



THE CODE OF BUSINESS CONDUCT AND ETHICS

As most recently adopted by the Board of Directors on November 19, 2025, and effective February 1, 2026.

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CEO MESSAGE

At AvalonBay, we make decisions every day that could impact our colleagues, our customers, shareholders, vendors and partners and it would be impossible to write a policy for every situation that you might encounter. So, rather than list a specific set of rules, this Code of Business Conduct and Ethics defines a standard of behavior that must be followed in all of our business dealings or relationships.

In addition to the Code of Business Conduct, our Core Values, the Associate Handbook, and other Company policies are readily available to support you. Your good judgment, along with the Code, will result in the right decisions.

If you are faced with a difficult ethical decision, ask yourself the following questions:

- Does this action support our core values and cultural norms?
- How would I feel if my actions were reported on the front page of the local newspaper, on social media, or on the nightly news?
- How would our customers or shareholders view AvalonBay if they knew its employees behaved this way?
- How would I feel if I had to explain my action to my spouse? My parents? My children?
- In other words, you must always ask yourself, "Am I doing the right thing?"

Supervisors and managers, by virtue of their positions of authority, must be ethical role models for all Employees and demonstrate the highest standards of integrity in all dealings with customers, suppliers, and the community at large. Ethical leadership includes both fostering a work environment that encourages Employees to voice concerns or otherwise seek assistance if faced with potentially compromising situations.

If, after reading this Code and other supporting policies, you are still uncertain about the right decisions, then look to your supervisor, Human Resources, Legal, or Internal Audit. Never do something that you think might violate this Code. You always have someone who can help you make the right decision.



Benjamin W. Schall
Chief Executive Officer

AVALONBAY'S VISION, PURPOSE, CORE VALUES AND CULTURAL NORMS

At AvalonBay, we are driven by a bold purpose: CREATING A BETTER WAY TO LIVE. We do this by providing distinctive apartment living experiences and contributing to the vitality of local communities. It is important work, and we all have a role to play in bringing our purpose to life.

Our culture is special and sets us apart. It is built around our desire to fulfill our purpose through a common vision, shared values, and cultural norms. These are the building blocks that make AvalonBay strong – and they are our inspiration as we reach new heights and go further together.

Our vision is to be the leading rental housing company in select U.S. markets by delivering distinctive experiences that customers value, creating a workplace where associates thrive, and achieving superior results for shareholders.

We have three core values to help guide our choices and actions.

- **A Commitment To Integrity** – Do the right thing always
- **A Spirit Of Caring** – Have genuine kindness and concern for others
- **A Focus On Continuous Improvement** – Always try to get better

Succeeding at AvalonBay is easy when we apply our seven cultural norms to our actions and interactions.

- **We Collaborate** – We solve problems together in the best interest of all AvalonBay stakeholders – our customers, associates, shareholders, and communities. In making decisions, we consider other perspectives and listen to each other, our customers, and the market. We share our time and knowledge with each other, and we actively seek ideas and support from others.
- **We Excel** - We expect the best from our colleagues and ourselves. By being highly engaged in this way, we produce outstanding results. We are motivated self-starters who care and work intensely for AvalonBay's success.
- **We Champion Inclusion & Diversity** – We treat everyone respectfully, demonstrating a spirit of caring for others. We value diverse perspectives and experiences and provide an environment where all associates are comfortable being themselves. We are stronger together because of our differences.
- **We Innovate** – We challenge convention and recognize problems as the seeds for innovation. We generate new ideas, offer better solutions, and embrace change at all levels. Knowing that not all ideas will work, we test new concepts before implementing them full-scale, and we discuss and learn from our failures.
- **We Act Like Owners** – We use the company's resources responsibly. We take smart risks by weighing the pros and cons of decisions, and we take ownership of and accountability for our choices and actions. We act in ways that focus on creating value for our customers, investors, and associates.
- **We Show Appreciation** – We recognize and reward excellent performance, celebrating successes of all sizes in all areas. We provide open, honest feedback and we acknowledge the contributions of others.
- **We Are Thoughtful And Thorough** – We use reliable data and sound judgment when making decisions and taking action. That means we do our homework and avoid jumping to conclusions. We plan well, think through the big picture, and evaluate the consequences of our decisions in order to best manage risk.

Creating A Better Way To Live comes down to each of us, asking ourselves everyday: "What can I do?" By putting our hearts into our purpose, we are helping to build a stronger culture, a more competitive AvalonBay, and a place that our customers can proudly call home.

In addition to upholding our Core Values, reinforcing our Cultural Norms, and following the ethical guidelines described within this Code, you are also expected to comply with any laws or government regulations that apply to your part of the business. In addition, AvalonBay also expects you to follow any other policies and procedures that currently exist or are introduced to you in the future.

Grow Sustainable Communities

We grow sustainable communities by taking into account the full ecosystem in which we operate. We integrate our environmental sustainability initiatives with our design, development, construction, and operations processes, and assess these initiatives for their impact beyond individual building performance.

We know our efforts to improve building performance have ripple effects that can reduce consumption of carbon-based fuels, improve air, and water quality, and reduce waste. In small and large ways, our attention to environmental impact is a critical part of developing sustainable communities.

We encourage all Employees to engage in innovative thinking to help reduce our environmental footprint. All associates should consider ways to be environmentally responsible in their work. You should not create or ignore environmental hazards and are encouraged to report any potential violations of environmental regulations.

Applicability of Code

This Code of Business Conduct and Ethics (“Code”) applies to all associates, including officers and, except where the context clearly provides otherwise, members of the Board of Directors. For convenience, we use the term “**Employees**” in this code to refer to all associates, including officers, and members of our Board of Directors. When we refer to laws, we are referring to all applicable statutes, laws, and regulations, including the rules of the Security and Exchange Commission (SEC) and the rules of the New York Stock Exchange or any other exchange on which the Company's securities trade.

The Code does not affect an individual’s ability to exercise their constitutional, statutory, or other protected rights. It is not intended to inhibit associates’ rights to discuss the terms and conditions of their employment under any federal or state labor laws or regulations or from engaging in any other activity protected by applicable laws or regulations, including any and all rights under the National Labor Relations Act, or any whistleblower protections under federal or state law.

What AvalonBay Expects of You

All Employees are expected to conduct themselves in an ethical manner and protect the assets and the reputation of AvalonBay at all times. Participating in any fraudulent or illegal activity is unacceptable; knowing about or reasonably suspecting such activity and not reporting it is also unacceptable. It takes years to develop a reputation for honesty and fair dealing and very little time for the actions of a few to destroy it. We should each be diligent to not only protect, but also enhance AvalonBay’s reputation.

This is especially important for those Employees who live onsite. The relationship we share with our residents is personal and is built upon them viewing AvalonBay as a Company that they can respect and trust. The trust bestowed upon each of us by our residents and colleagues is broad, and the consequences of abusing that trust can be severe and long lasting. You are required to conduct yourself at all times in a manner that is consistent with the Core Values and cultural norms of the Company.

Supervisors and managers play an additional critical role in ensuring the Code is applied in all of our business interactions. Employees should view their immediate supervisor and other leaders in the Company as role models of integrity and compliance. If an Employee is unsure of the right course of action, they should feel confident that they can ask questions of their manager, and/or approach them with a concern without fear of retaliation. Supervisors and managers should act to resolve the issue promptly and professionally.

Additionally, supervisors and managers have influence over which Employees are hired, promoted, and retained at AvalonBay. They need to consider how the behavior of those Employees reflects our core values and cultural norms when making these important talent decisions.

