



Global Privacy Policy

At Green Street, we understand our obligation to keep information about you secure and confidential. We will inform you of our policies for collecting, using, securing, and sharing personally identifiable and/or nonpublic personal information (“Customer Information”) the first time we do business and every year that you remain a customer with us. Therefore, we maintain the following principles with respect to protecting your privacy:

- We are committed to protecting your privacy at all times;
- We do not sell or disclose any nonpublic personal information about you to anyone except as required by law;
- We do not provide customer information to persons or organizations outside the affiliated companies who are doing business on our behalf, for their own marketing purposes;
- We contractually require any person and/or organization providing products or services to customers on our behalf to protect the confidentiality of Green Street customer information;
- We afford prospective and former customers of Green Street the same protections as existing customers with respect to the use of personal information.
- We do not market to minors/children, our website is not intended for minors/children and we do not knowingly collect data relating to minors/children.

Who We Are

Green Street Advisors, LLC is a U.S. limited liability company doing business as Green Street. Green Street Advisors (UK) Ltd., doing business as Green Street, is authorized and regulated by the Financial Conduct Authority (FRN 482269). React News is a trading name of Green Street Advisors (UK) Ltd.

Green Street is a business subject to the California Consumer Privacy Act of 2018 (Cal.Civ.Code § 1798.100 et seq. (“CCPA”), California Privacy Rights Act of 2020 (“CPRA”), the New York “Stop Hacks and Improve Electronic Data Security Act of 2019 (N.Y. Gen. Bus. Laws § 899-bb(“SHIELD Act”), the Data Protection Act of 2018 and the General Data Protection Regulation (Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC); General Data Protection Regulation (“GDPR”) enacted by the United Kingdom, as applicable, the Personal Information Protection Law of China (2021), and/or the General Law for the Protection of Personal Data of Brazil (Law 13.709), and any other applicable foreign, federal, state, or local data protection, data privacy, data security, and privacy protection laws in the United States and the United Kingdom as they may be enacted or amended (collectively, the “Data Protection Laws”).

Information We Collect

Data collected by Green Street is limited to the information needed to provide the services contracted between Green Street and the customer. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We collect and use various types of information we believe is necessary only to administer our business, and to offer you the best possible customer service. Customer information we collect is categorized into the following types:

- Geolocation data, such as regional IP addresses, are not used for tracking consumer location and movements.
- Commercial Information such as purchase or licensing information, including products and services purchased or licensed, obtained, or considered, or related histories or tendencies.
- Other general information we obtain about you that is not assembled for the purpose of opening an account or offering certain products or services that you may request, such as demographic information.
- Audio and visual data generated when you opt-in to video recordings. This is used for the purpose of customer service, customer presentations and training. This is not used for identification.
- Inferences drawn from personal, or customer information is for Green Street commercial use only. Green Street will make inferences based upon customer details as to which of our products may be useful. We do not use any automated decision-making technology.
- In the US, Green Street's Advisory business is a California registered investment adviser regulated by the Department of Financial Protection and Innovation. As a customer of our Advisory business, we are required to obtain, verify, document and retain data that identifies each organization and those there that utilize the regulated products and services. We will ask for the name of your entity, address, tax identification number and other information that will allow us to identify you. We may also ask to see your articles of incorporation, partnership agreement or other identifying documents. **Please note, this is for customers of our Advisory services only.**

Personal data is data that relates to an identified or identifiable natural person, this means a human being. Anonymous data, where you cannot find out who the data relates to, is not personal data.

Green may collect personal data from you, which can be split into the following different types:

- (a) Identity Data, which includes your first name, last name, date of birth and gender.
- (b) Contact Data, which includes your address, email address and telephone numbers.
- (c) Financial Data, which includes your bank account and payment card details.
- (d) Technical Data, which includes your IP address, your login data, and your browser type.
- (e) Profile Data, which includes your username and password and survey responses.
- (f) Transaction Data, which includes details about payments to and from you and other details of products and services you have purchased from us.
- (g) Marketing and Communications Data, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (h) Usage Data, which includes information about how you use our website, products, and services.

Personal data does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

We may collect aggregated details about your use of the websites for the purposes of aggregate statistics or reporting purposes. Aggregated data (usage details combined from a number of people's data) may come from your personal data but if it does not directly or indirectly reveal your identity, it is not considered personal data and falls outside the scope of this Policy. For example, we may combine and analyze your use of the website to

work out the number of users accessing a specific website feature. However, to the extent that the aggregated information could still be considered personal data, we will continue to process it in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How We Collect Personal Data

When you sign up for our services or communicate with us, you may choose to voluntarily give us certain personal data. We use different methods to collect data from and about you, including when you fill out a form or give us personal data via the phone, by post, online or by email or otherwise. Other instances where we may collect personal data are when you:

- (a) Visit our website or social media (e.g. through cookies);
- (b) Create an account with us to use our online portal;
- (c) Login to your account and utilize the various features;
- (d) Sign up for our mailing list/newsletter;
- (e) Enquire about or order products or services through our website or via the phone, fax, email, post or in person;
- (f) Create an account on our website;
- (g) Provide feedback;
- (h) Fill in a form on our website; and/or
- (i) Otherwise contact us.

Personal data may be collected by us and by our third-party service providers who assist us in operating the website, including:

Google Analytics

We use Google Analytics to help analyze how visitors access our website. Google Analytics generates statistical and other information about website use by means of cookies. Google will store this information. If you do not want your website visit information reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

HubSpot

We use HubSpot to help track and analyze inbound marketing opportunities. In common with many websites, when you read, browse, or download information from our public website, HubSpot's system may collect information such as the data and time of your visit, the pages accessed, and any information downloaded. This information is used for sales analysis, client prospecting and marketing campaigns.

FullStory & Amplitude

We use telemetry software to provide the firm with a full session replay of a visitor's interaction with our website, such as the links clicked, mouse movements, and pages/products visited. We collect this information to assist us in providing a better visitor experience.

Advanced Ads & Mail Chimp

For React News advertising clients, website ad clicks are tracked using Advanced Ads. Mail Chimp is used to track ad clicks in daily emails from React News.

Office 365

Green Street utilizes Office365 email and Microsoft Teams to correspond with clients, provide our products and services, education, and client support. These platforms also provide information and support to potential clients. Email is archived by a contracted third-party service provider with limited access rights. Email is reviewed by members of the Compliance team as required by regulatory authorities. Video recording via Teams is authorized by all attendees prior to recording through an opt-in function. Video calls between customers and Green Street sales staff are housed by a contracted third-party vendor and routinely used for internal training purposes. Recorded video calls may be shared between Green Street affiliates located in the U.S. and U.K.

Commercial property information we collect is categorized into the following types:

- Information from visitors to our website provided through online forms, such as building information, sales transaction information, and related property or market information;
- Other commercial property information that is directly provided from a client for valuation purposes.

Once the commercial property information has been verified, it may be used in an anonymized fashion to enhance our products/services.

We also use internal client information from Salesforce to help us increase the accuracy of our data product. This information is for internal use only and used to supplement deed and tax record data we collect from other third-party sources. This information is not published externally.

Please note, customers are not permitted to upload any PCI, PHI, PII or any sensitive information to our platform. Whether done purposefully or inadvertently, Green Street is not responsible for this data.

Credit Card Processing

We use a credit card payment and processing service provider to receive certain payment processing data that enables us to accept payment from purchasers/licensees of our products and services. Green Street does not retain credit card information, please see the terms and conditions when purchasing through our on-line portal.

Choosing How We Use Your Personal Data

We understand that you trust us with your personal data, and we are committed to ensuring you can manage the privacy and security of your personal data yourself. Therefore, we will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to meet the contractual obligations we are about to enter into or have entered into with you.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal or regulatory obligation.

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data using more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your transactions including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To allow you to use our online platform and to manage your account	a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Use of Cookies

What are cookies?

Like many websites, our website may use ‘cookies’ from time to time. Cookies are small files saved to the user’s computer’s hard drive that track, save and store information about the user’s interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards. We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, as a registered user your session cookie will also contain your user ID so that we can check which services you are allowed to access.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by HubSpot, Amplitude, and FullStory which use first-party cookies to track visitor usage. The React

News website utilizes Advanced Ads to track ad clicks for its advertising clients. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website.

