



**Exhibit E3:
Green Cleaning Policy**

This Green Cleaning Policy has been designed to implement a fully comprehensive green cleaning program for OCS. Used in conjunction with OCS's cleaning specification, it includes industry best practices as well as green cleaning processes to ensure a healthy and safe environment for the people who visit, live, learn, or work in OCS's facilities.

Required Green Cleaning Policies and Procedures

Green Cleaning Program Overview

To demonstrate its commitment to sustainable greening of its properties, OCS has implemented efforts toward the "greening" of its custodial operations. To achieve this end, this Policy has been structured based on the latest LEED-O+M rating system, which is the most standardized, followed and well-documented green cleaning protocol currently in practice. Facilities must meet certain prerequisites and credits in the LEED rating system. Several of the points are achievable through green cleaning programs. The buildings pursuing LEED certification must use the green cleaning strategies described in this document in at least 90% of its useable space.

Purpose of Green Cleaning

Many custodial cleaning products have been shown to degrade indoor air quality, pollute the water, and negatively impact the health of sensitive occupants. In effort to maintain a clean facility, service providers and facility managers often use harsh solutions that, while disinfecting the building, contaminate the indoor air. It is OCS's desire to maintain both clean properties and healthy environments for their occupants and are therefore committed to the green cleaning practices in this Policy.

Participation

OCS recognizes that the participation of all custodians and supervisors is an essential component of a successful green cleaning program. Therefore, OCS includes the requirements associated with green cleaning in the cleaning scope of all its buildings. The custodial team must demonstrate an ability to incorporate the following elements into the cleaning process: green product specification, staff training, solution storage, dilution and safe handling and equipment specifications and must also demonstrate a willingness to continue to develop these aspects of the program.

Low Environmental Impact Cleaning Policy

Hand Hygiene

Service Provider will promote healthy hand hygiene by providing soap and soap dispensers in custodial closets, kitchen areas, bathrooms, break rooms and locker rooms. Service providers are required to wash their hands on a routine basis while servicing the facility. Alcohol-based hand sanitizers will be provided in public areas. The properties' paper products should be dispersed

from hands-free dispensers to eliminate levers and cranks that users share. Hand soaps should not contain anti-microbial agents (other than as a preservative system) unless required by health codes and other regulations.

Staffing

Service Provider will maintain an appropriate staffing plan that is based on standard production rates and workloaded consistent with OCS's cleaning specifications. A contingency plan will be in place to manage staffing shortages and service interruptions, along with a process to obtain customer feedback when the contingency plan is used.

Protection of Vulnerable Occupants During Cleaning

- Vulnerable occupants include women who are pregnant, children, elderly occupants, and individuals with asthma, allergies, or other sensitivities.
- As much as possible, only sustainable cleaning products will be used.
- Any cleaning that involves the use of carpet cleaners, or if at any point the use of a non-sustainable cleaning product is required, this cleaning will be performed after regular business hours.

Chemical Storage Guidelines

Custodial team will maintain a program that reduces the exposure of the building occupants to potentially dangerous chemical, biological, and particle contaminants which adversely impact air quality, health, and the environment.

1. Any chemical stored in the custodial closets will have a locked container which encloses the liquid cleaning products and delivers out proper specified measurement for dilution.
2. The solutions used by the custodial team will all be stored in the custodial closet(s) and the custodial staff must follow these guidelines:
 - a. Safety Data Sheets (SDS) must be available to all service providers
 - b. Service providers are trained on SDS and chemical handling annually
 - c. All containers must be properly labeled to be easily identifiable
 - d. All cleaning products must be properly and safely stored
 - i. No liquids will be placed on shelves above eye level
 - e. Service providers must use appropriate personal protective equipment (PPE)
 - f. Chemical dilution systems must be adhered to
 - g. Unnecessary amounts of chemicals should not be stored in the custodial closet
 - h. Only authorized employees will have access to the main storage room
 - i. Where possible, OCS will maintain proper hot and cold water supplies and drain systems in custodial closets for the use of chemical dispensing and dilution
 - j. Service Provider shall be aware that certain OCS facilities require special disposal procedures of cleaning chemicals. Service Provider shall comply with these requirements, where specified by OCS

Special Treatment of Carpets

Carpet can be a source of bio-pollutants, dust and volatile organic compounds (VOCs). Pesticides and cleaning products (such as stain removers) that remain on the carpet after initial application can volatilize (rise into the air) over time and contaminate the indoor air. The following carpet treatment guidelines will mitigate the need for carpet cleaning solutions through both preventative and prescriptive treatment.

