

OVERVIEW

Alexandria Real Estate Equities, Inc. and its subsidiaries (collectively, “ARE” or the “Company”) own, operate, and develop real estate uniquely focused on collaborative life science, agricultural technology, and advanced technology campuses in AAA innovation cluster locations. As a mission-driven company dedicated to making a positive and lasting impact on the world, our environmental, social, and governance efforts are at the core of what we do. It remains our goal to develop and implement impactful solutions to society’s most pressing challenges; improve the health and vitality of the communities where we live and work; and contribute to a healthier, more sustainable, and more productive society. Our longstanding efforts have benefited our tenants, employees, and communities, as well as preserved and enhanced value for our stockholders over the long term.

SCOPE AND APPLICABILITY

This Vendor Code of Conduct sets forth the expectations that ARE has of its vendors, service providers, contractors, and consultants, as well as their employees, agents, and subcontractors (collectively referred to as “Vendors”). ARE expects its Vendors to embrace ARE’s commitment to ethical, environmental, and social standards throughout ARE’s supply chain by complying with this Vendor Code of Conduct (the “Vendor Code”) at all times while conducting business with or on behalf of the Company. ARE also expects its Vendors to ensure that their working conditions meet the core conventions of the International Labour Organization (“ILO”) and the Universal Declaration of Human Rights.

ARE may revise the Vendor Code and/or adjust the breadth of coverage over time to reflect current market practices and ARE’s own policies. For example, selected provisions of this Vendor Code may be applied to other business counterparties of ARE, such as lenders, borrowers, and joint venture partners. To the extent the Vendor Code requires a higher standard than required by commercial practice or applicable laws, rules, or regulations, Vendors should strive to adhere to these higher standards. **The expectations for Vendors in this Vendor Code are in addition to any requirements that may be contained in individual supplier agreements with ARE.**

This Vendor Code does not, and shall not be construed to, grant any rights to any Vendor, stockholder, employee, or any other person or entity (“any party”). It supplements, but does not supersede, any separate compliance codes, policies, or procedures that ARE may also have adopted. If there is any discrepancy or omission that is at odds with any provision of a current service-level or supply agreement, or any other contract governing ARE’s relationship with any party, including collective bargaining agreements (each, an “SLA”), or applicable local, state, or federal laws, regulations, or ordinances, then the SLAs and applicable laws shall prevail.

GOVERNANCE AND COMPLIANCE

Vendors must conduct all business activities in full compliance with the applicable laws, rules, and regulations of the countries in which they operate while conducting business with and/or on behalf of ARE. We expect Vendors to have management procedures in place to support compliance with laws, regulations, this Vendor Code, and ARE's Human Rights Policy. Vendors are responsible for communicating the provisions of this Vendor Code to their employees, agents, and subcontractors. This Vendor Code and ARE's Human Rights Policy can be found on our website at <https://www.are.com/esg.html>.

This Vendor Code is overseen by ARE's General Counsel, and may be supplemented, revised, amended, or withdrawn by ARE's Executive Chairman or Chief Executive Officer at any time and for any or no reason. ARE may also waive application of one or more of the provisions set forth in this Vendor Code where ARE believes that circumstances warrant a waiver. While ARE expects its Vendors to adhere and self-monitor their compliance with this Vendor Code, ARE may also audit a Vendor or inspect a Vendor's facilities to confirm compliance with the expectations outlined in this Vendor Code, or the accuracy of information provided by a Vendor in response to a request from ARE. ARE reserves the right to discontinue the business relationship should the noncompliance with this Vendor Code become known to ARE.

ENVIRONMENTAL MANAGEMENT AND SUSTAINABILITY

ARE expects that its Vendors comply with applicable environmental laws, including regarding hazardous materials, air emissions, waste, and wastewater discharges. ARE believes that doing well in our business and doing good for society are inherently linked endeavors and aims to make a positive impact on society by developing and operating efficient and healthy buildings, reducing energy consumption, mitigating greenhouse gas emissions and climate risk, and advancing human health and nutrition. ARE encourages Vendors to offer sustainable alternatives when providing goods and services to deliver more sustainable outcomes. Vendors should strive to reduce environmental impacts through the implementation of targets and processes to maximize the efficient usage of natural resources, energy, water, and materials and to minimize pollution, reduce greenhouse gas emissions, and waste. Vendors should monitor and track their environmental performance and also collaborate with ARE to measure and track the sustainability performance of goods and services supplied to ARE. ARE also expects its Vendors to implement their own written code of conduct and educate their supply chains on ways to reduce their environmental footprint.

BIODIVERSITY AND LAND CONSERVATION

ARE aims to protect and promote biodiversity and conservation and the restoration of natural habitats by employing a nature-inclusive approach to our real estate operations. We also respect and aim to refrain from developing in legally designated protected areas, and to avoid negative impacts on threatened and protected species. ARE also expects our Vendors to embrace these standards and to strive for improvement in these areas.

