

Acadia Whistleblower Policy/Procedures

Procedures for the Submission of Complaints or Concerns Regarding Financial Statement Disclosures, Accounting, Internal Accounting Controls or Auditing Matters

Section 301 of the Sarbanes-Oxley Act requires the Audit Committee of the Board of Trustees of Acadia Realty Trust (“Acadia”) to establish procedures for: (a) the receipt, retention, and treatment of complaints received by Acadia regarding accounting, internal accounting controls, or auditing matters; and (b) the submission by employees of Acadia and others, on a confidential and anonymous basis, of concerns regarding questionable accounting or auditing matters.

In accordance with Section 301, the Audit Committee hereby adopts the following procedures:

1. Acadia shall promptly forward to the Audit Committee any complaints that it has received regarding financial statement disclosures, accounting, internal accounting controls or auditing matters.
2. Any employee of Acadia may submit, on a confidential, anonymous basis if the employee so desires, any concerns regarding financial statement disclosures, accounting, internal accounting controls or auditing matters.

All such concerns may be made through: (i) the Whistleblower Hot Line Number: (833) 976-2044 or (ii) the internet-based system located at <https://www.whistleblowerservices.com/AKR>.

All contact made through either method will be sent directly to the Audit Committee Chair.

If an employee would like to discuss any matter with the Audit Committee, the employee should indicate this in the submission and include a telephone number at which he or she might be contacted if the Audit Committee deems it appropriate.

3. Following the receipt of any complaints submitted hereunder, the Audit Committee will investigate each matter so reported and take corrective and disciplinary actions, if appropriate, which may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit increase, bonus or stock options, suspension without pay or termination of employment.
4. The Audit Committee may enlist employees of Acadia and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial statement disclosures, accounting, internal accounting controls or auditing matters.
5. Concerns may be reported anonymously and confidentially. However, the Audit Committee encourages reporting individuals to supply contact information with their submission to facilitate follow-up, clarification, and assistance with any investigation, if necessary. An individual may choose to identify himself or herself or remain anonymous. If an individual identifies himself or herself, his or her identity will remain strictly confidential unless otherwise authorized by the individual. If such individual decides to remain anonymous, however, members of the Acadia team investigating the situation may have limited or no means to subsequently communicate with the reporting individual and investigate the matter further.

6. In conducting any investigation, the Audit Committee shall use reasonable efforts to protect the confidentiality and anonymity of the complainant. In certain circumstances, it may not be possible for the Audit Committee to ensure absolute confidentiality and anonymity due to the requirements of applicable laws, rules or regulations or the requirements of courts or administrative authorities having jurisdiction.
7. Acadia does not permit retaliation of any kind against employees for complaints submitted in good faith.
8. The Audit Committee shall retain as a part of the records of the Audit Committee any such complaints or concerns for a period of no less than seven (7) years.

Revised November 3, 2021