

Stratus Properties Inc.

Labor and Human Rights Policy

Stratus Properties Inc. and the entities we control (collectively, “Stratus”) is committed to conducting all aspects of its business in accordance with the highest ethical and legal standards. This Labor and Human Rights Policy is overseen by our Nominating and Corporate Governance Committee and was approved by the Committee and our Board of Directors. Its scope includes Stratus Properties, Inc. and the entities we control.

We are a diversified real estate company engaged primarily in the acquisition, entitlement, development, management, leasing and sale of multi-family and single-family residential and commercial real estate properties in the Austin, Texas area and other select markets in Texas. All of our operations are located in Texas and all of our employees (of whom we have fewer than 50) are located in Texas except for a few who work remotely or may work remotely primarily from locations in the United States.

Through our Ethics and Business Conduct Policy and Vendor Code of Conduct, we promote honest and ethical conduct. We believe that all individuals should be treated with dignity and respect, and that employee health, safety and well-being are essential to attracting and retaining the best people at every level of our Company. We are committed to supporting diversity and inclusivity in the workplace. We seek to respect human rights and also endeavor to operate our business in compliance with all applicable laws regarding human rights, labor and employment. While it is the duty of governments to protect human rights, such as the laws of the United States prohibit child labor, forced labor, human bondage, bonded labor, indentured servitude and slave labor, we recognize our responsibility to respect and uphold internationally recognized human rights. This Labor and Human Rights Policy was informed by, as we recognize, the United Nations Guiding Principles on Business and Human Rights. The UN's foundational principles are grounded in the role of business enterprises to respect human rights.

We strive to do business with third parties who demonstrate high ethical standards, and we encourage our vendors to adopt similar commitments and implement relevant policies and practices related to labor rights and human rights that are significant to their own businesses.

We recognize the following areas of human rights and labor rights as most relevant to our Company and our stakeholders. We also acknowledge that these may change over time.

- Employee safety, health and well-being
- Compliance with applicable labor laws
- Fair compensation
- Diversity and inclusion
- Non-discrimination
- Sexual harassment

Our Commitment

Labor

- We endeavor to operate our business in compliance with all applicable laws regarding labor and employment.
- We aim to provide a safe and healthy work environment for all our employees.
- We support fair working conditions and wages.
- We respect freedom of association and the right not to associate. We promote a culture that respects and values our colleagues’ contributions. We believe in the free exchange of speech and information, provided there exists no harassment, intimidation, or business or operational disruption.

For more information on our employees and our labor practices, see our website under the heading “People.”

Diversity and Inclusion

- Our Ethics and Business Conduct Policy states that we do not tolerate harassment or discrimination. Personnel who believe they have been subjected to such behavior or who observe or become aware of such behavior are directed to report in accordance with such policy or in accordance with our Policy against Discrimination, Harassment and Retaliation as set forth in our employee handbook.
- We promote equality and strive to protect the rights of all employees, including minority groups and women.
- We promote diversity and inclusion at all levels of our business.
- We strive to maintain a workplace that is free from discrimination or harassment based on gender, race, ethnicity, nationality, disability, religion, sexual orientation, gender identity, or any basis protected by applicable law.

We seek to avoid causing or contributing to adverse human rights impacts through our own activities and to address such impacts when they occur. We also seek to prevent or mitigate any adverse human rights impacts directly linked to our operations and development projects by our business relationships. Persons who know of possible or actual violations of this Policy should follow the reporting procedures set forth in our Ethics and Business Conduct Policy under the heading “Reporting of Illegal or Unethical Behavior.”

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Stratus’ Nominating and Corporate Governance Committee and Board of Directors approved this Labor and Human Rights Policy on December 15, 2022.