**CONCERT**°

DEFINING WHAT IT IS FOR US TO BUILD A PEOPLE-FIRST FUTURE

# Sustainability Framework 2019



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### Letter from Brian McCauley, President & CEO



I am excited to introduce this Framework, the next chapter in our sustainability journey at Concert.

Concert is proud of our sustainability accomplishments to date. We have designed and built more than 20 buildings that have achieved various levels of LEED certification as well as Tier 2 under the Toronto Green Standard. We've built complete, compact, mixed-use communities that provide affordable housing and a range of transportation options. We have developed best-in-class recycling facilities and programs in our

residential developments. We've invested in trades training programs and built a healthy company that has for 30 years provided long-term stable returns for our investors.

We now face serious issues that require a new way of thinking about sustainability. Climate change is real and getting worse, with buildings a prime contributor to greenhouse gas emissions. Urban alienation and loneliness are increasing in cities. As a builder, it is our responsibility to look back to our founding values and the insights of the last 30 years and combine these learnings with the latest thinking on sustainability to set in place a Framework for the next 30 years to address these issues. We are a mission-driven company that is trying to make a positive impact in the fabric of Canadian communities. Whether it's setting, and delivering on, ambitious GHG reductions, combating the increasing urban isolation and loneliness in our cities or getting more rigorous about how we measure and manage our performance, our new Framework is our road map to get us there.

Our business is changing and the future is increasingly uncertain, but what will remain the same for us is our commitment to integrity, service, and quality and an unwavering pursuit to positively impact Canadian communities. As we push to innovate in the areas of affordability, building performance and the way we engage with our tenants and customers, we will need to remember the founding principles that served us for the last 30 years.

I look forward to continuing this journey with all of you, and to redefining what it is for us to build a people-first future.

Sincerely,

Bran MEauley

Brian McCauley President & CEO





## **Executive Summary**

Concert has undertaken a comprehensive company-wide effort to reimagine its approach to sustainability. In some cases, this reimagination is just putting into context things that have been done since the beginning of the company, and in other areas we are forging a bold new path.

The timing of this refresh to our Framework comes at a time when the social and environmental challenges we face as a society are being felt most acutely in urban centres. Cities are the places where income inequity is growing, affordability is lessening and social isolation is increasingly an issue. Cities are also the places where climate change is making us reconsider how we design and manage our infrastructure and buildings, and where Concert is most active in investing, developing and managing its assets.

We are dedicated to addressing these challenges constructively and making a measurable difference through actions outlined in this new Framework. This "positive contribution" requires that we articulate a fulsome definition of sustainability that includes environmental, social and economic components and that these are integrated into all five lines of our business. Our vision over the next thirty years is to be a builder and investor that addresses these pressing challenges while positively contributing to the fabric and potential of Canadian communities and earning a stable return for our investors.

Given this, we set out to develop this Framework in a way that mirrors our commitment to these ideals. This

meant that staff from all levels of the organization and from all lines of business were consulted and engaged to develop ideas, principles, strategies and actions. It further meant that we were diligent in screening these ideas to ensure they would have the maximum impact in a given area and were aligned with our business needs. We researched the targets and plans of our peers in the real-estate industry both nationally and internationally. We consulted with local and national experts and modelled different scenarios to develop the package of principles, strategies and actions that comprise this Framework.

This Framework is designed to be a working document for staff to utilize when setting priorities, undertaking corporate planning and weighing important business decisions. It is organized into a topline set of 15 Principles that articulate a vision for each of the three components of sustainability: environmental, social and economic.

#### **Environmental Sustainability**

Concert recognizes that climate change is a genuine and urgent threat to our economy, health and ecology and as a result is a priority for action in this Framework. Concert is committing to an 80% reduction in GHG emissions by 2050, which is roughly

HOME

consistent with targets agreed to in the 2015 Paris Agreement on climate change. To achieve this, we will have to be aggressive with our retrofits, develop and procure clean energy, and accelerate our efforts to develop zero-carbon buildings. Reconciling our need to drastically cut emissions while maintaining healthy growth will be one of the central challenges of our company between now and 2050.

While cutting carbon is our priority, this Framework also identifies principles and strategies that address waste reduction in both construction and operations, and proposes targets for both water conservation and stormwater management. It also sets forth a path for us to reconsider the materials that go into our buildings from both a human and environmental health perspective. We will also recommit to active transportation by aspiring to develop best-in-class cycling and end of trip facilities. For a complete list of actions see **Appendix C**.

#### ENVIRONMENTAL SUSTAINABILITY PRINCIPLES:

Carbon, Transportation, Materials, Resilience, Waste, Ecology, Water, Stormwater



88 Scott, a mixed use 50 story tower targeting "Tier 2" of the Toronto Green Standard.

#### **Social Sustainability**

Concert is at the forefront of many of the most challenging societal issues that we face in urban areas. This includes growing inequity and affordability in our urban centers, and increasing social isolation and its deleterious effects on human health. Surveys are showing that loneliness is increasing in both the younger and older demographics specifically in Canadian cities. There are multiple theories as to why this is occurring, but addressing it is something that will require a wide range of solutions from the built form, to design, programming and tenant engagement.

To this end we have developed principles in the Framework that address inclusion, strong relationships and good health. Under these we have identified specific actions that address the provision of affordable and accessible units, as well as designing and programming for more social animation specifically in our rental housing properties. We are also identifying needs for more inclusionary training on truth and reconciliation with First Nations people. SOCIAL SUSTAINABILITY PRINCIPLES: Good Health, Inclusion,

Strong Relationships

#### **Economic Sustainability**

Sustainable economic growth is core to achieving all other aspects of this Framework, requiring that we make good investments, champion good design and planning, create engaging programming and rigorously track performance. Our three principles for economic sustainability include being good stewards of investor capital, taking the long view when it comes to those investments, and investing in people as our most valuable resource.

These economic principles have been in place since the founding of Concert in 1989. What we've added in this Framework is a commitment to reporting and transparency when it comes to our progress in measuring and addressing sustainability metrics. Some of the key actions in this Framework include achieving systemic excellence in data management as it pertains to sustainability outcomes, and taking This Framework is designed to be a working document for staff to utilize when setting priorities, undertaking corporate planning and weighing important business decisions.

part annually in the Green Real-estate Sustainability Benchmark (GRESB) survey. For a complete list of the metrics that are proposed to be tracked see **Appendix E**.

#### ECONOMIC SUSTAINABILITY PRINCIPLES:

Transparency, Stewardship, Long-term Thinking, Invest in People

We recognize this Framework is ambitious, and to achieve it we will need alignment across all five lines of our business. We will have to support our staff and leadership with training and tools to implement these strategies. There will be trade-offs and we will have to approach acquisitions, construction and property management in new and different ways, and make necessary adjustments to our processes.

Our goal is for this Framework to be a benchmark for leadership in sustainability in our industry, and that our lessons learned will be useful for our peers who are aligned with our values.



## Sustainability Principles



Carbon



Waste



Stormwater



Strong Relationships



Stewardship



Resilience



Transportation



Materials



Water



Good Health





Inclusion



Transparency



Invest in People





Long-term Thinking



## Introduction

#### **Building on our History**

Founded in 1989, Concert is active in developing rental apartments, condominium homes and active aging communities (seniors housing), and acquiring and developing commercial, industrial and infrastructure properties.

With operations all over the country and the backing of more than 200,000 Canadians represented by the union and management pension plans who own Concert, our commitment is to build strong, sustainable communities across Canada.

This Framework is intended to articulate our commitments to a fulsome definition of sustainability that includes Economic, Social, and Environmental Sustainability. These components of sustainability, while described individually in this Framework, are all mutually reinforcing but will manifest themselves differently in our business. As a community builder, we create places for our tenants, residents and guests to connect, work and live healthy and purposeful lives. To achieve this, we must be nimble and proactively manage an array of risks. Our communities will be on the front lines of some of the biggest challenges faced by society. From climate-change-driven extreme precipitation, heat waves, forest fires and coastal flooding, to increased income inequity, housing affordability and growing social isolation – all of these challenges will be experienced most acutely in the urban neighbourhoods where we invest and build. We are committed to being part of the solution for these problems and therefore our long-term sustainability goals are rooted in sector-specific, science-based targets, and our approach to action will model

best practices in corporate governance in that it will be measurable and reported on regularly and transparently.

#### **Environmental Sustainability**

There has never been a stronger imperative to demonstrate this leadership in acting on both environmental and social sustainability. In October 2018, the UN's Intergovernmental Panel on Climate Change noted that despite existing efforts to curb emissions, we are not on track to limit rates of global warming to 1.5°C above pre-industrial levels as committed to at the COP 21 Paris Agreement. The panel went on to warn that "the window of opportunity is small and shrinking – we have perhaps 12 years before a 1.5°C target is unattainable, assuming in the meantime there is concerted global action to rapidly scale back carbon emissions."

Carbon dioxide (CO2) is the largest greenhouse gas (GHG) contributor to climate change, now exceeding 415 parts per million – the highest level in 2.2 million years. The United Nations says buildings account for more than one third of global GHG emissions and in Vancouver and Toronto, buildings contribute over 50% of each city's current total emissions.

This challenge is enormous, and the scale of change required cannot be understated. However, as a leader in our industry, Concert's responsibility is to take meaningful and decisive action to meet this challenge head on. It's also important to note that while reducing carbon is and must be our key priority with regards to broader environmental protection, we also must continue to look for ways to reduce our consumption of water and materials while producing less waste.

#### **Social Sustainability**

Concert strives to be a community builder that is deeply invested in improving the lives of the people who live and work in our communities. To this end, Concert's vision is to be "the progressive leader in Canadian realestate for generations". Concert also recognizes that building community goes beyond the bricks and mortar of what we develop, build and manage. We must do more to meet the challenge of developing healthy, resilient, inclusive and diverse communities where residents can live their lives in a way

As a community builder, we create places for our tenants, residents and guests to connect, work and live healthy and purposeful lives. that gives them meaning. This wider area of practice is broadly known as social sustainability – and tackling this issue means making thoughtful changes not just to building design, but also to our property management practices and building-level programming.