COMPLIANCE WITH THE CODE

All Employees are responsible for reading, understanding, and complying with this Code of Business Conduct and Ethics. It is your personal responsibility to seek the advice of your supervisor or other Company official if you are unclear about any part of the Code.

Reporting Violations

If you believe that you may have inadvertently violated the Code or any applicable law or regulation, it is your responsibility to report that violation to the Company immediately through any of the methods listed in the “Who to Call” section below so that appropriate action can be taken. The fact that you have reported the violation will be taken into consideration in determining the appropriate disciplinary action, if any. In many cases, a prompt report of a violation can substantially reduce or eliminate the adverse consequences for all involved – the third parties, the Company and you.

If you become aware that another Employee, regardless of their position or level in the Company, has violated the Code, including any law or regulation applicable to AvalonBay's business, it is your responsibility to report that violation promptly. Violations that go unreported for an extended period of time can lead to more serious consequences for everyone involved. If the situation warrants, Human Resources, Internal Audit, Legal, the Board, or an appropriate Board Committee will oversee a confidential investigation. Under no circumstances should an Employee attempt to investigate an allegation of misconduct on their own, even if they are in a managerial or supervisory position. You will not be subject to retaliation for making a report in good faith. Making a report in ‘good faith’ means that your report is honest, sincere, and complete to the best of your knowledge.

All associates must cooperate fully and respond truthfully during any internal investigation.

Who to Call

The following contacts are available to you if you have any questions, need advice, or would like to report a concern:

- Your supervisor.
- Human Resources: 703-317-4797
- Any member of management.
- Internal Audit: 703-317-4718 (priority contact if claim is related to financial fraud or improprieties).
- Legal: 703-317-4639.
- The Chairman of Audit Committee for the Board of Directors; or
- AvalonBay EthicsPoint Hotline: www.avalonbayhotline.com and/or 866-292-2076

AvalonBay EthicsPoint Hotline

AvalonBay uses EthicsPoint, an anonymous, third-party managed hotline, for associates to report workplace concerns and issues. Because EthicsPoint is a third-party service, it is independent of AvalonBay and will never communicate or reveal your identity or contact information, unless you explicitly chose to do so. AvalonBay’s Internal Audit team, which reports directly to the Company’s Audit Committee of the Board of Directors, administers, and oversees EthicsPoint for the Audit Committee. Both Internal Audit and the Audit Committee are immediately notified of any EthicsPoint report or complaint.

You may access this hotline either through the Internet at www.avalonbayhotline.com, or by telephone at 866-292-2076. Once you access the hotline through either method, you will be prompted to describe your concerns and, if appropriate, an investigation will be conducted. You may be prompted to provide additional details regarding the issue and an appropriate Company representative will initially communicate with you through the EthicsPoint system. These steps can be taken without providing your identity if you choose.

Resolution of Concerns

AvalonBay believes that all Employees should have an avenue for expressing their concerns about workplace issues to management. For this reason, we provide an open-door culture that encourages associates to share their thoughts, ideas, and concerns with management on a regular basis.

However, at times an associate may have a more serious concern, such as a belief that they have been treated unjustly, that policies have not been applied fairly, or that they are the subject of a form of harassment. Do not attempt to investigate the concern directly. To ensure that these situations are addressed appropriately, the following Resolution Process has been established:

- If you have a serious concern, contact your immediate supervisor.
- If you do not feel comfortable approaching your supervisor, then you may contact your supervisor's manager or your business unit executive.
- If you do not feel comfortable approaching higher-level managers within your business unit, or if your concerns cannot be resolved within your business unit, contact Human Resources, Legal, Internal Audit, any member of management with whom you feel comfortable reporting the issue, or the EthicsPoint Hotline.
- The appropriate department will review the claims promptly without regard to the suspected wrongdoer's length of service, position, title, or relationship to the Company. The associate will be informed of any information that is pertinent to the associate at the conclusion of the review.
- If you are not satisfied with the results of the review, then you may prepare a written summary of concerns and request a review by Human Resources, Internal Audit, or Legal. After a full review of the situation, the associate will be notified of the decision, which will be final.

For concerns regarding financial fraud, accounting, or financial statement improprieties, you should contact Internal Audit directly or use the EthicsPoint Hotline.

Any Employee intentionally making false allegations or improperly sharing knowledge of an investigation will be subject to disciplinary action unless they are engaging in protected activity.

Non-Retaliation

Retaliation is prohibited against any individual who reports a concern in good faith or participates in a related resolution process. Any Employee who participates in or condones retaliation will be subject to disciplinary action, up to and including termination of employment as noted below in the Disciplinary Action section.

Disciplinary Action and Consequences of Code Violations

Associates who fail to comply with this Code of Business Conduct and Ethics or any applicable law, regulation, or Company policy, or who knowingly fail to report another Employee's violation of this Code, or who fail to cooperate fully and respond truthfully during an investigation into a violation, will be subject to disciplinary action up to and including termination of employment. In addition, and when appropriate, the Company may seek restitution for damages or refer matters to law enforcement. In the case of members of the Board of Directors, a violation may lead to a request from the Board for resignation or may be taken into account in determining nominees for the following year.

Guidance, Mitigation and Waivers, Administration, and Accountability

This Code of Business Conduct and Ethics has been adopted by the Company's Board of Directors, and any amendment to the Code must be approved by the Board and promptly disclosed publicly as required by law.

The different sections of this Code often describe who you should seek guidance from, or with whom you should discuss how to mitigate a provision of the Code. A mitigation is either a formal waiver by the Company of a provision of the Code to you or, in the alternative or in addition to a formal waiver, an agreement between the Employee and the Company on a means to achieve, or more closely achieve, the provisions of the Code if the Employee has a situation which could compromise their ability, or give the perception that they are unable, to fulfill the provisions of the Code. A mitigation to the Code includes the Employee disclosing the actual or potential violation, discussion with their business unit management, SVP-Human Resources, and/or Internal Audit or Legal, and determination if there is an acceptable alternate means for the Employee to fulfill the Code. If there is an acceptable mitigation, that process or decision is implemented, documented, reviewed annually, and updated if circumstances change. **However, in accordance with applicable law, an executive officer or member of the Board of Directors can only mitigate a provision of the Code with the approval of the Board or a designated committee of the Board, and any mitigation granted to an executive officer or director will be disclosed to the Company's shareholders as required by law.**

If a mitigation is granted to an associate, then where appropriate the mitigation should include a process or alternative solution to ensure that the spirit of the Code is adhered to by all parties. As well, a mitigation should be appropriately memorialized and monitored. The business unit executive is responsible for ensuring that the process or alternative solution is followed. The approved mitigation should be evaluated each year during the acknowledgement process to ensure it is still necessary and valid.

The Code is provided to all Employees each year, and to any Employee upon commencement of service, for review and acceptance. The Board has delegated to senior management of the Company the day-to-day administration of this Code with respect to associates other than executive officers. If the Code refers to a particular title to approve any matter or take any action, management may allow, in its discretion, an associate of similar or higher rank to undertake that responsibility in any particular instance. In the case of executive officers and members of the Board of Directors, the Board expects that the Chairman and CEO will provide guidance and oversight, but the Nominating, Governance and Corporate Responsibility Committee of the Board (or another committee that is designated) shall be responsible for administering the Code for executive officers and directors.

This Code of Business Conduct and Ethics, including any mitigation, and your execution of an acknowledgement form is not intended to and does not create an employment contract, guaranteeing employment for any particular period, nor does it create any express or implied promise for specific treatment in specific situations.