The default settings of browsers like Internet Explorer generally allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Therefore, should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly thereafter.

How long do we keep your personal data?

Data collected, used, and retained by Green Street is limited to the information needed to provide the products and services contracted between Green Street and the customer. Consumer data is retained for six years per DFPI and FCA regulatory books and records retention rules. We will keep the remainder of Green Street's non-regulated business data in line with the regulated business and follow the same retention period. Destruction of PI records will promptly follow the retention period. Financial records may be kept indefinitely.

Product Feedback

Please note that feedback provided to Green Street regarding our products and services will be shared internally to assist us in making improvements to those products and services. The information provided is housed internally and is not anonymized. We will not share this feedback outside of our organization.

Reasons We Share Information

We do not disclose your personal data without your permission, unless the disclosure is:

- (a) In accordance with this privacy policy or any agreement you enter into with us;
- (b) To our related companies (i.e. the GSA Group);
- (c) To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets;
- (d) Required or authorized by law or for security reasons (including to prevent fraud).
- (e) To third parties, including our third-party service providers, to whom we may disclose, or provide access to, your personal data in connection with the purposes described in the table above.
- (f) We may also share information with outside accountants, auditors, lawyers, and other outside professional advisers to us, subject to confidentiality obligations.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Disclosing Information in Other Situations

Under certain circumstances, we may be required by law to disclose your personal information. Green Street may also disclose personal information to protect its legal rights or to enforce our Customer Agreement. These may include:

- A disclosure in connection with a subpoena or similar legal process;
- A fraud investigation;
- An audit or examination;
- An inspection by regulatory or self-regulatory authorities;

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- The right to know and access what personal information is collected, used, shared or sold
- The right to delete personal information held by businesses
- Request restriction of processing of your personal data
- Request the transfer of your personal data to you or to a third party
- Withdraw consent at any time where we are relying on consent to process your personal data.
- The right to opt-out of the sale of personal information
- The right to non-discrimination
- The right to receive services on equal terms
- The right to correct inaccuracies
- The right to restrict sensitive personal information
- The right to opt-out of automated decision making
- The right of data portability

Green Street **does not:**

- Sell customer data
- Collect sensitive personal information as defined under CPRA
- Utilize automated decision-making
- Disclose share personal information to a “third party” as defined under CPRA
- Market or sell to minors

US Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Data Subject Access Request (DSAR)

A DSAR is a formal inquiry made to a company by a data subject inquiring what of their personal information has been collected, stored, and used.

If you wish to exercise any of the rights set out above, please [contact us](#).

We commit to giving you the ability to do all of the following:

UK and Europe:

- You can verify the details you have submitted to us by contacting our Legal and Compliance Team. Our security procedures mean that we may request proof of identity before we reveal personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response
- You can also contact us to change, correct, update or delete your personal data held by us at any time.
- You can request a readable copy of the personal data we hold on you at any time. To do this, please [contact us](#).

United States:

California consumers have the right to make a DSAR request to know, delete, and correct twice in a 12-month period:

- To request how we collect and have used your personal information over the past 12 months.
- To request deletion of any personal information collected. Note, we may deny your request if retaining the information is necessary to provide contractual service, comply with legal obligations, protect against illegal activity, etc.
- To correct any inaccuracies

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

UK and Europe - We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

United States - We will respond to a **verifiable** consumer written request within 45 days of its receipt. Send requests to:

Green Street
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660
Email compliance@greenstreet.com
Call us toll free 888-640-8780

Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

No discrimination will be brought against you for exercising these rights, including denial of service, quality of service, or increase price of service.

Upon receipt of a request to delete personal information, a business must delete the information and direct any service providers to delete the information from its records as well unless the business or service provider needs the information to: (1) compute the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer; (2) detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; (3) debug to identify and repair errors existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise his/her right of free speech, or exercise another right provided for by law; (5) comply with the California Electronic Communications Privacy Act; (6) engage in public or peer-reviewed scientific, historical, or statistical research in the public interest;

(7) to enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business; (8) comply with a legal obligation; (9) otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Information Security

Green Street has adopted an Information Security Policy as an aggregate of directives, regulations, rules, and practices that describes how the company manages, protects, and distributes information. The security infrastructure is assessed regularly with the goal to protect our customer, employee, and proprietary information. The firm maintains appropriate technical and organizational measures, internal controls, and information security routines intended to protect the data exporter's personal data. Our third-party service providers are contracted. We have robust training program and policies and procedure that include data privacy and cyber security.

General Data Protection Regulation (GDPR)

For European clients who contract directly with Green Streets Advisors, LLC (A U.S. entity) and UK or European clients that contract with Green Street Advisors UK Limited, we share your personal data within the GSA Group. This will involve transferring your data outside the European Economic Area (EEA).

GDPR applies to organizations, including non-European data controllers and processors, to the extent that they control or process personal data of individuals who are in the EU and/or the UK.

For the purposes of the GDPR, Green Street Advisors, with regard to relevant personal data are the data processor, and the client is the data controller. "Personal data" has the meaning given in Article 4 of the GDPR and relates only to personal data of which we are the data processor and in relation to which we are providing services to our customers.

Green Street will provide the following with respect to the services we provide:

1. We will comply with our applicable obligations as a data processor under the GDPR, including those requirements set out in Articles 28 (Processor), 29 (Processing under the authority of the controller or processor), 31 (Cooperation with the supervisory authority) and 32 (Security of processing) of the GDPR.
2. We will notify you without undue delay after becoming aware of a relevant personal data breach and provide reasonable assistance to you in your notification of that personal data breach to the relevant supervisory authority and those data subjects affected as set out in Articles 33 (Notification of a personal data breach to the supervisory authority) and 34 (Communication of a personal data breach to the data subject) of the GDPR.
3. We will not disclose or use personal data except in accordance with your lawful instructions, to carry out our obligations under, or as otherwise permitted pursuant to the terms of, our agreement(s) with you and to comply with applicable law, including the GDPR.
4. We will only transfer personal data to our affiliates that have executed a data protection agreement containing privacy and security terms that are materially similar to those contained herein.

Client contracts will be subject to model clauses which cover the following:

- Data exporter – Client, which purchases services from data importer and authorizes data importer to process data exporter's personal data for purposes of providing the services.
- Data importer – Green Street, which processes data exporter's personal data upon the instruction of the data exporter.
- Data subjects – Client employees

Categories of data - Business contact information

- Name
- Title
- Company Name
- Company Type
- Address
- Telephone Number
- Email Address
- Web Usage History

Processing operations - Processing will be undertaken to the extent necessary for data importer to provide services to data exporter.

The data importer has implemented and will maintain appropriate technical and organizational measures, internal controls, and information security routines intended to protect the data exporter's personal data. Please note, these procedures may also be applicable to data privacy regulations in other foreign jurisdictions.

For additional information please see the link below:

<https://www.greenstreet.com/uploads/EuropeanPoliciesandDisclosures.pdf>

If you would like to receive contractual clauses relevant to your relationship with us, please send a request to: compliance@greenstreet.com or you may call us toll free 888-640-8780.

Data Privacy Framework (DPF)

Green Street Advisors, LLC complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Green Street has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Green Street has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Green Street commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Green Street at:

Green Street
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660

Email compliance@greenstreet.com
Call us toll free 888-640-8780

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Green Street commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory

Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

The Federal Trade Commission has jurisdiction over Green Street's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF). Green Street is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

An Individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Additional information can be found in Annex I located at: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

Green Street does not transfer personal information to third parties acting as a controller. If in the future Green Street does transfer personal information to a third party acting as an agent on our behalf, Green Street shall remain liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

For California Consumers - California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)

We have described above our methods for collecting and using the information necessary to operate our business and to provide the best possible customer service. In accordance with CCPA and CPRA, listed below are the categories of personal information relating to California residents we collect and how the data is used.