Our overall approach to social sustainability is embodied by our mission statement at our Tapestry Seniors Housing portfolio, which is, "to create memorable moments in thriving, connected communities where individuals experience healthy and fulfilled lives." There is now substantial evidence that being socially connected significantly reduces the risk for premature mortality and that lacking social connectedness significantly increases this risk. This is most acute in both elderly and young people as both groups tend to live alone or in smaller households. According to Statistics Canada, individuals are experiencing loneliness and social isolation at increasing levels in modern Canadian society with approximately 30% of young Canadians in Vancouver and Toronto reporting in 2017 that they "often" or "almost always" feel lonely. Combined with the growing affordability crisis facing new home buyers and renters in both markets, this financial pressure and trend of loneliness is contributing to increasing levels of stress, directly impacting public health and wellness.

As a society, as we urbanize and increasingly move towards the construction of high-density, mixed-use developments to address affordability, we have to consider how our buildings will either positively or negatively affect the lives of the people who live in and adjacent to our communities. Our goal is to build developments that help residents, commercial tenants and visitors connect, build community, and ultimately live better lives. To do this, we need to constructively address affordability for both our renters and homebuyers. Only when we are achieving these goals can we truly call ourselves a community builder that is not only a progressive leader, but is also making a difference. This may require some big moves and partnerships that we have not previously contemplated, but many of these changes could be nuanced interventions and experimented with or piloted at smaller scales.

#### **Economic Sustainability**

Concert was established on foundational principles of economic sustainability. Concert is designed to create long-term wealth and value for its owners while giving back to the communities in which we work. We are diversified into five lines of business – Condominium Homes, Residential Rental, Active Aging Communities (Seniors Housing), Commercial & Industrial, and Infrastructure – to ensure we are resilient over the long term to changes and turbulence in the market.

We further live this commitment to economic sustainability through our policy of only using union trades for our on-site construction. This accomplishes two important economic sustainability outcomes. First, we invest in the hardworking union men and women who have a stake in our shared success. Second, and most importantly, we show our commitment to paying a living

## This challenge is enormous, and the scale of change required cannot be understated.

wage and to a just economy that values the skills of these Canadians. We further reinforce this commitment through our philanthropy by dedicating a significant portion of our corporate giving to trades training through technical colleges and not-for-profits.

Finally, our whole approach to business is to take the long view in the investments we make. We endeavour to provide good returns for our investors, but we do it in a way that maximizes long-term value while continuing to build on our brand and reputation. Examples of this include our emphasis on design excellence and construction quality as well as continuous investment in our income producing property (IPP) portfolio.

#### Governance

Concert actively pursues and maintains the highest standard of corporate governance practices in all five lines of business. All Concert leadership and employees agree to follow a comprehensive set of corporate conduct policies and practices that meet the high standards of our owners. We only invest in real-estate projects in Canada and we ensure that all our operations are in compliance with or exceed federal, provincial and local regulations.

Our investments meet the very highest ethical standards demanded by institutional investors. We undergo extensive due diligence on all our acquisitions, and new investments and developments are extensively reviewed with ownership prior to undertaking them.

We review our plan annually and report on our financial performance annually. Key strategy documents such as this are updated every three to five years to ensure they are current with the latest market conditions and technological developments.



## The Framework

#### The Purpose

The purpose of this Framework is two-fold:

- 1. Establish a long-term vision and set of principles for Concert's Environmental Social Governance across all five lines of our business.
- 2. Identify a set of tactical short-term strategies and actions and associated metrics that build momentum and drive the change necessary to achieve Concert's vision.

#### **The Process**

The Framework itself was created as a company-wide effort. Employees at all levels of the company were engaged in the development of the principles, targets, strategies and actions. These ideas were tested and vetted by local experts and supplemented by best-practices research that looked at international peers in the real-estate industry. In all, Concert hosted six staff workshops and over 287 points of engagement that were conveyed either electronically or at in-person events.

#### **The Structure**

The Framework addresses all three components of sustainability, but many strategies have co-benefits that reinforce each other. It includes a single guiding vision and 15 supporting principles that articulate how we approach each facet of either economic, social or environmental sustainability. Each principle is accompanied by key strategies that further articulate how we will approach each principle in our work. Where appropriate, specific short-term actions have been identified either through consultation or research and are noted under each strategy. While not all strategies have associated shortterm actions, this is not an indication of their lower priority. It only indicates

that there are no short-term actions associated with a given business unit or that the strategy is meant to be applied more broadly.

The purpose of this structure is to provide adequate direction on how the Framework will be brought to life in a diversified organization that is rapidly expanding. The Framework outlines Concert's core principles, how we will act on these principles, and where additional resources are needed or where current corporate planning can be adapted. The Framework's structure also allows for innovation as new ideas and technologies emerge and are assessed for their ability to support a particular principle and to benefit the company. In other words, if a better solution arises that is not currently among our current strategies or actions, we will adjust as necessary where it is in alignment with our principles. The intent of this approach is to strike a balance between leadership, consistency and innovation.

Finally, the Framework includes three appendices that provide more specific detail and summarize how the actions proposed in the Framework will manifest in our most important product: our buildings. The Appendices cover the following.

- **Appendix A** provides more depth on our approach to reducing carbon emissions from existing buildings.
- **Appendix B** outlines our approach to achieving zero emissions in our new buildings.
- **Appendix C** summarizes how these sustainability principles will impact new and existing buildings.

#### Concert's Sustainability Principles

These principles were sourced originally from existing corporate priorities and a survey that asked staff to identify areas where they thought the Framework should focus. The specific language was further developed and refined through consultation with leadership and subject matter experts both inside and outside the organization.

The purpose of principles is to guide our overall approach in a given area. They set the objective and the direction. They are focussed in each of the three areas of sustainability: social, economic and environmental. All the principles have some cross over with each other and with other business plan goals and corporate priorities such as our renewed focus on an enhanced customer experience.

#### **Environmental Sustainability**

**Carbon:** We are an inspiring leader in the Canadian real-estate industry in the reduction of carbon emissions from new and existing buildings.

**Resilience:** We build exceptionally crafted and enduring communities that meet high quality standards and are resilient to a changing climate. We invest in our assets to ensure long-term performance and durability.

#### Transportation: Our

buildings, communities and operations act as catalysts for low carbon transportation and healthier commuting options.

**Waste:** We seek to minimize waste in all aspects of our business and provide waste reduction solutions for our tenants.

**Materials:** We recognize the importance of reducing the use of persistent toxic chemicals for both human and ecological health in the materials we procure.

**Ecology**: We take a restorative approach to habitat and actively seek opportunities to connect our communities with nature.

#### Stormwater: Our

developments contribute to a healthy hydrological cycle and seek to eliminate contaminants in receiving water bodies.

Water: We treat water as a valuable resource and seek to use it in a manner that is consistent with good stewardship of the watersheds we are active in.

#### **Social Sustainability**

**Inclusion:** We create places that embrace diverse populations, facilitate housing accessibility and offer the many positive benefits of thriving community life.

#### **Strong Relationships:**

We build strong, trusting and collaborative relationships through thoughtful design, engaging programming, and responsive customer service that define a unique Concert experience. **Good Health:** We carefully select sites and use design, amenities and programming to support healthy choices that enhance well-being.

#### **Economic Sustainability**

Transparency: We will develop the internal capacity to achieve systematic excellence in data collection on social and environmental metrics to enable comprehensive corporate reporting and support an enhanced customer experience to ultimately improve our portfolio value. Stewardship: Concert recognizes the fiduciary responsibility our shareholders, investors and partners place on us with their capital contributions, and as a result we are committed to building a high-quality portfolio that generates an attractive return while also effectively mitigating risk.

#### Long-term Thinking:

We take the long view in creating resilient economic value for our shareholders, investors and partners, the communities we invest in, and the assets we manage.

#### **Invest in People:**

We support the development of a just economy where Canadians can get access to skills training, meaningful work and opportunities to contribute to society. We treat our employees and partners with respect.



## **Principles, Strategies and Actions**



### 1. Carbon

#### **Principle:**

We are a leader in the Canadian real-estate industry in the reduction of carbon emissions from new and existing buildings.

Carbon pollution is Concert's number one priority with regards to environmental sustainability. According to the United Nations, buildings account for more than one third of GHG emissions. In Vancouver and Toronto (where Concert is most active), buildings contribute over 50% of each city's current total emissions. At Concert, we see the need to accommodate planned accelerated growth of our portfolio holdings and increased profitability for our investors while achieving deep emissions reductions as one of our greatest challenges and opportunities. By proving that these seemingly opposing forces of increased returns and lowered emissions can be reconciled, Concert can define and substantiate a model that can be replicated by other portfolio managers for an even larger impact.

This challenge will not be met unless we evolve our approach to development. We must continue to challenge ourselves and stretch designs on future projects to move away from fossil fuels and be more efficient. Our plan will be to stay ahead of regulatory requirements in Toronto and Vancouver as the benchmark for guiding our designs across our entire portfolio. We will look at all aspects of our designs from massing to unit mix and density, to envelope assemblies and mechanical systems to achieve these goals.



Navio at the Creek, a LEED Gold Certified Building connected to a low carbon District Energy System.

We will have to make these decisions while balancing reliability and maintenance issues that could exist with adopting emerging technology, as well as the potential associated increased costs. Our approach will be to study and iterate early in the design process so that we evaluate as many potential options as possible to establish a cost effective and reliable pathway to zerocarbon buildings.

For our existing portfolio, our challenge will be to reduce our reliance on fossil-fuel-derived energy in a fiscally responsible way that does not detract from our emphasis on customer service. This will require us to look at retrofits in a different light than we have previously.