EMPLOYMENT, VENDOR AND OTHER BUSINESS PRACTICES

Treatment of Employees and Others

In keeping with our AvalonBay Values, you are expected to treat our residents, co-workers, vendors, and others with whom we do business, with integrity, respect, and dignity. Associates should feel free to share their ideas and managers should consider associate input as decisions are made.

Fair dealing applies to our customers, suppliers, and competitors. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material fact, your position with the Company, or any other unfair dealing practice.

Unfair dealing with vendors includes the giving of gifts by AvalonBay – you may only give gifts to vendors or their employees (including entertainment) that meet the guidelines for receipt by an AvalonBay associate of an appropriate gift discussed below under Conflicts of Interest. This means that a gift to a vendor must be a customary social and business amenity of modest value, must be tasteful and appropriate, and must not place the vendor’s employee in a conflicted position in their relationship with AvalonBay. You may never give a gift to a government official or a person acting on behalf of a municipality except for political donations that are approved in accordance with the Company’s political contributions policy discussed below.

AvalonBay has adopted a Human Rights Statement that addresses our commitment to various labor practices, including, among other things, our commitment to providing a safe and healthy work environment. Please see the *Human Rights Statement* in the Corporate Policies section of the HR Office Suite.

Equal Employment Opportunity

AvalonBay is committed to inclusion and diversity in the workplace and affirms that an inclusive and diverse workforce strengthens the Company as well as the communities in which we operate. AvalonBay makes employment decisions (e.g., hiring, transfers, promotions, leaves of absence, compensation, and terminations) without regard to a person's race ethnicity, color, religion, sex, national origin, sexual orientation, gender identity, pregnancy (including childbirth, lactation or related medical conditions), age (40 and over), physical or mental disability, genetic information (including characteristics or testing), citizenship status, uniformed service member or veteran status, or any other status protected by the law (“Protected Status”).

Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any associate, including supervisors and coworkers.

Non-Discrimination and Harassment-Free Workplace

We are committed to providing employees with a workplace that is free from unlawful discrimination, harassment or personal behavior that is not conducive to a productive work climate. AvalonBay forbids discrimination and harassment against any person, **including non-AvalonBay individuals with whom an AvalonBay Employee has a business, service, or professional relationship**, on the basis of their Protected Status as described above. Consistent with AvalonBay’s commitment to providing a workplace that is free from any discrimination, intimidation or harassment, the Company has adopted a detailed policy on Equal Employment Opportunity and Policies Against Discrimination and Harassment. This policy can be found in the Associate Handbook located in the HR Office Suite. If you believe that you are the victim of discrimination or harassment in any form, please notify anyone listed in the “Who to Call” section above.

Fraternization

Romantic relationships within the workplace can create conflicts of interest and an uncomfortable environment. If a romantic relationship develops between a supervisor and a direct or indirect report, or any other Employee with respect to whom one can influence compensation or career progression, the supervisor or more senior Employee must notify Human Resources. Human Resources will work with the individuals to facilitate a transfer for one of the Employees, if possible, or some other appropriate solution. In no situation may a supervisor manage an Employee with whom they are romantically involved.

Employees also must notify Human Resources promptly if they become romantically involved with another Employee, with a vendor, or with a resident. Similarly, managers who become aware of a romantic relationship that has developed between Employees, or between an Employee and vendor or resident, within their department, must notify Human Resources. Human Resources will work with the Employee to ensure that the relationship does not create segregation of duties issues and/or conflicts of interest.

Hiring of Family Members

While we welcome associate referrals, and often find our best associates through our current associates, it is generally not appropriate for family members (defined in Glossary) to work in the same community or business unit. No associate should work in the same reporting structure as another family member or have influence over compensation or career progression of a family member. For example, a maintenance manager should not supervise their child. However, with proper mitigation, family members may work at different communities or within a different business unit with prior approval from Human Resources.

As it relates to an Officer or a member of the Board of Directors, their spouse, domestic partner, and children will not be considered for employment with the Company unless approved by the Chief Executive Officer (in the case of an Officer) or by the Nominating, Governance and Corporate Responsibility Committee (in the case of a member of the Board of Directors).

Current Employees who become related, for example by virtue of marriage to another current Employee, generally will be permitted to continue employment, following a review by Human Resources. However, the Company may transfer one of the Employees if both Employees work in the same department, or reporting structure, or if an actual or potential conflict exists.

A Violence-free Workplace

AvalonBay believes that every Employee has the right to go home safely without injury every day. Any act or threat of violence in our workplace, whether by a fellow Employee or a person we do business with, will not be tolerated and is contrary to our commitment to a healthy and safe work environment. The Prevention of Violence in the Workplace policy has more detailed information and is located in the Associate Handbook in the HR Office Suite. Always notify your supervisor and/or others on the 'Who to Call' section if you feel that your work environment is threatening or unsafe.

DISCLOSURE AND INTERNAL CONTROLS

Anti-Fraud and Anti-Money Laundering Policy

Fraud is defined generally as an intentional, willful, or deliberate act with the intention of obtaining an unauthorized financial or improper benefit for yourself or others, such as money or property, by deception or other unethical means. All fraudulent acts are covered under this policy and include, but are not limited to:

- Embezzlement, bribery, or theft;
- Forgery, falsification, or improper alteration of documents (checks, timesheets, contractor agreements, bidding and procurement documents, purchase orders, invoices, budgets, the General Ledger, accounting, payroll, or financial systems, cash disbursements, approvals and authorizations, or other financial documents);
- The purposeful or bad faith omission, concealment, or failure to accurately state and/or disclose key facts, data, and information to others within the Company who are evaluating or reviewing a business matter;
- Improprieties in the custody, handling or reporting of money or financial transactions;
- The use of your position at AvalonBay for personal enrichment or the enrichment of a family member, friend, vendor, or business associate through the deliberate misuse or misapplication of the organization's resources or assets, including misuse of your title and position within the Company or misuse of confidential or important Company knowledge or plans;
- Misappropriation or misuse of funds, securities, IT systems, IT access, physical or electronic access to assets and data, passwords, supplies, inventory, or any other asset;
- Circumventing or overriding the Company's internal controls, including without limitation to manipulating a budget, giving or receiving improper access to IT systems and software,

untruthfulness, omission of key data, avoiding or altering a required approval, forgery, colluding with others (vendors, friends, associates, etc.), or preventing proper evaluation or oversight of a matter;

- Profiteering or obtaining personal benefit for yourselves or others as a result of insider knowledge of Company activities.

The purpose of AvalonBay's anti-fraud policy is to communicate management's intolerance for fraud, to promote a strong and well controlled environment that prevents, deters and detects fraud, to establish each Employee's personal responsibility and accountability for reporting suspected fraud, to require allegations of fraud to be investigated promptly and objectively, and to require strict disciplinary action and consequences when fraud is detected.

AvalonBay takes fraud extremely seriously regardless of the dollar amount involved and as in the past may notify law enforcement and pursue litigation and/or prosecution after discovering fraudulent activity.

Each associate must comply with internal controls that have been established by the Company with a view to detecting and preventing fraud. Each member of management should become familiar with the types of improprieties that may occur within their area of responsibility and be alert for any indication of irregularity.

