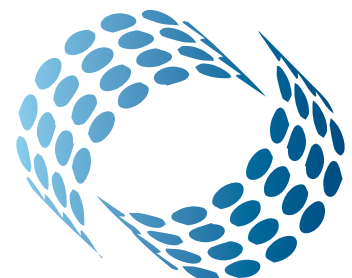


InvenTrust
Properties

CORPORATE RESPONSIBILITY POLICIES & PRACTICES



INVENTRUST PROPERTIES CORP. CORPORATE RESPONSIBILITY POLICIES & PRACTICES

InvenTrust Properties Corp. (hereinafter “InvenTrust” or “Company”) is a publicly traded, premier Sun Belt, multi-tenant essential retail REIT that owns, leases, redevelops, acquires, and manages grocery-anchored neighborhood and community centers, as well as high-quality power centers that often have a grocery component. We pursue our business strategy by acquiring retail properties in Sun Belt markets, opportunistically disposing of retail properties, maintaining a flexible capital structure, and enhancing environmental, social, and governance (“ESG”) practices and standards. We believe that corporate responsibility standards are an essential part of our commitment to enhance our communities, conserve resources and foster a best-in-class working environment while enhancing long-term stockholder value.

Environmental Sustainability

InvenTrust recognizes environmental responsibility as an opportunity to add long-term value to our properties and to benefit our customers, tenants, investors, as well as reduce our impact on the environment. We are setting a high standard for ourselves when it comes to reducing our environmental footprint and preparing for the future. We have set goals for areas under our operational control and working with our tenant partners to optimize operations through our green leases. Investing in our properties is a fundamental part of our business plan as we strive toward greater innovation and sustainability. For more information regarding our environmental sustainability practices and goals, please refer to our Corporate Responsibility Report on our website at: www.inventrustproperties.com/corporate-responsibility/.

Climate Change and Greenhouse Gas (“GHG”) Emissions

We are dedicated to assessing the effects of climate-related hazards and measuring the effectiveness of our strategies to mitigate them. Additionally, we are continuously exploring inventive solutions to decrease our greenhouse gas emissions and protect our organization from the impact of natural disasters. Our Disaster Recovery and Business Continuity Plans (“BCP”) strive to provide business continuity in the event of extreme weather events, including hurricanes, convective wind storms, earthquakes, and floods. A significant element of our plan involves capitalizing on the transition towards a sustainable world through initiatives such as water conservation, waste reduction, recycling programs, solar panel deployment and electric vehicle (“EV”) charging stations. We are committed to safeguarding the environment while also promoting the longevity of our operations.

Enterprise Risk and Resilience

InvenTrust takes a holistic approach to managing all risks, and risk management is integrated into operational decisions that impact the resilience of our portfolio. Our Disaster Recovery and Business Continuity Plans aim to provide business continuity in the event of extreme weather events as well as other scenarios like pandemics and cyber-attacks.

Annually, Management and the Board of Directors execute our Enterprise Risk Management (“ERM”) process to identify, assess, and select the key risks that have the highest potential to meaningfully impact our stakeholders. Once the key residual risks have been assessed, our ERM team works with the applicable risk owners to develop plans to mitigate, transfer, or exploit the risk.

In conjunction with the ERM process, the Company evaluates both the current risk trends and the magnitude of the impact should the organization fail to adequately mitigate the identified key risks. This process allows us to prioritize those risks which Management deems to be key and allocate resources accordingly.

Biodiversity and Habitat Protection

Although InvenTrust primarily acquires open-air shopping centers that are already developed, it places an emphasis on supporting and promoting biodiversity, where possible, by:

- Prioritizing water conservation
- Including native landscaping, xeriscaping and green roofs
- Using permeable walking trails
- Preserving green space and wooded areas
- Caring for existing trees and planting new trees

Energy and Water Management

InvenTrust Property Management is fully committed to operating our assets in the most efficient and effective manner possible. As such, all employees, from leadership to site-level operations staff, are committed to and actively participate in sound energy and water management practices in accordance with our corporate goals. Our corporate goals are published each year in the annual Corporate Responsibility Report. We shall insist on the same level of commitment from our vendors and contractors as well.