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Where before our focus was on energy efficiency improvements and cost savings, the focus will now be on how to switch fuels to lower carbon sources and use efficiency and cost savings as enabling tools to allow these switches to happen. Given their impact on our emissions and our ability to affect change in these properties, our focus will be to prioritize action in our residential rental buildings in both BC and Ontario. Our second priority will be to look at our Alberta holdings and opportunities to lower energy use, while evaluating the potential to purchase cleaner energy. Our third priority will be to investigate opportunities in our BC office portfolio and look for energy efficiency retrofits. We believe that most of these projects

Our plan will be to stay ahead of regulatory requirements in Toronto and Vancouver as the benchmark for guiding our designs across our entire portfolio. can be financed through the energy cost savings within 5-10 years and by accessing utility incentive programs. We will work to find solutions such that reductions in emissions will provide a financial benefit for our tenants and, in accordance with our fiduciary duties, will have a positive impact on returns for our shareholders, investors and partners.

While this plan will require significant work and investment in our portfolio, our core focus will be on projects that enhance our portfolio's value and positively impact long-term returns for our shareholders, investors and partners. Many of these investments will also have co-benefits that will transcend energy and cost-savings, as they will support our mission to provide an enhanced customer experience.

For example, ensuring that we have direct digital controls (DDC) and submetering in all of our properties will help us deliver energy and GHG savings, as well as help our property management team identify problems before complaints emerge from residents.

Preliminary emissions modelling of our portfolio (below) shows that growing our portfolio over the long term will require us to develop zero-carbon buildings post 2026. This again is an opportunity to not only lead nationally, but also improve the value of our portfolio. A study by the World Green Building Council in 2017 showed that high-performance, green buildings hold their value better than their lower-performing counterparts. This has also been reinforced in the local context through surveys completed by the Building Owners and Managers Association (BOMA).

For more detailed information on both our new and existing buildings plans, please see **Appendices A & B**.

#### Strategies:

C1 Zero Carbon: Commit to ensuring all new buildings will be zero-carbon in operations by 2026 as defined by the CaGBC.

#### **Specific Actions:**

- Commit to evaluating performance in all new developments through the BC Energy Step Code and Toronto Green Standard (TGS) v3 metrics (see **Appendix 2** for definitions)
- Commit to Step/Tier 2\* for Condominiums & Step/Tier 3 for Rental Housing (Short term)
- Commit to Step/Tier 3\* for Condominiums & Step/Tier 4 for Rental Housing (Medium term)
- Commit to Step/Tier 4\* for Condominiums & Rental Housing with zero-carbon certification (Long term)
- \* "Step" refers to the BC Energy Step Code, and "Tier" refers to the Toronto Green Standard V.3

#### C2

**Emissions Reductions:** Achieve 80% reduction in corporate GHG emissions by 2050 by systematically eliminating or offsetting fossil use in our portfolio.

#### **Specific Actions:**

- Create a "decision tree" to help working teams determine what emissions are to the account of tenants or of Concert
- Create an implementation schedule to complete energy audits on all residential and office properties (Short term)
- Create an implementation schedule for installing DDC in all Office and Residential properties (Short term)
- Create a fuel-switching strategy for existing buildings that gradually moves HVAC and DHW loads to electrically driven systems (Short term)
- Develop an energy procurement strategy that switches our energy use to renewable sources (Short term)
- Develop interim carbon reduction targets for 2020 to 2030
- Develop and launch a sustainable commuting program that offers support and benefits to employees who make lower carbon commuting choices (2019)
- Integrate review of carbon emissions and potential for savings into existing building evaluation process for property acquisitions
- Educate the working teams on environmental best practices, including how to review benchmark and property data and how to investigate potential emissions reduction initiatives and budget for them

#### Key Performance Indicators & Metrics: Carbon

- Total carbon emissions
- Carbon intensity of portfolio
- Quantity of renewable
   energy procured
- % carbon reduced over 2016 baseline

- Accountability:
  - Development
  - Construction
    - Property Management
  - Investments
  - Seniors





## 2. Resilience

#### **Principle:**

We build exceptionally crafted and enduring communities that meet high quality standards and are resilient to a changing climate. We invest in our assets to ensure long-term performance and durability.

Resilient people have the resources, knowledge and flexibility to maintain their well-being despite disruptions to everyday life. Our buildings and communities need to be able to do the same. This can mean designing our buildings differently to handle more extreme weather, or creating plans for when emergencies occur, thereby improving the resilience of our assets and helping protect the people who live and work in them.

This will require more data gathering and planning in the coming years. Canada is one of the most urbanized countries in the world, with over 75% of Canadians living in either urban or suburban environments. Urban residents are expected to feel significant impacts from climate change including extreme temperatures, intense storms, and rainfall, as well as economic shocks. Resilient communities require a carefully considered mix of physical and social infrastructure to adapt, respond and thrive collaboratively in the face of social, economic and environmental change.



600 Drake is our first building to pilot our emerging "Resilience Audit" and "Action Plan" development (see below).

#### Strategies:

**R1** 

**Assess Risk:** Audit all existing properties for their risk to climate change and emergency preparedness using criteria sourced from the City of Toronto's and BC Housing's climate resilience checklist.

#### **Specific Actions:**

- Develop a resilience checklist and audit portfolio on a building-bybuilding basis, including an overland flood risk mapping exercise based on future climate change scenarios
- Create an implementation schedule for auditing properties and begin including allowances for auditing in property budgets as appropriate
- Create resilience action plans at the property level based on the results of building audits
- **R2 Reduce Risk:** Reduce tenants' and purchasers' risk of harm associated with climate change and natural disasters in new developments.

#### **Specific Actions:**

- Review City of Toronto Minimum Back-up Power Guidelines for MURBs on all new developments
- Model future climate change scenarios for occupant comfort and building durability; create an implementation schedule for this modelling and begin including allowances in property budgets as appropriate
- Develop resilient design and management standards for use in all
   new developments

Key Performance Indicators & Metrics: Resilience

• Number of buildings that have undertaken a resilience audit

HOME

 Number of properties with emergency and resilience action plans



- Development
- Construction
- Property Management



## 3. Transportation

#### Principle:

Our buildings, communities and operations act as catalysts for low carbon transportation and healthier commuting options.

At Concert, we recognize that as community builders, realestate investors and property managers, we have a significant impact on the travel habits of the people who live and work in our properties. The choices we make with regards to mobility impact our health, our happiness and the environment. We must embrace the opportunity to positively impact all three areas through design, site selection and property management.

Change management research has shown that people are most likely to make changes to habits such as diet, commuting or waste diversion when they move into a new home or begin a new job. We will leverage our position as important actors in these life moments to affect positive change and encourage non-auto mode and low carbon transportation choices.

#### Strategies:

**T1 Cycling infrastructure:** For residential developments, provide best-inclass end-of-trip cycling facilities that exceed the minimum requirements of the local jurisdiction.

#### Specific Action:

- Work with development to develop a specification for our cycling facilities that will surpass local requirements
- **T2 Mobility:** Ensure that our residential developments provide a wide range of transportation options for residents that include walking, cycling, connections to transit, car share vehicles and electric vehicles.
- **T3 Electric vehicles:** Provide electric vehicle charging in all properties, where we have the ability and rights to do so.

#### **Specific Action:**

- Create an implementation schedule for installing electric vehicle charging at properties and begin including allowances in property budgets as appropriate
- **T4 Staff transit:** Support staff in making commuting and work travel choices that lower GHG emissions and lead to better health outcomes.

#### **Specific Actions:**

- Launch a sustainable commuting program that will offer support to staff who use transit, carpool, cycle or commute in electric vehicles
- Shift all Concert fleet vehicles to electric vehicles by 2025, including executive vehicle benefits

#### Key Performance Indicators & Metrics: Transportation

- Rates of use of cycling facilities in buildings
- Number of tenants who choose active and low carbon transportation choices
- Number of properties with electric vehicle charging
- Total carbon emissions of staff travel and commuting

- Accountability: Sustainability +
  - Development
  - Construction
  - Property Management



Collingwood Village, one of Vancouver's first rapid transit-oriented mixed use developments.





### 4. Waste

#### Principle:

We seek to minimize waste in all aspects of our business and provide waste reduction solutions for our tenants.

Reducing or eliminating the waste we produce through reducing, reusing and recycling can help make our business more efficient with the added benefits of minimizing resource extraction and reducing GHGs related to the production of goods.

Through an entrepreneurial approach to the disposal of our waste, we can also be an active partner in creating markets for recyclables leading to more efficient practices in the production and consumption of products and the potential to create new jobs and business opportunities in the local economy.

We can also be an active partner in creating markets for recyclables leading to more efficient practices in the production and consumption of products.



Sorting and recycling lounge, Salt, Vancouver.

#### Strategies:

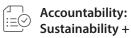
- **ZW1 Construction waste:** Achieve 75% construction waste diversion during construction projects.
- **ZW2** Building waste: Provide best-in-class waste diversion, sorting facilities and programming in all our residential and office properties where we have the ability and rights to do so, and explore ways to reduce truck trips for pick ups.

#### **Specific Action:**

• Develop a made-in-Concert approach to waste management that includes storage room design, logistics and communications that can be implemented nationally



- Construction waste diverted
- Waste diverted from managed
   properties



- Development
- Construction
- Property Management





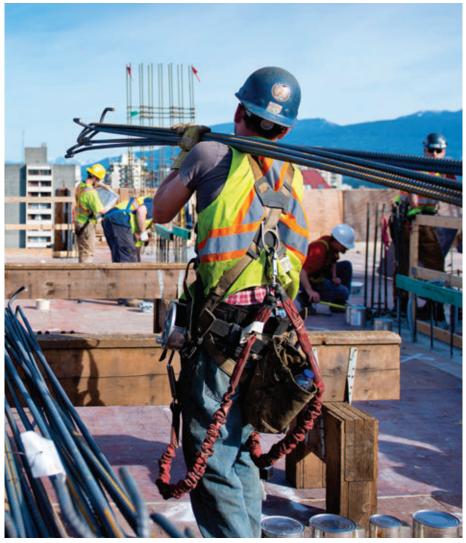
## 5. Materials

#### **Principle:**

We recognize the importance of reducing the use of persistent toxic chemicals for both human and ecological health in the materials we procure.