Money laundering involves individuals or organizations trying to conceal illegal funds or make these funds look legitimate. Money laundering is strictly prohibited. If you deal directly with customers or vendors, the following examples may be indications of potential money laundering and financial fraud:

- Attempts to make large payments in cash;
- Payments by someone who is not a party to the contract;
- Requests to pay more than provided for in the contract;
- Payments made in currencies other than those specified in the contract;
- Payments from an unusual, non-business account;
- Transactions forming an unusual pattern such as bulk purchases of products or gift cards, or many repetitive cash payments.

Any Employee detecting, suspecting, or having knowledge of any actual or potential fraud and/or money laundering must immediately report the activity to Internal Audit, Legal, the Chairman of the Audit Committee of the Board of Directors, or the EthicsPoint Hotline. If an Employee reports this first to their supervisor, any member of management, or Human Resources, then those individuals are responsible for reporting the activity to Internal Audit, Legal, or the Chairman of the Audit Committee of the Board of Directors. All reports will be treated with an appropriate level of confidentiality.

Accuracy of Records and Quality of Public Disclosures

The data that you input into or approve in the Company's accounting and record-keeping systems is ultimately relied upon to analyze and produce company records and reports that are communicated to others, including the Securities and Exchange Commission (SEC) and public. In addition, this data is used by management to make strategic, financial, and operating decisions. You are responsible and accountable for ensuring that documents you produce are fair, honest, accurate, timely and complete. This includes, but is not limited to: financial reports, budgets, bidding documents, accounting entries, analyses, submission of vendor requests, or purchase orders, approval of invoices, requests for funds or AVB assets of any type, approval of associate time, attendance and bonus documents, submission of associate performance documents, and submission of expense reports. It is not accurate, and is a violation of this requirement, to approve a payment to a vendor or subcontractor prior to the work being performed or the goods received, unless stipulated by a contract or otherwise appropriately approved by a senior vice president or executive officer. **Supervisors who review and approve any of the above must apply due care and diligence and must not simply "rubber stamp" items.**

You are reminded that approved expenses are only those that are business-related. Expenses for personal entertainment or extravagant meals are not considered business expenses and are not reimbursable. If

you have any question as to what a reimbursable business expense is, please refer to the Corporate Travel Policy, which is available under Corporate Policies in the HR Office Suite. If you have additional questions, you must review the matter with your supervisor, Accounting, Internal Audit or Human Resources prior to incurring the expenses.

Associates involved with the preparation or review of financial statements, reports or public communications (including filings with the SEC) must work diligently to help ensure full, fair, accurate, timely, and understandable reporting of financial and other Company information. You may not cause AvalonBay to enter into a transaction with the intent to document or record it in a deceptive, erroneous, or unlawful manner, and you may not create any false, misleading, or inappropriate documentation or book entry for any such transaction. Employees have a legal and ethical responsibility to report financial and other Company information properly and accurately and to report known or suspected violations by others to Internal Audit, Legal, the Chairman of the Audit Committee of the Board of Directors, or the EthicsPoint Hotline. We maintain the highest standards of accuracy, integrity, completeness, and confidentiality in our financial records and all related reporting, internal or external. All accounts and records will be maintained, and publicly issued financial reports will be prepared in a manner that complies with Generally Accepted Accounting Principles and all regulatory requirements. This includes, but is not limited to, the consistent use of basic accounting definitions and terms, application of accounting principles, classifications, reporting, and internal controls.

Without limiting the applicability of this provision to all associates, it is noted that this provision of the Code explicitly applies to the Company's Chief Executive Officer, Chief Financial Officer, Principal Accounting Officer (if different than the Chief Financial Officer), Corporate and Assistant Controllers, and persons performing similar functions. These individuals are required to maintain familiarity with the disclosure requirements applicable to the Company and are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts regarding the Company to others, whether within or outside the Company, including the Company's independent accountants.

CONFIDENTIALITY AND DATA PRIVACY

Confidential and Non-Public Information

It is a violation of the Code of Business Conduct and Ethics to fail to maintain the confidentiality of information entrusted to you that might be of use to competitors or vendors (or their customers) if disclosed, unless disclosure is related to an authorized business purpose or is legally mandated. Confidential or non-public information includes information about our financial statements before public release, pricing, services, development efforts, and potential acquisitions or dispositions, unless that information already has been made public through the appropriate Company channels. This information also could include customer lists, marketing plans, IT related plans, budgets, and other non-public proprietary Company information.

AvalonBay's ability to compete in the marketplace is driven by our ability to provide quality products and services in a way that challenges our competitors. Therefore, it is critical that you not share confidential Company information as described above with others outside of AvalonBay. That is why associates, at the onset of their employment, sign a Confidentiality Agreement.

You should be careful not to discuss confidential or non-public information with family members, co-workers, business or social acquaintances, or in places where you may be overheard, such as in elevators, on airplanes or in restaurants. You also may not share such confidential and proprietary Company information on social media or on public sites unless authorized to do so in advance.

Remember, confidential information should be limited to those associates who have a direct business need for the information. The fact that an associate works for AvalonBay does not automatically give that individual access to confidential or non-public information. In addition, when working with confidential information or

sending it to another individual who has a valid business need for the information, Employees should use or send only the confidential information necessary to accomplish the task.

While all Employees are encouraged to network and learn about developments in our industry, you must also observe the Company's Antitrust Policy, which is located under Corporate Policies in the HR Office Suite. That policy, for example, prohibits those involved with running our properties from sharing our historical, current, or expected rent or occupancy data with other apartment operators or seeking similar types of information from them about their businesses.

Notwithstanding the above, by signing this Code, you are acknowledging that you understand that nothing in any of the Company's policies, codes, or agreements prohibits you from providing information to, communicating with, or accepting a whistleblower bounty from any federal, state, or local governmental agency.

Media Relations and Outside Speaking Events

AvalonBay strives to anticipate and manage crisis situations in order to reduce disruption to our associates and to maintain our reputation as a high-quality company. The Company also responds to the media when appropriate to answer questions about our development or other activities. To best serve these objectives, the Company will respond to the news media in a timely and professional manner, and only through designated spokespersons. Generally, only officers may respond to media inquiries with statements purporting to be made on behalf of the Company. Officers must observe any additional policies regarding media contacts that are announced from time to time.

With regard to AvalonBay websites or pages, including AvalonBay community websites on Facebook or apartment rating websites, only authorized Employees may post responses or comments on behalf of the Company, and those Employees must affirmatively identify that the response or comment is being made by an AvalonBay Employee. It is unethical for AvalonBay Employees to post negative comments about our competition on any website. A more complete description of the Company's Social Media and Social Networking guidelines is in the Associate Handbook located in the HR Office Suite.

Any AvalonBay Employee who wishes to present on the Company's behalf, at an industry conference or other event, must get approval in advance from the SVP of their business unit. Presentations must be consistent with (i) current Company brand standards, (ii) the Company's Investor Relations messaging, (iii) Company strategy, and (iv) Company policy, including the Company's Antitrust Policy.

Customer and Data Privacy

You are responsible for safeguarding the privacy, confidentiality and security of residents, prospective residents and former residents and other information that has been entrusted to AvalonBay. The Company has an Information Security Policy, available in Corporate Policies in the HR Office Suite that outlines additional associate responsibilities related to data privacy.

Documents should always be retained and disposed of in accordance with the Company's Record Retention and Legal Holds Policy. Documents relevant to any threatened, anticipated or existing litigation, proceeding, or government investigation will be subject to a legal hold, and must be retained, regardless of the Company's Record Retention Schedule, until notified by the Legal Department. If you have any questions about such documents, or whether they are relevant, please contact the Legal Department.

