

# EQUITY LIFESTYLE PROPERTIES, INC.

## ANTI-CORRUPTION COMPLIANCE POLICY

### **I. OVERVIEW**

Equity LifeStyle Properties, Inc. and its subsidiaries (collectively, the “Company”) are committed to conducting all of its business in an honest and ethical manner, at home and abroad, consistent with its Business Ethics and Conduct Policy. The Company takes a zero-tolerance approach to bribery and corruption. The Company is committed to maintaining an effective compliance program to support compliance with the letter and the spirit of the anti-corruption laws of all jurisdictions in which the Company conducts business (collectively, “Anti-Corruption Laws”), including the U.S. Foreign Corrupt Practices Act (“FCPA”). Consistent with this commitment, the Company has adopted this Anti-Corruption Compliance Policy (as may be amended from time to time by the Company, the “Policy”).

This Policy applies to everyone employed by or retained by the Company, including all of its officers, directors, and employees (“Company Personnel”) and all agents, third-party representatives, and other intermediaries acting on behalf of the Company (“Third Parties” and, together with Company Personnel, “Covered Persons”). Each Covered Person has a personal responsibility and obligation to conduct the Company’s business activities ethically and in compliance with the law and this Policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect. All Covered Persons are required to read, understand, and comply with this policy and to complete the certification attached hereto as **Appendix A** at the time of hire or onboarding.

This Policy describes the Company’s principles prohibiting bribery, facilitation payments, and other improper payments in the conduct of its business operations and the responsibilities of Covered Persons to implement this Policy. The Company requires all Covered Persons to report any conduct that may violate this Policy. Covered Persons may report potential unethical or illegal activity directly to their manager, or to the Compliance Officer.

No policy can anticipate every situation. Questions about this Policy or how the Policy may apply to particular circumstances should be directed to the Compliance Officer.

### **What Conduct Is Prohibited?**

#### Corruption and Bribery.

The FCPA prohibits U.S. companies, such as the Company, from offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value, including but not limited to cash, discounts, gifts, tickets, meals, travel and employment opportunities, to any person, while knowing that all or a portion of such money or thing of value will be offered, given or promised, directly or indirectly, to a foreign official for the corrupt purpose of influencing any act or decision of the foreign official in their official capacity, inducing the foreign official to do or omit to do an act in violation of his or her lawful duty or securing any other improper advantage in order to obtain or retain business or direct business to any person. “Foreign officials” includes all officers or employees

of a foreign government or public international organization, or any person acting in an official capacity for or on behalf of a foreign government or public international organization. "Foreign officials" also includes family members and close associates of such individuals. Foreign official status is not always apparent and even staff-level employees may be considered foreign officials.

The Company strictly prohibits bribery, kickbacks, or other giving of improper payments in any of its business operations, whether they occur directly or indirectly through a Third Party. Covered Persons shall not offer, make, promise, accept, or authorize any payment to or from a foreign official or other person that would directly or indirectly violate any Anti-Corruption Laws and may not threaten or retaliate against another Covered Person who has refused to commit an offense or has raised concerns under this Policy.

If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must immediately be rejected and reported to the Compliance Officer. Requests can include those in the form of asking for a donation to charity, employment of a family member, or payment for a business trip in addition to requests for cash payments. Similarly, if any Covered Person knows or believes that an improper payment has been or will be made, the Covered Person must also report such payment to the Compliance Officer.

## **II. GIFTS, TRAVEL, AND ENTERTAINMENT**

The Company requires all Covered Persons to exercise caution when providing gifts, travel, or entertainment of any kind, or receiving the same from third parties, and to consult the Compliance Officer with any questions regarding the legality or appropriateness of an activity or offering. Such conduct by Covered Persons must be permitted under applicable laws including FCPA, permissible pursuant to the terms of this Policy and the Company's Business Ethics and Conduct Policy.

