

Spirit Realty Capital, Inc.

Human Rights Policy

1. Introduction

At Spirit Realty Capital, Inc. (“Spirit” or “the Company”) we are committed to protecting all human rights, with reference to the UN Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Not only is it the right thing to do but we believe this commitment is fundamental to promoting sustainable operations and ultimately benefits all of our stakeholders. In line with our Code of Business Conduct and Ethics, Employee Handbook, Diversity Equity and Inclusion Policy, and Vendor Code of Conduct, Spirit takes responsibility to ensure human rights are respected in all its business functions. Spirit also promotes human rights by encouraging social and environmental progress and better standards of life and freedom for our employees, vendors, and the communities we serve.

2. Application

This Policy applies to all individuals working for Spirit, including all directors, officers, and employees (collectively, “Company Employee(s)”).

3. Equal Opportunity

Spirit prohibits discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. Recruitment, hiring, placement, development, training, compensation and advancement may not be based on any of these factors but should instead be based on rational factors such as qualifications, performance, skills and experience. Spirit does not accept disrespectful or inappropriate behavior, harassment or retaliation in the workplace or in any work-related circumstance outside the workplace.

4. Child Labor

Spirit prohibits the use of child labor and the exploitation of children in all forms. Spirit will work with proper authorities to address any situation involving child labor or child exploitation should it become aware of any.

5. Forced Labor and Human Trafficking

Spirit prohibits the use of forced labor and human trafficking in all forms. Spirit will work with proper authorities to address any situation involving forced labor or human trafficking should it become aware of any. Furthermore, Spirit is committed to compensating its employees at competitive rates.

6. Occupational Health and Safety

Spirit recognizes the importance of the health, safety and environmental well-being of our employees, and Spirit is committed to providing and maintaining a healthy work environment that includes access to clean sanitary facilities and drinking water for our employees at all facilities. We recognize water as a fundamental human right. Consistent with Spirit’s Code of Business Conduct and Ethics and Employee Handbook, Spirit encourages open discussion with our employees for their health, safety and environmental concerns. To promote a safe and healthy work environment for employees, clients, and visitors, Spirit offers

information to employees about workplace safety and health issues through staff meetings, bulletin board postings, memos, or other communications. Some of our best safety improvement ideas come from employees. We maintain a tobacco and smoke-free workplace for the health of our employees and in order to maintain pleasant working conditions. In addition, Spirit is committed to a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

7. Transparency in the Supply Chain

Spirit recognizes that no business is immune from supply chain risks. Within our current business model, we do not use suppliers or have a supply chain and thus we are not directly associated with sourcing high-risk materials or hiring low-wage or unskilled workers without legal immigration status. Nevertheless, we are committed to fostering strong and mutually beneficial partnerships and we aim to partner with other upstanding corporate citizens that take necessary precautions in their supply chains.

8. Freedom of Association

Spirit respects the rights of Company Employees and vendors concerning freedom of association and collective bargaining provided however, that all Company Employees must comply with all applicable labor and employment laws, which include laws related to freedom of association, privacy and collective bargaining. It is the responsibility of Company Employees to understand and comply with such laws that are relevant to his or her jobs.

9. How to report

This Policy is not a comprehensive rulebook and cannot address every situation that a Company Employee may face. This Policy should also be read in conjunction with the Code of Business Conduct and Ethics, Employee Handbook and Vendor Code of Conduct and other Company policies 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 Directors 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.

10. Related Policies

Please refer to the Code of Business Conduct and Ethics, Employee Handbook, Vendor Code of Conduct, and Diversity, Equity and Inclusion Policy.

SPIRIT REALTY CAPITAL, INC.

HUMAN RIGHTS POLICY

ACKNOWLEDGMENT FORM

I hereby acknowledge that I have received, read, understand, and will comply with the Spirit Realty Capital, Inc. Human Rights 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