

Essex Property Trust, Inc. Vendor Code of Conduct

May 2023

Essex Property Trust, Inc., together with its affiliates and subsidiaries (collectively referred to herein as the “Company”), expects our vendors, contractors, consultants and professional service providers (collectively referred to herein as “Vendors”) to embrace the letter and spirit of our commitment to integrity and to comply with our internal Code of Business Conduct and Ethics, which applies to all Company associates, officers, and directors (<http://investors.essexapartmenthomes.com/CorporateGovernance>). Our Vendor Code of Conduct is listed below.

BUSINESS STANDARDS

Company Vendors shall conduct their business interactions and activities with integrity and in accordance with their obligations under their agreements with the Company. In addition, all Company Vendors shall, without exception, comply with the following:

Accuracy, Reporting and Record Keeping

Vendors must honestly and accurately record and report all information and create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Company Assets and Information

Vendors must safeguard and responsibly use the physical assets and confidential information of the Company.

Bribes and Kickbacks

Vendors must never offer a bribe, kickback, bartering arrangement, goods, services, any other incentive, etc. to a Company associate to obtain or retain Company business.

Gifts

A Gift is defined as customary for (1) business entertainment, meals and food products and (2) event sponsorship and gatherings including luncheons and picnics when it does not place, or appear to place, the associate under an obligation, or the influence of a Vendor. Permitted Gift Amounts consist of (1) the same amount as Essex Associate Handbook, currently at \$100.00, to each Company associate for business entertainment, meals and food products or (2) \$300 for each event sponsorship, for any one vendor during a calendar year. A Gift with a value greater than the Permitted Gift Amount requires approval from either the SVP of HR, CFO or CEO of Essex Property Trust, Inc. either in advance or within six months of detection. Any Gift, which may compromise a Company associate’s judgment or business decision, is forbidden. Cash, gift certificates and other monetary instruments are prohibited and are not considered customary gifts. Any Gifts must be in compliance with all applicable laws.

Conflicts of Interest

Vendors must avoid the appearance of actual improprieties and/or conflicts of interests. Company Associates may not have ownership interests in, or family relationships with, a Company Vendor. Associates may not accept Gifts or benefits from a Vendor in exchange for the Vendor obtaining more favorable terms in its deal with the Company than would otherwise be made available to the Vendor.

Insider Trading

Vendors must avoid insider trading by not buying or selling the Company’s stock when in possession of information about the Company that is not available to the investing public and that could influence an investor’s decision to buy or sell stock.

Antitrust and Fair Competition

Vendors must comply with all state and federal antitrust and competition laws. Vendors are strictly prohibited from entering into any agreement or understanding with competitors or potential competitors regarding prices or other terms of sale, volumes, costs, profits, allocating customers or markets, exchanging confidential and competitively sensitive information, or engaging in any other form of anticompetitive behavior. All pricing, wage and hiring decisions must be made unilaterally by each Vendor, without discussion, collaboration or agreement with competitors or potential competitors.

Minimize Environmental Impact

Vendors must comply with all state and federal environmental laws. Company's goal is to exceed current laws and asks that whenever possible, Vendors should operate with the lowest environmental impact possible. Any pollution or material waste should be prevented. The use of biodegradable materials, recycled paper, locally produced materials/products and sustainable building materials should be used.

When Vendors see opportunities for Company to operate more sustainable and environmentally friendly, they should share them with Company.

Health and Safety

Vendors should ensure that the health and safety of residents, employees and visitors to the properties is maintained during all work and activities at the properties. Clear communication and/or signage should be in place when Vendors are performing work at Company properties. Employees of Vendors should be trained on health and safety issues and the use of non-hazardous & eco-friendly products are encouraged.

Human Rights and Labor Practices

Vendors are expected to respect human rights and uphold fair labor standards in accordance with the United Nations Guiding Principles on Business and Human Rights, and as informed by the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and all applicable labor laws and regulations.

Anti-Discrimination: No discriminatory actions can be taken to its employees with regards to race, color, national origin, ancestry, creed, religion, sex, familial/marital status, physical or medical condition, age, genetics, sexual orientation, gender identity/expression, political views, military status, domestic violence victimhood, source of income, handicap, disability, citizenship status, immigration status, primary language spoken or any other protected classification under local, state or federal law.

Anti-Harassment: Vendors must seek to ensure that their employees are treated with respect and dignity. Physical, sexual, psychological, or verbal harassment or any other form of abusive behavior must not be tolerated. Vendors shall reject and prohibit corporal punishment, intimidation, and any other form of physical or mental coercion.

Wages, Working Hours Benefits: Vendors should compensate their employees in line with state and federal wage laws, including those regarding minimum wages, overtime hours and legally mandated benefits. All applicable laws regarding working hours must be met and overtime shall be compensated at pay rates greater than regular hourly rates. Workers must be provided with an understandable wage statement with sufficient information to verify accurate compensation for work performed. Deductions from wages as a disciplinary measure shall not be permitted.

Prevention of Child Labor and Forced Labor: In no circumstance does Company allow its Vendors to operate with any forced or involuntary labor or use child labor during their operations. Vendors must seek to prohibit child labor and adhere to federal, state and local employment regulations established for the protection of minors, as informed by ILO Conventions 138 and 182. Vendors shall also seek to forbid all forms of forced labor, as informed by ILO Convention 29 and 105. No one should be forced to work by

any means of coercion, including intimidation, debt bondage, retention of identity papers, or threats of denunciation to immigration authorities.

COMPLIANCE WITH ESSEX PROPERTY TRUST VENDOR CODE OF CONDUCT

It is the Vendor’s responsibility to ensure they understand and comply with the Company Vendor Code of Conduct and to inform Company Internal Audit if a situation develops that causes the Vendor to operate in violation of this Code. Company Vendors are expected to self-monitor their compliance with this Code and to replicate these standards with their own business partners. The Company may immediately remove any Vendor who behaves in a manner that is unlawful or inconsistent with this Code.

VENDOR REPORTING REQUIREMENT

Vendor agrees to provide reporting and furnish information as requested by the Company about details of Gifts provided to Company associates, within 10 business days of request.

REPORTING OF QUESTIONABLE BEHAVIOR AND/OR POSSIBLE VIOLATIONS

Vendors are encouraged to report any possible violations of the Vendor Code of Conduct by Company employees or service providers. Vendors may submit anonymous reports to the Company by contacting any of the following:

1. Call the Company’s anonymous and confidential compliance hotline service, Convercent, at 1-800-492-3958 or submit a report online at convercent.com/report
2. Send a letter or an email to Essex Internal Audit Department at:
 - a. 21860 Burbank Blvd., Suite 200 Woodland Hills, CA 91367
 - b. Or internalaudit@essex.com

The Company will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior and/or a possible violation.

Signature: _____

Printed Name: _____

Title: _____

Date: _____