The use of products that may contain toxic chemicals or use toxic chemicals in their extraction, production or disposal permeates all aspects of modern life. As a developer and property manager, Concert has a role to play in increasing our understanding of product toxicity as it pertains to the people who live and work in buildings. We must also better understand how our purchasing decisions with regards to materials impact our environment and the people who build our buildings.

Our focus here will be to try and limit the use of materials that have demonstrated impacts on the environment and human health while developing our understanding of these issues to better inform future actions. With the average Canadian now spending 90% or more of their time indoors, we believe that this will be an area that many builders will begin to pay more attention to in the future.



Construction of Salt, a LEED Gold Certified Building in Vancouver.

#### Strategy:

M1

**Toxic materials:** Reduce the use of materials and products that contain persistent toxic chemicals.

#### **Specific Actions:**

- Create a Concert Materials List that will identify suitable alternatives to
   commonly specified materials that contain persistent toxic chemicals
- Create an updated healthy procurement resource for property management that specifies lower impact or non-toxic products such as Green Seal and ECOLOGO certified products



- Accountability:
- Development of materials list
- Development
- Construction
- Property Management





## 6. Ecology

#### Principle:

We take a restorative approach to habitat and actively seek opportunities to connect our communities with nature.

The health of our ecosystems can be directly tied to the health of our economy, our community and our pride of place. Therefore, Concert focuses our holdings and developments in already urbanized centres to maximize returns while minimizing our footprint on ecologically sensitive areas. Concert also believes in minimizing our ecological impact and, where possible, restoring the ecological integrity of the urban ecosystems where we build, own, and operate buildings. This includes the development of habitat for pollinators, reducing the urban heat island effect, and increasing the health of the hydrological cycle in the watersheds where we work.

The health of our ecosystems can be directly tied to the health of our economy, our community and our pride of place.



A green roof planted with native species on Navio at the Creek.

#### Strategies:

- E1 Ecosystem protection: Avoid development in sensitive ecosystems such as wetlands and riparian areas, or in the habitat of endangered species.
   E2 Local species: Landscape sites using only local or adaptive plants, and prioritize the planting of pollinator species.
   E3 Enhance biodiversity: Improve the ecological integrity (i.e. amount, density and variety of plants and animal species) in the communities where we are active.
   Specific Action:
  - Include green or active roofs in all new developments



#### Key Performance Indicators & Metrics: Ecology

 Area of green space introduced into urban areas every year



- Development
- Construction
- Property Management





## 7. Water

#### Principle:

We treat water as a valuable resource and seek to use it in a manner that is consistent with good stewardship of the watersheds we are active in.

Water conservation is a foundational element of sustainability and one that all of us interface with daily. Our connection to water is intimate and our approach to water conservation will be shaped by local supply and constraints.

Concert has already taken significant actions to reduce water use in its Vancouverbased residential properties by upgrading to more efficient fixtures and toilets. We regularly design drought-tolerant landscapes in new developments that do not require ongoing irrigation. Our next focus will be to investigate how we can encourage water reuse in new developments.



Urban Agriculture on the roof of Navio South at the Creek.

#### Strategies:

<b>Efficiency:</b> Exceed minimum standards for water efficiency in all new developments.
<ul> <li>Specific Action:</li> <li>Take a regional approach to water conservation that sets a target that is a minimum 10% improvement over the code requirement</li> </ul>
<ul> <li>Conservation: Upgrade existing facilities to use less water.</li> <li>Specific Actions: <ul> <li>Where we have the ability and rights, measure and benchmark water consumption in all properties</li> <li>Target a 10% reduction across the Concert portfolio compared to a 2016 baseline</li> </ul> </li> </ul>



Key Performance Indicators & Metrics: Water

- Total potable water use in Residential and Office properties
- Number of buildings employing water reuse strategies



#### Accountability: Sustainability +

- Development
- Construction
- Property Management



A constructed wetland water feature at Westbrook, Tapestry.

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## 8. Stormwater

#### Principle:

Our developments contribute to a healthy hydrological cycle and seek to eliminate contaminants in receiving water bodies.

We are fortunate to be active in development markets like Vancouver and Toronto, where rainwater is an abundant resource. But with a changing climate, the timing and volume of this rainfall is becoming more volatile. As a result, we will have to design landscapes and drainage systems that can accommodate both hotter and drier summers, and also more intense rain storms throughout the year.

We can achieve this challenge while reducing the demand for potable water by encouraging beneficial reuse in our landscapes and other building systems. Our designs should also acknowledge the role we play in affecting urban watersheds. Where possible, we will try to emulate natural systems and ensure that we are improving the quality of water that goes into receiving water bodies.

#### Strategies:

SW 1	Stormwater runoff: Reduce contaminants in run-off from new and	
	existing developments.	

#### Specific Action:

- Incorporate stormwater separators in all new developments
- **SW2** Infiltration: Maximize onsite detention and where possible, infiltration of stormwater on all new developments through designs that emulate natural systems. Additionally, by increasing the amount of permeable area in our projects, we will be able to reduce impacts of the urban heat island effect, peak stormwater volumes, and improve ground water recharge.

#### Specific Actions:

- Target achievement of TGS Tier 1 stormwater requirements in all
   new buildings
- Install green or active roofs on all new developments
- Seek to reduce impermeable area in new and existing developments





- Volume of stormwater treated on site in new developments
- Area of permeable surface in portfolio
- Development
- Construction
- Property Management

We are fortunate to be active in development markets like Vancouver and Toronto, where rainwater is an abundant resource.





## 9. Inclusion

#### Principle:

We create places that embrace diverse populations, facilitate housing accessibility and offer the many positive benefits of thriving community life.

Equity and social inclusion are key components of social wellbeing. As a developer, we can use design management practices to ensure that the broadest spectrum of community members can participate in and contribute to the economic and cultural life of their city. Inclusive environments are places that work better for everybody at all stages of life.

Removing physical and visual barriers to access is the first step towards inclusivity. But we must also ensure that places feel safe and welcoming for everyone. As our residents, customers and the people who visit our developments come from diverse backgrounds, there should be an equally diverse set of available housing options and services. We recognize that barriers to access can be social, economic, or psychological, and therefore we must ensure that our developments, our staff and our processes are set up to truly welcome everyone.

#### Strategies:

11

Affordability: We will endeavour to surpass any minimum requirements specified by local governments. Our goal will be to maximize access to available government grants and programs to subsidize affordable housing. In addition to the above, we will also continue to explore opportunities to improve the affordability of our units through design.

#### **Specific Actions:**

- Explore the development of programs in the short term that can help our renters into home ownership in Concert developments
- Continue to explore more affordable suite design options
- Seek ways to standardize or systemize our product offering to lower costs while maintaining quality
- 12 Access: Include accessible suites in all projects, and design suites and developments for all stages of life and lifestyle. Development designs will be characterized by universal access and a portion of suites that are accessible. We will also explore how suites can be adapted over time to better suit people's evolving needs.
- **I3 Reconciliation:** We will endeavour to be an active partner in truth and reconciliation with First Nations. As a builder of communities, we recognize the role we play in supporting and enabling reconciliation with Canada's Indigenous population.

#### Specific Actions:

- Adopt section 92 of the *Truth and Reconciliation Commission of Canada: Calls to Action* report. Section 92 of the *Calls to Action* report deals with Business and Corporations in reconciliation. It stipulates that we will:
  - Offer sensitivity training on Indigenous issues and related colonial history to our leadership and staff
  - Engage respectfully with Indigenous People in our work
  - Offer opportunities to Indigenous People and Indigenous businesses

#### Key Performance Indicators & Metrics: Inclusion

#### Number of affordable suites we have provided in a year

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 % of staff who have undergone a truth and reconciliation experience

#### Accountability: Sustainability +

- Development
- Construction
- Property Management
- People Experience
- Sales & Marketing

As our residents, customers and the people who visit our developments come from diverse backgrounds, there should be an equally diverse set of available housing options and services.



Concert employees on site during the construction of Patina.

105



ONCERT

Concert has undergone "bike friendly" building audits on our rental properties at Collingwood Village.

HOME

## 10. Good Health

#### **Principle:**

We carefully select sites and use design, amenities and programming to support healthy choices that enhance well-being.

Physical health is an essential element of human well-being. Research shows that people's assessment of their own health is a better predictor of life satisfaction than their doctor's objective assessment. In other words, feeling healthy is just as important to happiness as actually being healthy.

A holistic approach to healthy places includes both insulating people from environmental threats as well as acknowledging that our environment influences our feelings and our behaviour. For example, we can fight the deleterious effects of sedentary living by reducing the time spent sitting during a daily commute. This means creating mixed-use places where people can walk from home to work, and situating communities near rapid transit nodes. It also means ensuring that streets and public spaces privilege and enable pedestrians, cyclists and transit users. These actions benefit both health and happiness: surveys show that foot and bicycle commuters experience more joy and less fear, rage and sadness than car drivers.

#### Strategies:

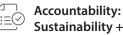
GH1 Active mobility: Ensure that the location and design of our development sites and property holdings limit added traffic congestion, deteriorating public health and increased carbon emissions. By seeking development sites that are strategically located next to services, jobs and cycling infrastructure, and designing them to prioritize active mobility such as walking, cycling and taking transit, we can lower the need for residents and tenants to use single-occupancy vehicles.

