

SACHEM CAPITAL CORP.

Whistleblower Policy

Purpose

Sachem Capital Corp. (the “Company”) is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and the Company’s commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and assurance that they will be protected from reprisals or victimization for whistleblowing.

This policy is intended to provide protection for you if you raise concerns regarding the Company, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with any of the Company’s policies; or
- activities, which otherwise amount to serious improper conduct.

Reporting Responsibility

It is the responsibility of all employees to comply with the Company’s policies and to report concerns regarding the Company and violations or suspected violations of Company policy in accordance with this policy.

No Retaliation

No employee who in good faith reports a concern, violation or suspected violation in accordance with this policy shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise serious concerns within the Company prior to seeking resolution outside the Company.

Reporting Violations

The Company has an open door policy when it comes to reporting a concern, violation or suspected violation and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, employees are encouraged to directly contact the Company’s CEO or his successor. Employees who wish to remain anonymous also call Joel J. Goldschmidt, Esq. of Morse, Zelnick, Rose & Lander, LLP, Corporate and Securities Counsel to the Company, at (212) 838-8269.

Accounting and Auditing Matters

The Audit Committee of the Board shall investigate all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of any of the Company's policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of Company policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously on the Company's anonymous hotline. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Company's CEO will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.