- **Personal Identifiers**, Information we receive from you on forms or through email communication, telephone or in-person interviews, such as your name, address, phone number and title. This information is used to communicate with clients and potential clients.
- **Personal identifiers, including those listed in California statutes**, such as full name, contact names, alias, address, unique personal identifier, online identifier IP address, email or account name. This also includes email addresses for your company employees or contact persons that you provide to us. This is needed to administer our business, to provide you with the best possible customer service and personalize the research and website content you receive. We also use this information to notify you of changes to our products or website along with any other relevant company updates. Customer records and professional information such as name, signature, address, telephone number, job title, business email address, that are used to bill for services, provide products and services, and customer contracts. Company and employee names will also be used to run an OFAC search.
- **Commercial Information** such as purchase or licensing information, including products and services purchased or licensed, obtained, or considered, or related histories or tendencies.
- **Internet or other electronic network activity** such as information from visitors to our website provided through online forms, site visitor data and online information collecting devices such as "cookies." Green Street also collects and retains interactive user session data, such as pages visited and links clicked, browsing and search history, or other interaction with our website and password-protected library of data and products. This information is used to better understand your use of the site and improve our products, services, and user experience.
- **Geolocation data**, such as regional IP addresses, are not used for tracking consumer location and movements.
- **Sensory data**, Audio and visual data generated when you opt-in to video recordings. This is used for the purpose of customer service, customer presentations and training. This is not used for identification.
- **Professional or employment- related information**, we track when a user moves companies to deactivate their subscription and/or prospecting purposes.
- **Inferences drawn** from personal, or customer information is for Green Street commercial use only. Green Street will make inferences based upon customer details as to which of our products may be useful. We do not use any automated decision-making technology.

Green Street does not collect, or process customers' sensitive data as defined under CPRA. Data collected by Green Street is limited to the information needed to provide the services contracted between Green Street and the customer.

Please see your rights under the CCPA/CCPR listed above under the heading Your Legal Rights and Data Subject Access Request (DSAR)

Keeping Current with our Privacy Policy

Green Street will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. If, at any time in the future, it is necessary to disclose any of your nonpublic personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you may have the opportunity to opt out of such disclosure. Additionally, since this policy may change from time to time, you can always review our current policy by contacting us for a copy at: (949) 640 – 8780 or visiting our website at www.greenstreet.com.

Contact Details

Robyn Francis, Chief Compliance Officer, and Data Protection Officer is responsible for the maintenance and update of this privacy policy and Green Street's data privacy efforts. Should you have any questions in relation to this privacy policy, please contact Compliance in the US by email compliance@greenstreet.com or call us at (949) 640-8780. Contact UK compliance at compliance-uk@greenstreet.com or by calling our UK office at +44 (0)203 793 7000.

Information Commissioner's Office (ICO)

For more information or to make a complaint in the UK regarding your rights and data protection, please contact your local supervisory authority at www.ico.org.uk

DataRep

Green Street processes the personal data of individuals in the European Union, European Economic Area and Switzerland and has appointed DataRep as its Data Protection Representative for the purposes of GDPR and FADP. If you would like to raise a question to Green Street or otherwise exercise your rights in respect to your personal data, you may contact DataRep for all regions by email at datarequest@datarep.com quoting Green Street Advisors (UK) Ltd in the subject line. You may also visit the DataRep website here: www.datarep.com/datarequest

Inquiries may also be mailed to DataRep at the following addresses:

DataRep (GDPR)
3rd and 4th Floor
Altmarkt 10 B/D
Dresden, 01067, Germany

DataRep (Swiss FADP)
Leutschenbachstrasse 95
ZURICH, 8050, Switzerland

****It is essential that you mark your letters for 'DataRep' and ensure that in the correspondence you refer to Green Street Advisors (UK) Ltd.***

***** DataRep does not represent TA Associates and Welsh, Carson, Anderson & Stowe***

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Green Street Affiliated Companies

The following is a list of all companies affiliated with Green Street to which this policy applies:

- Green Street Advisors (UK) Limited
- TA Associates
- Welsh, Carson, Anderson & Stowe
- React News

Cyber Security

Green Street makes Cyber Security a top priority to ensure protection for both its customer information and proprietary data. Our policy has been structured by considering risk, business operations, IT infrastructure and critical information for the prevention of business breaches. Industry practices are followed as it relates to IT processes and procedures for prevention and action plans. Recurring security tests are performed on IT infrastructure and business dependencies to achieve maximum protection against threats. Testing is done by external vendors to ensure the latest threats and vulnerabilities are evaluated against the business. Testing is intrusive at all levels of hardware and software for both internal and external facing equipment. Green Street's staff also performs reviews of infrastructure on a scheduled basis. Real-time monitoring is in place for IT related systems to ensure action can be taken promptly. Latest software releases and patches are applied to systems as they become available. If a cyber-attack were to occur, our procedures are tailored to stop, contain, maintain business operations, escalate to authorities and reevaluate security practices.

General Disclosure

Green Street's US Research, Data, and Analytics products along with its global news publications are not provided as an investment advisor nor in the capacity of a fiduciary. The firm maintains information barriers to ensure the independence of its non-regulated businesses from the regulated services provided by Green Street.

Advisory Disclosure

Green Street US Advisory is a California registered investment adviser regulated by the Department of Financial Protection and Innovation. Services are only offered to clients or perspective clients where Green Street and its advisory representatives are properly licensed or exempt from licensure. Please note, Green Street's US Research, Data, and Analytics products along with its global news publications are not provided as an investment advisor nor in the capacity of a fiduciary. The firm maintains information barriers to ensure the independence of its non-regulated businesses from the regulated services provided by Green Street.

Green Street, at times, assists Eastdil Secured, a real estate brokerage and investment bank, when Eastdil Secured provides investment banking services to companies in Green Street's Research coverage universe. Green Street is never part of the underwriting syndicate or the selling group, but Green Street may receive compensation from Eastdil Secured for consulting services that Green Street provides to Eastdil Secured related to Eastdil Secured's investment banking services. Green Street does not control, have ownership in, or make any business or investment decisions for, Eastdil Secured.

Green Street does not directly engage in investment banking, underwriting or advisory work with any of the companies in our research coverage universe. However, Green Street's investment advisory practice services investors seeking to acquire interests in publicly traded companies. Green Street may provide such valuation services to prospective acquirers of companies which are the subject(s) of Green Street's research reports.

Important Information about Procedures for Opening a New Advisory Account

To help the government fight the funding of terrorism and money laundering activities, along with Green Street's Customer Identification Program we are required to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account for Advisory services, we will ask for your information that will allow us to identify you. We will request articles of incorporation, a business license, partnership agreement or a W-9. We will also compare your information against government contact lists such as the Office of Foreign Assets Control (OFAC).

ADV Part 2

Green Street's Form ADV Part 2 is available in hard copy or electronic form upon request. Alternatively, you can obtain a copy at <http://adviserinfo.sec.gov> under 'Part 2 Brochures'.

Complaints

If you have any complaints, please send them to:

Green Street
Attention: Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660
949-640-8780

Conflicts of Interest Disclosure

Management of Conflicts of Interest: Conflicts of interest can seriously impinge the ability of Green Street employees to do their job. In that spirit, Green Street adheres to the following policies regarding conflicts of interest:

- Green Street employees are prohibited from actively trading the shares of any company in our coverage universe.
- Green Street employees do not serve as officers or directors of any of our subject companies.
- Neither Green Street nor its employees/analysts receive any compensation from subject companies for inclusion in our research.
- On occasion, Green Street analysts may be contacted by companies within the firm's coverage universe regarding potential employment opportunities. Additional disclosure will be made when appropriate.

A number of companies covered by Green Street research reports pay an annual fee to receive Green Street's research reports. Green Street may periodically solicit this business from the subject companies. In the aggregate, annual fees for Green Street US and Green Street UK research reports received from subject companies represent approximately 3% of each of Green Street US's and Green Street UK's respective total revenues.

Green Street publishes research reports covering issuers that may offer and sell securities in an initial or secondary offering.

Green Street US generally prohibits research analysts from sending draft research reports to subject companies. However, it should be presumed that the analyst(s) who authored this report has(/have) had discussions with the subject company to ensure factual accuracy prior to publication and has(/have) had assistance from the company in conducting due diligence, including visits to company sites and meetings with company management and other representatives.

Business Continuity Policy

Green Street has developed a Business Continuity Plan to address how we will respond to events that could significantly disrupt our business whether the disruption is due to weather, health or some other unforeseen circumstance. Since the timing and impact of disasters and disruptions are unpredictable, we will be flexible in our approach to actual events as they occur. With that in mind, we are providing you with this general information on our Business Continuity Plan.

