none"> Sent regular communications to tenants on all practices to be followed by tenants and the building's employees as well as links to CDC and WHO websites for COVID-19 updates

ELEVATING TENANT WELLNESS

The management team evaluates an array of opportunities to elevate the wellness of tenants and actively seeks tenant feedback to address any concerns that may arise. As we transition to a post COVID-19 world, the management team has reached out to tenants to understand and address any concerns about returning to office and to facilitate a smooth transition.

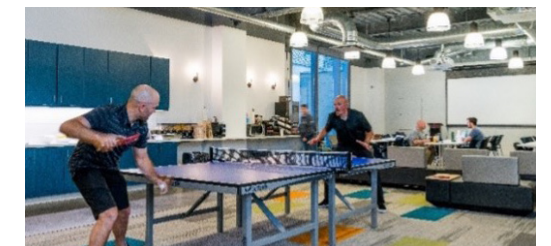
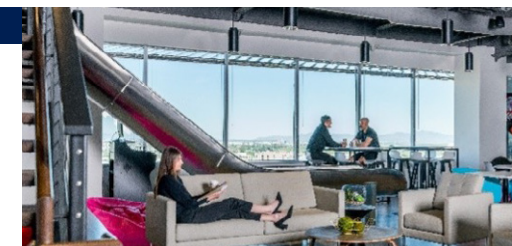
Many of our properties offer facilities that provide tenants with access to equipment to support their health and wellness. Facilities such as on-site cardio rooms, aerobics and yoga studios, and fitness centres that offer a variety of equipment including non-motorised strength training equipment, free weights and cardio strength equipment that can suit each tenant's fitness needs, are available for tenant use. Some facilities at Tower I also offer daily group exercise classes.

In addition, the property managers at some of our properties including Tower I, 222 Main, 101 South Hanley and CrossPoint organise group activities such as basketball leagues, yoga events, and walking clubs to maintain tenant engagement. These activities help promote a healthy lifestyle and provide an opportunity for tenants' employees to destress and connect with the community.

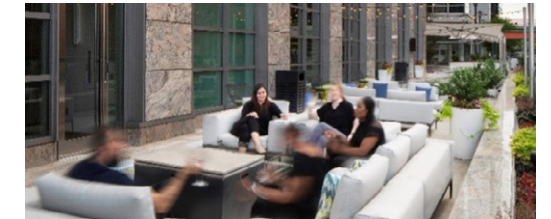
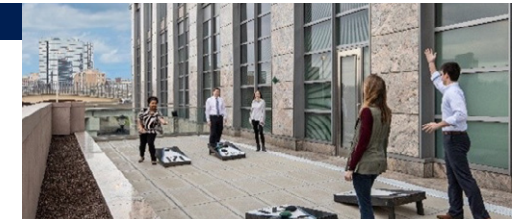
Our properties such as Park Tower and Sorrento Towers provide bike storage rooms to meet the increasing interest by employees riding their bikes to work. Locker rooms and shower facilities are also available in a number of our properties.

The management team also sought ways to promote wellness during the past two years when most tenants were still working from home. For example, Reston Square offered virtual fitness classes through the building's virtual concierge service.

222 Main



171 17th Street



Urban Beehives

The Manager has been successfully running the beehive programme at CrossPoint since 2020. The beehive programme was initially started to share the importance of bees and their myriad contributions to sustainable development¹⁰ with tenants, and to pique their interest in sustainability. Over the years, the beehive programme has provided an effectively unique way to preserve urban green space while maintaining positive tenant relationships.

Through in-person and online correspondences, tenants have expressed positive feedback towards the urban hives and an increase in engagement and satisfaction was reported. Encouraged by the positive response, the programme was expanded in FY2022 to two other PRIME properties - One Washingtonian Center and Reston Square. The Manager looks to continue to bring tenants together with this awe-inspiring experience and strives to provide a platform for tenants to strike a deeper conversation about sustainability.