- **Energy Management Plans** shall include the timely LED conversion of each center's common area lighting, where feasible. The plan shall also include the installation of smart lighting control systems (energy management systems) that are maintained wirelessly and automatically, on-site electric vehicle ("EV") charging stations, and the exploration of on-site renewable energy.
- **Water Management Plans** shall include a full assessment of each new acquisition's irrigation and water systems to ascertain opportunities for improvements; the annual monitoring of water usage and the potential for smart irrigation controller upgrades; conversions of plant material to native species; conversion of irrigation heads to MP Rotators and drip irrigation where feasible; enhanced xeriscaping in regions where such a practice is feasible; and strict adherence to all local municipality watering restrictions.
- **Roofing:** It shall be the practice for InvenTrust Properties to use white, reflective TPO roofing membranes for every re-roof project wherever and whenever possible. This practice saves our tenants energy by reducing their cooling cost as the white membrane reflects solar heat back to the atmosphere, so it isn't absorbed inside the building.

Indoor Air Quality

InvenTrust Property Management is fully committed to providing healthy indoor environments at our shopping centers. Tenants and their employees enjoy direct benefits from healthy indoor environments. As such, we established this policy to maintain healthy indoor environments in the properties we own and manage. While the Property Managers work in conjunction with our vendors, everyone at the property is responsible for the success of this policy and for carrying out the contents of the following Indoor Air Quality ("IAQ") Management Plan.

- **Smoke Free Centers:** InvenTrust Properties maintains a strict no smoking policy inside the buildings and within 30 feet of building entrances, windows, and air intakes. Property Managers will oversee enforcement of this policy and include this as part of their regular monthly inspections.
- **VOC Control:** Low and No-VOC products are recommended for use in any common areas and in vacancy turn-over work.
- **HVAC Preventative Maintenance:** For any property where the Landlord is responsible for the HVAC, ensure a preventive maintenance program is in place, to include inspecting, cleaning, servicing of the units and changing air filters, per ASHRAE standards or similar local or regional standards.
- **Janitorial Services:** Property Managers will ask any janitorial service with which they contract if they are willing and able to use green cleaning methods using Green Seal certified products (greenseal.org).
- **IAQ Improvement:** Property Managers will meet with HVAC and janitorial service providers as necessary to discuss additional IAQ management strategies.

Sustainable Purchasing

InvenTrust Property Management is fully committed to managing and operating our properties in such a way that minimizes the footprint of the property and positively contributes to our environmental goals. As such, each property shall follow sustainable purchasing guidelines for all products required for operations in area under management control.

- **Recycled Material Usage:** Areas under management control should request that contractors use products manufactured with the maximum practical amount of recycled or recovered material, especially post-consumer material, to the extent practical. This includes, but is not limited to, cleaning products, office supplies and construction materials.
- **Environmentally Preferred Products:** Areas under management control should request that contractors use, environmentally preferable products whenever cost-effective and to the extent practical.

Sustainable Purchasing (Continued)

- **Information Storage:** Property Management staff shall send and store information electronically when possible. This includes email, website, and e-fax.
- **Product Durability:** Property Management staff shall consider durability and repairability of products prior to purchase.

Waste Diversion and Recycling

InvenTrust Property Management is fully committed to managing and operating our properties in such a way that minimizes the footprint on both the property and the environment and to positively contribute to our environmental goals. As such, it is the goal of InvenTrust Properties to have waste diversion and recycling efforts in place at all the shopping centers in our portfolio.

Waste Diversion and Recycling Guidelines

- We shall make best efforts to recycle the following materials at our properties: aluminum, cardboard, paper, glass, steel, and plastic, in accordance with local regulations and hauling policies.
- Property Managers will ensure the proper disposal area equipment is available and clearly labelled to facilitate safe, easy, and convenient recycling and waste disposal practices onsite for staff and tenants.
- Property Managers will work to identify opportunities to improve recycling efforts and evaluate the feasibility of any new recycling programs or operations adjustments.
- The Landlord will provide all new tenants with guidance on recycling efforts and initiatives at the property.