Contacting Us

During a significant business disruption, you can contact us via email or by phone at (949) 640-8780. Green Street will also post relevant updates on its website www.greenstreet.com as information becomes available.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making financial and operational assessments, protecting the organization's proprietary information, and allowing our customers access to our platform. In short, our business continuity plan is designed to permit our organization to resume operations as quickly as possible, given the scope and severity of the disruption.

Our business continuity plan addresses data backup and recovery, mission critical systems, financial/operational assessments, regulatory reporting and alternative communications with customers, employees, regulators, critical suppliers, and third-party service providers.

Varying Disruptions and Pandemics

Significant business disruptions can vary in their scope, such as an event that only impacts Green Street, a single building housing one of our office locations, the business district where one of our offices may be located, a city where we house a location, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. If the disruption is localized to Green Street, we will operate remotely and expect to resume business as soon as possible. If a disruption affects our business district, city, or region, our employees will work remotely. In the event of a pandemic illness, Green Street will follow the guidelines set forth by the CDC or other relevant authority regarding spread prevention, travel restrictions and alternative working arrangements. If employees are ill or have been exposed to the specific virus (illness), they are required to stay home and self-quarantine. The health of our employees is of the utmost importance and Green Street will consider whether it is in their best interest to temporarily close any given location. Green Street's Senior Leadership Team will make these necessary determinations should this situation arise. In all situations, Green Street will make IT infrastructure a top priority to support our staff that may need to work remotely for a prolonged period.

For more information

If you have questions about our business continuity planning or need additional information regarding the plan in its entirety, you may contact Robyn Francis, Chief Compliance Officer (949) 640-8780 or via email at compliance@greenstreet.com.

Please note that our Business Continuity Plan is subject to modification –updates will be posted as needed.

**ITEM 1. COVER PAGE FOR PART 2A OF FORM ADV:
FIRM BROCHURE**

MARCH 2024

Green Street Advisors, LLC

**100 BAYVIEW CIRCLE, SUITE 400
NEWPORT BEACH, CA 92660**

**FIRM CONTACT:
ROBYN FRANCIS
CHIEF COMPLIANCE OFFICER**

**FIRM WEBSITE ADDRESS:
WWW.GREENSTREET.COM**

This brochure provides information regarding the qualifications and business practices of Green Street (hereinafter “We”, “us”, or “our”). If you have any questions about the contents of this brochure, please contact Robyn Francis, Chief Compliance Officer, by telephone at (949) 640-8780 or by email at rfrancis@greenstreet.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any State Securities Authority.

Additional information about Green Street is also available on the SEC’s website at www.adviserinfo.sec.gov by searching CRD#: 172378.

Please note that the use of the term “registered investment adviser” and description of Green Street and/or our associates as “registered” does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for more information on the qualifications of our firm and its employees.

ITEM 2. MATERIAL CHANGES TO OUR PART 2A OF FORM ADV: FIRM BROCHURE

Green Street is required to advise you of any material changes to our Firm Brochure ("Brochure") from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

This Item will identify and discuss the material changes since the last annual update to assist investors and make them aware of certain information that has changed since the prior year's Brochure and that may be important to them.

Since our last annual amendment, which was filed March 6, 2023, Green Street has made the following changes:

1. There have been no material changes since our last annual amendment filing.

Green Street's Form ADV Part 2A Firm Brochure is available in hard copy or electronic form upon request. Alternatively, you can obtain a copy at <http://www.adviserinfo.sec.gov>, under 'Part 2 Brochures' on the left side of the screen.

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Item 4. Advisory Business

Green Street is committed to discovering and delivering insights and foresight to our clients. We provide a broad range of advisory services to commercial real estate market participants.

Green Street Advisors, LLC doing business as Green Street is a Delaware limited liability company wholly owned by Green Street Parent LLC (GSP). GSP's Parent, Green Street Intermediate Holdings, LLC and subsidiaries are limited liability companies formed in the State of Delaware. In October 2022, a controlling interest of Green Street Intermediate Holdings, LLC was sold to private investment funds affiliated with TA Associates. TA Associates is a U.S. private equity firm founded in 1968.

More information on TA Associates and its affiliates is available at <https://www.ta.com/>.

Information on indirect ownership of Green Street can be found below and in more detail in the firm's ADV Part 1 public disclosure under schedule B, located at the following link:

<https://reports.adviserinfo.sec.gov/reports/ADV/172378/PDF/172378.pdf>

Indirect Owners

- GREEN STREET TOPCO, LLC
- GREEN STREET INTERMEDIATE HOLDINGS, LLC
- GGCOF GS BLOCKER, LLC
- EMERALD MIDCO, INC.
- EMERALD PURCHASER, INC.
- EMERALD PURCHASER, INC.
- WCAS XIII, LP
- WCAS XIII, ASSOCIATES LLC
- PETRUS BUYER, INC.
- PETRUS INTERMEDIATE, INC.
- PETRUS HOLDINGS, INC.
- PETRUS TOPCO, L.P.
- PETRUS TOPCO GP, LLC
- PETRUS AGGREGATOR, L.P.
- TA ASSOCIATES XIV GP, L.P.
- PETRUS CO-INVEST AGGREGATOR, L.P.
- TA XIV-A, L.P.
- TA XIV-B, L.P.
- TA ASSOCIATES XIV GP, L.P.
- TA ASSOCIATES XIV GP, L.P.

A brief description of the services our team provides to clients and their experience follows:

Senior Management Team:

Our Advisory senior management consists of the Executive Vice President of Advisory & Consulting, who also is a member of Green Street's Senior Leadership Team and is supported by a team of professionals who provide experience, insight, and innovative thinking.

All material conflicts of interest under CCR Section 260.238 (k) are disclosed below regarding our firm, our representatives, or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

To comply with CCR Section 260.238(j), we disclose that lower fees for comparable services may be available from other sources. Green Street does not directly engage in investment banking, underwriting or advisory work with any of the companies within our research coverage universe. However, Green Street's advisory practice services investors seeking to acquire interests in publicly-traded companies. Green Street may provide such valuation services to prospective acquirers of companies which are the subject(s) of Green Street's research reports.

Description of the Types of Advisory Services We Offer

Advisory Services:

Green Street's Advisory Services Group ("ASG") provides our clients with tailored solutions that address their specific needs. Some of the advisory services that we offer include:

- Strategic Consulting:
Green Street's ASG team conducts research and valuation studies to identify optimal public and private market strategies designed to maximize value, mitigate risk, reduce conflicts of interest, enhance competitive positioning, and increase liquidity. We provide insight and guidance on analyzing, structuring, and executing firm-level planning and re-organization activities for publicly traded REITs, and private real estate companies. Our strategic planning assignments have included initial public offerings (IPOs), privatizations, mergers, acquisitions, and sales.
- Valuation:
Green Street's ASG uses our proprietary net asset value (NAV) methodology and recurring cash flow analysis to value a variety of real estate entities, including publicly traded REITs, public non-traded REITs, private REITs and private real estate companies. This quantitative and qualitative analysis identifies strengths and weaknesses of the public REIT peer group. We also provide insight in valuing real estate as an asset class by comparing real estate's risk-adjusted returns to the broader equity and debt markets.
- Custom Research:
Our ASG aims to present analysis with clarity and insight. We execute a diverse range of assignments while leveraging our understanding of the most effective structures and strategies in operating, capitalizing and financing a competitive real estate business. We offer a customized product for each client to accommodate specific profiles and objectives. Our clients have included private REIT management teams, boards of directors, legal practitioners, institutional investors, and individual property owners.