Since partnering with Alveole, the Manager has been able to offer unique programmes to tenants surrounding the beehives. Before the pandemic, tenants were invited to join educational workshops that include learning about bees, working with the beekeeper, extracting honey and making of beeswax candles. These programmes provide educational insights to tenants on the roles of bees in people's lives and the sustainability efforts to halt the rapid decline in the bee population.

Due to COVID-19 restrictions, the in-person workshops had instead been replaced with live-footage of the beehives and streaming of the monthly beekeeper maintenance activity. Online beekeeping workshops were made available to all tenants. The property managers also held a "Name the Queen" contest for building employees at CrossPoint to foster tenant engagement.



10. Patel et al, 'Why bees are critical for achieving sustainable development' (2020). Available at: <https://link.springer.com/article/10.1007/s13280-020-01333-9#ack1>

ETHICAL BEHAVIOUR AND COMPLIANCE

[103-2] [103-3][205-1][205-2] [205-3] [404-1]

Good corporate governance is the cornerstone of long-term success for companies. Having a robust corporate governance system ensures that the Manager is well-placed to address any potential risks to the company's reputation and promotes investor confidence.

Although the COVID-19 pandemic posed unique challenges for PRIME, the Board continue to work closely with the Manager to monitor the situation. The Manager implemented its business continuity plan to address the impact of the pandemic on business operations, with all employees working remotely. The Board was regularly consulted on developments that required impact assessments and mitigation measures. They were also regularly updated on relevant legal and regulatory requirements in light of the rapidly evolving COVID-19 situation.

The Manager takes a zero-tolerance stance towards bribery, corruption and non-compliance with relevant laws and regulations and adopted the Singapore Code of Corporate Governance issued by the Monetary Authority of Singapore. Please refer to PRIME's Corporate Governance Report in Annual Report FY2021 for more details on PRIME's corporate governance system.

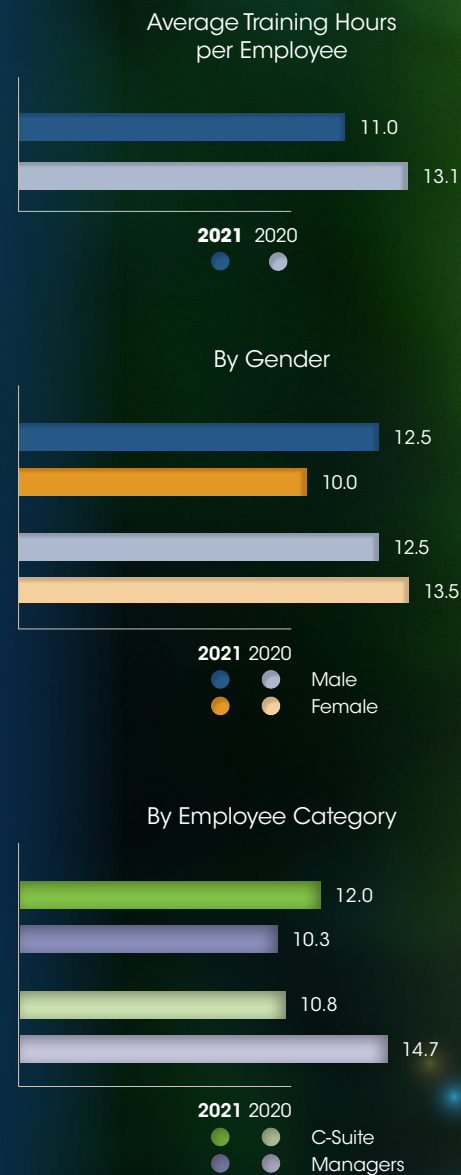
In order to ensure that PRIME maintains its culture of responsible and ethical behaviour, the Board takes a top-down approach by setting out a code of conduct and ethics, with a set of clear policies and procedures in place for dealing with conflicts of interest. The code of conduct sets out expectations and guidelines for employees of the Manager on matters of ethical concern, and is communicated to all employees with an annual mandatory refresher training on the rules and ethics. To support the effectiveness of these policies and procedures, the Manager has in place appropriate risk control processes and undergoes regular internal and external audits to ensure those controls remain effective.

