



VENDOR CODE OF CONDUCT

The following standards are for work procedures and conduct while working at any **Aimco** property or location or on behalf of Aimco.

This Vendor Code of Conduct sets forth the expectations of Aimco with respect to all vendors with whom Aimco does business including direct vendors and any of their subsidiaries, affiliates or other related entities involved in the provision of services or products to Aimco (collectively called “Vendors”). This includes subcontractors, suppliers, and agents of Vendors, as well as their employees (collectively called “Indirect Vendors”).

Any reference in this document to Vendors applies equally to Indirect Vendors. Aimco expects Vendors to work with their Indirect Vendors to ensure that Indirect Vendors make a good faith effort to meet this Code of Conduct. Aimco expects Vendors to maintain and keep current appropriate management policies, procedures and controls whose scope aligns to and supports this Code of Conduct. Aimco will evaluate Vendors based on this Code of Conduct to determine whether to engage Vendors as it relates to environmental, social, and governance (“ESG”) issues within their products and/or services on an ongoing basis.

HUMAN RIGHTS

Aimco expects each of its Vendors and Indirect Vendors to support and respect the protection of human rights, including abiding by Aimco’s Human Rights Policy, and to ensure that is not complicit in human rights abuses, including:

1. **Harassment, Harsh or Inhumane Treatment:** Vendor will create and maintain an environment that treats all employees with dignity and respect. Vendor will not engage in any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse in the conduct of its business. No harsh or inhumane treatment, coercion or corporal punishment of any kind is to be tolerated by Vendor in the conduct of its business, including its business with Indirect Vendors.
2. **Health and Safety:** Vendor shall follow all applicable laws, regulations, and other governmental directives in the jurisdiction in which it operates or any other location where production or work is undertaken to ensure a safe and healthy workplace for all personnel, including personnel of Indirect Vendors. At a minimum, Vendors should implement recognized workplace systems, procedures and controls for the health and safety of all personnel in compliance with nationally-recognized standards.
3. **Forced Labor, Human Trafficking, and Slavery:** Vendor shall not use any forced, bonded or indentured labor or involuntary prison labor. All work, including overtime work, will be voluntary and workers should be free to terminate their employment. Vendors will not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.
4. **Child Labor:** Vendor shall, at a minimum, not engage in any practice of child labor. The minimum admission to employment or work shall not be less than the age the local law designates for lawful employment. All Vendors must comply with all laws and regulations governing child labor and apprenticeship programs.



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5. Wages, Benefits, Working Hours: Vendor shall comply with all applicable state and federal wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Vendors must act in accordance with Aimco's Human Rights Policy available online at:

<https://www.aimco.com/wp-content/uploads/2022/10/Aimco-Human-Rights-Policy-FINAL-UPDATED10.17.22.pdf>

FREEDOM OF ASSOCIATION & RIGHTS TO COLLECTIVE BARGAINING

Aimco requires vendors to recognize the principles of freedom of association and collective bargaining. Vendors should be 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.

FAIR TREATMENT AND NO DISCRIMINATION OR HARASSMENT

Aimco does not tolerate any discrimination, harassment or form of disparate treatment in the workplace of our supply chain. The workers of our vendors should be treated with respect and dignity at all times. They should not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment, or any other form of inappropriate behavior or abuse. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to all workers of our vendors.

ANTI-BRIBERY AND CORRUPTION

1. Vendors will only engage in fair competition and must take a zero-tolerance approach to bribery or corruption of any kind.
2. Vendors and family members of vendors will not take unfair advantage of anyone through manipulation, coercion, bribery, or privileged information to create an unjust precedence for their business.
3. Vendors shall follow all laws, both local and national, restricting gifts or entertainment that may be provided to government officials or government employees.
4. If Vendor suspects that any part of its dealing may not be appropriate, Vendor must discuss it with legal counsel or go through its own company's whistle-blowing program.

SITE SAFETY

To the extent Vendor is performing on-site work:

1. Vendor will obey all applicable local, county, state, and federal laws, ordinances and rules governing hazardous materials.



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2. Vendor will provide all safety equipment as required. Vendor will provide safety fences, signs or warning tapes as required. At the end of each workday, the site will be left with all safety precautions in place. Open excavations will be fenced with temporary orange fencing.
3. Vendor will be responsible for all safety practices, meetings and notices throughout the course of the work. Vendor will follow prescribed requirements of the Occupational Safety and Health Administration (OSHA) or State OSHA program in States with their own program or any other applicable agency.
4. Vendor will be responsible for notifying Aimco of any controversies, misconduct, penalties, incidents, accidents, or breaches of the Vendor Code of Conduct. Vendor will be responsible for remedying any such violation to the extent possible.

AIMCO CODE OF BUSINESS CONDUCT AND ETHICS

Vendors must act in accordance with Aimco's Code of Business Conduct and Ethics available online at: <https://www.aimco.com/wp-content/uploads/2022/10/Aimco-Code-of-Business-Conduct-and-Ethics-Final-Updated-Clean-10.6.22.pdf>

MONITORING COMPLIANCE

Aimco will monitor Vendors' compliance with the Vendor Code of Conduct, Aimco's Human Rights Policy, and Aimco's Code of Business Conduct and Ethics through the following methods:

1. Checks performed by an independent third party as may be required
2. Regular meetings and/or checks performed by Aimco
3. Vendor self-assessments

Vendor Representative

Date