

HUMAN RIGHTS POLICY



Aimco Human Rights Policy

Commitment

Respect for all human rights, as defined by the United Nations Universal Declaration on Human Rights, reflects the values we uphold at Aimco. We believe that they are fundamental to promoting sustainable operations, and we strive to promote human rights in all business functions, including with our partners and vendors. Aimco is committed to conformance with the UN Guiding Principles on Business and Human Rights.

In accordance with our policies, our [Code of Business Conduct and Ethics](#) and all applicable laws and regulations in the communities in which we operate, we institute sound human rights practices that support responsible corporate citizenship. This policy is derived from the International Labor Organization Conventions.

Fostering engagement with key stakeholder groups, including our shareholders, business partners, colleagues, and community, is essential for identifying and addressing human rights risks, while promoting the standards we set for ethical and responsible behaviors in the market.

Scope

- A. **Teammate Expectations:** This policy applies to all Aimco teammates as indicated through the Employee Handbook, the Code of Business Conduct and Ethics, and all relevant policies and procedures.
- B. **Vendor/Supplier/Contractor/Partner Expectations:** This policy applies to all vendors, suppliers, contractors, and partners. We expect our vendors, suppliers, contractors, and partners to be fair and just in all business dealings, including the respect, health, and security of those they serve, and we communicate this expectation in our Vendor Code of Conduct signed by vendors, suppliers, contractors, and partners.
- C. **Geographic Locations:** This policy applies to all company operations regardless of geographic location.

General

- A. **Freedom of Association:** Albeit not applicable to our business activities, Aimco expects employees and vendors to comply with relevant laws and regulations concerning the freedom of association and collective bargaining. Aimco is aligned with the International Labor Organization and its core conventions: No. 87, the Freedom of Association and Protection of the Right to Organize Convention, and No. 98, the Right to Organize and Collective Bargaining Convention.
- B. **Child Labor:** Aimco complies with all laws and regulations in the communities in which we operate, including those that prohibit the unlawful employment and exploitation of children in the workplace. We will work closely with the proper authorities to address any such instances of which we become aware.

- C. Forced Labor & Human Trafficking:** Aimco stands firmly against the use of all forms of forced or compulsory labor and/or human trafficking. Therefore, we will not tolerate such acts in our business practices and will work closely with the proper authorities to address any such instances of which we become aware.

- D. Safe, Secure, and Equitable Working Conditions:** Aimco complies with laws and regulations in the communities in which we operate. Therefore, unsafe working conditions are not tolerated. We also work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws. Therefore, we work diligently to ensure fair compensation and competitive benefits as a leading employer in the real estate industry. We expect our partners and vendors to ensure safe, secure, and equitable working conditions.

- E. Transparency in the Supply Chain:** We recognize that no business is immune from supply chain risks. Within our current business model, we are not directly associated with sourcing high-risk materials, or by hiring low-wage, unskilled workers, without legal immigration status. As we are committed to fostering strong and mutually beneficial partnerships, we aim to partner with other upstanding corporate citizens.

- F. Water Resources:** We recognize that the right to water is a fundamental human right.

- G. Equal Opportunity:** We value diversity among our human capital, vendors, and other stakeholders. We strive to protect the rights of women and people of color. We are committed to equal opportunity for all qualified individuals. We work to maintain workplaces that are free from discrimination and harassment on the basis of race, color, national origin, ethnicity, religion, gender, sexual orientation, gender identity, gender expression, age, disability, military or veteran status, marital status, genetic information, or any other characteristic protected by law. We do not tolerate harassment, disrespectful, or inappropriate behavior, or unfair treatment or retaliation of any kind.

- H. Workplace Safety and Security:** We comply with applicable health and safety laws and regulations. In addition, we do not tolerate threats, threatening behavior, or acts of violence against teammates, visitors, guests, or other individuals by anyone on company property.

Training & Reporting

In order to adequately convey Aimco expectations, this policy is shared when teammates are hired and reviewed on an annual basis, and teammates have the ability to report any human rights violations, breaches, and/or concerns in the communities in which we operate to our General Counsel, or anonymously through our 24-7 third-party anonymous reporting system through either www.MySafeAimco.com or by calling 844-490-1910 for further investigation and remediation.