All Covered Persons are prohibited from accepting or giving money or anything of value, including but not limited to discounts, gifts, tickets, meals, entertainment, travel and employment opportunities, to any foreign officials or any person or firm when there is reason to believe that it will be passed on to a foreign official.

## **III. POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS**

Covered Persons may not make political contributions or charitable donations, whether in their own name or in the name of the Company, to obtain or retain business or to gain an improper business advantage. Any political contributions or charitable donations made to a bona fide organization, organization connected to any foreign official or government entity by the Company or any Covered Person must be permitted under applicable Anti-Corruption Laws, permissible pursuant to the terms of this Policy and the Company's Political Contributions Policy.

## **IV. ENGAGING AND DOING BUSINESS WITH THIRD PARTIES**

The Company may be liable for improper payments and actions by Third Parties, and must therefore take reasonable precautions to ensure that Third Parties conduct business ethically and comply with this Policy. The Company shall employ appropriate procedures to mitigate risk of noncompliance by Third Parties, such as compliance language in written agreements. Any third-party agent relationship which involves interaction with government officials on the Company's

behalf will be subject to additional scrutiny. All Company Personnel are required to communicate the Company's zero-tolerance approach to corruption to all suppliers, contractors, business partners, and any other third party at the outset of any business relationship with them, or at the earliest opportunity thereafter.

The Company hires all candidates for paid and unpaid positions on merit and never to influence the candidate or referrer of the candidate to gain a business advantage. Covered Persons may not hire any person by any means other than through established Human Resources procedures and must alert the Compliance Officer of any potential conflicts of interest or relationships with foreign officials.

## **V. ACCOUNTING AND RECORDKEEPING REQUIREMENTS**

It is the Company's policy to maintain accurate books and records and a system of internal accounting controls sufficient to ensure compliance with the record-keeping provisions of applicable laws. It is every Covered Person's responsibility to make sure that documents supporting all records (*e.g.*, receipts, disbursements, journal entries) relating to transactions involving foreign officials, domestic and foreign governments and international organizations, and with Third Parties retained by the Company to act on its behalf in potential dealings, are accurate and contain wording that clearly describes the reason and purpose for each transaction, the amount involved, and the identity of the counterparty. Recordkeeping requirements are not limited to amounts that would be "material" in the traditional financial sense. Third Parties are responsible for ensuring that all invoices submitted to the Company contain sufficient detail and supporting documentation to allow for proper and accurate recording in the Company's financial records. All Company records are subject to audit, and financial records should be maintained in accordance with generally accepted accounting principles.

## **VI. REPORTING REQUIREMENTS AND WHISTLEBLOWER PROTECTION**

The Company expects and requires any Covered Persons who have knowledge of, or reason to suspect, a violation of this Policy to contact the Compliance Officer immediately. Failure to report known or suspected violations of this Policy may result in disciplinary action, up to and including termination. Reports of known or suspected violations that are made honestly and in good faith will not result in adverse employment-related action or retaliation.

**APPENDIX A: COMPANY PERSONNEL POLICY CERTIFICATION**

I hereby acknowledge that I have received, read, and fully understood the Anti-Corruption Compliance Policy (the “Policy”) of the Company (as defined in the Policy). I agree to comply with all the rules contained therein. I further agree to participate in any trainings conducted by the Company in relation to the Policy. I certify that, after due inquiry and investigation, I am not aware of any fact or circumstance that indicates that a violation of the Policy has occurred as of the date of this Certificate. I further certify that I will promptly report any non-compliance or potential violations in accordance with the Policy. I understand that failure to comply with the Policy or applicable Anti-Corruption Laws (as defined therein) may result in immediate termination and could lead to prosecution, which may result in civil or criminal liability, fines, and/or imprisonment.

Should I have any questions regarding the Policy or become aware of any deviations or violations, I will contact the Compliance Officer immediately.

Signature: \_\_\_\_\_

Name (print): \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_