Additional Recycling Guidelines

- Property Managers will work to identify opportunities and implement initiatives for composting food waste and properly disposing of cooking oil/grease whenever feasible.
- Property Managers will ensure that electronic waste (e-waste), including but not limited to batteries, appliances, IT equipment and devices, and tools, is properly disposed of in separate collection areas and removed by an approved e-waste collection service.

Sustainable Construction

Each property shall abide by the following green construction guidelines for construction projects, including repairs, renovations, and tenant buildouts.

- **Construction Area Practices:** To the best of our ability, we will endeavor to accomplish the following:
 - Use temporary protective dust curtains to separate work areas from other occupied spaces.
 - Protect porous and fibrous materials such as carpet from absorbing VOCs until installed.
 - Clean up dust immediately following construction activity.
- **Ventilation and Worker Protection:** To the best of their ability, each contractor shall:
 - Seal off air supplies and returns to protect ventilation systems from contamination.
 - Provide a continuous minimum ventilation rate of 1 air change per hour during construction.
 - Require VOC-safe respirator masks for workers installing any product that contains over 150 grams per liter of VOCs.
- **Construction Waste Management Plan:** It is the goal of each Construction & Development ("C&D") project to divert at least 50% of C&D waste from the landfill by salvaging, recycling, and reusing. The following can be diverted: asphalt, concrete, metals, window glass, wood, paper, aluminum, light fixtures, and cardboard.

Green Leases

InvenTrust looks to promote energy efficiency, cost savings, improved air quality, and sustainability in buildings through the use of green leases. Green lease language removes barriers that previously existed between landlords and tenants when it comes to capital expenditures and utility reporting. InvenTrust aims to include green lease language in all new and renewal leases to require or encourage the following practices:

- Diligently pursue cost effective sustainable practices with tenant buildouts
- Amortize and recoup capital costs for energy-efficient improvements made to the building and common areas and share the long-term savings and efficiencies by both parties
- Installation of LED lighting
- Use of Low or No VOC paints
- Installation of programmable thermostats
- Use of recycled or reclaimed finish material
- Incorporate efficiency into energy-using equipment by using ENERGY STAR labeled equipment and optimize its operating schedules
- Use WaterSense labeled plumbing fixtures
- Install HVAC equipment free of ozone-depleting substances
- Meet ASHRAE standards for acceptable indoor air quality

Environmental Due Diligence for New Acquisitions

Our commitment to sustainability is paramount in all our business decisions. When it comes to the acquisition of retail properties, not only do we take into consideration the economic potential of the property, but also its ability to operate sustainably. Due diligence items reviewed by the Investment Committee for new acquisitions include, but are not limited to:

- Common Area LED Lighting
- Energy Management System
- Efficient Landscaping/Irrigation
- Electric Vehicle (EV) Charging Stations
- Recycling Program
- Cool Roofs
- Public Transportation / Bike Racks
- On-Site Renewables
- Building Certifications (i.e. LEED, IREM, etc.)
- Green Leases
- Wellness-Inspired Amenities
- Smoke-Free Policy
- Green Cleaning Service Contracts
- Water Reclamation
- Building Safety

Social Responsibility

InvenTrust places people at the center of our commitments. Our employees, tenants, and communities are the driving force behind everything we do.

Human Rights Policy

InvenTrust recognizes its responsibility to respect human rights in its operations in accordance with the [United Nations Universal Declaration of Human Rights](#) (the "UDHR"). All employees are required to obey the law and comply with specific standards relating to legal obligations, ethics, and business conduct. The Company has clear accountability mechanisms in place to monitor and report on compliance with these directives. In addition, parties contracting with the Company, such as vendors, are also required to operate in a manner which is compliant with all applicable laws and subject to certain operating standards. The Company will take actions to terminate relationships with parties who fail to comply with applicable laws and operating standards where necessary.

Forced Labor, Child Labor and Modern Slavery

InvenTrust prohibits and denounces the use of all forms of forced labor including indentured labor and child labor, all forms of slavery and any form of human trafficking. InvenTrust is committed to complying with all applicable labor laws.

