

Acadia Realty Trust

Human Rights Policy

I. Respect for Human Rights

Acadia Realty Trust (“Acadia”) strives to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. This policy applies to Acadia and our affiliated entities. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. We are committed to engaging with all of our stakeholders in developing, implementing, and evaluating this policy’s effectiveness.

II. Diversity and Inclusion

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, religion, color, national origin, ethnicity, sex, sexual orientation, gender identity, gender expression, age, disability, veteran status, marital status, genetic information, or any characteristic protected by law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills, and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

III. Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our associates, by addressing and remediating identified risks of accidents, injury, and health impacts.

IV. Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for associates are provided, as needed, and are maintained with respect for associate privacy and dignity.

V. Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking. Additionally, we are committed to complying with all applicable child labor laws.

VI. Work Hours, Wages, and Benefits

We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws. We are committed to complying with applicable labor and employment laws.

VII. Water Resources

We recognize that the right to water is a fundamental human right.

VIII. Freedom of Association

The right to freedom of association is proclaimed in the Universal Declaration of Human Rights. We support freedom of association and the rights of its workers to lawfully and peacefully associate, organize and bargain collectively.

IX. Training and Reporting for Associates

We strive to create workplaces in which open and honest communications among all employees are valued and respected.

X. Reporting Violations of this Policy

If any trustee, officer or employee of Acadia has concerns or complaints regarding questionable human rights violations, then he or she should submit those concerns or complaints to their supervisor or to the Human Resources department.

In order to encourage reports of observed violations of this policy, we keep all reports strictly confidential to the extent reasonably possible within the objectives of this policy. We do not allow retaliation for reports made of misconduct by others. Specifically, Acadia will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such an officer or employee in the terms and conditions of his or her employment. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

This Human Rights Policy was approved and made effective by the Acadia Realty Trust Board of Directors on August 13, 2019.