- **Benchmarking:**
Utilizing publicly available and proprietary data, Green Street delivers direct, insightful comparisons between companies and sectors, thus providing a platform for knowledge enhancement and informed decision making. The spectrum of metrics studied may include historical and projected operating performance, key valuation drivers, and analysis of capital structure, among others. Green Street consultants focus on each client's unique areas of interest to provide information that is tailored to meet their specific needs.
- **Operating Partnership Unit (OP unit) Advisory:**
In an OP unit transaction, we capitalize on our expertise to assist clients with analyzing opportunities to sell assets, provide independent valuation of REIT stock and OP units offered, and recommend the best REIT partner. Green Street helps structure OP unit transaction terms and explains the investment merits represented by the potential REIT buyers.
- **Transaction Advisory:**
Green Street provides advisory services to support commercial real estate transactions across all major asset classes and geographic markets. Green Street's team assists clients in numerous ways, including investment identification and selection, acquisition/ disposition analysis, analysis of strategic alternatives, and OP unit advisory services. We believe the combination of deep transactional experience and our robust REIT research enables Green Street to add value during all phases of a transaction.

Deliverables on the above services will include a presentation and discussions via meetings and conference calls ("Deliverables"). Our services will be deemed complete upon the earliest to occur of the delivery of the final deliverable, or within twelve (12) months of the date of the Agreement.

Tailoring of Advisory Services

We offer customized research and advisory services, including tailored research projects in the public and private real estate arenas.

Participation in Wrap Fee Programs

We do not offer wrap fee programs.

Regulatory Assets Under Management

Green Street provides a variety of research reports and statistical analyses to our advisory & consulting clients; however, it does not provide continuous and regular supervisory or management services to clients. The firm has no assets under management.

Item 5. Fees & Compensation

We are required to describe our brokerage, custody, fees and fund expenses so our clients are aware of how much they are charged and by whom. Our fees are generally negotiable.

How We Are Compensated for Our Advisory Services

Advisory Services:

ASG clients are invoiced based on the size and scope of their engagement. Fees are billed on a flat fee basis and are variable and negotiable with a maximum fee for advisory services of \$2 million. We do not deduct fees from clients' assets or bill clients for fees incurred beyond their negotiated fee for the service being provided. Acceptable methods of payment include either a check or bank wire/ACH. Please note, the only client bank information we receive is high-level identification information (i.e., company name, but no bank account number) to enable us to properly record client's wire/ACH payment to the proper invoice. This information is received and maintained by our banking institution who have security protocols in place to ensure the safety of the information. This includes password protection and token identification.

ASG services payment terms are determined on a case-by-case basis. Generally, one half of the fees will be due at the commencement of the agreed upon services, and the other half upon completion of the advisory & consulting services. Clientele agree to pay an initial fee as compensation for Green Street's engagement of the project, and a separate terminal fee for the output at the end of the project. The second half of the fee and the "separate terminal fee" are the same. The fee will be due upon completion of the engagement for short-term engagements. One-half of the fee will be due at the commencement of our work, and one half upon completion for long-term engagements. Payments made at the outset of an engagement are not considered prepayments, are not provided as compensation for any definable future period of work to be performed, they are incurred costs and are nonrefundable.

Unlike a traditional discretionary client relationship or relationship for the provision of nondiscretionary supervisory services, Green Street Advisors, LLC is not engaged to provide ongoing services with respect to a portfolio of securities or other ongoing services for a specified period of time. Rather, Green Street Advisors, LLC provides analysis and deliverables as specified in each individual client contract (which may include consultation with Green Street Advisors, LLC personnel during the term of the contract).

Other Fees:

Green Street will be reimbursed for its reasonable out-of-pocket expenses incurred in connection with assignments, such as required travel and lodging, within thirty (30) days after invoicing. Clients also agree to pay applicable taxes and duties, if any (including withholding taxes, but excluding income taxes imposed on Green Street).

ASG nor any of our supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

There are no other fees to report.

Policy Regarding Fees Due in Advance

Due to the services Green Street offers, it does not collect typical advisory fees in advance such as, assets under management, retainer fees, per-plan fees, etc. Each engagement is a fee for service arrangement with negotiated price and terms. Green Street does not provide ongoing investment advice to clients, but rather enters into project-based engagements with advisory clients.

Item 6. Performance-Based Fees & Side-By-Side Management

We do not charge performance-based fees to our clients.

Item 7. Types of Clients & Account Requirements

We have the following types of clients:

- Banking or Thrift Institutions;
- Investment Companies;
- Pensions, Endowments, Foundations, and Profit Sharing Plans;
- State or Municipal Government Entities;
- Corporations, Limited Liability Companies and/or Other Business Types;
- Real Estate Owners, Managers, and Operators; and
- Professional Organizations, Accountants, Lawyers, and Consultants;
- Insurance Companies

We generally do not require a minimum fee for ASG engagements.

Item 8. Methods of Analysis, Investment Strategies & Risk of Loss

We employ a multi-step process of REIT valuation. Our company-level analytical work includes the following:

- Extensive quantitative and qualitative analyses to assess the current market value of each company's assets and liabilities, for example:
 - Estimating NAVs based on the characteristics of a REIT's underlying property portfolio including location, quality, lease structure and growth prospects
 - Applying prevailing cap rates, as determined by the generally active and liquid real estate markets, to forward looking NOI estimates. Our analysts spend significant time speaking with market participants (e.g. REIT executives, private real estate market participants, brokers, etc.), tracking comparable transactions, reading trade publications and reviewing findings of providers of transaction information to determine the appropriate cap rate
 - Employing a discounted cash flow approach to determine whether current private- market cap rates (and the NAVs estimated from them) represent a fair price. Where they do not, we use Intrinsic NAV (our estimate of fair value) in place of NAV.
- A systematic approach to evaluating the best REITs on a variety of critical factors to determine their merits relative to their peers, including:
 - Franchise value
 - General and administrative overhead

- Balance sheet risk
- Corporate governance/Takeout odds
- Translating these evaluations into premiums/discounts to asset value at which the REITs' shares should be valued
- Applying the warranted premiums/discounts to the NAV estimates to determine the warranted share prices
- Comparing the warranted share prices to the current stock prices to form our BUY/HOLD/SELL recommendations for REIT stocks.

It is important to note that we employ a relative pricing model when conducting our REIT analysis and making our company-specific BUY/HOLD/SELL recommendations. We generally have an equal number of Buy-rated stocks and Sell-rated stocks within each property sector. In essence, we answer the question of which REIT stocks are overpriced and which stocks are underpriced at any point in time relative to their respective property-sector peers. The strength of our research is rooted in the focus that we place on property-level analysis through our published reports. Green Street analysts focus solely on their analytical work and providing support to our clients – we are not distracted by obligations faced by typical Wall Street analysts, whose firms are involved in investment banking activities.

Please Note the Following Risks:

Investment Risk. Investing in securities involves risk of loss that clients should be prepared to bear. While asset markets may increase and your account(s) could enjoy a gain, it is also possible that asset markets may decrease, and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in asset markets, and that you are appropriately diversified in your investments.

Advisory Risk. The success of our research, advisory & consulting, and investment strategies depends on our ability to effectively analyze and evaluate securities. However, our analyses and evaluations may fail to predict the future performance of securities.

REIT Risk. REITs are susceptible to many of the same risks associated with direct ownership of real estate, such as the following: declines in property values; increases in property taxes, operating expenses, interest rates or competition; overbuilding; zoning changes; and losses from casualty or condemnation. Additionally, REITs are reliant on the ability of their managers to effectively manage their properties, have limited diversification across asset classes, and could be significantly affected by changes in tax laws.

Item 9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or investor's evaluation of the adviser or the integrity of the adviser's management. Neither Green Street nor any of its officers, directors, employees or other management persons, have been involved in any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, legal or disciplinary events in the past 10 years that would require disclosure in response to this Item.

Item 10. Other Financial Industry Activities & Affiliations

Through an asset purchase in February 2020, Green Street now owns three news publications that it acquired from Harrison Scott Publishing. This service is referred to as 'News'. The news publications are produced by an independent business unit of Green Street that is operated separately from its advisory business. This independent business line is located in Summit, New Jersey and operates behind a robust information barrier designed to ensure that the News Alerts staff does not have preferential access to and does not influence or otherwise play any part in Green Street's research or advisory processes.

In February 2021, Green Street purchased React News, a London-based subscription provider of market-leading commercial property news and deal data. React News is a trading name of Green Street Advisors (UK) Ltd. Green Street Advisors (UK) Ltd. is authorized and regulated by the Financial Conducts Authority (FRN 482269). React News is not part of Green Street's regulated business in the UK or the US. React News operates behind robust information barriers to ensure the independence of React News and the research and advisory services provided by Green Street.