Diversity, Equity and Inclusion (DEI)

InvenTrust Properties is committed to providing equal employment opportunities (EEO) to all persons. To that end, the Company prohibits discrimination, harassment and/or retaliation on the basis of:

- age
- race
- color
- religion
- national origin
- gender
- sexual orientation
- gender identity or expression
- physical or mental disability
- marital status
- veteran or military status
- pregnancy
- alienage or citizenship status
- genetic predisposition or carrier status
- any other status protected by applicable federal, state or local law.

Equal opportunity extends to all aspects of the employment relationship, including without limitation, recruitment and hiring, transfers, promotions, training, terminations, working conditions, compensation, benefits, and all other terms and conditions of employment.

Discrimination and Harassment

InvenTrust strictly prohibits any behavior which rises to the level of discrimination, harassment, threat, intimidation, or otherwise creates a hostile work environment. We are committed to providing a workplace free from any type of unlawful discrimination and harassment including that of a sexual nature, verbal threats, intimidation, and physical assault, all of which violates Company policy. Employees are encouraged to report violations including any instances of discrimination and harassment without fear of reprisal or retaliatory action. Anyone found to be participating in unlawful discrimination, harassment, or retaliatory actions shall be subject to disciplinary action.

Freedom of Association

The right to freedom of association is set forth in the UDHR. We respect the rights of our employees to lawfully and peacefully associate, organize and bargain collectively. All employees shall comply with all applicable labor and employment laws, regulations, and polices related to freedom of association.

Safe and Healthy Workplace

The health and safety of our employees is our top priority. The Company complies with all applicable government safety, health, and environmental laws and regulations, and has established protocols to provide a safe and healthy workplace. We strive to ensure that our employees are aware of, and follow, Company safety protocols for avoiding risk, identifying and reporting unsafe working conditions including security breaches, and reporting injuries and other health related concerns in the workplace.

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 and are committed to complying with applicable labor and employment laws.

Reporting Violations

Any complaints about anyone violating any policies should be promptly reported. Violations can be reported as follows: i) an immediate supervisor; ii) Human Resources; iii) the Company's General Counsel; or iv) the ethics hotline at 855-477-8405 (a service provided by an independent third party).

InvenTrust will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against any employee who raises concerns. Any person who participates in any such retaliation is subject to disciplinary action up to and including termination.

Community Engagement

InvenTrust engages with its communities through on-site events, social media and volunteer events. We invest in the communities that support our centers by stimulating job growth and increasing tax revenue for the surrounding areas. In addition, our leasing and redevelopment efforts aim to meet the changing needs of our communities.

Philanthropy Practices

InvenTrust has a shared passion and dedication to giving back to our community, and for this reason we support charitable causes such as St. Jude Children's Research Hospital, Feed My Starving Children, Feeding America, Cycle Nation, and other local organizations. In addition to our company-organized philanthropic events, we implemented half-day Fridays to give employees the flexibility to volunteer for their charities of choice. This results in approximately 208 hours of potential time that employees can make an impact in their community.

We also support crisis and disaster relief where possible. Throughout the COVID-19 pandemic and after natural disasters such as hurricanes, InvenTrust collaborated with our vendors and tenants to expedite repairs and reopen as soon as it was safe to do so in order to serve our local communities.

Governance Standards and Practices

InvenTrust believes our corporate governance is structured in a manner that closely aligns the Company's interests with that of our stockholders. For more information about our corporate governance structure, please refer to our Corporate Governance Guidelines which is available on our website at: www.inventrustproperties.com/governance-guidlines/.

Stakeholder Engagement

InvenTrust's success as an owner and operator of shopping centers requires that we engage with and consider the needs of all our stakeholders which includes our shareholders, employees, lending partners, tenants, and local communities. We believe stakeholder engagement is a continuous dialogue rather than event-driven communication. The value of listening to and understanding all of our stakeholders' views about our business operations is immensely important to us. Our engagement approach is grounded in a set of core principles:

- **Transparency:**
Openly connect with stakeholders by providing information and communications in a timely and understandable manner.
- **Consistency:**
Engage proactively and maintain regular and consistent communication to provide continuity and meaningful engagement.
- **Accountability:**
Inform stakeholders of InvenTrust's performance and strategic execution.

