

Spirit Realty Capital, Inc.

Anti-Corruption Policy

1. Introduction

Spirit Realty Capital, Inc. (“Spirit” or “the Company”) is committed to conducting its business with the utmost integrity. This Policy contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. To the extent this Policy requires a higher standard than required by commercial practice or applicable laws, rules, or regulations we adhere to these higher standards.

2. Application

This Policy applies to all individuals working for Spirit, including all directors, officers, and employees (collectively, “Company Employee(s)”). In addition, the Company Employees and the Company may also be held liable for the conduct of third parties acting on the Company’s behalf, including consultants, brokers and business associates. Accordingly, as described in this Policy, it is imperative that the Company Employees take steps to inform and monitor third parties who interact with government officials on the Company’s behalf.

3. Corruption

It is the policy of the Company to conduct all of its operations and activities in compliance with all applicable laws and regulations in the U.S. (including the U.S. Foreign Corrupt Practices Act “FCPA”) and the other countries in which the Company conducts or may conduct business. The Company Employees and third parties acting on the Company’s behalf, are prohibited from participating in any type of level of corruption, defined as dishonest or fraudulent conduct by those in power.

4. Bribes and Facilitation Payments

The Company Employees and third parties acting on the Company’s behalf, are prohibited from participating in bribes, defined as paying, giving, promising, providing, offering, or authorizing to pay, give, promise, provide or offer, anything of value, either directly or indirectly, to anyone, if such conduct could reasonably be construed as being intended to influence any act or decision of the recipient, and/or the entity the recipient represents, in order to secure an improper advantage or to otherwise obtain or retain business for the Company. Company Employees are also prohibited from participating in facilitation payments, which are defined as bribes made to secure or expedite the performance of a routine or necessary action to which the Company is legally entitled to receive. In other words, paying bribes and/or facilitation payments is strictly prohibited. For details on the Company’s policy with respect to giving and receiving gifts and other business hospitalities please refer to Spirit’s Gift and Entertainment Policy.

5. Anti-Money Laundering

The Company Employees and third parties acting on the Company’s behalf, are prohibited from participating in money laundering, which is defined as the act of converting money or other material values gained from illegal activity into money, investments or other assets that appear legitimate and so the illegal source cannot be traced. We work closely with our financial service providers to comply with all aspect of their Anti-Money Laundering and Know Your Customer policies and procedures.

6. Hiring Third Parties

The Company will hire only third parties it believes are qualified and reputable to act on its behalf with government officials. The Company may require third parties to adhere to this Policy and/or agree to contractual requirements to ensure their compliance with applicable laws.

7. Accounting and Estimations

Please see detail regarding accounting and estimations in our Code of Business Conduct and Ethics.

8. Competition and Fair Dealing

Please see detail regarding competition and fair dealing in our Code of Business Conduct and Ethics.

9. Compliance with Antitrust Laws

Please see detail regarding compliance with Antitrust laws in our Code of Business Conduct and Ethics.

10. How to report

This Policy is not a comprehensive rulebook and cannot address every situation that you may face. This Policy should also be read in conjunction with the Code of Business Conduct and Ethics, Employee Handbook and Gifts and Entertainment Policy with respect to issues discussed in this Policy.

All Company Employees have a duty to report any known or suspected violation of this Policy, including any violation of the laws, rules, regulations or policies that apply to the Company. If you know of or suspect a violation of this Policy, immediately report the conduct to your manager. Your concern will be investigated accordingly. If you feel uncomfortable reporting the conduct to your manager or you do not get a satisfactory response, you may contact Human Resources or the Company's legal department directly. All reports of known or suspected violations of the law or this Policy will be handled sensitively and with discretion.

You may also file a confidential report by phone or online by contacting our third-party administrator, NAVEX Global. Simply contact our Employee Ethics Hotline by calling (855)-502-2070 or by submitting a report to <https://spiritrealty.ethicspoint.com/>. If you wish to remain anonymous, please provide as much detail as possible to allow the Company to conduct an investigation. Reports regarding hotline activity are provided monthly to certain members of Company management, the Board of Directors and internal auditors. The Audit Committee of the Board of Direction is tasked with reviewing and investigating further any matters that pertain to the integrity of management or adherence to the standards set forth in the Code of Business Conduct or Ethics and this Policy.

Reports may also be sent to the follow address:
Spirit Realty Capital, Inc.
2727 N. Harwood, Suite 300
Dallas, TX 75201
Attn: Human Resources

All Company Employees will be held accountable for adherence to this Policy. It is Company policy that any Company Employee who violates this Policy will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. Company Employees who violate the law or this Policy may expose themselves

to substantial civil damages, criminal fines, and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community.

11. Related Policies

Please refer to the Code of Business Conduct and Ethics, Gifts and Entertainment Policy, Employee Handbook, and Insider Trading Compliance Program.

SPIRIT REALTY CAPITAL, INC.
ANTI-CORRUPTION POLICY
ACKNOWLEDGMENT FORM

I hereby acknowledge that I have received, read, understand, and will comply with the Spirit Realty Capital, Inc. Anti-Corruption Policy.

I understand that my agreement to comply with the Policy does not constitute a contract of employment.

Please sign here: _____

Print Name: _____

Date: _____

Policy acknowledgements will be captured through our employee self-services portal (ADP Workforce Now®). When necessary, this signature page will need to be completed and returned to Spirit Realty Capital, Inc.'s Human Resources Department within ten (10) business days of receiving this Policy