#### **Specific Actions:**

- Develop actions to encourage more active commuting for Concert employees
- Screen new residential development sites for their Walk Score and access to alternative commuting options
- GH2 Healthy choices: Ensure that healthy food and services are available on site or within walking distance of our developments and employee worksites.
- GH3 Diverse amenities: For residential developments, provide different types of amenities that allow for varied types of recreation such as a bike repair space, makerspaces, theatre rooms, outdoor public kitchens and others. The goal is to facilitate more casual connections among residents with shared interests. These varied amenities packages will also serve to expand and refine Concert's product offering.
- GH4 Multi-generational play: For residential developments, include play spaces in building design that allow residents of all ages to play and connect. By creating shared spaces where diverse age groups can co-exist and connect, community ties can be strengthened. We will also explore ways to expand the access to the programming and amenities that occur in our Tapestry Seniors Living properties when they are a part of larger master planned communities.



- % of bike audits on properties
- Mode split of Concert staff
- Average Walk Scores of residential properties
- Access to healthy food in or around our developments and employee worksites



- Sustainability +
- Development
- Construction
- Property Management
- Marketing



## 11. Strong Relationships

#### Principle:

We build strong, trusting and collaborative relationships through thoughtful design, engaging programming and responsive customer service that define a unique Concert experience.

Social belonging is a core individual need. People with strong positive relationships are happier, healthier and more productive at work, and they live up to an average of 15 years longer than those who are socially isolated. Research has also shown that the number of strong relationships that people have is the most significant determinant of life satisfaction and mental health.

The impact of social trust on wellbeing goes beyond relationships with family and close friends. Cities and societies in which people express high levels of trust in neighbours and strangers are happier. The research in this area shows that even superficial trust-building encounters in public raise people's spirits as much as time with close friends. Research also confirms a strong correlation between face-to-face encounters, economic growth, and creativity.

#### Strategies:

- SR1 Variety of social spaces: Create places that are welcoming to all. This includes offering spaces with different levels of privacy so that community members can control their levels of social engagement based on their needs. A rich community can be built on what may seem like insignificant encounters with neighbours. People need spaces that allow them to connect and eventually create meaningful relationships. We will develop spaces that are covered and uncovered that can allow people to gather year-round.
- SR2 Connected Communities: Create communities that are well-connected to nearby resources and accessible to residents and visitors. This includes not only purchasing the right real-estate, but also developing the right buildings, infrastructure, and spaces and attracting the necessary services and retail tenants to our new developments.

#### **Specific Actions:**

- Track and improve the overall Walk Score of our residential portfolio
   over time
- Develop criteria in the future that will inform purchasing and development design decisions for our residential portfolio
- **SR3** Social Programming: Work to connect residents and commercial tenants, build trust and provide programming that improves the quality of life of the people that live and work in our buildings. Good design can only take us so far and we need good programming and management that provides the impetus for residents to get to know each other.

#### **Specific Actions:**

- Develop a staff and resident engagement pilot program designed to build social capital and improve wellness within our properties, and wellness and work-life balance for staff
- Encourage the development of resident- and tenant-run events and social groups
- Investigate opportunities to engage residents of our condo buildings after sale

#### Key Performance Indicators & Metrics: Strong Relationships

- Number of residents who know their neighbours
- Number of social groups formed by residents
- Frequency that social spaces are used, and length of use
- The average and buildingspecific Walk Score of our developments
- Number of events
   programmed a month
- Attendance at group events



- Development
- Construction
- Property Management



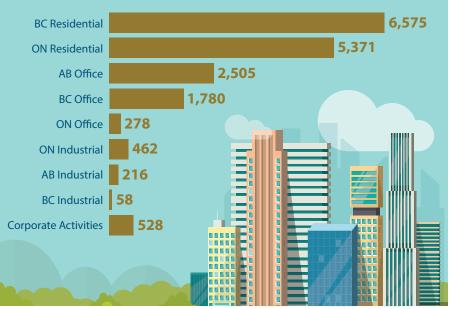
## 12. Transparency

#### Principle:

We will develop the internal capacity to achieve systematic excellence in data collection on social and environmental metrics to enable comprehensive corporate reporting, support enhanced customer experience and improve our portfolio value.

There is a global movement towards increased transparency with regards to corporate Environmental Social Governance The research arm of Jones Lang Lasalle released a report in 2018 that correlates realestate investor confidence with improved transparency and higher asset values. It found that portfolios achieved higher values in markets where asset managers and owners were more transparent about portfolio performance on corporate social and environmental metrics. As Concert evolves its approach to implementing sustainability, so must we evolve our ability to track and report data so that we can demonstrate success and continue to refine our approach and strategy.

#### Emissions: 17,773 tonnes (2016)



Total Concert Building GHG emissions.

#### Strategies:

TY1	<b>Benchmarking:</b> Develop processes, procedures and systems to enable us to report our social and environmental performance in alignment with global benchmarks.			
TY2	<b>TY2 Optimization:</b> Track and report data in a way that enables our working teams to make sound and responsible decisions with respect to optimizing our portfolio for sustainability and enhanced customer service.			
ТҮЗ	<b>Reporting:</b> Regularly issue public reports on our progress with regards to social and environmental goals and targets while maintaining confidentiality with respect to sensitive stakeholder information and proprietary business intelligence.			
<ul> <li>Specific Actions:</li> <li>Take part in the Green Real Estate Sustainability Benchmark (GRE survey)</li> <li>Continue to report our carbon emissions through the Climate S platform and explore using the Global Reporting Initiative (GRI)</li> </ul>				
Key Performance Indicators & Metrics: Transparency				

- Annually report on sustainability metrics outlined in this Framework
- Annually benchmark through GRESB
- Information System
- TechnologyAccounting
- Property Management
- Corporate Communications



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## 13. Stewardship

#### Principle:

Concert recognizes the fiduciary responsibility our shareholders and investors place on us with their capital contributions, and as a result we are committed to building a high-quality portfolio that generates an attractive return while also effectively mitigating risk.

We have assured our owners, partners and investors that we will invest their money wisely. As a result, we are disciplined in our approach to investment and development, embedding a culture of prudent risk management throughout all our lines of business. We are diversified across residential, commercial and industrial property holdings in three provinces to mitigate disruption in any one market. We further manage our risk by splitting investments between long-term holdings and shorterterm development projects. We endeavour to ensure that our portfolio is balanced and provides strong risk-adjusted returns for stakeholders.

We manage our growth through strategic planning and careful due diligence throughout the property life cycle from acquisition to development, construction and operations, leasing and sales.



Village Gate West Master-Planned Community, Etobicoke.

We have assured our owners, partners and investors that we will invest their money wisely.





## 14. Long-term Thinking

#### **Principle:**

We take the long view in creating resilient economic growth for our investors, the communities we invest in and the assets we manage.

Our investors require us to be economically sustainable for generations as they rely on us to provide them with ongoing income to support the retirement of their pensioners. As a result, we maintain a longterm perspective on markets; we favour investments that provide strong, stable cashflow as opposed to volatile investments. This perspective helps us better manage through short-term volatility in a given market.

This approach informs not only how we grow but also how we operate as a developer and property manager. Whether it's investing in our existing assets, or allocating budgets to our new developments, we incorporate sustainability factors into our investment strategy to maximize value, manage risk and support stable, long-term returns.



Forensics Services Coroner's Complex, Concert's first public-private partnership project, Toronto, Ontario.

This approach is especially important when making investments in our portfolio of buildings. For example, while some energy efficiency retrofits may have attractive short-term returns, they may limit future opportunities to achieve deeper, more meaningful economic, social, and environmental outcomes. Our approach is to look at the broader picture to ensure that, in addition to generating adequate returns, the investments we make are aligned with our sustainability principles and corporate values.

We are willing to responsibly invest in building upgrades with longer payback periods but that advance our long-term goals and ultimately increase the value of our holdings.

Similarly, on new construction projects, Concert endeavours to design and construct its new developments so that they retain value, are economical to operate and stay ahead of regulatory requirements.





## 15. Invest in People

#### Principle:

We support the development of a just economy where Canadians can get access to skills training, meaningful work and opportunities to contribute to society. We value integrity and seek to build long-term respectful relationships with our employees and partners.

There is a virtuous cycle between productivity and people: higher levels of productivity allow companies to reinvest in people, and smart investments can result in higher labour productivity. Concert was founded on a similar virtuous cycle whereby the development of income-generating properties that utilized union labour would provide returns to union pension plans. Our business is to continue to look for these types of opportunities to invest in people in a way that creates additional value for our ownership and makes us more effective at what we do. Ultimately, Concert strives to be a great place to work and good partner to work with.

We extend this philosophy to our corporate giving programs where we invest in trades training programs and organizations that help alleviate poverty. We also leverage the skills and knowledge of our employees in our giving programs through Concert Community Works which provides project management support to community groups and societies that lack this capacity.



An electrician works on Salt, Vancouver.

#### Strategies:

IIP1

Great place to work: We will develop a strategic plan for people,
 culture and learning with the goal of continuing to optimize the Concert
 Workforce. This will include a review of all aspects of what is traditionally
 defined as human resources and the identification of strategic priorities
 for improvement.

#### **Specific Actions:**

- Develop a Strategic Plan for People and Experience
- Conduct regular employee surveys to assess progress
- Encourage personal and professional development plans for all staff

Key Performance Indicators & Metrics: Invest in People

- Accountability: Sustainability +
- Employee satisfaction as measured through surveys
- % of staff that have personal and professional development plans
- People Experience



### Letter from Dave Ramslie, Vice President – Sustainability



Change can be a dirty word for large organizations like ours, but in the past year of consulting with staff at all levels of the organization in the development of this Framework, I have found a tremendous appetite for change and a willingness to try new things. This does not mean that change will be easy or will be swift. In some cases, difficult trade-offs may have to be made, and in many cases more research needs to be done to realize the vision presented in this Framework during implementation.

