

POLICY ON POLITICAL CONTRIBUTIONS AND GOVERNMENT RELATIONS
(adopted by the Nominating and Corporate Governance Committee effective March 6, 2015)

- This policy provides that the following types of contributions by or on behalf of the Company (“Company Political Spending”) are prohibited, except if approved as provided below:
 - Contributions, gifts or payments to political office holders or candidates, political parties, political action committees (PACs), “SuperPACs” or other political entities organized and operating under 26 U.S. C. Sec. 527 of the Internal Revenue Code; or any other political organizations, whether made directly or indirectly (including payments or contributions to support or oppose proposed legislation or ballot issues), and whether made with respect to federal, state or local matters;
 - Costs for attending any political event or fundraiser (e.g. buying a plate or table at a luncheon);
 - Payment or reimbursement of expenses related to the political process;
 - Fees for engaging a legislative lobbyist or representative for any purpose;
 - In-kind contributions, including use of Company offices, telephones, office supplies, or employee time to support an office holder, candidate or political party.
- Any Company Political Spending must receive prior written or electronic approval by the Company’s Chief Executive Officer and either the Company’s General Counsel or Associate General Counsel.
- Any Company Political Spending must reflect the Company’s business purposes and promote the interests of the Company, including on issues relating to multifamily development and operations, without regard for the private political preferences of any individual Officers.
- No contribution or expenditure will be given or made in anticipation of, in recognition of, or in return for an official act.
- Under no circumstances will an employee be reimbursed for personal political contributions or expenses.
- The Company may belong to various industry trade associations and state apartment associations that may engage in political spending from time to time. Any amounts spent by such industry trade associations shall not be attributed to the Company, provided that such activities are not controlled by the Company and are generally undertaken for the benefit of the industry or members of the organization as a whole.
- In certain situations, AvalonBay may encourage associates to support or oppose legislative issues that affect our business or to contribute to political action committees that further our business interests. In no instance, however, should an associate feel pressured to do so.
- Associates are also strictly prohibited from using their position in the company to coerce or pressure any other associate, vendor or resident to make contributions to or show support for candidates or political causes.
- The Nominating and Corporate Governance Committee of the Company’s Board of Directors, a committee composed of outside directors, will review the Company Political Spending on an annual

basis and will review this Policy on Political Contributions and Government Relations on a regular basis.

- This policy will be distributed to all officers of the Company annually with a required acknowledgement in order to ensure compliance.