Cyber Security and Threats

It is each associate's responsibility to follow AvalonBay policies, procedures, and standards as they relate to cybersecurity. Gaining, or attempting to gain, unauthorized access to data, websites, and/or systems and sharing of passwords is prohibited. Associates must prevent unauthorized disclosure or modification of sensitive information, including Personally Identifiable Information.

To support associates with their responsibility related to cybersecurity, the IT Department provides and requires annual associate and new hire training, periodic communications, and mock phishing emails to

ensure associates are always aware of the continuous, deceptive threats that they can encounter every day. Failure to successfully complete a required training or phishing exercise could result in an associate's access and privileges to AVB systems, software, and applications being removed.

In addition, associates **must read and familiarize** themselves with the AvalonBay Policy on Cybersecurity Phishing located under Corporate Policies in the HR Office Suite.

Responsible Use of Artificial Intelligence (AI)

While the Company encourages innovation and productivity through the use of Artificial Intelligence (AI) tools, when using AI tools for work purposes, Employees must only use AI tools in a manner that is consistent with Company policy, including the Acceptable Use Policy. If an Employee has a question regarding what is authorized, then they should reach out to their Manager and IT. Employees are accountable for ensuring the confidentiality of Company information and for the quality and accuracy of their work, particularly when generated with the support of AI tools.

Protection of Intellectual Property

AvalonBay associates will respect all copyright and other intellectual property laws. For AvalonBay's protection as well as your own, it is critical that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including AvalonBay's own copyrights, trademarks and brands.

It is important that we respect the property rights of others. AvalonBay Employees will not acquire or seek to acquire, by improper means, a competitor's trade secrets or a competitor's proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of intellectual property.

CONFLICTS OF INTEREST

A conflict of interest arises when your personal interests interfere – or appear to interfere – with your ability to make sound and objective business decisions on behalf of AvalonBay. Understand that actual, apparent or potential conflicts of interest may go beyond your dealings with residents, customers, vendors, or suppliers. Conflicts of interest may also include dealings with other AvalonBay associates or may occur because of benefits received by your family members (see definition in Glossary), relatives, business colleagues, or partners, acquaintances, friends and other relationships. Sharing or otherwise discussing information pertaining to associates' wages and working conditions will not generally constitute a conflict of interest.

To provide a few guidelines, any direct or indirect interest in, connection with, or benefit from any activity, especially outside commercial activities, involves a conflict of interest if:

- The activity could adversely affect or compete with AvalonBay;
- The interest, connection, or benefit could reasonably be expected to cause you to consider anything other than the best interest of AvalonBay when deliberating and voting on company matters;
- The interest, connection, or benefit could give you, a member of your family, or other individuals with whom you have the relationships noted above an improper benefit (see definition in Glossary) that you obtain because of your position within AvalonBay;
- You are placing your own personal interests above AvalonBay's interests.

To provide an exhaustive list of those circumstances or activities that constitute a conflict of interest and require a mitigation is virtually impossible. Therefore, rather than presenting a list of precise rules and exceptions, we are instead providing guidelines to help you identify situations where a conflict of interest is likely to arise. If you are ever uncertain, you should not attempt to judge your own case; instead, you should inquire as to whether a conflict exists for which a mitigation would be needed. Many conflicts or potential conflicts, if addressed early, can be resolved or avoided. You should keep in mind that the objective

of this policy is to assure your undivided loyalty and to avoid the appearance of conflicts that can erode confidence and trust.

The following guidelines help explain situations in which conflicts of interest can arise, and an Employee may not engage in such activities unless they disclose in writing all relevant details to their supervisor or business unit executive, Legal, and Human Resources, and receives an appropriate written mitigation permitting the conduct. **In the case of executive officers and members of the Board of Directors, a mitigation of a conflict of interest may be granted only by the Board or an authorized Board committee and will be publicly disclosed promptly as required by law.**

Business Opportunities and Use of Company Assets

Employees are prohibited from (a) taking for themselves personally, or for others, opportunities that are discovered through the use of AvalonBay property, business dealings, information, or position, unless they disclose the opportunity in writing and receive a mitigation from their business unit executive, Legal and the Senior Vice President of Human Resources; (b) improperly using corporate assets, property, information, or position for personal gain or improper gain for others; and (c) competing with the Company.

As an AvalonBay Employee, you are entrusted with protecting our assets and avoiding waste. You should follow our security and safety procedures, keep our communities and offices secure, and ensure that maintenance concerns are reported promptly. In addition, Company assets, equipment, and property should not be used for personal gain or benefit. You should use our brands only as authorized by the Marketing Department. All Company assets should be used for legitimate and ethical business purposes.

AvalonBay Employees and/or members of their families are prohibited from taking items that are left behind in apartments, near trash bins, at construction sites, in vacated office spaces, etc. Under no circumstances should items left behind be retained by an associate for personal use or be given to others. In some circumstances, AvalonBay provides a process whereby items can be fairly distributed or donated. Employees are responsible for ensuring that all appropriate policies and procedures are followed in these cases and that they secure the approval of the functional group's Vice President. For more information about the proper handling of resident items following disposal, eviction, or abandonment, please consult the Evictions/Skips/Abandonments SOP760 policy located in Online Policy Manuals.

Involvement with Vendors

AvalonBay and its associates select our vendors based on the needs and best interest of our business. Consequently, we utilize only reputable, qualified individuals or companies that charge competitive and fair market rates for their services. Vendors include all suppliers, contractors, subcontractors, consultants, advisors, experts, and anyone with whom we may do business.

The criteria used in vendor selection should always be based on the supplier's ability to provide the service or product in question at the quality and price desired by AvalonBay in a timely manner. Therefore, Employees may not develop relationships with suppliers or vendors that could compromise the Company's impartiality.

For example, Employees should not purchase appliances directly from vendors at a discount (but may do so following the Associate Discount Programs and procedures set out by the Procurement Department in Arlington to manage the transaction). Employees also should not hire, or accept complementary services or discounts from, an AvalonBay vendor such as a landscaper, decorator, or subcontractor to work on their personal or any other type of residence even if they are paying for the service. This kind of relationship can create the perception of a conflict because the pricing for materials and services can be subjective. Associates should not solicit donations from AvalonBay vendors or arrange work by AvalonBay vendors for charities with which the associate is involved (unless approved as part of our philanthropy program).

In some situations, an Employee may have a relationship with a vendor that predates their employment at AvalonBay, or the vendor's relationship with AvalonBay, or there may be other unusual circumstances. If you become aware of this kind of situation, you must promptly disclose it to your supervisor and report it to Human Resources and Legal in writing. Any mitigation of these vendor guidelines will be made at the sole

discretion of Human Resources, Legal and your business unit executive, and must have prior written approval.

AvalonBay includes a Vendor Code of Conduct as part of national vendor contracts in which references to these expectations are included. It is also the vendor's responsibility to ensure they understand and comply with the AVB Vendor Code of Conduct and to inform AVB if a situation develops that causes the vendor to operate in violation of this Code. AVB vendors are expected to self-monitor their compliance with the Vendor Code of Conduct or any AVB policy. The Vendor Code of Conduct provides details on how to access the EthicsPoint Hotline and the Internal Audit department directly.

Tips, Gifts, and Entertainment

AvalonBay generally follows a "no tipping" policy for all Employees, unless authorized by management. Providing superior customer service to our residents is an expectation, not an "extra."

