

Policy Statement:

The mission of Arbor Realty Trust, Inc. and its subsidiaries (collectively, “Arbor” or the “Company”) is to provide tailored financing solutions for real estate investors, primarily in lending to operators of multifamily properties. Ultimately, we enable owner-operators to invest in, build, and sustain the physical buildings that provide communities with spaces in which to live and work. Our values of innovation, entrepreneurship, loyalty, quality, and appreciation allow us to execute our mission and to serve a wide variety of clientele, promote economic opportunity, build community, and keep people sheltered and safe. Arbor treats all employees, clients, potential and existing, vendors, and counterparties, equally and with respect.

The Company is firmly committed to the promotion of a society where everyone is equally entitled to human rights, without discrimination, and we conduct our business with a likeminded philosophy. This includes the exclusion of all forms of modern slavery, including forced, compulsory labor, child labor, and human trafficking, from our business and supply chain.

Arbor’s Human Rights policy was informed by the UN Global Compact, GRI Standards, and GRESB Policies and seeks to not only protect and respect internationally proclaimed human rights but also to ensure we are not complicit in any human rights abuses.

Arbor recognizes and respects the diversity of laws in the locations where we operate. Due to the nature and locations of our business, when faced with conflicts between such laws and our human rights commitments, the Company will seek to honor the principles of internationally recognized human rights statements to the greatest extent possible.

Implementation:

Arbor’s respect for human rights is clearly evidenced through:

- The Company’s Code of Business Conduct and Ethics (the “Code”), which outlines what behavior is and is not permissible by Arbor employees and vendors. The standards set forth in the Code are informed by legal experts as well as industry best standards. The Company seeks periodic feedback from employees, vendors, and its Board of Directors (the “Board”) to keep the Code updated.
- The Company’s vendor management program, which defines and implements our expectations of our suppliers, contractors, and vendors is based on industry best practices and international human rights standards. Our program standards include a Vendor Management Policy and a Vendor Code of Conduct.
- The Company’s maintains a strong commitment to compliant and transparent reporting in its public filings, giving visibility into how we conduct our business.

- Arbor’s strong commitment to continuously improving diversity and inclusion practices in the workplace.
- Arbor’s willingness to become an Anti-Defamation League (“ADL”) Workplace Pledge Signatory.
- Arbor’s participation as a Human Rights Campaign (“HRC”) ‘Count Us In’ Employer Pledgor.

Arbor is also dedicated to continuing education around non-discrimination, equality, and human rights concepts, including how they apply to the Company’s business, as well as industry best practices. This work is accomplished through a meaningful collaboration between hired experts, the Board, Arbor’s Human Resources Department, Arbor’s Legal Department, and the Arbor ESG Taskforce.

Due to the nature and locations of Arbor’s business, we do not expect human rights issues and violations to be common or significant. However, the Company works to identify and prioritize the most salient human rights issues it faces, based on the following:

- With more than 600 employees, Arbor respects the human rights of its employees and contractors by endeavoring to promote freedom from discrimination, harassment, and retaliation, as well as rights to privacy, health, and safety.
- As a notable commercial mortgage provider and Government-Sponsored Enterprise (Fannie Mae, Freddie Mac, and HUD) approved seller-servicer, Arbor acknowledges the significant gap between white and minority property ownership rates and is committed to supporting all clients with flexible financing options, a crucial factor in building generational wealth and diversifying the market.
- As a financier of commercial projects, Arbor recognizes its unique responsibility to engage with its clients and help them meet their financial goals while respecting human rights in the process.
- As a procurer of third-party products and services, the Company strives to engage with vendors whose values and business principles reflect their respect for the human rights of the people with whom, and the communities in which they do business.

Governance:

Arbor’s Code sets out guidelines for business conduct required of all Arbor employees and agents, and includes, directly or by reference, relevant information to report concerns or violations, and potential remedies. If any employee or other stakeholder believes that someone is violating this Human Rights Policy Statement, they are empowered to immediately report anonymously such a concern through one of the available channels outlined in the Company’s Whistleblower Policy. Retaliation or intimidation against individuals reporting issues in good faith is strictly forbidden. Further details are available in the Code or in the Whistleblower Policy.

Arbor's Executive Vice President, Human Resources ("EVP"), and General Counsel ("GC"), along with their respective dedicated teams, advise on key product, policy and corporate decisions, leading any relevant human rights diligence and/or protection efforts. They work closely with the Board and the rest of Arbor's leadership to ensure that we live up to the expectations of the public marketplace, our clients, and other internal and external stakeholders.

The EVP and GC shall jointly oversee the implementation of this policy.

This policy is founded on meaningful engagement with relevant stakeholders.

This policy will be reviewed no less than annually.