1. Prevent stains
 - a. Clean up spills promptly using cold water and one or more blotting cloths
 - b. Make a spill kit available to occupants
2. Promptly clean and thoroughly dry carpets if they should become saturated with water
 - a. Quick action following a leak or other water damage may prevent carpet loss and the growth of mold and/or mildew. (Do not attempt to clean a moldy carpet without proper protective equipment, clothing, respirators, and air filters. Special training may be required to adequately deal with a water-soaked carpet.)
3. Avoid excessive use of carpet shampoos and bonnet cleaning products. Bonnet cleaning involves the use of cotton, rayon, and/or polypropylene pads and a rotary shampoo machine. Although these chemicals are usually mild, overuse makes more frequent extraction cleaning necessary.
4. Deep-clean when necessary.
 - a. Periodically deep-cleansing of carpet is necessary to extract dirt, bio-pollutants, moisture, and embedded cleaning agents.
 - b. A wet vacuum water extraction machine after dry vacuuming may be used.
 - c. The Carpet and Rug Institute recommends rapid drying of the carpet, within 24 hours.
 - d. Pre-sprays applied carefully and left on long enough can reduce the amount of chemicals needed.
5. All vacuum filters will be replaced on a regular basis. The responsible party will record maintenance performed on all cleaning equipment, including filter replacement, to ensure that they are regularly replaced to reduce energy usage

Reducing Microbial Growth through Proper Cleaning

The following are basic guidelines to minimize the need for antimicrobial products at OCS:

1. Clean first and then apply disinfectant.
 - a. Most disinfectants are not cleaners and are usually only effective on a clean surface.

- b. Wait the recommended time before rinsing the antimicrobial solution from the surface (usually at least ten minutes, although some products are rapid-use and may only need one or two minutes)
2. Use disinfectants only when and where required
 - a. Ordinary detergents should remove more microbes than disinfectants
3. Change mop heads and sponges daily
4. Change cleaning water frequently (water used in mop-buckets, etc.)
 - a. Do not waste water by overfilling mop buckets, etc.
5. Intentionally clean areas where water collects and condenses
 - a. Areas such as refrigerator and air conditioner pans as well as air cleaner/humidifier machines
6. Use a drain maintainer (containing enzymes) if drains clog or has an odor
7. If there is a food preparation area in any of the subject buildings, OCS and/or Service Provider employees that prepare food for customers must use antimicrobial soaps and/or disinfectants

NOTE- If the Service Provider uses antimicrobial products, it must document the specific antimicrobial used and reason for use.

Service Provider Training Requirements

Service Provider will provide training of personnel in the hazards, use, maintenance and disposal of cleaning chemicals, dispensing equipment and packaging. Documentation of the training sessions, attendees and topics covered needs to be collected and maintained by the custodial manager.

1. Basic Service Provider Training
 - a. Service providers should receive basic training, including the green cleaning specifications delineated in this OCS Green Cleaning Policy.
 - b. An average of eight hours of training (or more) per year is required for each custodian. However, training frequency and duration shall be adjusted based on employee's tenure and date of hire. New hires should participate in a more robust and concentrated training period, likely exceeding eight hours for their first year. Substitute employees shall also be trained according to the same standard as new hires.
2. Training Specifications
 - a. Safety data sheets (SDS).
 - b. Compliance with the Green Seal standard of GS – 37.
 - c. Use and wear of personal protective equipment (PPE).
 - d. Recycle and compost processes, at least one to two instances per year. Must be approved by OCS's facilities and/or sustainability office.
 - e. Service Providers should be informed of OCS's product reporting requirements.
 - i. All cleaning products which are not on the GS-37 list must be approved by OCS personnel.
3. Provide OCS with monthly training logs indicating the attendees and the training topic

Green Cleaning Materials Policy

General Green Cleaning Solutions and Custodial Products Guideline

Service Provider must purchase general consumable products such as disposable paper products and trash bag liners that contain recycled material. Cleaning chemicals shall be environmentally friendly. At least 75% of these products (demonstrated via product inventory or total annual purchases) must meet at least one of the sustainability criteria noted below.