The Company has a robust stakeholder engagement program led by our Investor Relations team, Marketing department, Corporate Secretary's office and executive management team. We actively engage with our stakeholders in a number of forums on a year-round basis including earnings calls, annual shareholder meetings, SEC filings, investor meetings, press releases, analyst conferences, employee and tenant surveys and our website.

Any relevant concerns are addressed promptly by the Investor Relations department. Shareholders may also make their views known through individual voting for directors, say-on-pay advisory vote and other matters submitted to shareholders for approval. In addition, shareholders may submit proposals in accordance with applicable rules and our bylaws.

Risk Management Practices

InvenTrust takes a holistic approach to incorporate enterprise risk management (“ERM”) into our policies and practices, including how we identify, analyze and address risks. Our ERM Committee reports annually to the Audit Committee and Board of Directors and proactively manages all risks throughout the organization through an effective risk management framework. Strategic, financial, operational and ESG risks are analyzed with all Company departments to determine probability, exposure, and velocity, and then risks are managed to mitigate, transfer or exploit the exposure as appropriate.

Business Continuity and Crisis Response Practices

InvenTrust understands that interruptions have an impact on its stakeholders and is committed to mitigating the impact of all unplanned business interruption. Our Risk Management department oversees the Company’s Business Continuity Plan, prioritizing resiliency, and recovery to our most critical business functions. The Company’s Disaster Recovery Plan and Crisis Response Plan strive to provide business continuity in the event of extreme weather events, including hurricanes, convective windstorms, earthquakes, and floods, as well as other scenarios like pandemics, cyber-attacks, and ransomware.

The Crisis Response team manages incidents for crises such as social unrest and extreme weather events and assists our local teams by overseeing the Company’s response to incidents.

Internal Audit Practices

Management engages external resources to enhance our internal audit function. The internal audit team conducts an annual risk assessment that addresses financial and fraud risks facing the Company and develops a plan based on the results of this assessment. The plan is presented to Executive Management and the Audit Committee of the Board of Directors by the internal audit team on an annual basis. Progress on the plan is provided quarterly, with a final assessment evaluated in conjunction with the Annual Report on Form 10-K.

Code of Ethics and Business Conduct

InvenTrust has adopted a Code of Ethics and Business Conduct (the “Code of Conduct”) applicable to our directors, officers, and employees, which promotes integrity, ethics and legal compliance. For further information, our Code of Conduct is available on our website at: www.inventrustproperties.com/code-of-ethics/

Anti-Corruption Practices

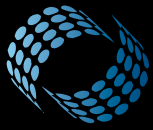
The Company is committed to complying with the U.S. Foreign Corrupt Practices Act (“FCPA”) and other applicable anti-corruption laws. The FCPA prohibits the Company and its employees, directors, officers, and agents from offering, giving, or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, or official of a public international organization. The Company prohibits employees, directors, and officers from giving or receiving bribes, kickbacks, or other inducements to foreign officials. This prohibition also extends to payments to agents acting on the Company’s behalf if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. The use of agents for the payment of bribes, kickbacks or other inducements is expressly prohibited. Violation of the FCPA and other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors. If you have any questions regarding this policy or suspect a violation of this policy, please contact the General Counsel.

Anti-Money Laundering

InvenTrust is committed to minimizing the risk of our operations being used by money launderers and preventing any financing of terrorism. We will comply with all applicable anti-money laundering laws, and we will not knowingly do business with anyone who we suspect of being connected with criminal or terrorist activity. We will never knowingly participate in a scheme to launder money, underreport the size of a cash transaction, or wrongfully avoid tax liability. Furthermore, we will take reasonable steps to know our clients in order to reduce the chance that we will inadvertently assist in money laundering.

Data Privacy and Cybersecurity Practices

InvenTrust is committed to protecting our data and information systems. We collect limited personal information from our tenants, and we do not sell any personal information to third parties. Access to any personal information is restricted to employees with a legitimate need to possess it for a business purpose. Technology and processes have been implemented that focus on preventing, detecting, and responding to cybersecurity threats. We have developed policies and procedures for our employees to follow that mitigate cybersecurity risk, including a robust security awareness training program, spontaneous phishing campaigns to test our users, as well as required tools to authenticate access to our systems.



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