

Fair Housing Policy — Summit Property Group

Compliance Document

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1. Policy Statement and Purpose

FAIR HOUSING POLICY

Summit Property Group
600 Commerce Street, Suite 300
Nashville, TN 37203

Effective Date: [EFFECTIVE DATE]

Summit Property Group is committed to full compliance with the Fair Housing Act (42 U.S.C. §§ 3601-3619), the Civil Rights Act of 1866, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and all applicable state and local fair housing laws.

It is the policy of Summit Property Group to provide equal housing opportunity to all persons regardless of race, color, religion, sex (including gender identity and sexual orientation), national origin, familial status, or disability — the seven federally protected classes under the Fair Housing Act. Additionally, Summit Property Group complies with Tennessee state law, which also prohibits discrimination based on ancestry.

This policy applies to all aspects of our operations including advertising, application processing, tenant selection, lease terms and conditions, maintenance and repairs, use of common areas, and termination of tenancy. All employees, agents, and vendors acting on behalf of Summit Property Group are required to comply with this policy.

2. Advertising and Marketing Compliance

All advertising and marketing materials for Summit Property Group properties shall comply with the Fair Housing Act and HUD advertising guidelines (24 CFR Part 100).

Prohibited Language: Advertisements shall not contain language that indicates a preference, limitation, or discrimination based on any protected class. This includes explicit statements ("no children," "Christian community"), coded language ("exclusive neighborhood," "adult lifestyle"), and descriptions that may discourage protected groups from applying.

Required Elements: All print and digital advertisements must display the Equal Housing Opportunity logo or statement. The fair housing logo must be prominently displayed in all leasing offices, model units, and on the company website.

Human Imagery: When photographs or illustrations of people are used in advertising, they should represent a diverse cross-section of the community. This includes diversity in race, ethnicity, age, family composition, and persons with disabilities.

Online and Social Media: The same fair housing advertising standards apply to online listings, social media posts, and digital advertising. Targeted advertising on social media platforms must not exclude audiences based on protected characteristics. Property descriptions should focus on the physical features of the unit and community amenities, not the characteristics of current or desired residents.

3. Reasonable Accommodations and Modifications

Summit Property Group shall provide reasonable accommodations and permit reasonable modifications for persons with disabilities in accordance with the Fair Housing Act and Section 504 of the Rehabilitation Act.

Reasonable Accommodations: A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling. Examples include: assigning an accessible parking space closer to a resident's unit; allowing a service animal or emotional support animal despite a no-pets policy; permitting a live-in aide for a person who needs assistance; providing documents in alternative formats (large print, audio); and adjusting rent payment dates for residents receiving disability benefits on a specific schedule.

Reasonable Modifications: A reasonable modification is a structural change made by or for a person with a disability to the premises they occupy or common areas. Under the Fair Housing Act, residents may make reasonable modifications at their own expense for units not covered by Section 504 federal funding. The landlord may require that modifications be done in a workmanlike manner and may require restoration of the interior to its original condition upon move-out (with limited exceptions).

Request Process: Requests for reasonable accommodations or modifications should be submitted to the property manager in writing. An interactive process will be used to determine an effective accommodation. Summit Property Group will respond to all requests within 10 business days. Documentation of disability-related need may be requested if the disability or need is not apparent, but specific diagnosis shall not be required.