- Green Seal GS-37, for general-purpose, bathroom, glass and carpet cleaners used for industrial and institutional purposes
- UL EcoLogo 2792 for cleaning and degreasing compounds
- UL EcoLogo 2759 for hard-surface cleaners
- UL EcoLogo 2795, for carpet and upholstery care
- Green Seal GS-40, for industrial and institutional floor care products
- UL EcoLogo 2777 for hard-floor care
- EPA Safer Choice Standard
- Cleaning devices that use only ionized water or electrolyzed water and have third-party-verified performance data equivalent to the other standards mentioned above (if the device is marketed for antimicrobial cleaning, performance data must demonstrate antimicrobial performance comparable to EPA Office of Pollution Prevention and Toxics and Design for the Environment requirements, as appropriate for use patterns and marketing claims)

Disinfectants, metal polish, or other products not addressed by the above standards must meet one or more of the following standards (or a local equivalent for projects outside the U.S.):

- UL EcoLogo 2798 for digestion additives for cleaning and odor control
- UL EcoLogo 2791 for drain or grease trap additives
- UL EcoLogo 2796 for odor control additives
- Green Seal GS-52/53, for specialty cleaning products
- California Code of Regulations maximum allowable VOC levels for the specific product category
- EPA Safer Choice Standard
- Cleaning devices that use only ionized water or electrolyzed water and have third-party-verified performance data equivalent to the other standards mentioned above (if the device is marketed for antimicrobial cleaning, performance data must demonstrate antimicrobial performance comparable to EPA Office of Pollution Prevention and Toxics and Design for the Environment requirements, as appropriate for use patterns and marketing claims).

Disposable custodial paper products and trash bags must meet the minimum requirements of one or more of the following programs, or a local equivalent for projects outside the U.S.:

- EPA comprehensive procurement guidelines, for custodial paper
- Green Seal GS-01, for tissue paper, paper towels and napkins
- UL EcoLogo 175, for toilet tissue
- UL EcoLogo 175, for hand towels
- Custodial paper products derived from rapidly renewable resources or made from tree-free fibers
- FSC certification, for fiber procurement
- EPA comprehensive procurement guidelines, for plastic trash can liners; and/or
- California integrated waste management requirements, for plastic trash can liners (California Code of Regulations Title 14, Chapter 4, Article 5, or SABRC 42290-42297 Recycled Content Plastic Trash Bag Program)

Hand soaps and hand sanitizers must meet one or more of the following standards, or a local equivalent for projects outside the U.S.:

- No antimicrobial agents (other than as a preservative) except where required by health codes and other regulations (e.g., food service and health care requirements)
- Green Seal GS-41, for industrial and institutional hand cleaners
- UL EcoLogo 2784 for hand cleaners and hand soaps
- UL EcoLogo 2783 for hand sanitizers
- EPA Safer Choice Standard

For projects outside the U.S., any Type 1 eco-labeling program as defined by ISO 14024: 1999 developed by a member of the Global Ecolabelling Network may be used in lieu of Green Seal or UL Ecolabel standards.

To the extent practical, no cleaning or disinfecting products should contain ingredients that are carcinogens, mutagens, or teratogens. These include chemicals listed by the U.S. EPA or the National Institute for Occupational Safety and Health on the Toxics Release Inventory (40 CFR, Section 372, Subpart D). If such products containing these toxic chemicals must be used (cleaning solutions for specific equipment, etc.), only the minimum amounts should be used and the product must be disposed of properly. On the Toxic Release Inventory, a complete list of toxic chemicals is maintained by the U.S. EPA and can be found at their website.