To ensure that the Manager's employees are well-positioned to contribute to PRIME's culture of responsible and ethical behaviour, as well as keep abreast of legal and regulatory developments, PRIME ensures that each employee receives the necessary training. In FY2021, each employee received an average of 11 hours of training. At the C-Suite level, employees received an average of 12 hours of training, while employees at managerial level received an average of 10.3 hours of training.

PRIME's Employee Training Programmes

- | | |
|------------------|---|
| C-Suite level | <ul style="list-style-type: none"> • Rules and ethics • Forums aimed at C-Suite level and Sponsors • Seminars on various topics related to industry updates and the future of the industry |
| Managerial level | <ul style="list-style-type: none"> • Rules and ethics • Seminars on various topics related to industry updates and the future of the industry |

AVERAGE TRAINING HOURS PER EMPLOYEE



To ensure that PRIME's stakeholders have a safe and confidential avenue to raise concerns about possible improper behaviour observed in the course of business, the Manager has put in place a Whistleblowing Policy, which may be accessed at <https://secure.ethicspoint.com/domain/media/en/gui/71338/index.html>.

The Manager also ensures that full compliance is achieved with the relevant laws and regulations that apply to PRIME. The Manager closely monitors changes in legislations and regulations, as well as significant developments in the operating environment. Significant changes were promptly communicated to stakeholders.

MAIN LAWS AND REGULATIONS RELEVANT TO PRIME IN PRIME'S OPERATING COUNTRIES

Singapore	United States
<ul style="list-style-type: none"> • Monetary Authority of Singapore regulations (Property Funds Appendix and Provisions in the Trust Deed) • Singapore Exchange Listing Manual requirements • Personal Data Protection Act 2012 ("PDPA") 	<ul style="list-style-type: none"> • Building standards codes specific to each state • Energy codes specific to each state • The Gramm-Leach-Bliley Act of 1999 and Privacy laws specific to each state

As the COVID-19 situation continues to evolve, the Manager will review measurements regularly to ensure compliance with additional regulations related to COVID-19. To comply with the social distancing rules, the Manager's employees were all instructed to work from home, and discussions with Unitholders moved fully online.

In terms of support for tenants at the height of the COVID-19 pandemic, tenants were provided with assistance by way of lease deferrals on a case-by-case basis.

In FY2021, the Manager recorded zero confirmed incidences of bribery or corruption. There were also no fines or non-monetary sanctions for non-compliance with laws and regulations.



APPENDIX A: METHODOLOGY

This section details definitions, methodologies and data boundaries otherwise not already specified, applied to the sustainability performance data disclosed in our SR. They are made with reference to GRI Standards Glossary 2018, internationally recognised standards and the reporting guidance set out in the respective GRI topic-specific disclosures. The GRI topic-specific disclosures covered are listed out in Appendix B: GRI Content Index of this report.

GENERAL:

Employee

Employee is defined as an individual who is in an employment relationship with the Group, according to its national law.

ENERGY MANAGEMENT:

Energy consumption and Indirect Scope 2 GHG emissions

Energy consumption and GHG emissions data of our PRIME properties cover the total Gross Floor Area ("GFA") for the entire building across our portfolio. The total energy consumption is expressed in megawatt hours (symbol: MWh) while emissions are expressed in tonnes of CO₂.

In FY2021/22, data from landlord-controlled areas cannot be obtained due to the change of property managers. However, according to the US Department of Energy it is estimated that building occupants can control up to 50%¹¹ – 80%¹² of energy use in a commercial building. Additionally, 101 South Hanley and the two new acquisitions in 2021 – Sorrento Towers and One Town Center, were excluded from the scope of electricity consumption and scope 2 emissions due to the limited data available. PRIME will include all properties in the scope for future reports.

