

Douglas Emmett, Inc.
Policy on Political Activity

From time to time, we engage in public policy advocacy in support of our real estate business and the office and multifamily real estate sectors through ongoing and constructive interactions with government officials, policymakers and stakeholder groups. All of our advocacy activities are directed toward creating value for our stockholders and other stakeholders, without regard to the personal political affiliations or views of any individual Douglas Emmett officer, employee, or board member.

Public Policy Advocacy

From time to time, we make constructive contributions to policy discussions relevant to our business and the communities in which we operate, including around policies that may impact i) the value of our real estate (such as crime, homelessness, and community improvements), ii) REIT or shareholder taxation, iii) the cost to operate our Company or real estate, or iv) a particular development project or related development initiatives. In doing so, we seek to leverage our diverse expertise and collaborations with our stakeholders to advance sound public policy. In areas where we have deep experience, we may develop public policy positions to guide our advocacy efforts using internal and external subject matter experts.

Our Participation with Trade and Policy Development Organizations

We join trade associations to further engage in collaborative and constructive approaches to industry engagement with policymakers and other stakeholders. We also participate in a variety of issue advocacy coalitions and alliances that seek to advance policy proposals consistent with our key priorities.

Oversight by the Board of Directors

Our Board is responsible for overseeing that any engagement by us in the political process advances a corporate purpose and complies with this policy and applicable ethical and legal obligations. Additionally, our Board approves our *Code of Business Conduct and Ethics* that is applicable to our activities. The *Code* is publicly available on our website, and outlines in detail the key principles of ethical conduct expected of our employees, officers and directors.

Compliance with Laws.

We seek to comply with all laws governing political activity and interactions with public officials, and never to influence the judgment of any government officials by unlawful inducement. Additionally, no employee may engage in any lobbying activities on our behalf without prior approval by our Board of Directors or Chief Executive Officer.

Violations and Compliance

We maintain robust processes for reporting violations and validating compliance with the law and our policies. Any of our personnel who believe they have witnessed illegal or unethical behavior relating to our political activities are required to bring the matter to the attention of either their manager, our senior managers, our Human Resources representatives, or any member of our Audit Committee or our Board of Directors, either directly or through the confidential hot line that we maintain. We enforce a strict anti-retaliation policy for any reports submitted in good faith.