Service Provider shall document the type, volume and concentration of all chemicals used in the cleaning process. Service Provider will also maintain a plan that addresses the handling of hazardous spills or mishandling incidents.

Low Environmental Impact Cleaning Equipment Policy

Service Provider must implement an equipment program to reduce building contaminants with minimum environmental impact. At least 40% of the total annual purchases of powered

custodial equipment (by cost; purchased, leased or used by subcontractors) must meet at least one of the sustainability noted below. Compliance is based on percentage of equipment used to clean the project at time of inventory.

- Safeguards, such as rollers or rubber bumpers, to avoid damage to building surfaces
- Ergonomic design to minimize vibration, noise, and user fatigue, as reported in the user manual in accordance with ISO 5349-1 for arm vibrations, ISO 2631-1 for vibration to the whole body, and ISO 11201 for sound pressure at operator's ear
- As applicable, environmentally preferable batteries (e.g., gel, absorbent glass mat, lithium-ion) except in applications requiring deep discharge and heavy loads where performance or battery life is reduced by the use of sealed batteries
- Vacuum cleaners must be certified by the Carpet and Rug Institute Seal of Approval/Green Label Vacuum Program and operate with a maximum sound level of 70 dBA or less in accordance with ISO 11201
- Carpet extraction equipment, for restorative deep cleaning, must be certified by the Carpet and Rug Institute's Seal of Approval Deep Cleaning Extractors and Seal of Approval Deep Cleaning Systems program
- Powered floor maintenance equipment must have vacuums, guards, or other devices for capturing fine particulates, and must operate with a maximum sound level of 70 dBA, in accordance with ISO 11201
- Propane-powered floor equipment must have high-efficiency, low-emissions engines with catalytic converters and mufflers that meet the California Air Resources Board or EPA standards for the specific engine size and operate with a sound level of 90 dBA or less, in accordance with ISO 11201
- Automated scrubbing machines must be equipped with variable-speed feed pumps and either (1) on-board chemical metering to optimize the use of cleaning fluids or (2) dilution control systems for chemical refilling. Alternatively, scrubbing machines may use tap water only, with no added cleaning products

Reporting

Service Provider must provide documentation of its comprehensive green cleaning program upon request and must also provide written updates, including a record of supply purchases, equipment purchases and training on at least a quarterly basis.

Applying Green Cleaning to the Specifications

The Low Environmental Impact Cleaning requirements, the Green Cleaning Materials requirements and the Low Environmental Impact Cleaning Equipment requirements are to be applied to OCS's cleaning specifications.

For example, the task, "clean door glass and other adjacent glass areas" must be performed using a chemical that meets the Green Seal GS-37 Standard and microfiber technology in lieu of paper

products when possible as set forth in the Green Seal GS-42 Standard. The task, “fully vacuum all carpeted areas from wall to wall including walk-off mats and edges” must be performed with a vacuum cleaner that captures 96% of particulates 0.3 microns in size and operates with a sound level less than 70dBA.

Occupant Feedback

Service Provider will collect building occupant feedback on an ongoing basis to improve its custodial program. OCS and/or the Service Provider will use formal surveys as well as a complaint response system to discover and respond to building occupant ideas and complaints. The custodial team will operate with a “continuous improvement” mindset and will be open to new ideas, technologies, procedures and processes. OCS and/or the Service Provider will document survey results, as well as the steps taken in response to the survey.

Quality Control Measures

OCS is committed to maintaining its buildings in an environmentally preferable way that will benefit the health of the facility occupants, visitors, maintenance personnel and the natural environment. To this end, OCS routinely evaluates the successes and shortcomings of all employed practices and makes immediate alterations accordingly.

Building and site walk-throughs are completed routinely by OCS’s supervisors and management to ensure adoption and proper application. As recommended by the U.S. Green Building Council, OCS may use a third-party to assess the quality of the custodial services, including the APPA level of cleanliness. Facility occupants are highly encouraged to report any outstanding custodial issues to the facility personnel. New technologies for environmentally sensitive cleaning will be continuously monitored and assessed as they become available and adopted when they are applicable. Similarly, this policy will be updated as needed to ensure that current and successful procedures are being carried out.