Our firm is not registered, nor does it have an application pending to register, as a broker-dealer, registered representative of a broker dealer, investment company or pooled investment vehicle, other investment adviser or financial planner, futures commission merchant, commodity pool operator, commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or a sponsor or syndicator of limited partnership, or an associated person of the foregoing entities.

Our firm does not recommend or select other investment advisers for our clients.

Item 11. Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Green Street prohibits its employees from actively trading the securities it covers in its Advisory engagements.

Our firm nor its related person recommends to clients, buys or sells for client accounts, securities in which the firm or a related person has a material financial interest.

Our firm does not recommend securities (or other investment products) to advisory clients in which we or any related person has some other proprietary (ownership) interest.

The firm does not invest in the same securities it recommends to its clients, so there are no conflicts of interest presented. Additionally, we require that the personal investment transactions of members and employees of our firm comply with our Code of Ethics and that all such transactions be carried out in a way that does not endanger the interest of any client. Direct or indirect (except through mutual funds and ETFs) trading in the securities of REITs, international REITs or other publicly traded real estate companies is prohibited. This includes those included on the firm's Restricted List. Shorting, or buying options in any REIT fund is also prohibited. This restriction includes trading on behalf of any dependent or person in their household, as well as any account held in their name. With regard to other listed securities, all employees must arrange for duplicate statements to be sent directly to Green Street Compliance. These are to be reviewed and logged by our compliance staff for evidence of anything improper such as trading on material inside information or trading restricted securities. The restricted list is reviewed on a monthly basis – sooner if necessary.

The firm, nor any of its related persons, recommend securities to clients, or buys or sells securities for client accounts, at or about the same time that we or a related person buys or sells the same securities for our own (or the related person's own) account.

Item 12. Brokerage Practices

Green Street does not provide brokerage services.

Research and Other Soft Dollar Benefits:

We do not receive research or other products or services nor execution from a broker-dealer or a third party ("soft dollar benefits") in connection with client securities transactions.

Brokerage for Client Referrals:

We do not receive client referrals from a broker-dealer or third party.

Directed Brokerage:

We do not recommend, request or require clients to direct us to execute transactions through a specified broker-dealer. We do not permit a client to direct brokerage.

Aggregate Purchase:

The firm does not aggregate the purchase or sale of securities for client accounts.

Item 13. Review of Accounts or Financial Plans

Our clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our firm does not provide ongoing services to our clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for such matters.

Item 14. Client Referrals & Other Compensation

Our firm does not provide cash and/or non-cash compensation to independent solicitors (non-registered representatives) for the referral of prospective clients to our firm nor does someone who is not a client provide an economic benefit to us for providing investment advice or other advisory services to our clients.

Item 15. Custody

We do not have custody of our clients' funds. Due to the nature of our business, our clients do not receive periodic account statements from Green Street.

Item 16. Investment Discretion

Green Street does not accept discretionary authority to manage securities accounts on behalf of our clients.

Item 17. Voting Client Securities

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the unlikely event that proxies are sent to our firm, we will forward them on to our client and ask the party who sent them to mail them directly to our client in the future.

Item 18. Financial Information

Green Street is not required to provide financial information in this Brochure because:

- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.
- We do not accept prepayment of fees.

Green Street has never been the subject of a bankruptcy proceeding.

Item 19. Requirements for State-Registered Advisers

Executive Officers & Management Persons

Dirk S. Aulabaugh

Year of Birth: 1969

Educational Background, Professional Designations & Exams

1993 – University of Florida, M.A. in Business Administration with a concentration in Real Estate

1991 – University of Florida, B.S. in Business Administration with a concentration in Finance

2012 – Series 7, 66

Business Background:

Dec 2014 – Present: Green Street Advisors, LLC; Executive Vice President, Global Head of Advisory Services

Jeffrey Stuek

Year of Birth: 1972

Educational Background, Professional Designations & Exams

1999 – University of North Carolina at Chapel Hill, MBA with a concentration in Finance

1991 – University of North Carolina at Chapel Hill, BSBA, Business

2022 – Series 65

Business Background:

Jan 2020 – Present: Green Street Advisors, LLC; Chief Executive Officer

Jan 2013 – Jan 2020: TravelClick; President – North America

Robyn Francis

Year of Birth: 1972

Educational Background, Professional Designations & Exams

2006 – Series 7, 66

2007 – Series 24

2014 – Certified Regulatory and Compliance Professional (CRCP) from FINRA's Institute at Wharton.

Business Background:

Dec 2014 – Present: Green Street Advisors, LLC; Chief Compliance Officer

Dec 2009 – Sept 2020: Green Street Investors, LLC; Chief Compliance Officer

Dec 2014 – Jan 2020: Green Street Trading, LLC; Chief Compliance Officer

Other Business Activities:

Dirk Aulabaugh

- Company Name: Bergstrom Center for Real Estate Studies at the University of Florida
- Address: 100 Bryan Hall, PO Box 117150, Gainesville, FL 32611-7150
- Nature of the other business: Advisory Board
- Investment-related: No
- Your position: Advisory Board Member
- Title: Advisory Board Member
- Your duties: Volunteer that speaks with students and gives advice on the program to the Real Estate Center Director.
- The start date of your relationship with the other business: October 2014
- Approximate number of hours per month you devote to the other business: 3 days per year
- The number of hours you devote to the other business during securities trading hours: 3 days per year

Jeffrey Stuek

- Company Name: Point B
 - Address: 17065 Camino San Bernardo, Suite 200, San Diego, CA 92127
 - Nature of the other business: owner of a Technology Industry Association firm called TSIA
 - Investment-related: No
 - Your position: Member, Board of Directors
 - Title: Board Member
 - Your duties: Time is spent reviewing strategy, financial results and providing independent perspective.
 - The start date of your relationship with the other business: 2015
 - Approximate number of hours per month you devote to the other business: 5-10 hours a year
 - The number of hours you devote to the other business during securities trading hours: 5 -10 hours a year
-
- Company Name: Cornerstone Family Programs
 - Address: 80 Washington St, Morristown, NJ 07960
 - Nature of the other business: Not-for-profit organization serving in-need children and senior citizens in local community
 - Investment-related: No
 - Your position: Member, Governance Committee

- Title: Member
- Your duties: Donating money and I am on the governance committee
- The start date of your relationship with the other business: 2024
- Approximate number of hours per month you devote to the other business: 1-2 hours
- The number of hours you devote to the other business during securities trading hours: 0

Robyn Francis does not have any Outside Business Activities to disclose.

Please see Item 10 of this Firm Brochure for any other business in which our firm is actively engaged. Our firm does not charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self-regulatory organization or administrative proceedings.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not have a relationship or arrangement with any issuer of securities. Petrus Aggregator, LP is a limited partner of Petrus Topco, LP. Petrus Topco, LP, through indirect ownership, owns 100% of Green Street Advisors, LLC. Green Street Advisors, LLC does not itself issue securities. As a fiduciary, our firm always put our client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure. Clients may obtain a copy of our Code of Ethics by contacting Robyn Francis, Chief Compliance Officer at (949) 640-8780.

