

ACADIA REALTY TRUST: ANTI-CORRUPTION POLICY

Acadia Realty Trust and Acadia Realty Limited Partnership (collectively, “**Acadia**”) are committed to conducting business with honesty and integrity and in compliance with all applicable laws, including applicable anti-bribery and anti-corruption laws such as the Foreign Corrupt Practices Act of 1977 (“**FCPA**”). Under the FCPA, it is illegal for U.S. persons, including U.S. companies or companies traded on U.S. exchanges, and their subsidiaries, directors, officers, employees and agents, to bribe foreign government officials. It is impossible to predict and describe every prohibited situation, so it is important that you adopt both the spirit and the letter of this Policy.

This Policy prohibits Acadia and its personnel (employee and contractor alike) from directly or indirectly making, promising, authorizing or offering “anything of value” to any person in order to secure an improper advantage (e.g., a regulatory approval), obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to third parties where you know, or have reason to know, that the third party will use any part of the payment for bribes.

The term “anything of value” is very broad and can include, for example: cash, gift cards, gifts, travel, meals, lodging, entertainment, loans, non-arm’s length transactions, charitable or political donations, and business, employment or investment opportunities. For this reason, the giving of any such items to a government official is prohibited, unless pre-approved by Acadia’s General Counsel in writing.

Although the FCPA includes an exception for so-called “facilitation payments”—that is, nominal payments made to low-level government officials to ensure or speed the proper performance of a government official’s routine, non-discretionary duties or actions—other anti-corruption laws do not exempt such payments. Accordingly, it is Acadia’s policy not to allow facilitation payments.

Acadia maintains books and accounting records that accurately reflect transactions in reasonable detail. These record-keeping requirements apply to all payments (including the types described above), not merely those that would be material in the traditional financial sense. Officers, directors, employees, contractors, and third parties are prohibited from manipulating books or records in an effort to mask transactions, either by characterizing them in some oblique way, or by omitting them from the books or records entirely. Accordingly, no undisclosed or unrecorded accounts may be maintained for any purpose.

If you have any questions regarding this policy or suspect a violation of this policy, please contact the General Counsel.

Adopted: July 1, 2021