



## VENDOR CODE OF CONDUCT POLICY

As of: November 11, 2019

At American Assets Trust, Inc. ("**AAT**"), we conduct business in accordance with the highest ethical standards, including working with vendors that hold themselves to such standards. This Vendor Code of Conduct Policy ("**Vendor Code**") outlines minimal standards that vendors and their officers, directors, managers, employees, representatives and/or affiliates (collectively, "**Vendor**") shall adhere to when conducting business with, for or on behalf of AAT, including, without limitation, the following:

### **Business Practices:**

- Maintain professional standards throughout all business dealings.
- Consult with AAT on any matter relating to actual or potential noncompliance with laws and regulations.
- Avoid insider trading, defined as the purchase or sale of securities while in the possession of material, non-public information.
- Engage in ethical behavior and comply with all applicable laws relating to offering any business courtesies or gifts. Avoid the appearance of or actual conflict of interests in any dealings (direct or indirect) with AAT's employees or their affiliates (See AAT Code of Business Conduct and Ethics Policy available on AAT's website for further guidance).
- Comply with all anti-corruption, anti-money laundering, antitrust and fair competition laws.
- Maintain integrity and confidentiality of data, recordkeeping and intellectual property.
- Comply with all laws and regulation regarding the privacy of information (including personal and sensitive information) and data protection.
- Protect and responsibly use both AAT's physical and intellectual assets.
- Obtain all necessary licenses and permits to conduct activities.
- Engage in the ethical and humane treatment of animals.
- Prohibit use, possession, distribution of weapons and/or drugs, of any kind.

### **Employment Practices:**

- Conduct employment practices in compliance with all laws and regulations.
- Comply with modern slavery laws, including, but not limited to, laws and regulations prohibiting slavery, servitude, force, compulsory labor, human trafficking and child labor.
- Comply with all local minimum wage laws.
- Comply with all local labor laws and standards regarding working hours, overtime and public holidays.
- Provide a work environment free of discrimination and harassment based on gender, race, color, national origin, age, religion, marital status, disability, sexual orientation, veteran status or any other protected class.

- Maintain an internal process to allow employees to confidentially and anonymously report allegations of mistreatment, discrimination, abuse, violation of law or violation of this Vendor Code and prohibit retaliation against such reporting.
- Promote a safe and healthy work environment in accordance with all applicable laws and regulations.
- Develop and manage safety protocols to identify, prevent and mitigate unnecessary risky behavior.
- Treat all employees with dignity and respect.
- Prohibit inhumane treatment and/or disciplinary action.
- Support employees' right to exercise freedom of speech and freedom of association.

**Environmental Practices:**

- Comply with the requirements of applicable federal, state and local environmental laws and regulations.
- Promote environmental benefits through reduced energy and water consumption, reduced greenhouse gases emission and implementation of waste minimization programs.
- Monitor and track the environmental impact of operations.
- Source and use environmentally clean materials and products when feasible.
- Cooperate with AAT and its sustainability efforts.

It is the responsibility of Vendor to ensure that Vendor's employees, agents, representatives, subcontractors and suppliers are informed and comply with this Vendor Code. AAT may request the removal of any individual or entity that it deems to be in violation with (or to have violated) this Vendor Code (in addition to any other rights and remedies that AAT may have). Vendor shall report any allegations of mistreatment, discrimination, abuse, violation of law or other violation of this Vendor Code to AAT. Vendor may report such allegations anonymously, if desired, at <https://americanassetstrust.ethicspoint.com>.

This Vendor Code of Conduct Policy may be amended by American Assets Trust, Inc. from time to time and shall be made available on American Assets Trust, Inc.'s website, [www.americanassetstrust.com](http://www.americanassetstrust.com).