The electricity Grid Emission Factor ("GEF") used has been sourced from the U.S. Government Environmental Protection Agency ("US EPA") Emissions and Generation Resource Integrated Database ("eGRID"). The last available GEF was from 2021.

TALENT MANAGEMENT AND DEVELOPMENT:

Training hours

Average training hours per employee = Total training hours for the financial year / the total number of employees recorded as at 31 December 2021.

OCCUPATIONAL HEALTH AND SAFETY:

Occupational accident

According to the International Labour Organization, an occupational accident is an unexpected and unplanned occurrence, including acts of violence, arising out of or in connection with work which results in one or more workers incurring a personal injury, disease or death. The coverage for occupational accident cases include employees and workers at our corporate office and any other PRIME properties.

COMPLIANCE:

Non-compliance incidents

Such incidents refer to non-compliance with social, economic and environmental laws and/or regulations applicable to the Group, brought through dispute resolution mechanisms and/or resulting in:

- Significant fines
- Non-monetary sanctions

11. US Department of Energy, 'Energy Efficiency in Separate Tenant Spaces – A Feasibility Study'. Available at: https://www.energystar.gov/sites/default/files/asset/document/DOE%20-%20Energy%20Efficiency%20in%20Separate%20Tenant%20Spaces_0.pdf
 12. US Department of Energy, 'Engaging Tenants In Energy Efficiency'. Available at: <https://betterbuildingssolutioncenter.energy.gov/toolkits/engaging-tenants-energy-efficiency>

APPENDIX B: GRI CONTENT INDEX

GENERAL STANDARD DISCLOSURES

GRI Standard	Disclosure	Section of Report of Reason for Omission	Page	
GRI 102: General Disclosures 2016	Organisational Profile			
	102-1	Name of the organisation	About this Report	1
	102-2	Activities, brands, products, and services	About this Report	1
	102-3	Location of headquarters	About this Report	1
	102-4	Location of operations	About this Report	1
	102-5	Ownership and legal form	About this Report	1
	102-6	Markets served	About this Report	1
	102-7	Scale of the organisation	About this Report	1
	102-8	Information on employees and other workers	Diversity and Inclusion	9
	102-9	Supply chain	PRIME's Value Chain	3
	102-10	Significant changes to the organisation and its supply chain	Annual Report FY2021 Significant Events	2
	102-11	Precautionary Principle or Approach	Annual Report FY2021 Corporate Governance Report	57 – 85
	102-12	External Initiatives	Annual Report FY2021	
102-13	Membership of Associations	REIT Association of Singapore ("REITAS") and Singapore Institute of Directors ("SID")		
Strategy				
102-14	Statement from senior decision-maker	CEO Statement	2	
Ethics and Integrity				
102-16	Values, principles, standards, and norms of behaviour	PRIME's Sustainability Approach	3	
Governance				
102-18	Governance structure	Annual Report FY2021 Corporate Governance Report	57 – 85	
Stakeholder Engagement				
102-40	List of stakeholder groups	Sustainable Management	4	
102-41	Collective bargaining agreements	There are no collective bargaining agreements in place		
102-42	Identifying and selecting stakeholders	Sustainable Management	4	
102-43	Approach to stakeholder engagement	Sustainable Management	4	
102-44	Key topics and concerns raised	Sustainable Management	4	
Reporting Practice				
102-45	Entities included in the consolidated financial statements	About this Report	1	
102-46	Defining report content and topic Boundaries	About this Report	1	
102-47	List of material topics	Sustainable Management	4	
102-48	Restatements of information	Not applicable		
102-49	Changes in reporting	Not applicable		
102-50	Reporting period	1 st January 2021 – 31 st December 2021		