VENDOR CODE OF CONDUCT

WORKING CONDITIONS AND OCCUPATIONAL HEALTH AND SAFETY

Vendors are expected to maintain working conditions that comply with the respective laws and regulations and promote well-being, productivity, and dignity among their workforces.

- **Health and Safety.** ARE expects Vendors to incorporate health and safety management practices into all aspects of their business, and fully comply with all applicable safety and health laws, including in the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. ARE also expects Vendors to minimize employee and visitor exposure to potential safety hazards by appropriately identifying, assessing, and minimizing risks.
- **Wages and Benefits.** Vendors must comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. The Company expects Vendors to work toward improving standards of living and quality of life for their employees and communities. Deductions from wages as a disciplinary measure (without the express, written permission of the worker) or as otherwise prohibited by applicable laws or regulations are not permitted.
- **Working Hours.** Vendors must adhere to legal limits on working hours, rest periods, and public holidays, as required by the applicable laws, rules, and regulations.
- **Physical and Mental Well-Being.** Vendors must ensure that the physical and mental demands of the workplace do not compromise the well-being of their employees, and that measures are put in place to manage work-related stress and to promote a healthy work environment.

PREVENTION OF DISCRIMINATION AND HARASSMENT

ARE expects its Vendors to provide a work environment free of discrimination and harassment, to respect the rights of its employees, and to seek to provide them with a safe and respectful environment. We expect Vendors to prohibit inhumane treatment and/or unlawful disciplinary action, to treat people with respect and dignity, promote equal opportunity for all, and help create an inclusive and ethical culture.

ARE believes that employment should be based solely on a person's ability and not personal characteristics. We expect Vendors to maintain a workplace free of unlawful discrimination on the basis of any characteristics or statuses protected by law. Employees shall not be subject to verbal, physical, sexual, or psychological abuse, harassment, or retaliation from reporting harassment, and shall be treated with respect and dignity.

PREVENTION OF FORCED LABOR, CHILD LABOR, AND HUMAN TRAFFICKING

We expect Vendors to prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking. Vendors are expected to employ individuals that are of legal working age who willingly agree to work for them.

ARE will not tolerate:

- **Child Labor.** Vendors must comply with all applicable minimum age labor laws and ILO Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour), and must not use child (under the age of 15) labor.
- **Forced or Compulsory Labor.**
- **Unacceptably Hazardous Working Conditions for Workers.** Nor will the physical punishment, abuse, or involuntary servitude of any worker be tolerated.

Should a pattern of violation of these principles become known to ARE and not be corrected, ARE will discontinue the business relationship.

ANTI-CORRUPTION, ANTI-COMPETITIVENESS, AND CONFLICT OF INTEREST

ARE maintains a Foreign Corrupt Practices Act and Anti-Corruption Policy and expects Vendors to make business decisions based on merits and not provide or accept any bribe, kickback, or other improper benefit in relation to ARE's business. For purposes of this Vendor Code, "improper benefit" includes gifts, entertainment, travel expenditures, hospitality, cash or cash equivalents, employment or job offers, benefits, favors, or anything else of value, either directly or indirectly, to or from anyone (regardless of whether they are in the private or public sector), if such conduct could reasonably be construed as being intended to influence any act or decision of the recipient, and/or the entity the recipient represents, in order to secure or guarantee an improper advantage or to otherwise obtain or retain business for the Company or another party.

Vendors are expected to avoid any actions that could result in a material conflict of interest. A "conflict of interest" occurs when an individual's private interest interferes with or undermines, or appears to interfere with or undermine, the requirements of his or her function. Vendors are also expected to refrain from engaging in anti-competitive practices that restrain the effects of market competition, including, but not limited to, price fixing, market division, and refusal to deal.

We expect Vendors to comply with all applicable anti-corruption, anti-bribery, antitrust, and fair competition laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act.

FREEDOM OF ASSOCIATION

The Company expects its Vendors to adhere to applicable laws and the core conventions of the ILO regarding the right of their employees to affiliate with lawful organizations without interference.

CONFIDENTIALITY AND DATA PROTECTION

Vendors should uphold all legal obligations and otherwise ensure protection of all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose beyond the scope of the business arrangement with the Company without prior authorization.

We expect Vendors to ensure information remains private by maintaining adequate cybersecurity and complying with all laws and regulations to mitigate risk of a data breach.

REPORTING AND WHISTLEBLOWER PROTECTION

We expect our Vendors to provide their employees with avenues for raising legal or ethical issues or reporting concerns without fear of retaliation. We also expect our suppliers to take action to prevent, detect, and address any retaliatory actions.

REPORTING A CONCERN

Should a person subject to this Vendor Code become aware of any known or possible instance of noncompliance with this Vendor Code, he or she should promptly report such possible noncompliance to a representative of the General Counsel or the Chief Financial Officer of the Company through the Investor Relations number on ARE's website. We encourage our employees and third parties to raise concerns without fear of retaliation.

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