ITEM 1: COVER PAGE FOR PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

MARCH 2024

DIRK AULABAUGH (CRD #2871936)
FRANK BAZZANO (CRD #7140541)
TYLER BLUE (CRD #6547256)
JACOB BRACKEN (CRD #7021415)
JOHN FILLEY (CRD #7371628)
ROBYN FRANCIS (CRD #4844221)*
ANDREW GUNTER (CRD #7272283)
SAGE HALE (CRD #5819473)
ROY JIANG (CRD #7640157)

JUELLA OWENSWALLER (CRD #2865674)*
PIERRE-ANTOINE RIGAUD (CRD #6439488)
TRINITY SANDERS (CRD #7517720)
NATHANIEL SIINO (CRD #6642275)
BAYLE SMITH (CRD #6222919)
ANDREW SPINDLER (CRD #6781536)
JEFFRY STUEK (CRD #2608504)*
SUSAN WORSHAM (CRD #5777616)*
LILLIAN XIA (CRD #5931722)



Green Street

100 BAYVIEW CIRCLE, SUITE 400
NEWPORT BEACH, CA 92660
P: (949) 640-8780

FIRM CONTACT:
ROBYN FRANCIS
CHIEF COMPLIANCE OFFICER

FIRM WEBSITE ADDRESS:
WWW.GREENSTREET.COM

This brochure supplement provides information regarding Dirk Aulabaugh, Frank Bazzano, Tyler Blue, Jacob Bracken, John Filley, Robyn Francis*, Andrew Gunter, Sage Hale, Roy Jiang, Juella Owenswallers*, Pierre-Antoine Rigaud, Trinity Sanders, Nathaniel Siino, Bayle Smith, Andrew Spindler, Jeffry Stuek*, Susan Worsham* and Lillian Xia that supplements our ADV Part 2A brochure which you should be in receipt of. Please contact Robyn Francis rfrancis@greenstreet.com if you did not receive Green Street's brochure or if you have any questions about the contents of this supplement. For more information regarding Mr. Aulabaugh, Mr. Bazzano, Mr. Blue, Mr. Bracken, Mr. Filley, Ms. Francis*, Mr. Gunter, Mr. Hale, Mr. Jiang, Ms. Owenswallers*, Mr. Rigaud, Ms. Sanders, Mr. Siino, Mr. Smith, Mr. Spindler, Mr. Stuek*, Ms. Worsham* and Ms. Xia please visit the SEC's website at www.adviserinfo.sec.gov.

**These employees are not acting in the capacity of an investment advisor representative. However, due to their job function, they are required to be included in this brochure supplement.*

Item 2. Educational Background & Business Experience

Dirk Aulabaugh

Year of Birth: 1969

Educational Background, Professional Designations & Exams

1993 – University of Florida, M.A. in Business Administration with a concentration in Real Estate

1991 – University of Florida, B.S. in Business Administration with a concentration in Finance

2012 – Series 7, 66

Business Background:

Dec 2014 – Present: Green Street Advisors, LLC; Executive Vice President, Global Head of Advisory Services

Frank Bazzano

Year of Birth: 1995

Educational Background, Professional Designations & Exams

2017 – University of Connecticut, B.S. in Finance

2019 – Series 65

Business Background:

May 2019 – Present: Green Street Advisors, LLC; Vice President, Advisory & Consulting

Jan 2019 – May 2019: Unemployed

Aug 2017 – Jan 2019: Kairos Investment Management Company, LLC; Investment Analyst

May 2017 – Jul 2017: Unemployed

Jun 2016 – May 2017: University of Connecticut; Student

Tyler Blue

Year of Birth: 1984

Educational Background, Professional Designations & Exams

2015 – Arizona State University, Master of Business Administration with a concentration in Finance

2007 – California Polytechnic State University, San Luis Obispo; B.A. in Business Administration with a concentration in Finance

2008 – California Real Estate Broker

2015 – Series 65

Business Background:

Aug 2015 – Present: Green Street Advisors, LLC; Senior Vice President, Advisory & Consulting

Jacob Bracken**Year of Birth:** 1993Educational Background, Professional Designations & Exams

2017 – San Diego State University, B.S. in Business Administration with a concentration in Finance

2019 – Series 65

Business Background:

Oct 2019 – Present: Green Street Advisors, LLC; Vice President, Advisory & Consulting

Sept 2018 – Oct 2019: TD Ameritrade Institutional; Relationship Manager

Aug 2016 – Oct 2019: Prep Kitchen Little Italy; Bartender

Apr 2016 – Oct 2018: Stone Brewery Liberty Station; Event Server

Sept 2015 – May 2017: San Diego State University; Student

John Filley**Year of Birth:** 1998Educational Background, Professional Designations & Exams

2020 – University of Oregon, B.S. in Business Administration with a concentration in Finance

2021 – Series 65

Business Background:

Apr 2021 – Present: Green Street Advisors, LLC; Associate, Advisory & Consulting

Sept 2020 – Apr 2021: Roth Staffing Company; Data Associate assigned to Green Street

Sept 2016 – Jun 2020: University of Oregon; Student

Robyn Francis**Year of Birth:** 1972Educational Background, Professional Designations & Exams

2007 – Series 24

2006 – Series 7, 66

2014 – Certified Regulatory and Compliance Professional (CRCP) from FINRA's Institute at Wharton.

Business Background:

Dec 2014 – Present: Green Street Advisors, LLC; Chief Compliance Officer

Dec 2009 – Sept 2020: Green Street Investors, LLC; Chief Compliance Officer

Dec 2014 – Jan 2020: Green Street Trading, LLC; Chief Compliance Officer

Andrew Gunter**Year of Birth:** 1997Educational Background, Professional Designations & Exams

2020 – California Polytechnic State University, San Luis Obispo, B.S. in Business Administration with a concentration in Financial Management

2020 – Series 65

Business Background:

June 2020 – Present: Green Street Advisors, LLC; Senior Associate, Advisory & Consulting

Sept 2019 – Mar 2020: California Polytechnic State University; Student

July 2019 – Sept 2019: KCB Management; Intern

Jan 2019 – Jun 2019: California Polytechnic State University, San Luis Obispo; Student

Aug 2018 – Dec 2018: University of New Haven; Student

June 2018 – Aug 2018: The Riverside Company; Intern

Sept 2017 – June 2018: California Polytechnic State University, San Luis Obispo; Student

July 2017 – Sept 2017: Peloton Document Solutions; Intern

Sept 2016 – Jun 2017: California Polytechnic State University, San Luis Obispo; Student

Sage Hale**Year of Birth:** 1986Educational Background, Professional Designations & Exams

2019 – INSEAD, Master in Business Administration (MBA)

2011 – Brigham Young University, B.A. in International Relations

2020 – Series 65

Business Background:

Oct 2020 – Present: Green Street Advisors, LLC; Senior Associate, Advisory & Consulting

Dec 2019 – Oct 2020: Unemployed

Jan 2019 – Dec 2019: INSEAD; Student

Oct 2018 – Dec 2018: Harvest Park Capital LLC; Intern

Sep 2014 – July 2018: Cottonwood Residential; Associate, Acquisitions & Asset Management

Roy Jiang**Year of Birth:** 1995Educational Background, Professional Designations & Exams

2020 – University of California, Riverside, Master in Business Administration

2017 – University of California, Santa Barbara, BS in Physics

2022 – Series 65

2022 – Chartered Financial Analyst (CFA)

Business Background:

Sept 2022 – Present: Green Street Advisors, LLC; Associate, Advisory & Consulting

Aug 2020 – Sept 2022: Green Street Advisors, LLC; Analyst – Commercial Operations

Aug 2019 – July 2020: Service Champions; Financial Analyst

Mar 2018 – June 2019: Inviscid Software; Financial Analyst

July 2017 – Feb 2018: University of California, Riverside; Student

Aug 2013 – June 2017: University of California, Santa Barbara; Student

Juella Owenswaller**Year of Birth:** 1963Educational Background, Professional Designations & Exams

1987 – University of Texas, Dallas, Bachelor of Science Business Administration

2014 – Series 65

2007 – Series 24

1999 – Series 55

1997 – Series 7

Business Background:

Nov 2019 – Present: Green Street Advisors, LLC; Senior Compliance Manager

Apr 2007 – Jan 2020: Green Street Trading, LLC; Senior Compliance Manager

Pierre Rigaud**Year of Birth:** 1988Educational Background, Professional Designations & Exams

2013 – Cornell University, Master of Professional Studies in Real Estate

2011 – Center of Hotel Management (CMH, Paris), Bachelor in Hospitality Administration

2015 – Series 65

Business Background:Jan 2015 – Present: Green Street Advisors, LLC; Senior Vice President, Advisory & Consulting

Trinity Sanders**Year of Birth:** 1991Educational Background, Professional Designations & Exams

2017 – University of California, Irvine, B.A. in Economics

2020 – University of Southern California, M.S. in Finance

2022 – Series 65

Business Background:

