

THE HOWARD HUGHES CORPORATION

HUMAN RIGHTS POLICY

Adopted December 2022

Respect for Human Rights

Respect for human rights is a fundamental value of the Howard Hughes Corporation (“HHC” or the “Company”). We strive to respect and promote human rights consistent with the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers, contractors, and tenants. Our aim is to help increase the enjoyment of human rights within the Company and the communities in which we operate. This policy on Human Rights & Responsibilities (the “Policy”), is guided by international human rights principles encompassed by the Universal Declaration of Human Rights.

This Policy applies to the Company, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. The Company also expects our vendors, developers, suppliers, contractors, and tenants to uphold these principles and urges them to adopt similar policies within their own businesses. We use due diligence as a means to identify and prevent human rights risks to people in our business and value chain. The Human Rights Policy is overseen by the Chief Executive Officer.

Additionally, any discussion of human rights falls short if it fails to include a reference to the accountability that travels in tandem with those rights. As beneficiaries of laws and regulations securing our own rights, we believe we and others who have similarly benefitted have a responsibility to honor those laws and to encourage others within our sphere of influence to do so. Further, where feasible we acknowledge a responsibility to use such resources and influence as we may have to see that others who do not enjoy similar rights have the opportunity to do so.

Community and Stakeholder Engagement

We recognize that we are part of the communities in which we operate and proactively engage with people within those communities. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. We are committed to using our influence to preserve the basic dignity of each resident and employee in communities we serve. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business.

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, properties and communities that are free from discrimination or

harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable 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. A safe and healthy environment includes access to clean sanitary facilities and drinking water as a fundamental human right. 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. Our Risk Management Department hosts discussions with all operations leadership regarding health issues and risks to employees on a regular basis. The department also hosts in-person/onsite training for all employees with respect to Risk Management principles, including safety and security. The Risk Management Department and insurance broker consultants visit each HHC location frequently throughout the year for internal safety inspections.

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. HHC requires all newly employed individuals to participate in workplace harassment training. Additional 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.

Child Labor

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Implementation and Governance

HHC will actively identify, monitor and address human rights risks and issues arising within our sphere of influence. We will continue to screen prospective Tenants for quality care practices and a commitment to honor internationally recognized human rights, and to monitor current Tenants for compliance with our Policy and the minimum standard regulatory care requirements of our lease arrangements with them. We will make this Policy publicly available on our website at <https://www.howardhughes.com/>.

We will report periodically on our performance with respect to human rights issues and this Policy in our annual ESG Report. Violations or other misconduct related to our Policy should be promptly reported to HHC's executive management, legal department, or via the HHC Whistleblower Hotline via the [Whistleblower Hotline website](#) or phone at 1-800-766-8125). Employees, Vendors or Tenants who have questions or concerns regarding this Policy can seek guidance via the same sources.