

Governance

Our business is built on integrity. Since our founding in 1993, we've focused on doing the right thing for students, parents, universities and our team members. Our culture of respect and honesty is backed by strong governance and infrastructure as well as policies outlining our principles.

The Academic and Residential Complex,
University of Illinois Chicago

ESG Oversight

ACC relies on our multifunctional ESG Committee and our DEI Task Force to keep us aiming higher and to execute on our vision and strategy. These entities pull together teams from across the company to execute key initiatives. They also report our ESG activities and results quarterly to our executive management team and ownership entity.

In 2023, we consolidated all of our risk-related activities, including compliance and privacy, under our newly expanded legal department for greater efficiency and reporting. Our executive management team and ownership also provide oversight of risk mitigation strategies in areas ranging from climate to cybersecurity. We are able to leverage the scale and resources of our ownership to enhance our risk mitigation capabilities.

Compensation

ACC's employee compensation programs are designed to attract, retain and motivate talented employees. They reward employees for meeting individual goals, and also link a substantial portion of compensation to the achievement of shared company and ESG goals that drive sustainable shareholder value. The executive team and our ownership entity have established a bonus compensation structure for all company employees that incorporates ESG priorities and related key performance indicators.

Ethics & Compliance

Our ethical culture is rooted in our company value to "do the right thing." We keep this culture strong by providing clear codes and policies for ethical conduct, backed by a companywide infrastructure that supports compliance. This includes training and resources to help team members understand policies, make good decisions and recognize violations.

Code of Conduct

All ACC team members must follow our Code of Business Conduct and Ethics, which covers topics such as conflicts of interest, fair dealing and disclosure of proprietary information. All team members must review and affirm the code each year. We also have a Code of Ethical Conduct for senior financial officers.

Governance Structure

Our Internal Audit team performs key functions to support ACC's ethical environment, culture and commitment to integrity. These include conducting an annual, entity-level control assessment based on the Committee of Sponsoring Organizations (COSO) internal control framework, including surveying executives through a COSO-aligned survey, and an annual fraud survey of all internal control framework process owners and participants to enhance our risk assessment.



Project Spotlight

ACC's latest Leadership Conference included our first Women in Leadership panel. Eight of our female senior leaders led our general managers in a discussion of the unique experiences and perspectives women bring to ACC. The panelists represented the diversity of our leadership's tenure, background and experience. The session was so well-received it inspired the creation of a new women's group at ACC.

[Learn more >](#)

Handling Issues

Team members may report workplace concerns through our anonymous hotline, which is administered by a third-party service. Any reports made through EthicsPoint are routed directly to our Internal Audit team, which administers EthicsPoint and is also immediately notified of any report or complaint. Internal Audit oversees EthicsPoint-based investigations, and if the situation warrants, Human Resources, Internal Audit or Legal will oversee a confidential investigation. Further, our Protection of Whistleblowers policy protects reporting team members against retaliation.

We have not had significant bribery, fraud or corruption issues in 2023 or in any prior reporting years. In addition, we had no legal actions for anticompetitive behavior, antitrust and monopoly practices in 2023 or any prior reporting years. Finally, we have an anti-harassment policy, which all team members have acknowledged.

Review our Code of Conduct [here](#).

Stakeholder Engagement

Our regular engagement with stakeholders enables us to transparently communicate our company's performance and receive feedback that helps us improve. Additionally, we reach out directly to our primary stakeholders:

Residents

We are committed to listening to our residents to understand their needs and their experience of living in our communities. We keep an open, two-way dialogue with residents through our residence life programs, daily interactions, social media and formal surveys. We use their input to improve their satisfaction with the living accommodations and to develop programs for student success. We also survey residents on their communication preferences and their satisfaction with ACC's communication, which enables us to improve our customer service.

Universities

Our relationships with universities are core to everything we do, and we seek to uphold their traditions and contribute to their goals and mission.

Led by our vice president of university relations, we continually engage with our partners to identify how we can work together to address higher education issues. We are members of many leading higher education organizations and also participate in panels and discussions with university stakeholders through these channels.

Communities

When we develop a property, we become a long-term member of the community. We strive to be a good neighbor and community leader by convening community leaders for predevelopment eco-charrettes, employing local contractors in construction, integrating local retailers into our properties and giving back to charities.

Team Members

We maintain — and communicate — an open-door management policy at all levels of ACC. We use both informal two-way dialogue with team members and formal feedback like surveys to continually improve our operations and develop new programs. We also use this feedback to strengthen our culture. With some team members working at our corporate headquarters and some working at properties across the country, and many working remotely, we work hard to bring people together through calls, newsletters and culture committee events. We use all of these occasions to celebrate team members' achievements.



To celebrate our partnership with the Hi, How Are You Project, ACC designer Raece Godwin designed this mural in our Home Office.

Responsible Technology Use

Technology Roadmap

In 2023, we continued to implement our three-year technology roadmap, which is designed to help us utilize tools and technologies to provide the best possible experience for residents. We are strategically pursuing solutions that make our processes more efficient so we can continue to provide exceptional service as we scale our business. We are also improving integration with our partners to share data securely as we automate business processes.

Although we are excited about AI’s potential for business transformation, we are still studying the compliance issues associated with its use. We want to ensure that, as with any new technology, we apply it in the right areas with the right governance.

Cybersecurity

We are committed to protecting both our corporate data and systems and the personally identifiable information we collect from our partners, team

members and residents. In 2023, we continued to mature our cybersecurity program by simplifying our ecosystem of solutions and ensuring we have the right service providers to secure our processes and data.

We continually monitor the regulatory landscape and follow industry guidelines — such as the General Data Protection Regulation and California Consumer Privacy Act — to ensure we exceed requirements in our markets.

We also conduct training and awareness campaigns with our team members to teach them how to responsibly handle and protect data and keep their operations secure.

Our privacy committee reviews all agreements with third parties to ensure end-to-end compliance and that there is an auditing process in place. And our chief technology officer provides quarterly security and privacy updates to our Strategic Planning and Risk Committee.



People Spotlight

The hospitality industry is Hoang Nguyen’s first love, but as a hotel manager he quickly realized he had an aptitude and passion for using technology to enhance the customer experience. He joined ACC in 2023, and his people skills and frontline service experience make him ideally suited to implement our technology roadmap.

“Job No. 1 is that tech needs to work for people—it needs to be reliable, user-friendly and deliver a seamless experience.”

[Learn more about Hoang >](#)

Business Continuity

Our business has continued to evolve this year, and we’ve navigated this evolution while continuing to operate our properties with excellence, provide the best possible experience with students, build strong partnerships and maintain a strong culture. Our values will continue to guide us in our next chapter of growth.

Additionally, we have enacted detailed business continuity plans that allow us to better serve our residents, create value and protect the well-being of our people. With our long-term strategy, our focus on residents and the communities we serve, and our performance and operating discipline, we believe we are well positioned to navigate the future and to build even more communities where students love living.