Feb 2022 – Present: Green Street Advisors, LLC; Associate, Advisory & Consulting

Sept 2020 – Nov 2021: Deloitte; Analyst

June 2020 – Aug 2020: Unemployed

May 2019 – May 2020: University of Southern California; Student

Mar 2019 – Oct 2019: Marshall & Stevens, Inc.; Intern

Dec 2018 – Feb 2019: Unemployed

Nov 2017 – Nov 2018: Index Fund Advisors, Inc.; Portfolio Analyst

July 2017 – Oct 2017: Unemployed - Traveling

Jan 2017 – Jun 2017: Province West; Intern

Nathan Siino**Year of Birth:** 1990Educational Background, Professional Designations & Exams

2013 – University of California – Los Angeles, B.A. in Economics

2016 – Series 65

2018 – Chartered Financial Analyst (CFA)

Business Background:

Apr 2016 – Present: Green Street Advisors, LLC; Senior Vice President, Advisory & Consulting

Jan 2013 – Apr 2016: Sabal Financial Group; Analyst

Bayle Smith**Year of Birth:** 1990Educational Background, Professional Designations & Exams

2013 – University of Southern California, B.S. in Business Administration with a concentration in Real Estate Finance

2013 – Series 7, 66

2017 – Chartered Financial Analyst (CFA)

Business Background:

Dec 2014 – Present: Green Street Advisors, LLC; Senior Vice President, Advisory & Consulting

July 2013 – Dec 2014: Green Street Advisors, Inc.; Associate, REIT Research

Andrew Spindler**Year of Birth:** 1984Educational Background, Professional Designations & Exams

2011 – University of California, Los Angeles, MBA with concentration in Real Estate Finance

2006 – University of Southern California, BS in Accounting

2008 – CPA

2016 – Chartered Financial Analyst (CFA)

Business Background

Apr 2017 to Present – Green Street Advisors, LLC; Senior Vice President, Advisory & Consulting

Mar 2011 to Apr 2017 – Sabal Financial Group; Manager of Capital Markets

Jeffry Stuek**Year of Birth:** 1972Educational Background, Professional Designations & Exams

1999 – University of North Carolina at Chapel Hill, MBA with a concentration in Finance

1991 – University of North Carolina at Chapel Hill, BSBA, Business

2022 – Series 65

Business Background:

Jan 2020 – Present: Green Street Advisors, LLC; Chief Executive Officer

Jan 2013 – Jan 2020: TravelClick; President – North America

Susan Worsham**Year of Birth:** 1972Educational Background, Professional Designations & Exams

1999 – California State University, Fullerton, B.S. in Business with concentration in Marketing

2018 – Series 65

Business Background

Jan 2015 – Present: Green Street Advisors, LLC; Senior Compliance Associate

Nov 2005 – Jan 2020: Green Street Trading, LLC; Compliance Associate

Lillian Xia**Year of Birth:** 1989Educational Background, Professional Designations & Exams

2018 – Columbia Business School (Columbia University), MBA with concentration in Real Estate

2011 – Dartmouth College, BA in Computer Science & Economics

2021 – Series 65

2018 – Series 63, 79

Business Background:

Mar 2021 – Present: Green Street Advisors, LLC; Vice President, Advisory & Consulting

Nov 2019 – Feb 2021: Quadro Partners; Investment Product Specialist

July 2018 – Sept 2019: Macquarie Group; Executive

Aug 2016 – May 2018: Columbia Business School; Student

Item 3. Disciplinary Information

Dirk Aulabaugh, Frank Bazzano, Tyler Blue, Jacob Bracken, John Filley, Robyn Francis, Andrew Gunter, Sage Hale, Roy Jiang, Juella Owenswaller, Pierre-Antoine Rigaud, Nathaniel Siino, Bayle Smith, Andrew Spindler, Jeffry Stuek, , Susan Worsham, Alexander Wu and Lillian Xia have not been subject to any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, revocations, or suspensions.

Item 4. Other Business Activities

Dirk Aulabaugh

- Company Name: Bergstrom Center for Real Estate Studies at the University of Florida
- Address: 100 Bryan Hall, PO Box 117150, Gainesville, FL 32611-7150
- Nature of the other business: Advisory Board
- Investment-related: No
- Your position: Advisory Board Member
- Title: Advisory Board Member
- Your duties: Volunteer that speaks with students and gives advice on the program to the Real Estate Center Director.
- The start date of your relationship with the other business: October 2014
- Approximate number of hours per month you devote to the other business: 3 days per year
- The number of hours you devote to the other business during securities trading hours: 3 days per year

Tyler Blue

- Address of the other business: 16899 Jamboree Rd #219, Irvine, CA
- The nature of the other business: Freelance audio engineering
- Investment-related: No
- Your position: Self
- Title: N/A
- Your duties: Freelance audio engineering
- The start date of your relationship with the other business: 6/1/12
- Approximate number of hours per month you devote to the other business: 0-1
- The number of hours you devote to the other business during securities trading hours: 0
- Company Name: ASCAP (American Society of Composers, Authors and Publishers)
- Address of the other business: 16899 Jamboree Rd #219, Irvine, CA
- The nature of the other business: Passive music royalty income
- Investment-related: No
- Your position: Self
- Title: N/A
- Your duties: Passive music royalty income
- The start date of your relationship with the other business: 3/1/12
- Approximate number of hours per month you devote to the other business: 0
- The number of hours you devote to the other business during securities trading hours: 0

Jeffrey Stuek

- Company Name: Point B
- Address: 17065 Camino San Bernardo, Suite 200, San Diego, CA 92127
- Nature of the other business: owner of a Technology Industry Association firm called TSIA
- Investment-related: No
- Your position: Member, Board of Directors
- Title: Board Member
- Your duties: Time is spent reviewing strategy, financial results and providing independent perspective.
- The start date of your relationship with the other business: 2015

- Approximate number of hours per month you devote to the other business: 5-10 hours a year
- The number of hours you devote to the other business during securities trading hours: 5 -10 hours a year
- Company Name: Cornerstone Family Programs
- Address: 80 Washington St, Morristown, NJ 07960
- Nature of the other business: Not-for-profit organization serving in-need children and senior citizens in local community
- Investment-related: No
- Your position: Member, Governance Committee
- Title: Member
- Your duties: Donating money and I am on the governance committee
- The start date of your relationship with the other business: 2024
- Approximate number of hours per month you devote to the other business: 1-2 hours
- The number of hours you devote to the other business during securities trading hours: 0

Neither Frank Bazzano, Jacob Bracken, John Filley, Robyn Francis, Andrew Gunter, Sage Hale, Roy Jiang, Juella Owenswaller, Pierre-Antoine Rigaud, Trinity Sanders, Nathaniel Siino, Bayle Smith, Andrew Spindler, Susan Worsham or Lillian Xia have any Outside Business Activities to disclose.

Item 5. Additional Compensation

Neither Dirk Aulabaugh, Frank Bazzano, Tyler Blue, Jacob Bracken, John Filley, Robyn Francis, Andrew Gunter, Sage Hale, Roy Jiang, Juella Owenswaller, Pierre-Antoine Rigaud, Trinity Sanders, Nathaniel Siino, Bayle Smith, Andrew Spindler, Jeffry Stuek, Susan Worsham or Lillian Xia receives economic benefits (sales awards or other prizes) from someone who is not a client.

Item 6. Supervision

Ms. Francis, Chief Compliance Officer of Green Street, supervises and monitors all Green Street's associates' activities on a regular basis. Ms. Francis reviews all outgoing correspondence for written financial advice that Green Street's associates provide to their clients. As Chief Compliance Officer, Ms. Francis is bound by the firm's Code of Ethics and regulated by all applicable federal and state laws, rules and statutes in keeping with the highest levels of professional and ethical standards. Please contact Ms. Francis if you have any questions at (949) 640-8780.

Item 7. Requirements for State-Registered Advisers

Dirk Aulabaugh, Frank Bazzano, Tyler Blue, Jacob Bracken, John Filley, Robyn Francis, Andrew Gunter, Sage Hale, Roy Jiang, Juella Owenswaller, Pierre-Antoine Rigaud, Trinity Sanders, Nathaniel Siino, Bayle Smith, Andrew Spindler, Jeffry Stuek, Susan Worsham and Lillian Xia have not been involved in any arbitration claim alleging damages in excess of \$2,500. Furthermore, none of them have been involved in nor found liable in any civil, self-regulatory organization, or administrative proceeding nor has been the subject of any bankruptcy petitions.