

PURPOSE AND SCOPE

The purposes of this Equal Employment Opportunity Policy (this “Policy”) are to ensure that all employees, applicants, officers and directors of Alexandria Real Estate Equities, Inc. and its subsidiaries (collectively, “ARE” or the “Company”) understand that it is the intent of the Company to transact business in accordance with the highest moral and ethical standards in the areas of equal employment opportunity and to provide procedures for persons subject to this Policy to report instances of non-compliance with this Policy.

Any violation of this Policy or applicable law by a person subject to this Policy, or false claims made under this Policy, may result in prompt disciplinary action, up to and including termination of employment or removal and, in appropriate cases, civil action or referral for criminal prosecution.

This Policy sets forth the publicly available policies of the Company concerning the subjects covered hereby and supplements additional policies of the Company included in our Employee Handbook that all employees acknowledge upon hiring.

EQUAL EMPLOYMENT OPPORTUNITY

The Company strives to foster a fair and inclusive workplace that respects the rights of our employees. The Company seeks to provide a safe, respectful, and productive work environment that helps our employees succeed and advance in their careers.

In order to provide equal employment and advancement opportunities to all qualified individuals, employment decisions at the Company are based only on lawful factors including merit, qualifications, abilities and the quality of one’s performance. This policy governs all aspects of employment, including recruitment, selection, job assignment, promotion, compensation, discipline, layoff, recall, termination and access to benefits and development. ARE does not discriminate in employment opportunities or practices on the basis of any characteristic or combination of characteristics protected by applicable federal, state and/or local law. Our Equal Employment Opportunity policy is part of our Employee Handbook, and the Company’s Talent Development team addresses equal opportunity in the training it provides for hiring managers.

The Company will make reasonable accommodations for qualified individuals with known disabilities who request accommodations, unless doing so would result in an undue hardship or a direct threat to safety. The Company also makes reasonable accommodations for the religious observances and practices of employees, including with respect to employee work schedules, religious dress practices and religious grooming practices, unless doing so would result in an undue hardship. Applicants and employees should contact the Talent & Business Operations Team to request a reasonable accommodation, if one is needed.

Alexandria Real Estate Equities, Inc.
EQUAL EMPLOYMENT OPPORTUNITY POLICY

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company, or (c) consistent with the Company's legal duty to furnish information.

As a federal government contractor, ARE has developed and maintains a written affirmative action plan relating to individuals with disabilities and protected veterans, which sets forth the policies, practices and procedures to which the Company is committed in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and protected veterans is followed. This program of affirmative action as to individuals with disabilities and protected veterans is endorsed by the Company's highest directors and officers. The head of Business Operations is responsible for maintaining an audit and reporting system to monitor compliance with our affirmative action program and equal opportunity policy.

It is also the Company's policy to provide a work environment free of harassment, and the Company does not tolerate harassment of employees, contractors, consultants, or others by managers, supervisors, employees, agents of the Company, or any other third party.

SEEKING HELP AND INFORMATION

Persons subject to this Policy who have questions about this Policy or a potential violation of this Policy should discuss the matter with a representative of the Talent & Business Operations Team, the General Counsel or the Chief Financial Officer.

REPORTING OF EVENTS OF KNOWN OR POSSIBLE NON-COMPLIANCE

Should a person be subjected to any form of discrimination or other conduct that violates this Policy, or witness or otherwise become aware of any known or possible instance of non-compliance with this Policy, he or she must promptly report such possible non-compliance to a representative of the Talent & Business Operations Team, the General Counsel or the Chief Financial Officer. In addition, employees may use any other reporting avenue outlined in the employee handbook.

INVESTIGATIONS OF POSSIBLE EVENTS OF NON-COMPLIANCE

All reports concerning possible events of non-compliance with this Policy will be promptly, fairly and thoroughly investigated, keeping the matter confidential to the extent consistent with performing a complete investigation.

RETALIATION NOT PERMITTED

Individuals can raise good faith concerns and make reports without fear of reprisal. Because the Company values its policy against discrimination and encourages reporting of inappropriate behavior, the Company will not retaliate against any person who, in good faith, reports any instance of non-compliance or possible non-compliance with this Policy or any potential violation of law, assists another to make a good faith report, participates in good faith in an investigation of a report or hearing, or otherwise seeks to obtain his/her legal rights under any federal, state, or local EEO law, and will not knowingly permit or tolerate retaliation by others. However, any person who makes a report known to be false or provides information known to be false may be subject to disciplinary action, up to and including termination or removal. An individual who feels that he or she or others have been subject to retaliation or have witnessed any form of retaliation, must immediately notify the Talent & Business Operations Team. Complaints of retaliation must be reported and will be handled in the same manner as other reports under this Policy.

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