

## POLICY ON POLITICAL CONTRIBUTIONS

## POLITICAL SPENDING PROHIBITION

The following forms of contributions and actions by or on behalf of Mid-America Apartment Communities, Inc. ("MAA" or the "Company"), otherwise referred to as "Political Spending", are prohibited unless approved as outlined below:

- Contributions or payments to or on behalf of any
  - political office holders or candidates,
  - political parties,
  - political action committees ("PACs"), "SuperPACs" or other political entities organized and operating under 26 U.S. C. Sec. 527 of the Internal Revenue Code, or
  - other political organizations;
- Indirect or non-monetary support of any of the above through
  - Paying for expenses related to the political process (e.g. advertisements or other campaign expenses),
  - Supporting political events or fundraisers (e.g. travel expense reimbursement or buying a table at a luncheon), or
  - In-kind or non-monetary contributions (e.g. use of Company offices, telephones, office supplies, or employee time to support an office holder, candidate or political party);
- The withholding of monetary or non-monetary support in an attempt to influence the actions of any of the above; and
- Fees for engaging a legislative lobbyist or representative.

# POLITICAL SPENDING APPROVAL PROCESS AND RECORD KEEPING

From time to time, MAA may determine it is in the best interest of shareholders to consider Political Spending to promote Company interests concerning legislation or regulatory actions that could directly or significantly impact the industry or business interests of the Company.

In such instances, any Political Spending must:

- reflect the Company's business purposes and promote the interests of the Company, without regard for the private political preferences of any associates or members of the Board of Directors of the Company;
- be consistent with MAA's organizational objectives and operational approach to ESG, including social and environmental initiatives and sought outcomes, as aligned with MAA's strategy approved by the Board of Directors; and
- receive prior written or electronic approval by the Company's Chief Executive Officer and the Company's General Counsel.

The Company will maintain a record of all Political Spending approvals that will include the date, form, value and

recipient of all approved contributions. The Nominating and Corporate Governance Committee of the Company's Board of Directors will review any Political Spending on an annual basis and will periodically review this Policy on Political Contributions.

No contribution or expenditure in anticipation of, in recognition of, or in return for an official act will be approved.

#### TRADE ORGANIZATIONS

The Company may belong to various industry trade associations (e.g. National Apartment Association, National Multifamily Housing Council and NAREIT) and/or state or local apartment associations, amongst others, that may engage in political spending from time to time. Amounts spent by such associations shall not be attributed to the Company and are not considered Political Spending under this policy, provided that such activities are not controlled by the Company and are generally undertaken for the benefit of the industry or members of the organization as a whole.

In addition, associates may from time to time be asked to participate in one or more trade associations on behalf of MAA. Participation by associates on behalf of MAA in trade associations is not considered Political Spending under this policy.

In certain situations, the Company may also make associates aware of certain legislative issues that affect MAA and may encourage associates to support trade association efforts in response to such issues (e.g. writing an elected official in support or opposition of a legislative matter). Any such actions taken in conjunction with trade association efforts shall not be attributed to the Company and are not considered Political Spending under this policy, provided that such activities are not controlled by the Company and are generally undertaken for the benefit of the industry or members of the trade association as a whole.

## **ASSOCIATE CONTRIBUTIONS**

The Company may make associates aware of opportunities to personally contribute to industry trade associations or PACs that further its business interests. Any monetary contribution by an associate must be purely voluntary. In no instance should an associate feel pressured to make a personal contribution. Under no circumstances will an associate be reimbursed for personal political contributions or expenses.

Associates are also strictly prohibited from coercing or pressuring any other associate, vendor or resident to make personal contributions to or show individual support for candidates or political causes.

## **POLICY CERTIFICATION**

Executive officers of the Company will be required to acknowledge their compliance with this policy on an annual basis