Acceptance of "Gifts", which includes a third party paying for entertainment, outings or meals or providing personal services, may raise many actual or perceived conflict of interest issues that you must be vigilant to avoid. Gifts include donations and/or gifts for associate or personal events. Acceptance of gifts, products, personal services or materials by an Employee or family member can create a perception that the Gift influenced our decision to work with a given vendor or influenced business decisions. It may also be, or appear to be, an improper benefit to the associate receiving the gift.

Of course, in the normal course of business, vendors sometimes buy an Employee lunch, invite an Employee to join the vendor at a sporting event, or send a nominal gift to an Employee or team. Follow these guidelines when considering whether the vendor's offer is appropriate. These guidelines also apply to anyone with whom we do business, including residents.

A Gift will generally not create a conflict of interest if all of the following are true:

- The gift or favor has a value of \$150 or less, **and**
- The gift is a customary social or business amenity, **and**
- The gift was not solicited, **and**
- The gift is not cash or a cash equivalent, *such as a gift card to a restaurant or retailer, or a contribution to a GoFundMe fundraiser or other donation for the benefit of the associate, family members or affiliated organizations*, **and**
- The gift does not place, or appear to place, the Employee under an obligation to, or the influence of, the vendor, and the gift is not, and does not appear to be, an improper benefit, **and**
- The gift is not from a vendor/business partner who has already given a Gift recently (generally, within the last year).

Employees may never accept cash, gift cards, or gift certificates, in any amount, from a vendor, resident or anyone with whom we do or may likely do business. In addition, any gift of business entertainment must be professional and tasteful, include the discussion of business matters, and take place in a setting that is appropriate and inclusive.

Facts and circumstances vary from case to case. If you think there is any chance that a Gift may create an actual or perceived conflict of interest, you should seek guidance from your supervisor. If a conflict of interest will be created in appearance or fact, discuss the situation with your business unit executive, who may consult with Human Resources and/or Legal depending on the circumstances, to determine if a mitigation is appropriate. Remember, your job and the trust Employees have in you is far more valuable than any Gift.

Any exceptions to this policy based on specific circumstances must have the approval of an Executive Officer.

Associate Gifts and Donations:

Unless approved in advance by the business unit executive, associates cannot expense donations or gifts they make on behalf of the Company to associates or non-associates (e.g., in connection with life or career

events such as death of an associate’s family member, marriage, welcoming of new children into the household, birthdays, holidays, promotion or retirement). Please note that associates who retire under the AvalonBay retirement plan receive a gift from the company as part of the retirement plan.

Guidelines for Gifts

If anyone offers you a Gift that may create a conflict of interest under these guidelines, you must report the offer to your supervisor. In cases where the vendor’s behavior clearly violated the Vendor Code of Conduct that they agreed to, or where the vendor was clearly trying to improperly influence you, your report to your supervisor should be in writing.

In cases involving vendors, you should also notify the Procurement Department in Arlington immediately. These types of offers may signal a vendor who is hoping to use influence, rather than quality services and fair market prices, to obtain AvalonBay business.

Occasionally, management may implement additional policies and procedures for particular departments regarding the receipt and disclosure of gifts.

If you have questions about whether or not a Gift is appropriate, contact your manager, business unit executive, Legal, or Human Resources.

Examples of Generally Acceptable Situations	Examples of Situations that are Generally Not Acceptable
A holiday gift of a modestly priced bottle of wine	Fine wine or a case of wine
A celebratory dinner for a project team after a key milestone is met	An expensive dinner with the project team leader during the vendor selection process
Specialty logo items such as coffee mugs, sports bottles, polo shirts, etc.	Fine jewelry, watches, or clothing
Lunch or dinner	Very expensive, weekly or frequent lunches or dinners with the same vendor
Tickets to a local sporting or entertainment event at which a vendor is present	<p>Tickets to a prestigious event such as championship games</p> <p>Tickets to any event where the business partner will not be present to get to know AvalonBay associates or to discuss business or industry related matters.</p> <p>Entertainment at any venue that is not tasteful, appropriate, and inclusive.</p>
A trip associated with a site visit with a clearly defined business purpose with relevant associates	<p>A trip to a resort for you and a guest that does not have a clear or specific business purpose.</p> <p>A vendor-sponsored trip whose duration and cost are more than reasonably needed to accomplish the business purpose of the trip (including by bringing associates on the trip who are not needed for the business purpose). Costs in excess of what is reasonably needed (e.g., travel perks, entertainment, outings, meals, etc.) will be considered gifts that are subject to the conflict of interest rules.</p>

A book or report that relates to our business	Vendor materials left over from job sites or their excess inventory or samples (i.e., drywall, tile, other building and home materials, furniture, home fixtures, etc.)
A gift basket for a leasing office or project team during holiday season	A large or expensive gift basket for an individual associate

Secondary Employment or Positions

All full-time associates should consider AvalonBay their primary employer. This means that if an associate also holds another job, the associate must consider their obligation to AvalonBay first. Outside employment may not interfere with your AvalonBay job responsibilities in any way, including, but not limited to, the requirement that any outside employment duties are performed outside of your AvalonBay schedule and without use of AvalonBay resources. With any outside employment or volunteer position, you must inform the Company if you are in a position of influence or decision-making that could create a conflict of interest.

An associate, whether full-time or part-time, is not permitted to work for an AvalonBay competitor, vendor, or supplier while employed at AvalonBay. Additionally, excluding unpaid volunteer work, an associate may not work (i) in the multifamily industry or (ii) in the same function (e.g., operations, finance, marketing) outside of AvalonBay while employed at AvalonBay. These rules are designed to avoid conflicts of interest and protect AvalonBay’s proprietary and confidential information. Exceptions may be made for associates whose responsibilities are limited in scope and do not involve regular access to proprietary, confidential or competitively sensitive information (e.g., concierge positions). Any exceptions under these rules must have prior written approval of both the associate’s business unit Senior Vice President and the Senior Vice President of Human Resources.

In addition, associates may not serve as a director, trustee, officer, or similar positions (paid or otherwise) of any business without prior written approval of the Chief Executive Officer, except that non-officer associates may serve in such positions for a family-owned business with the approval of their supervisor and the SVP of Human Resources. This rule does not apply to charitable, civic, religious, educational, professional, public, or similar organizations (“non-profits”), or to homeowners' or condominium association boards, in any such case whose activities do not conflict with the interests of the Company and that do not impose excessive demands on your time or interfere with your work at the Company.

If AvalonBay conducts business with or donates to a charity or non-profit that an Officer, and/or their family member, also has a formal role in (i.e., employee, advisor, Board member, etc.), then the Officer must disclose their role and/or family member’s role in the non-profit organization during the Quarterly Related-Party Disclosures process administered by Internal Audit. This disclosure also applies to any vendor, service provider, or affiliate the Company does business with where an Officer has a family member who serves as an employee or in a role of influence. If you have any questions, or are unsure if a disclosure is warranted, please contact Internal Audit.

Employees are not permitted to work for another Employee or resident on a full-time, part-time, or contractor basis. This includes all off-hours work including, but not limited to, housecleaning, babysitting, repairs, and general maintenance. If a member of your immediate family works for a resident on a full-time, part-time, or contractor basis, you must notify your manager.

Any Employee in violation of the guidelines above will be subject to disciplinary action up to and including termination of employment.