As Brian noted in the beginning of this document, Concert has much to be proud of with regards to its history in delivering on sustainability. Much of this Framework is just putting into context a trajectory for change that we are already on. The difference is that we are adding some new components and refreshing our approach to others where we have new information.

This Framework may also seem overly ambitious in its scope. Like, there may be too much to do, but while this strategy is organized into a variety of components of sustainability, and into a hierarchy of decision-making priorities, it is also an integrated plan where many of the principles, strategies and actions will have co-benefits and will be mutually re-enforcing.

For example, by meeting our goal for Transportation to ensure that our developments provide a wide range of transportation options for residents, we will also support our commitment to Good Health by providing more opportunities for active mobility, and by getting people to drive less, we will also deliver indirect carbon savings. By helping to build strong relationships within our communities, we are also building brand equity with our tenants which supports taking the long view in building value. It also makes our communities more resilient to an uncertain and changing climate where residents may need to rely on their neighbours in times of stress.

In the end, much of what we are setting out to do we are ready to achieve. Where we do not currently have answers, I am confident that our talented workforce and partners can fill that gap with innovation. This is an exciting time and I look forward to supporting Concert on this journey and being part of a team that makes a difference.

Sincerely,

Dave Ramslie Vice President, Sustainability





### Appendix A – Existing Buildings Carbon Framework

This appendix provides an overview of how Concert can reduce GHG emissions in its existing buildings to achieve an 80% reduction by 2050. This Framework is high level and based on the best information on hand as of the end of 2018. Ongoing work will be needed to set interim targets based on more detailed information in 2019.

#### Context

Concert is an owner and operator of a diverse set of industrial, commercial and residential properties. These buildings, based on their configuration and leasing structure, have different impacts on Concert's carbon portfolio. While much of the portfolio by squarefootage is commercial and industrial, the majority of our emissions comes from our residential properties (see figure below). This is primarily because Concert is responsible for paying for the energy bills in these properties, whereas in industrial and commercial we are not. According to generally accepted GHG accounting protocols, the party that procures the energy and controls the

systems producing it is responsible for the resulting emissions. The third largest source of emissions based on 2016 data is from Concert's Alberta Office portfolio, which is a function not of size again, but of how dirty, or carbon intensive, the Alberta energy grid is. These three property categories represent 81% of Concert's GHG emissions.

To achieve an 80% reduction in GHGs by 2050, Concert will have to find GHG reduction opportunities in all aspects of its business. For the purpose of prioritizing actions over the short term however, the intent is to focus on these three asset classes in order to maximize impact. This Framework is also consistent with targeting efforts where we have the most knowledge and opportunity to act. Residential buildings by their design are more uniform, and are less driven by unique process loads that are more common to industrial properties.

To guide this Framework, a set of objectives were identified.

#### **Objectives**

- Achieve systemic excellence in data collection and analysis
- Establish a long-term objective of the portfolio to reduce carbon emissions by 80% by 2050
- Establish shorter term GHG targets based on business plans and more detailed asset data
- Balance cost recovery with GHG
   emissions reduction opportunities
- Build value and resilience in the portfolio

#### **Overall Strategy**

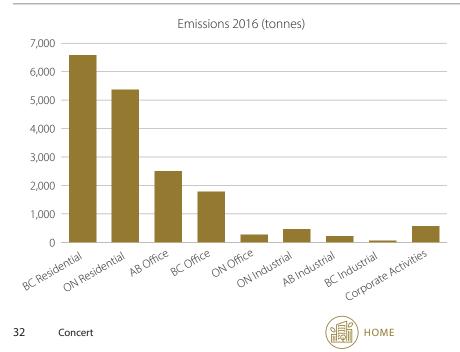
#### Short-term Actions: Improved Data Gathering & Portfolio Benchmarking 2019-2021.

In 2019, we will work with Energy Advantage (Concert's current energy dashboard provider), our own internal information system technology (IST) group, and third-party contractors to sharpen our data collection practices. We will also work with IST and Accounting to ensure that while improving in accuracy, this reporting will not require more resources and will be automated wherever possible.

We will ensure that data collected is always cast against comparative analysis of benchmark properties that are of similar class, climate zone and other relevant characteristics. We will move to monthly monitoring of the consumption of individual sites to identify anomalous consumption periods through visualizations and alerts.

Based on preliminary benchmarked data gathered to date, we will begin on-site detailed audits of buildings

#### Concert's GHG Emissions by Source



with the highest GHG emissions and energy consumption to develop a GHG-reduction strategy and retrofittingproject priorities. The audits will evaluate projects based on the potential for GHG reductions, cost savings, and potential return on investment. We will then evaluate how these overlay with other operational priorities like customer experience, asset renewal and routine maintenance.

An early priority will be to ensure that all residential properties have direct digital controls (DDC) installed that can optimize a building remotely. The combination of good quality benchmarked data and DDC will allow Concert to more effectively drill into each building's operations data to find the source of any anomalies. Our operations staff can then make recommendations for improvements based on similar properties, advice from consultants, and observed operations. This type of ongoing optimisation can help to keep buildings comfortable and operating efficiently.

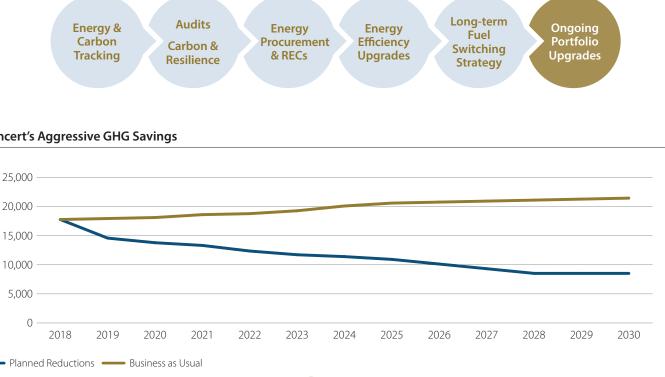
#### Short to Medium Term: **GHG Reduction Projects**

Based on information gathered through building audits and the benchmarking process, we will identify fiscally responsible projects that will lead to achievement of our carbon reduction strategies. This is where we will actively start to work with our partners and investors to create sustainability and carbon reduction strategies for our properties. This will likely include specific building upgrades starting with our residential properties, like fuel switching retrofits and tenant engagement programs. Our goal will be to complete one GHG reduction project in BC and a second in Ontario every year until all projects have been upgraded.

We will look to finance these projects from the cost savings provided by the retrofits themselves. Some projects may require longer repayment terms than others and we may have to investigate ways to finance upgrades from an internal rotating fund.

Starting in 2019, we will also actively investigate opportunities to lower our GHG emissions through the purchase of cleaner fuels such as wind power in Alberta and Renewable Natural Gas in BC. There may be slight premiums to acquiring these alternative resources, but we will investigate changing our payment terms and commitments to address this. In some cases, we will work with our tenants to investigate their willingness to pay for any added costs, and in all cases we will ensure high levels of customer service. Based on the successful implementation of the strategies noted above, Concert can expect to achieve a 3-5% reduction in GHGs annually while growing its portfolio in a manner consistent with long-term growth targets.

See the summary table in **Appendix C** to see how and when proposed carbon and other sustainability strategies will be integrated in our new buildings.



#### Concert's Aggressive GHG Savings



### Appendix B – New Buildings Framework

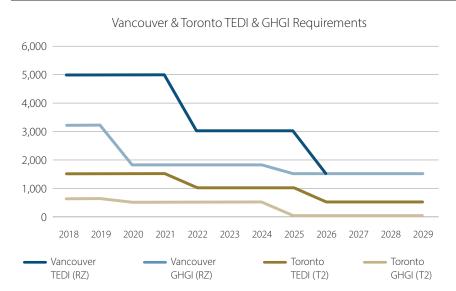
#### Context

The federal government has set a policy target for achieving "Net Zero" buildings by 2032. However, while the target is uniform, the approaches to achieve it will not be. Canada is a large country, and the markets where Concert builds are very different. They have very different climates and different power grids, and these will result in different targets and different ways of designing and building our projects.

The progression of national standards has been led by the cities of Vancouver and Toronto and the Province of BC. All are using a stepped, metrics-based approach that include Thermal Energy Demand Intensity (TEDI), Total Energy Demand Intensity (TEUI), and Greenhouse Gas Intensity (GHGI). All three also require energy modelling and air-tightness testing as a pre-requisite. Being a milder climate with access to slightly cleaner electricity, the Vancouver market can be more aggressive, targeting lower TEDI and GHGI levels more quickly.

The figure below shows that both the City of Toronto and the City of Vancouver are targeting a TEDI of 15kWh/sqm/yr. as their end state, as well as low or zero-carbon emissions. Given this, and Concert's commitment to being better than minimum standards, the recommendation is to achieve a TEDI of 15kWh for all new projects starting design in 2024. This is one year ahead of the target date for projects under going rezoning in Vancouver (Climate Zone 4) and two years ahead of the Toronto market (Climate Zone 6). Further, our collective goal should be to be Zero Carbon (as defined by CaGBC) by 2024 in both jurisdictions. See more on Zero Carbon Buildings below.

**Comparison of Vancouver and Toronto Performance Requirements** 



The impacts of these targets on our buildings means that Concert is going to have to invest more heavily in building envelopes and switch to highly efficient electric-based HVAC systems.

Below are recommendations for an incremental roll-out of how we can achieve these targets in both markets, and what it could mean to the design and construction of our buildings.

One of the biggest challenges for us to overcome in our buildings is how to decarbonize our HVAC and domestic hot-water systems. As noted above, this will mean moving to electrically based systems that have lower GHG emissions. While many solutions exist for heating and cooling in the Vancouver market, the Toronto market (due to its harsher climate) is less well developed. The solutions for domestic hot water are also especially challenging to address with current technology regardless of the market. The good news is that recent research has shown that our plans to increase envelope performance not only reduce the burden on these new systems, but also equalize the demands for heating, cooling and domestic hot water, allowing for the potential to better optimize our buildings overall and dramatically reduce construction costs.

