

# EQUITY LIFESTYLE PROPERTIES, INC.

## ECONOMIC SANCTIONS & ANTI-MONEY LAUNDERING LAWS COMPLIANCE POLICY

### I. STATEMENT OF POLICY

Equity LifeStyle Properties, Inc. and its subsidiaries (collectively, the “Company”) are committed to compliance with all applicable laws and regulations, including those related to economic sanctions (collectively, “Sanctions”) and anti-money laundering (collectively, “AML Laws”). Consistent with this commitment and its Business Ethics and Conduct Policy, the Company has adopted this Economic Sanctions and Anti-Money Laundering Laws Compliance Policy (as may be amended from time to time, the “Policy”). This Policy applies to everyone employed by the Company 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”).

Adherence to this Policy and its procedures is very important. Violations of Sanctions and/or AML Laws may result in civil and criminal penalties, secondary sanctions, difficulty obtaining licenses or approvals and reputational damage. If any Covered Persons has any questions about their obligations to comply with Sanctions and this Policy, or if any Covered Persons suspects that any violation has occurred, such Covered Persons should contact the Compliance Officer.

### II. SANCTIONS

#### A. Sanctions Overview

As a company incorporated and operating in the United States, the Company and Covered Persons are required to comply with all U.S. Sanctions. With respect to applicable U.S. Sanctions, the U.S. Department of the Treasury, Office of Foreign Assets Control (“OFAC”) is the primary U.S. government agency responsible for administering Sanctions, which are laws and regulations that restrict business with certain countries, individuals, and entities in order to advance specific foreign policy and national security priorities. OFAC sanctions target entities and individuals designated on OFAC’s sanctions lists, including the List of Specially Designated Nationals and Blocked Persons (the “SDN List”).<sup>1</sup>

The Company will not provide services to, engage in any transactions or otherwise do any business involving countries, territories, entities, or individuals targeted by applicable Sanctions (including, as of the date of this Policy, **Cuba, Iran, North Korea, Syria, Venezuela, and the Crimea region of Ukraine**), whether directly or indirectly, unless authorized under all applicable laws. Any opportunity to engage in transactions with sanctioned countries or sanctioned persons must be reviewed and approved in advance in writing by the Compliance Officer. The Compliance Officer

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<sup>1</sup> The SDN List is available on OFAC’s website at <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>. Other OFAC sanctions lists also are available online: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx>. A consolidated list that includes all OFAC sanctions list, as well as other U.S. restricted party lists are available at <https://legacy.export.gov/csl-search/>.

will be responsible for ensuring all such transactions are only conducted if permitted under applicable Sanctions.

## **B. Sanctions Screening Procedures**

The Company will perform restricted party screening of suppliers, vendors, and other counterparties (“Screening Parties”) from high-risk jurisdictions prior to onboarding to confirm whether such parties, and if applicable their owners, are the target of Sanctions, or involve any countries or parties targeted by Sanctions. The list of high-risk jurisdictions, which is subject to change, currently consists of the following countries and territories: **Albania, Belarus, Bosnia and Herzegovina, Burundi, Central African Republic, China (including Hong Kong and Macau), Cuba, Democratic Republic of the Congo, Iran, Iraq, Kosovo, Lebanon, Libya, Mali, Montenegro, Nicaragua, North Korea, North Macedonia, Russia, Serbia, Somalia, South Sudan, Sudan, Syria, Ukraine, Venezuela, Yemen, and Zimbabwe.**

The Compliance Officer will be responsible for ensuring that restricted party screening is conducted at onboarding and that existing Screening Parties are periodically rescreened in accordance with the Procedures to ensure they have not become the target of Sanctions as a result of changes to Sanctions. Covered Persons shall not enter into transactions or agreements with or involving a country or party subject to Sanctions. Covered Persons shall report the situation to the Compliance Officer immediately.

## **III. AML LAWS**

### **A. Overview of AML Laws**

The Company is committed to complying with all applicable AML Laws. Money laundering is an act of disguising the true nature of property, or transferring, acquiring or using property, knowing that such a property is derived from a criminal offense (which may include drug trafficking or terrorist activities). Money laundering is the process by which criminals attempt to conceal the true origin and ownership of the proceeds of illegal activities. Any involvement in a transaction that seeks to conceal, disguise the nature, location, source, ownership, or control of proceeds derived from a wide range of crimes may constitute money laundering.

The U.S. Department of Justice has the authority to bring criminal enforcement actions against companies and individuals for violations of AML Laws. In addition, other financial services regulators and agencies may enforce fiscal violations of AML Laws, including those relating to tax, currency controls and customs.

The Company is not a financial institution or money services business and as such, certain aspects of AML Laws do not apply to its operations. Nevertheless, it is the Company’s policy to comply with its obligations under AML Laws, and any Covered Person who suspects that any money laundering or other unlawful conduct is occurring should report immediately to the Compliance Officer.

### **B. AML Laws Compliance Procedures**

Any activities or arrangements that appear suspicious or indicative of money laundering should be reported to the Compliance Officer immediately. No other counterparty, including the Third Party in question, should be informed about any such suspicion, as doing so could be a violation

of AML Laws. The following non-exhaustive list of “red flag” indicators and arrangements may generally be considered suspicious under AML Laws and may arise at any time during a Third Party relationship:

- The presentation of identifying documents that appear forged, altered, or otherwise invalid;
- The maintenance of a complex corporate or organizational structure where such complexity does not seem to be warranted;
- Multiple persons or accounts that share the same name, address, telephone number, or other identification, but otherwise appear unrelated;
- One person or entity that uses multiple addresses or P.O. boxes for no apparent reason;
- Potential Third Parties include government officials;
- Transfers of funds to an individual person’s bank account instead of an organization or entity’s bank account;
- Accounts funded by one individual or entity and then transferred to an apparently unrelated individual or entity;
- Very urgent requests to transfer funds and a lack of details of the transaction; and
- Financial activity that generally appears inconsistent with a Third Party’s stated charitable objectives or financial circumstances, or the Company’s understanding of the Third Party’s organization.

#### **IV. AUDITS**

The Company will conduct periodic internal audits of the Policy and related procedures to confirm that they are operating correctly and effectively. The Company may also periodically conduct external audits in connection with the Policy and related procedures.

#### **V. QUESTIONS AND REPORTING**

The Company Personnel certification in **Appendix A**, which signifies that each person signing has read, understood, and promised to abide by the Policy, will be collected from all Company Personnel at the time of hire and periodically thereafter. 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 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.

This Policy does not address every aspect of compliance with Sanctions and AML Laws. Given the complex and fact-specific nature of the issues that can arise under Sanctions and AML Laws, Covered Persons involved in transactions that may involve risk under Sanctions and AML Laws, or interpretation of the issues set forth in this Policy, should promptly seek guidance from the Compliance Officer when questions arise.

**APPENDIX A: EMPLOYEE POLICY CERTIFICATION**

I hereby acknowledge that I have received, read, and fully understood the Economic Sanctions and Anti-Money Laundering Laws 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 Sanctions or AML Laws (as defined in the Policy) 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: \_\_\_\_\_