FAIR HOUSING POLICY

INTRODUCTION

The Terra Holdings group of affiliated companies, which includes the Brown Harris Stevens, Vanderbilt, and Halstead Management companies and affiliates (collectively, the "Company"), are dedicated real estate professionals and committed to equal opportunity and non-discrimination in all aspects of the housing related services they provide. The Company expressly prohibits any form of discrimination based on an Unlawful Category as shown on the attached chart. Any discrimination based on an Unlawful Category by agents or employees in the performance of their expected job duties will not be tolerated and will subject the agent or employee to appropriate disciplinary or other measures.

COVERAGE

This policy covers all Company employees and agents without exception, and in all forms of their housing activities, including marketing, applications, and other housing services. The Company will not tolerate, condone or allow discrimination, whether engaged in by clients, employees, agents. independent contractors or other non-employees who conduct business with the Company. While the Company's ability to control clients and third parties is limited, this does not diminish the obligation of the Company's agents and employees to comply with the law and this Policy. Agents cannot assist clients in unlawful discriminatory behavior and must immediately report any unlawful activity to their managers and to General Counsel.

EDUCATION AND PROCEDURES

The Company engages in periodic training of employees and agents on the anti-discrimination laws and provides summaries of the pertinent anti-discrimination laws covering the Company's activities as manager, sales, and leasing agent of housing. It requires all employees and sales and leasing agents to review the laws. Any questions or issues concerning discrimination should be addressed to the Company's in house counsel; reports and complaints will be kept confidential to the fullest extent possible without impairing the Company's obligations to comply with the law. Where necessary, the Company may employ an outside lawyer or consultant to investigate a question and provide guidance in handling the matter.

RETALIATION PROHIBITED

The Company will not in any way retaliate against an individual who makes a report of discrimination or provides information concerning such actions nor will it permit any employee or agent to do so. Retaliation is a serious violation of this policy and should be reported immediately. Any person found to have retaliated against another individual for reporting unlawful discrimination will be subject to the same disciplinary action provided for offenders.

| Acknowledgement: I have reviewed and agree to comply with the Policy. |
|---|
| Name: |
| Company: |
| Date: |

FAIR HOUSING PROTECTED CHARACTERISTICS

| Protected Characteristic | Federal (Title VII or otherwise indicated) | Florida | Connecticut | New Jersey | New York State | New York City | Suffolk County |
|--|---|----------------|-------------|---------------|-------------------|------------------|-------------------|
| Race | Yes | Yes | Yes | Yes | Yes* | Yes | Yes |
| Color | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Religion/Creed | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Sex/Gender | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Sexual Orientation | Yes | Yes** | Yes | Yes | Yes | Yes | Yes |
| Gender Identity or Expression | Yes | Yes** | Yes | Yes | Yes | Yes | |
| National Origin | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Disability/Handicap | Yes | Yes (handicap) | Yes | Yes | Yes | Yes | Yes |
| Familial Status (parent(s) or guardian(s) living with a child or children under age 18 or pregnancy) | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Age | | | Yes | | Yes | Yes | Yes |
| Source of Income | | | Yes | Yes | Yes | Yes | Yes |
| Military/Veteran status | | | Yes | Yes | Yes | Yes | Yes |
| Arrest Record | | | | | | Yes | Yes |
| Marital Status | | | Yes | Yes | Yes | Yes | Yes |
| Occupation | | | | | | Yes | |
| Domestic Violence Victim Status | Yes (VAWA) | | | | Yes | Yes | Yes |
| Citizenship/Immigration Status | | | | | Yes | Yes | |
| Height and Weight | | | | | | Yes | |

^{*} Under The Crown Act, race as a protected characteristic includes protection against discrimination based on race-based hairstyles by extending statutory protection to hair texture and protective styles such as afros, braids, locs, twists, and knots.

^{**} Although gender identity and sexual orientation are not protected characteristics on a state-wide basis under the Florida Civil Rights Act, there are relevant local protections for both gender identity and sexual orientation in Miami-Dade County and Palm Beach County.