This challenge will require us to push our consultant teams to provide us with robust and reliable systems that meet Concert's high standards for quality and reliability. Doing this may require us to re-think our processes in some cases, make trade-offs, and try new things that we have traditionally not ventured into. Concert is currently studying the application of heat-pump-based systems in greater detail in order to better understand how best to begin this journey.



#### Objectives

- Achieve Zero Carbon new construction, consistent with the CaGBC definition, by 2026
- Use economical and robust approaches to carbon reduction
- Stay ahead of regulatory action

#### **Overall Strategy**

Our general approach will be to push innovation first in our rental housing portfolio, and then replicate it in our condominium housing projects. Where opportunities arise to develop commercial offices, we will also push for accelerated performance in this building type.

Our goal is to position Concert on the leading edge of building without downloading unnecessary risk to our customers, and to maintain our reputation for quality. We will try to balance consistency across the portfolio with regional differences required by climate and local building practices. The end goal is to get our projects to minimum envelope performance of better-than-a-TEDI 30kWh/sqm/yr., and to shift as much of our HVAC and DHW load to electrical-driven systems as possible. Our stretch goal is to get buildings applying for development permit, or site-plan approval, down to a TEDI of 15 kWh/sqm/yr. or less by 2026.

Doing this will require us to look at each new project as an opportunity to explore and refine our approach to reducing GHGs. In some cases, this may just be increased study and evaluation at the design stage, but in most cases, it will require some changes to how we design and construct our developments.

Below is a proposed progression of how this would need to happen in order to stay ahead of regional regulations in our benchmark cities of Vancouver and Toronto respectively. The dates noted represent the time of Development Permit or Site Plan Approval application.

Further, for a summary of how and when proposed carbon and other sustainability strategies will be integrated in our new buildings, see the summary table in **Appendix C**. The following is a summary of the highlevel design strategies required to meet the above-noted levels of performance. These are based on BC Housing and City of Toronto-sponsored studies that used parametric modelling to determine the lowest-cost approach to achieving each step or tier of a given standard.

Designing to **Step 3** of BC Energy Step Code:

- 50% Window-to-wall ratio (WWR) or lower and a rational building form
- Effective wall values of R9 or better
- High performance double or triple glazed windows
- Reduce thermal bridging

Designing to **Step 4** of BC Energy Step Code:

- Include design strategies from above and include:
  - Elimination of all significant thermal bridges
  - High efficiency centralized HRV or ERV units
  - Triple glazed windows with high performance frames

Designing to **Step 4** of BC Energy Step Code with Zero Carbon Certification:

- Include design strategies from above and:
  - Use electrically powered heating and cooling
  - Use electrically powered units for DHW
  - Eliminate natural gas use
  - Include renewable energy generation on-site
  - Procure renewable energy credits

#### The Progression of Targets in the Victoria/Vancouver Market

Building Type	2019-2023	2023-2026	2026 forward
Condo	Step 2* (CO2e /sqm/yr. <6kg)	Step 3 (CO2e /sqm/yr. <4kg)	Step 4 (CO2e /sqm/yr. <1kg)
Office/Retail	Step 2Step 3(CO2e /sqm/yr.(CO2e/sqm/yr.<6kg)<4kg)		Step 3 (CO2e/sqm/yr. <1kg)
Seniors (Hotel)	Step 2	Step 3	Step 3
Rental	Step 3 (CO2e/sqm/yr. <6kg)	Step 4 (CO2e /sqm/yr. <4kg)	Step 4 (CO2e/sqm/yr. <1kg)

Building on the South Coast of BC

\* Step refers to the level of performance defined by the BC Energy Step Code



## The Progression of targets in the Toronto Market based on the Toronto Green Standard

#### Proposed Progression for Southern Ontario

Building Type	2019-2023	2023-2026	2026 forward
Condo	Tier 2* (CO2e/sqm/yr. <15kg)	Tier 3 (CO2e/sqm/yr. <10kg)	Tier 4 (CO2e/sqm/yr. <5kg)
Office/Retail	Tier 2     Tier 3       (CO2e /sqm/yr.     (CO2e /sqm/yr.       <15kg)     <8kg)		Tier 4 (CO2e/sqm/yr. <4kg)
Seniors (Hotel)	Tier 2	Tier 3	Tier 4
Rental	Tier 2/3 (CO2e /sqm/yr. <10kg)	Tier 4 (CO2e /sqm/yr. <5kg)	Tier 4 (CO2e/sqm/yr. <1kg)

\* Tier refers to the level of performance as defined by the Toronto Green Standard (TGS) and the Toronto Zero Carbon Buildings Framework.

We recognize that there are many components of hitting TGS Tier 2 beyond just energy. As a result, we design for the Tier 2 Energy Targets while only achieving Tier 1 in other respects of the design.

#### (V3) Tier 2 Targets

- 50% WWR or lower and a rational building form
- Effective wall values of R9 or better
- High performance double or triple glazed windows
- Reduce thermal bridging
- 25% improvement in air leakage over a baseline ASHRAE 90.1-2013 value
- Likely require reductions in corridor pressurization from a typical industry value of 30 cfm/suite to 15-20 cfm/ suite, and/or improvements to the efficiency of installed suite HRVs or ERVs from 65% to 75%
- Further reductions to domestic hot water loads will also be required. 37 (2012) (SB-10 2017)

#### (V4) Tier 2 Targets

- Including the above noted design strategies and adding the following:
- High-performance triple glazing (~U-0.2)
- HRVs or ERVs (>80% efficiency)
- A fuel switch from gas to heat pumps on at least a proportion of the plant, make-up air, and/or domestic hot water loads
- Air leakage reductions of approximately 40% to 50% better than the ASHRAE 90.1-2013 baseline may also be required

#### (V5) Tier 2 Targets

- Including of the above-noted design strategies and adding the following:
  - High-performance envelope with an effective R-value of approximately 20
  - Windows must achieve a performance level equivalent to Passive House
  - A 75% or greater reduction in air leakage with minimal use of corridor pressurization

- Targets will also likely require a full fuel switch and the use of heat pumps for the majority of the heat plant, make-up air, and domestic hot water loads

#### (V6) Tier 2 Targets

- These targets are essentially the same as Version 5 with the addition of:
  - Complete electrification of HVAC and DHW loads
  - Incorporating onsite renewable energy
  - Purchase of renewable energy credits

#### Zero Carbon Buildings

To achieve zero-carbon accreditation from the CaGBC, the following prerequisites need to be met:

- A TEDI of 30kWh/sqm/yr. or lower
- Onsite renewable energy
- Purchase of renewable energy credits

The advantage of achieving zerocarbon as a certification over other high-performance certifications (such as Passive House) is that it achieves the carbon outcomes while being less restrictive and more economical with design and construction.

By ensuring that we are moving to building all of our buildings to a TEDI of 30kWh/sqm/yr. or lower, we are ensuring that we can meet all of the minimum qualification standards for the CaGBC's Zero Carbon certification program. This allows us to move to a future scenario where all our products going forward from 2020 can be certified as Zero Carbon, should we opt to develop or purchase the requisite renewable energy.



#### Other Items

#### **Air-Barrier Testing**

Air-tightness of the building is a critical factor in creating long-lasting, reliable energy performance. There are different standards available in North America to draw from, including the Seattle standard, which has been in effect for over five years now, the adoption of which would allow industry and officials to draw on local knowledge and expertise. Vancouver requires, and Toronto recognizes for tier 2 buildings, the ASTM E779 standard with some modifications. Buildings must achieve a maximum air leakage of 2 L/s per  $m^2$  of façade area, at a pressure of 75 Pascals. To help builders achieve this, there are also requirements for the individual components to meet maximum leakage rates, including windows, elevator doors, loading docks and others.

#### Commissioning

Definitions and procedures for fundamental and enhanced commissioning should be referenced to the updated LEED v4 requirements. This means commissioning practice must follow ASHRAE Guideline 0-2005 and Guideline 1.1-2007 (consistent with LEED), and be performed by a certified commissioning agent only. Commissioning Agents must additionally be independent. Specific building systems that should be commissioned under the new TGS requirement include:

- HVAC systems: all "complex systems" and systems with economizers, as well as "simple systems" with over 140 kWh cooling or 175 kWh heating
- Lighting and daylighting systems: 20 kW installed lighting overhead, or more than 10 kW with daylight or occupancy controls
- Domestic hot water systems: 60 kWh capacity
- Building envelopes
- Renewable energy systems

#### Submetering

Concert has used submetering in several recent projects. Under the TGS Version 2.0, submetering is an optional condition for buildings seeking Tier 2. It requires the installation of in-suite thermal energy meters on all heating and cooling appliances in residential buildings above and beyond existing requirements for individual suite meters for electricity use. Similarly, both thermal energy meters for heating and cooling appliances and electricity meters are also required at the individual tenant scale in multi-tenant commercial/retail buildings. All meters must conform either to the Canadian Standards Association (CSA) Standard C 900 Heat Meter Standard or to the European Committee for Standardization (CEN) Standard EN 1434. The current TGS also recommends the use of the International Performance Measurement and Verification Protocol (IPMVP) to guide energy savings strategies.

