Anti-Displacement & Tenant Stability Policy
Clear Investment Group — Social Impact Policy Statement

1. Purpose

Clear Investment Group ("CIG" or the "Firm") is committed to protecting the housing stability of tenants residing in properties it acquires. CIG's value-add strategy is designed to improve the physical and financial condition of an asset without displacing tenants who are meeting their lease obligations.

2. Scope

This policy applies to all residents in good standing at properties acquired or managed by CIG across Clear Opportunities Fund I, Clear Opportunities Fund II, and any successor investment vehicles, from the point of acquisition through disposition.

3. Policy Statement

CIG does not displace tenants who are current on rent and in compliance with their lease. Specifically:

- No eviction without cause. CIG does not evict or decline to renew a tenant's lease solely as a result of an acquisition, ownership change, or renovation. Non-renewal or eviction only occurs for documented lease violations, including non-payment of rent, consistent with applicable state and local law.
- Gradual rent adjustment, not displacement pricing. For tenants in good standing at acquisition, CIG does not reset rents to full market rate immediately. Rents are typically increased in a phased manner at each lease renewal — moving partway toward market at the first renewal, with market rent reached only at a subsequent renewal — rather than through an immediate, displacement-inducing increase.
- Advance notice. Tenants are provided reasonable advance written notice of any rent adjustment or lease change, consistent with or exceeding applicable state and local requirements.
- Renovation without displacement, where possible. Where unit-level renovation requires a tenant to vacate temporarily, CIG's standard practice is to offer relocation to another unit within the property or portfolio, with a right to return, rather than terminating the tenancy.
- Fair housing compliance. CIG's leasing and property management practices comply with all applicable federal, state, and local fair housing laws.

4. Governance and Oversight

This policy is implemented by CIG's Director of Leasing & Management, in coordination with on-site property management teams and the Director of Acquisitions during the underwriting and transition period following a new acquisition.

5. Reporting

CIG tracks and reports on tenant displacement as part of its IRIS+-aligned impact metrics framework (Metric PI1297 – Displacement), alongside its Tenant Retention (PI9319) metric, as part of quarterly and annual investor reporting.

Approved and adopted by:

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Amy Rubenstein
CEO, Clear Investment Group LLC

Date: __7/1/2026_____________