

Getty Realty Corp.
Complaint and Investigation Procedures

(Revised February 26, 2019)

Complaint and Investigation Procedures

The following procedures have been adopted by the Audit Committee of Getty Realty Corp. (the “**Company**”) to govern the receipt, retention, and treatment of complaints regarding the Company’s accounting, internal accounting controls, auditing matters, questionable financial practices or potential violations of the federal securities laws (“**Complaints**”) and to protect the confidential, anonymous reporting of employees’ concerns regarding such Complaints.

POLICY

It is the policy of the Company to treat Complaints seriously and expeditiously.

Employees will be given the opportunity to submit for review by the Company confidential and anonymous Complaints, including without limitation, the following:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the SEC or members of the investing public;
- violations of SEC rules and regulations applicable to the Company and related to accounting, internal accounting controls and auditing matters;
- violations of the federal securities laws;
- intentional error or fraud in the preparation, review or audit of any financial statement of the Company; and
- significant deficiencies in or intentional noncompliance with the Company’s internal accounting controls.

If requested by the employee, the Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Vendors, customers, business partners and other parties external to the Company also will be given the opportunity to submit Complaints; however, the Company is not obligated to keep Complaints from non-employees confidential or to maintain the anonymity of non-employees.

Complaints will be reviewed under Audit Committee direction and oversight by the Company’s General Counsel or such other persons as the Audit Committee or General Counsel determines to be appropriate.

The Company will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures.

In the event that the Company contracts with a third party to handle complaints or any part of the complaint process, the third party will comply with these policies and procedures.

PROCEDURES

Receipt of Complaints

1. **Written Complaints to General Counsel:** Any person may submit a written Complaint to the General Counsel of the Company at the following mailing or e-mail address:

Joshua Dicker
Executive Vice President, General Counsel and Secretary
Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: jdicker@gettyrealty.com

2. Written Complaints to Members of the Audit Committee: Any person may submit a written Complaint to any member of the Audit Committee of the Company (each an “**Audit Committee Member**”) at the following mailing or e-mail addresses:

Philip E. Coviello, Jr.
c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: pcoviello@gettyrealty.com

Mary Lou Malanoski

c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: mlmalanoski@gettyrealty.com

Richard E. Montag
c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: rmontag@gettyrealty.com

Howard Safenowitz
c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: hsafenowitz@gettyrealty.com

3. Written Complaints to Other Company Officers: Any person may submit a written Complaint to any officer of the Company at the following mailing address:

Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753

Any submission should be made care of (“**c/o**”) either (a) a specified officer (each of whom can be identified by reference to the Company’s Annual Report to Stockholders, the Company’s Annual Report on Form 10-K filed with the Securities and Exchange Commission or the Company’s website) or (b) a specified office (for example, President or Chief Financial Officer).

4. Written Complaints to Other Members of the Board of Directors: Any person may submit a written Complaint to any other member of the Company's Board of Directors at the following mailing or e-mail addresses:

Leo Liebowitz, Chairman
c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: lliebowitz@gettyrealty.com

Christopher J. Constant, President and Chief Executive Officer
c/o Getty Realty Corp.
Two Jericho Plaza, Suite 110
Jericho, New York 11753
Email: cconstant@gettyrealty.com

Milton Cooper
c/o Kimco Realty Corporation
3333 New Hyde Park Road, Suite 100
New Hyde Park, New York 11042
Email: mcooper@kimcorealty.com

5. Employee Submissions:

With respect to any Complaint submitted by an employee, such employee need not provide his or her name or other personal information and reasonable efforts will be used to conduct the investigation that follows from a Complaint from an employee in a manner that protects the confidentiality and anonymity of the employee submitting the Complaint.

6. Access to Reports and Records and Disclosure of Investigation Results:

All reports and records associated with Complaints are considered confidential information and access will be restricted to members of the Audit Committee, the Company's legal department and employees of the Company or outside counsel involved in investigating a Complaint as contemplated by these procedures. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Complaints and any resulting investigations, reports or resulting actions generally will not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at the time.