#### **Embodied Carbon**

Embodied Carbon calculations are required now in both Vancouver and Toronto green building policies. Both cities use the following standard requirements:

1) The Life Cycle Costing Analysis (LCA) must include all envelope and structural elements (including footings and foundations), complete structural wall assemblies (from cladding to interior finishes, including basement), structural floors and ceilings (not including finishes), roof assemblies, and stairs construction. This applies to parking structure, too. The LCA excludes excavation and other site development, partitions, building services (electrical, mechanical, fire detection, alarm systems, elevators, etc.), and parking lots

2) The LCA must assume a building lifetime of 60 years

3) The life-cycle boundary must account for cradle-to-grave impacts, including resource extraction, product manufacturing and transportation, building construction, product maintenance and replacement, and building demolition/deconstruction/ disposal (EN 15804/15978 modules A1-A5, B2-B4, and C1-C4). Operating energy and water consumption are excluded

4) The Life-Cycle Inventory (LCI) database used must be ISO 14040, 14044, and 21930 compliant and regionally specific, if possible

5) The Life-Cycle Impact Assessment (LCIA) method used must be the US EPA's Tool for the Reduction and Assessment of Chemical and Other Environmental Impacts (TRACI)

6) If the service life of a product used in initial construction is greater than the building's assumed service life, the impacts associated with the product may not be discounted to reflect its remaining service life. In addition to reporting the embodied carbon as detailed above, projects shall separately report, where readily available, the impacts and benefits beyond the system boundary (EN 15804/15978 module D)

#### **Note:** This is a reporting requirement only to better inform our own building designs in the future.



## Appendix C – Summary of Actions

Area		Actions
Invest in People	1	Develop people and culture plan
Transparency	2	Achieve systematic excellence in data collection and reporting
	3	Complete GRESB
	4	Report our emissions through Climate Smart
Inclusion	5	Explore the development of programs in the short term that can help our renters into home ownership in Concert Developments
	6	Continue to explore more affordable suite design options
	7	Seek ways to standardize or systemize our product offering in order to lower costs while maintaining quality
	8	Adopt section 92 of the <i>Truth and Reconciliation Commission of Canada: Calls to Action</i> report. Section 92 of the <i>Calls to Action</i> report deals with Business and Corporations in reconciliation. It stipulates that we will:
8a Offer sensitivity training on Indigeno and staff		Offer sensitivity training on Indigenous issues and related colonial history to our leadership and staff
		Offer opportunities to Indigenous People and Indigenous businesses
Strong	9	Track and improve the overall Walk Score of our residential portfolio over time
Relationships	10	Develop criteria in the future that will inform purchasing and development design decisions
	11	Encourage the development of resident- and tenant-run events and social groups
	12	Develop a staff and resident engagement pilot program designed to build social capital and improve wellness within our properties, and wellness and work-life balance for staff
	13	Investigate opportunities to engage residents of our condo buildings after sale
Good Health	14	Develop programs to encourage more active commuting for Concert employees
Resilience	15	Develop a resilience checklist and audit portfolio on a building-by-building basis, including an overland flood risk mapping exercise based on future climate change scenarios
	16	Create resilience action plans at the property level based on the results of building audits
	17	Review City of Toronto Minimum Back-up Power Guidelines for MURBs on all new developments
	18	Model future climate change scenarios for occupant comfort and building durability
	19	Develop resilient design and management standards for use in all new developments
Ecology	20	Include green or active roofs in all new developments
	21	Improve the ecological integrity (i.e.: amount, density and variety of plants and animal species) in the communities where we are active



Transportation	22	Work with Development and Construction to develop a specification for our cycling facilities that will surpass local requirements
	23	Launch a sustainable commuting program that will offer support to staff who use transit, carpool, cycle, or commute in electric vehicles
	24	Shift all Concert fleet vehicles to electric vehicles by 2025, including executive vehicle benefits
Waste	25	Achieve 75% construction waste diversion during construction projects
	26	Develop a made-in-Concert approach to waste management that includes storage room design, logistics, and communications that can be implemented nationally
Materials	27	Create a Concert Materials List that will identify suitable alternatives to commonly specified materials that contain persistent toxic chemicals
	28	Create an updated healthy procurement resource for property management to specify lower impact or non-toxic products such as Green Seal and ECOLOGO certified products
Stormwater	29	Incorporate stormwater separators globally in all new developments
	30	Install green or active roofs on all new developments
	31	Seek to reduce impermeable area in new and existing developments
	32	Target achievement of TGS Tier 1 stormwater requirements in all new buildings
Water	33	Take a regional approach to water conservation that sets a minimum 10%-better-than-code- requirement target
	34	Measure and benchmark water consumption in all properties where we have the ability and right to do so
	35	Target a 10% reduction across the Concert portfolio over a 2016 baseline
Carbon	36	<ul> <li>Commit to evaluating performance in all new developments through the BC Energy Step Code and TGS v3 metrics (see <b>Appendix B</b> for definitions)</li> <li>Commit to Step/Tier 2* for Condominiums &amp; Step/Tier 3 for Rental Housing (Short term)</li> <li>Commit to Step/Tier 3* for Condominiums &amp; Step/Tier 4 for Rental Housing (Medium term)</li> <li>Commit to Step/Tier 4* for Condominiums &amp; Rental Housing – with zero-carbon certification (Long term)</li> </ul>
	37	Complete energy audits on all residential and office properties subject to our ability and right to do so. (Short term)
	38	Install direct digital controls in all Office and Residential properties, subject to our ability and right to do so. (Short term)
	39	Integrate sustainability building evaluations as part of the overall due diligence process when evaluating potential acquisitions
	40	<ul> <li>Create a fuel switching Framework for existing buildings that gradually moves HVAC</li> <li>and DHW loads to electrically driven systems. (Short term)</li> <li>Develop an energy procurement strategy that switches our energy use to renewable sources. (Short term)</li> </ul>
	41	Develop and launch a sustainable commuting program that offers support and benefits to employees who make lower carbon commuting choices. (2019)
	42	Develop interim carbon reduction targets for 2020 to 2030



## Appendix D – Summary of Building-specific Strategies and Actions

New Buildings	Existing Buildings	Framework	Suggested Timing	Cost
		Carbon & Energy		
$\checkmark$	$\checkmark$	Measurement-based Commissioning (LEED V4 credit)	ASAP	\$
$\checkmark$		Sub-metering New Buildings (consistent with COV Requirement)	ASAP	\$
	$\checkmark$	Sub-Metering in Existing Buildings (by suite, or by floor, end use, and major equipment), where feasible	ASAP	\$
$\checkmark$		Embodied Carbon Reporting on all new projects	ASAP	\$
$\checkmark$		Air-tightness testing	ASAP	\$
$\checkmark$		Electric Vehicle Charging – 33% of stalls installed, with charging infrastructure for 100% with load sharing	2020	\$\$
	$\checkmark$	Electric Vehicle charging at all properties, where feasible	2024	\$\$
$\checkmark$		Renewable Energy Onsite	2024	\$\$
$\checkmark$		Carbon Neutrality (TEDI 15kWh/sqm/yr. TEUI of 90kWh/sqm/yr. 0kg/sqm/yr. CO2e)	2026	\$\$\$
		Water		
$\checkmark$	$\checkmark$	Low flow fixtures on sites, where feasible	ASAP	\$
$\checkmark$	$\checkmark$	High efficiency irrigation, where feasible	ASAP	\$
$\checkmark$		Water re-use for non-potable uses	2024	\$\$
		Stormwater		
$\checkmark$		Stormwater separators in all projects	ASAP	\$
$\checkmark$		Incorporate stormwater detention on all new projects	2020	\$\$
		Waste		
$\checkmark$		Divert more than 75% of construction waste	ASAP	\$
$\checkmark$	$\checkmark$	Provide best-in-class waste recycling facilities, where feasible	Continue	



		Resilience		
$\checkmark$		Model future climate scenarios in building design	ASAP	\$
$\checkmark$	$\checkmark$	Develop building resilience plan for operations	ASAP	\$
$\checkmark$	$\checkmark$	Where appropriate, develop overland flood plans	2020	\$
$\checkmark$		Have 72 hours of back-up power for critical systems (elevators, pumps, ventilation, refuge area)	2020	\$\$
		Materials		
$\checkmark$	$\checkmark$	Eliminate VOCs from projects (base building only for existing properties and subject to our rights under leases)	2024	\$
$\checkmark$	$\checkmark$	Reduce the amount of Red list materials in all properties (base building only for existing properties and subject to our rights under leases)	ASAP	\$
		Health & Wellness		
$\checkmark$		Explore the use of Fitwel or similar standard for all projects	ASAP	\$
$\checkmark$	$\checkmark$	Create best-in-class bike facilities in projects where we have the ability and right to do so	2020	\$
$\checkmark$	$\checkmark$	Use MERV 13 filters or better where we have the ability and right to do so	2020	\$\$
	$\checkmark$	Explore deployment of Social and Wellness Coordinator for tenant programming	2019	\$



## Appendix E – Summary of Sustainability Metrics

Area of Focus	Description
Inclusion	Number of activities programmed weekly, monthly or annually
	Total number of "below market"* units in our developments
	Number of "below market"* units we have provided in a year
	Diversity** of users in public spaces
Strong Relationships	Number of residents who know their neighbours
	Number of social groups formed by residents
	Frequency that social spaces are used, and length of use
	The average and building-specific Walk Score of our developments
Good Health	Walk Score
	Mode split of Concert Properties
	% of bike audits on properties
Resilience	Number of buildings that have undertaken a resilience audit
	Number of properties with emergency and resilience action plans
	All new developments have a resilience charrette
Ecology	Area of green space introduced into urban areas every year
	Green Roof Area
Transportation	Rates of use of cycling facilities in buildings
	Number of tenants that choose active and low carbon transportation choices
	Number of properties with electric vehicle charging
	Total carbon emissions of staff travel and commuting
	Mode share of employees
Stormwater	Percentage of permeable surface in portfolio
Water	Total potable water use in Residential and Office properties
	Number of buildings employing water reuse strategies
Carbon	Total Carbon Emissions
	Carbon intensity of portfolio
	Quantity of renewable energy procured
	% Carbon reduced over 2016 baseline
	Average Energy Star Score
	Natural Gas Reduced in portfolio
Waste	Average Waste Diversion on Construction Projects
	Waste diverted from managed properties
Materials	Development of materials list

\* Below market is defined as any unit that has some provision or security attached to it that ensures it is more affordable than market units

\*\* Diversity in this sense includes Age/Ethnicity/Gender



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