Political Activities and Dealings with Government Officials

AvalonBay respects your right to participate (during your personal time) or not participate in the political process as you see fit. Political activities as described within do not include associates’ participation in union activities. However:

- Associates may not seek reimbursement for any political contributions or devote any work hours to any campaign for a candidate or political party;
- Associates may not, for political purposes, use or permit anyone to use any AvalonBay facility, materials, equipment, or property, including use of the AvalonBay name and logo, without prior approval of their business unit executive, who will seek approval in accordance with the Company's "Political Contributions and Lobbying" policy;
- Political contributions by our Employees may subject the Company to significant legal restrictions and prohibitions, including through the application of "pay to play" laws that can prohibit the Company from engaging in certain businesses if Employees make contributions to covered officials, candidates, or committees. Therefore, the Company may, to the extent permitted by law and for the purpose of addressing such possible restrictions and prohibitions, require pre-clearance of, and may prohibit, specified types of personal, political contributions by certain levels of Employees.

Employees also are strictly prohibited from using their position in the Company to coerce or pressure any other Employee, vendor, or supplier to contribute to or show support for candidates or political causes or organizations.

Payments, entertainment, and gifts that could be perceived as questionable or as a conflict of interest, or that may jeopardize the reputation of government officials or the Company, are prohibited.

In certain situations, AvalonBay may encourage Employees to support or oppose legislative issues that affect our business. In no instance, however, should an Employee feel pressured to show that support or opposition.

The Company has adopted a formal Political Contributions and Lobbying Policy, which requires pre-approval for any political contributions to be made or lobbying efforts to be engaged in on behalf of the Company, whether such contributions or activities occur at the local, state, or federal levels. This policy is located under Corporate Policies in the HR Office Suite.

Civic, Charitable, and Business Solicitation

AvalonBay Employees should not solicit favors or gifts from vendors, residents, or other associates at any time (including donations from vendors or residents to associate events unless approved by the SVP of Human Resources or an Executive Officer). By asking for favors, gifts, or tips, you could appear to be implying a return favor.

In addition to not using AvalonBay e-mail systems, copiers, or other equipment or materials to further personal business endeavors, Employees may not conduct sales meetings at work at any time, such as for cosmetics, household items or children's fundraisers. Solicitations related to such matters by one associate of another associate are prohibited when either person is on working time.

AvalonBay has a strong sense of responsibility to the communities in which we do business. Therefore, as a Company, we often participate in charitable activities. You are welcome and encouraged to join in these activities.

However, you should not use AvalonBay resources such as e-mail, voice mail, etc., to approach other Employees, vendors, or residents to solicit a charitable contribution or advertise a personal business pursuit. In addition, you may never use your position in the Company to pressure Employees, residents, or vendors to participate in charitable giving.

If you have a charitable cause that you believe AvalonBay should support on a Company-wide basis, discuss it with your supervisor or business unit executive. Please see the Solicitation and Distribution Policy located in the Associate Handbook in the HR Office Suite for additional information.

Personal Investments

Investments in private companies that engage in real estate activities, or in private companies that provide services to or sell products to real estate companies, or in private investment funds that invest in such companies, require the prior approval of your business unit executive and an officer in each of the Legal

and Human Resources groups after disclosure by you of all relevant facts. Examples of companies subject to such prior approval include companies that own or develop real estate, vendors such as landscapers and contractors, and companies that provide technology solutions to real estate companies.

Factors that will be considered in assessing whether a direct or indirect investment in a company creates a conflict of interest include the following: whether the company is a competitor of, does business with, or is seeking to do business with AvalonBay; your role at AvalonBay; the relationship between the business of the outside company, AvalonBay's business, and what you do at AvalonBay, including whether your role can influence, or appear to influence, AvalonBay's business relationship with the other company; the financial significance of the investment to you and the other company; and the extent to which the investment gives you the ability to manage and control the other company. The term "company" refers to a business in any organizational format, including a partnership, limited liability company, corporation, or sole proprietorship.

A conflict of interest will generally not be deemed to occur from investment in publicly traded securities of a corporation where the security holdings would not have the effect of influencing you, the Company, or the other corporation. The Company's Insider Trading Policy applies to your investment in other companies, and you should avoid buying or selling securities and other investments that are timed in relation to AvalonBay's operations such that the investment may be regarded as an attempt by you to profit from the use of knowledge of AvalonBay's strategies, investment intentions or other confidential information.

These guidelines also apply to members of your immediate family or household.

Investments in private partnerships or funds or similar investment vehicles may create a conflict of interest when directors and officers invest together or make investment opportunities available to other directors or officers.

Loans

AvalonBay does not provide loans to Employees for personal reasons. Additionally, federal law prohibits the Company from making or arranging loans to its executive officers and directors.

Employees experiencing financial hardship due to unforeseen disasters or other personal emergencies may be eligible to seek assistance through the [AvalonBay Associate Relief Fund](#).

TRADING IN COMPANY SECURITIES

Insider trading, which is discussed more fully in the Company's Insider and Special Trading Policies (located under Corporate Policies in the HR Office Suite), is both unethical and illegal, and will be dealt with decisively by the Company. Employees are required to comply with all insider trading laws, rules, and regulations. The Company's Insider and Special Trading Policies prohibit all Employees from trading in Company securities on the basis of material, nonpublic information. In addition, the Board of Directors and officers of the Company (and other associates who may be designated from time to time) must follow certain procedures before trading in Company securities, including obtaining advance consent. The Company's "Special Trading" procedures explain this policy in more detail. In accordance with the Insider and Special Trading Policies, communicating material, nonpublic information about the Company to others who may trade Company securities is also prohibited.

LOCATING COMPANY POLICIES

The policies referenced within this Code of Business Conduct and Ethics can often be found in the Human Resources Office Suite, applicable business unit SharePoint page, or the Legal Policies and Procedures SharePoint page on the Company's intranet. Management may issue additional policies or revisions to these policies periodically. Your employment with AvalonBay is contingent upon complying with all Company policy and procedures. If you need clarification or an exception, it is your responsibility to review and discuss the matter with your manager and Human Resources.

Company policies and corporate statements maintained in locations cited above include, but are not limited to:

- [Associate Handbook & State Addenda](#)
- [Payroll Policies](#)
- [Corporate and Regional Office – Hybrid Work and Telecommuting Policy](#)
- [Mobile Device User Policy](#)
- [Media Guidelines](#)
- [Human Rights Statement](#)
- [Political Contributions and Lobbying Policy](#)
- [Antitrust Policy](#)
- [Community Operations Online Policy Manuals](#)
- [Vendor Code of Conduct](#)
- [AvalonBay Associate Relief Fund](#)
- [Insider Trading Policy \(includes Anti-Hedging, Anti-Speculation and Anti-Pledging Policies\)](#)
- [Information on AVB's Safeguards for Protecting and Securing Personal, Confidential Information](#)
- [Record Retention and Legal Holds](#)
- [Subpoenas Policy](#)
- [Expense Reporting and Reimbursement Policy](#)
- [U.S. Economic Sanctions Compliance and Anti-Corruption Policy](#)
- [AvalonBay Policy on Cybersecurity Phishing](#)
- [Employment Posters and Required Notices for Managers and Remote Associates](#)
- [Acceptable Use Policy](#)