APPENDIX B: GRI CONTENT INDEX

MATERIAL TOPICS

GRI Standard	Disclosure	Section of Report of Reason for Omission	Page	
Reporting Practice				
GRI 102: General Disclosures 2016	102-51	Date of most recent report	Published on 31 May 2021	
	102-52	Reporting cycle	Annual	
	102-53	Contact point for questions regarding the report	About this Report	1
	102-54	Claims of reporting in accordance with the GRI Standards	GRI Standards: Core Option; About this Report	1
	102-55	GRI content index	GRI Content Index	15
	102-56	External assurance	PRIME has not sought external assurance on this report but may do so in the future.	
Sustainable Economic Value				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Sustainable Management	4
	103-2	The management approach and its components	Sustainable Economic Value	5
	103-3	Evaluation of the management approach	Sustainable Economic Value	5
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	Annual Report FY2021 Financial Review	12 – 15
Energy and Carbon Abatement				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Sustainable Management	4
	103-2	The management approach and its components	Energy and Carbon Abatement	6 – 8
	103-3	Evaluation of the management approach	Energy and Carbon Abatement	6 – 8
GRI 302: Energy 2016	302-1	Energy consumption within the organisation	Energy and Carbon Abatement - Performance	6 – 8
GRI 305: Emissions 2016	305-2	Energy indirect (Scope 2) GHG Emissions	Energy and Carbon Abatement - Performance	6 – 8
GRI G4-CRE8: Green Buildings	CRE 8	Type and number of sustainability certification, rating and labelling schemes for new construction, management, occupation and redevelopment	Energy and Carbon Abatement	6 – 8
Diversity and Inclusion				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Sustainable Management	4
	103-2	The management approach and its components	Diversity and Inclusion	9
	103-3	Evaluation of the management approach	Diversity and Inclusion	9
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	Diversity and Inclusion	9

MATERIAL TOPICS (CONT'D)

GRI Standard	Disclosure	Section of Report of Reason for Omission	Page	
Health, Safety and Satisfaction of Stakeholders				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Sustainable Management	4
	103-2	The management approach and its components	Health, Safety and Satisfaction of Stakeholders	10 – 11
	103-3	Evaluation of the management approach	Health, Safety and Satisfaction of Stakeholders	10 – 11
GRI 403: Occupational Health and Safety 2018	403-1	Management Approach: Occupational health and safety management system	Health, Safety and Satisfaction of Stakeholders	10 – 11 Information unavailable at property level. Please refer to the note below this section.
	403-2	Management Approach: Hazard identification, risk assessment, and incident investigation	Health, Safety and Satisfaction of Stakeholders	10 – 11
	403-3	Management Approach: Occupational health services	Health, Safety and Satisfaction of Stakeholders	10 – 11 Information unavailable at property level. Please refer to the note below this section.
	403-4	Management Approach: Worker participation, consultation, and communication on occupational health and safety	Health, Safety and Satisfaction of Stakeholders	10 – 11 Information unavailable at property level. Please refer to the note below this section.
	403-5	Management Approach: Worker training on occupational health and safety	Health, Safety and Satisfaction of Stakeholders	10 – 11
	403-9	Work-related injuries	Health, Safety and Satisfaction of Stakeholders	10 – 11
Ethical Behaviour and Compliance				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Sustainable Management	4
	103-2	The management approach and its components	Ethical Behaviour and Compliance; Annual Report FY2021 Corporate Governance Report	12 – 13; 57 – 85
	103-3	Evaluation of the management approach	Ethical Behaviour and Compliance; Annual Report FY2021 Corporate Governance Report	12 – 13; 57 – 85
GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	Annual Report FY2021 Corporate Governance Report	57 – 85
	205-2	Communication and training about anti-corruption policies and procedures	Ethical Behaviour and Compliance; Annual Report FY2021 Corporate Governance Report	12 – 13; 57 – 85
	205-3	Confirmed incidents of corruption and actions taken	Ethical Behaviour and Compliance; Annual Report FY2021 Corporate Governance Report	13; 57 – 85
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	Ethical Behaviour and Compliance	12

Note: PRIME is aligning existing data management and collection processes to fit GRI's disclosure requirements and will include property level information when available.