

EQUITY LIFESTYLE PROPERTIES, INC.
VENDOR CODE OF CONDUCT

Equity LifeStyle Properties, Inc. and its affiliates (the “Company”) are committed to fair and ethical business conduct, consistent with its Business Ethics and Conduct Policy. We require our partners, suppliers, and vendors, as well as their employees, agents and subcontractors (collectively, the “Vendor”), to embrace this commitment to integrity by complying with this Vendor Code of Conduct (the “Code”). This Code incorporates the principles in the Company’s Human Rights and Labor Rights Statement and applies them to Vendors.

COMPLIANCE WITH THE VENDOR CODE AND REPORTING

The Code may not cover every situation a Vendor may face. When in doubt or when there are questions or concerns about a violation of the Code, Vendors are encouraged to contact the Company’s Compliance Officer at internalaudit@equitylifestyle.com, or the Company’s whistleblower hotline at 1-833-500-1758. Vendors can also contact the Company’s Safety Hotline at 1-844-570-4236 for workplace health and safety concerns.

It is the responsibility of the Vendor to ensure that its representatives understand and comply with this Vendor

Code and to inform its Company contact (or a member of the Company management) if the Vendor knows, or has reason to believe, that a violation by it or its representatives may have occurred or may occur in the future. Vendors must allow their employees to raise issues or concerns without fear of retaliation. The Company will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Code. Though Vendors must self-monitor, they should be able to demonstrate their compliance with this Code upon the Company’s request. If a Vendor is noncompliant, the Company reserves the right to take appropriate actions, including contract termination. The Company may require removal from the Company account of any Vendor personnel who behaves in a manner that is unlawful or incompatible with this Code.

LEGAL AND REGULATORY COMPLIANCE PRACTICES

Vendors must conduct business in full compliance with all applicable laws, codes, ordinances, rules and regulations in performance of their obligations. Nothing in this Code grants additional rights or expectations to a Vendor or alters the Company’s contractual or legal rights. The Company reserves the right to modify this Code at any time in its sole discretion, without prior notice.

- **Licensing/Permits:** Vendors must obtain all required licenses and permits to conduct business in applicable jurisdictions.
- **Insider Trading:** Vendors must comply with all “insider trading laws” relating to transactions in securities of the Company. To the extent that Company policies impose a higher standard than what is required by applicable national and/or local laws and regulations on its Vendors, such higher standard will prevail.

CONFIDENTIALITY AND DATA PROTECTION

Vendors may be entrusted with proprietary and personal information. Vendors should uphold all legal obligations and otherwise ensure protection of all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose beyond the scope of the business arrangement with the Company without prior authorization.

Vendors must also ensure information remains private by maintaining adequate cyber security and complying with all laws and regulations to mitigate risk of a data breach.

HUMAN RIGHTS AND LABOR STANDARDS

We expect our Vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture.

- **Working Hours, Wages and Benefits:** Vendors must comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. The Company encourages Vendors to work toward improving standards of living and quality of life for their employees and communities. Vendors are prohibited from requiring workers to work more than the maximum hours as set by international standards, and local and national laws.
- **Freedom of Association and Collective Bargaining:** The Company believes its employees are its most important asset and values employee engagement. The Company expects its Vendors to adhere to applicable laws regarding the right of their employees to affiliate with lawful organizations without interference. Vendors must respect each employee's right to make an informed decision, free of coercion to organize or join associations, and bargain collectively, if they so choose, in accordance with local, state, and federal legal requirements and responsibilities and international standards such as the International Labor Organization standards, whichever are stricter.
- **Nondiscrimination, Diversity, and Inclusion:** The Company is dedicated to creating a workplace that values and respects the diversity and inclusion of people. We advocate fairness and equality of opportunity. The Company makes employment decisions (hiring, promotions, terminations) without regard to a person's race, ethnicity, color, religion, sex, national origin, sexual orientation or gender identity, pregnancy, age, disability, military status, or any other status protected by the law. We do not tolerate discrimination, harassment, unfair treatment or retaliation of any kind in the workplace and in any work-related circumstance outside the workplace. Vendors shall maintain a workplace free of unlawful discrimination, which includes any characteristic or status protected by law. Vendor employees shall not be subject to verbal, physical, sexual or psychological abuse, harassment, retaliation and shall be treated with respect and dignity.
- **Child Labor:** The Company does not tolerate forced, bonded or oppressive child labor and supports the elimination of these forms of labor. Vendors must comply with all applicable minimum age labor laws and not use child labor. Individuals employed by Vendors must be no younger than the minimum age for employment under applicable law.
- **Forced Labor and Human Trafficking:** Vendors must not engage in the recruiting, transporting, or use of forced labor in any form, including prison or debt bondage labor, the lodging of deposits or identity papers by employers or by outside recruiters, modern forms of slavery and any form of human trafficking.

HEALTH AND SAFETY

Vendors shall incorporate health and safety management practices into all aspects of their business. Vendors must fully comply with all applicable safety and health laws, including in the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. Vendors shall minimize employee and visitor exposure to potential safety hazards by appropriately identifying, assessing and minimizing risks. Vendors are encouraged to invest in and train for an incident and injury-free workplace.

ENVIRONMENT

The Company is committed to an environmentally sustainable future and expects that its Vendors comply with applicable environmental laws, including regarding hazardous materials, air emissions, waste, and wastewater discharges. Vendors are encouraged to reduce their carbon footprint and undertake sustainability initiatives to meet our objectives of protecting the planet while lowering operating costs and improving the efficiency of our portfolio.

ANTI-CORRUPTION, FAIR COMPETITION AND BUSINESS PRACTICES

- **Anti-Bribery and Anti-Corruption:** Vendors shall not engage in any form of corrupt practices including, without limitation, extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involvement with terrorist or organized crime organizations or activities. Vendors shall not offer bribes or kickbacks to any Company representative, government official or third party with the intention of obtaining or retaining a business advantage.
- **Antitrust:** Vendors must comply with applicable antitrust and fair competition laws. Unethical business practices such as improper exchange of competitive information, price fixing, bid rigging, or improper market allocation are prohibited.
- **Conflicts of Interest and Fair Dealing:** Vendors must avoid offering gifts, favors or benefits that are intended (or could appear) to influence the Company's employees to act in their personal interest ahead of the Company's best interest. Vendors must avoid unfair dealing.

FINANCIAL RESPONSIBILITY/ACCURATE RECORDS

Vendors must accurately record, maintain, and report business records, including financial account, quality reports, time records, expense reports, and any submission to regulatory authorities.

CODES OF CONDUCT AND SUB-TIER VENDORS

Vendors must have management systems in place to support compliance with laws, regulations, and this Code. We encourage our Vendors to implement their own written code of conduct and vendor code of conduct to apply to their vendors.

Approved October 2022