GLOSSARY OF TERMS

Company	A business in any organizational format, including a partnership, limited liability company, corporation, or sole proprietorship. If Company is capitalized, then it is referring to AvalonBay.
Confidential or non-public information	Information about our financial statements before public release, pricing, services, development efforts, and potential acquisitions or dispositions, unless that information already has been made public through the appropriate Company channels. This information also could include customer lists, marketing plans, IT related plans, budgets, and other non-public proprietary Company information.
Conflict of interest	Situation in which your personal interests interfere – or appear to interfere – with your ability to make sound and objective business decisions on behalf of AvalonBay
Employees	All associates, including officers, and members of our Board of Directors.
EthicsPoint	An anonymous, third-party managed hotline, for associates and others to report workplace concerns and issues.
Fair dealing	Not taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material fact, your position with the Company, or any other unfair dealing practice. Applies to our customers, suppliers, and competitors.
Family Member:	(i) your spouse, domestic partner, children, stepchildren, siblings, parents, stepparents, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in law, or sister-in-law, whether or not any of the foregoing are sharing your household, (ii) your grandchildren, uncles, aunts, cousins and the spouses, partners, and children of each, whether or not any of the foregoing are sharing your household, and (iii) any other person who is not in the foregoing categories who is sharing your household (except a bona fide tenant or employee with rent and/or compensation based on arm’s length terms).
Fraud	An intentional, willful, or deliberate act with the intention of obtaining an unauthorized financial or Improper benefit for yourself or others, such as money or property, by deception or other unethical means.
Good Faith	Your report is honest, sincere, and complete to the best of your knowledge.
Gifts	A third party paying for entertainment, outings or meals or providing personal services, include donations and/or gifts for associate or personal events.
Improper Benefit	Something that you or a family member obtain under circumstances that could reasonably be expected to create the appearance that it might have been obtained improperly on account of your position within AvalonBay.

Insider & Special Trading	Trading in Company or other securities on the basis of material, nonpublic information.
Laws	All applicable statutes, laws and regulations, including the rules of the Security and Exchange Commission (SEC) and the rules of the New York Stock Exchange or any other exchange on which the Company's securities trade.
Mitigation	A formal waiver by the Company of a provision of the Code to you or, in the alternative or in addition to a formal waiver, an agreement between the Employee and the Company on an alternative means to achieve the provisions of the Code if the Employee has a situation which could compromise their ability, or give the perception that they are unable, to fulfill the provisions of the Code
Money Laundering	Individuals or organizations trying to conceal illegal funds or make these funds look legitimate.
Personal Interest	A financial interest; employment, consulting, or vendor or independent contractor relationship; or any interest, connection, or benefit, financial or non-financial that could reasonably be expected to create the appearance that you might consider anything other than the best interests of AvalonBay.
Vendors	All suppliers, contractors, subcontractors, consultants, advisors, experts, and anyone with whom we may do business.

AVALONBAY CODE OF BUSINESS CONDUCT AND ETHICS

Employee Acknowledgement

I, _____, acknowledge that I have read and understand AvalonBay's Code of Business Conduct and Ethics. I understand that it is my personal responsibility to get clarification of any part of the Code that I do not understand by going to my supervisor, Human Resources, Legal, or Internal Audit. I acknowledge that lack of understanding is not an excuse for violation of the guidelines set forth in the Code. In addition, I accept responsibility for reporting, through appropriate Company channels, any action that I believe could be a violation of this Code.

I acknowledge that my employment with AvalonBay is contingent upon complying with all AvalonBay policies and procedures, which may be amended from time to time. It is my responsibility to understand the policies and procedures, and to seek clarification and/or mitigation to the policy, if necessary.

I understand that nothing in this Code is intended to inhibit my rights or those of other associates to discuss the terms and conditions of my/their employment under any federal or state labor laws or regulations or from engaging in any other activity protected by applicable laws or regulations, including any and all rights under the National Labor Relations Act, or any whistleblower protections under federal or state law.

Print Employee's Full Legal Name

Employee Signature

Date

THE ELECTRONIC SIGNED COPY OF THIS AGREEMENT WILL BE FILED IN YOUR PERSONNEL FILE.

AVALONBAY CODE OF BUSINESS CONDUCT AND ETHICS

Employee Acknowledgement: Conflict of Interest Disclosure

In furtherance of the Conflict of Interest section of the Code of Business Conduct and Ethics, and to help AvalonBay assure that it effectively monitors and reviews related party transactions, please review and, if accurate, sign the following acknowledgements or describe the exceptions that prevent you from signing the following acknowledgements:

To the best of my knowledge, within the last 12 months or since my last Conflict of Interest disclosure, whichever is longer:

- AvalonBay has not conducted business with any person, vendor, contractor, subcontractor, consultant, organization, or entity in which I, or a **family member**, have or had a financial or **personal interest**
- I have not recommended that AvalonBay conduct business with, nor do I at present expect AvalonBay to conduct business with, any person, vendor, contractor, subcontractor, consultant, organization, or entity in which I, or a **family member**, have or had a financial or **personal interest**.
- I have not received, nor do I at present expect to receive, from any person, vendor, contractor, subcontractor, consultant, organization, or entity, anything that creates or may appear to create an **improper benefit** or conflict of interest for me, including:
 - I have not engaged an AvalonBay vendor for personal services (Note: this excludes any authorized discounts offered to all AvalonBay associates through the Procurement or Benefits department).
 - I have not accepted any gifts valued in excess of \$150, and I have not accepted any cash, gift cards or gift certificates of any amount, or any other gift that may create a conflict of interest, unless approved by the General Counsel, SVP Human Resources, or VP Internal Audit
 - I have not, taken any items from any AvalonBay jobsite (e.g., community, office, construction site) that belong to AvalonBay or any of its vendors, contractors, subcontractors, consultants, or residents, unless it was specifically authorized and in compliance with Online Policy 610 – Disposal of Used Equipment & Material.
- I have not worked outside of AvalonBay in any way that conflicts with my AvalonBay duties or schedule or in any way that creates a conflict of interest with AvalonBay or violates this Code of Conduct.

If you cannot truthfully sign this acknowledgement, hit the exception button (on electronic versions of this acknowledgement) and use the space provided to fully describe any and all matters which prevent you from truthfully signing the acknowledgement. If you received proper, previous authorization to waive or mitigate the conflict, please note when and from whom. (The fact that you cannot sign the acknowledgement does not automatically mean that you violated the Code. For example, you may have received authorization, but we are asking for a complete explanation here in order to assure full disclosure.)

Please note the meaning of the following for purposes of these acknowledgements:

The following are considered your **family members**: (i) your spouse, domestic partner, children, stepchildren, siblings, parents, stepparents, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in law, or sister-in-law, whether or not any of the foregoing are sharing your household, (ii) your grandchildren, uncles, aunts, cousins and the spouses, partners, and children of each, whether or not any of the foregoing are sharing your household, and (iii) any other person who is not in the foregoing categories who is sharing your household (except a bona fide tenant or employee with rent and/or compensation based on arm's length terms).

A ***personal interest*** refers to a financial interest; employment, consulting, or vendor or independent contractor relationship; or any interest, connection, or benefit, financial or non-financial that could reasonably be expected to create the appearance that you might consider anything other than the best interests of AvalonBay.

An ***improper benefit*** means something that you or a family member obtain under circumstances that could reasonably be expected to create the appearance that it might have been obtained on account of your position within AvalonBay.

THE ELECTRONIC SIGNED COPY OF THIS AGREEMENT WILL BE FILED IN YOUR PERSONNEL FILE.

Integrity...Commit to it!

Concerns and reports regarding financial fraud, abuse, or possible Code of Business Conduct and Ethics violations are made anonymously and confidentially through EthicsPoint, a confidential third-party hotline. You will not be subject to retaliation or discrimination for making a report in good faith.

Confidentiality...we commit to it!

There are two ways to report a concern to EthicsPoint:

Toll-free: 1-866-292-2076

AvalonBayHotline.com (24/7)

AvalonBay
COMMUNITIES