

Spirit Realty Capital, Inc.

Vendor Code of Conduct

1. Introduction

At Spirit Realty Capital, Inc. (“Spirit” or “the Company”) we are committed to fair and ethical business conduct consistent with our Code of Business Conduct and Ethics. The Company expects its partners, employees, agents, and vendors to embrace this commitment as well. As a general matter, please refer to our other related policies available on our website at www.spiritrealty.com for more information regarding the Company’s commitment to these topics.

2. Application

This Policy applies to all vendors, suppliers, agents, subcontractors or other third parties working on behalf of Spirit (collectively, “Company Vendors”).

3. Legal and Regulatory Compliance

Company Vendors should conduct business in full compliance with laws and regulations applicable to their business. Nothing in this Code grants additional rights or expectations to a Company Vendor or alters the Company’s rights in any capacity.

4. Confidentiality and Data Protection

Company Vendors may be provided with or have access to proprietary and personal information. Company Vendors should uphold all legal obligations and otherwise ensure protection of all proprietary, confidential, personal or otherwise sensitive information. Such information should not be used for any purpose beyond the scope of the business arrangement with the Company. Company Vendors should also ensure such information remains private by maintaining adequate cyber security and complying with applicable laws and regulations.

5. Human Rights and Labor Standards

The Company expects Company Vendors to protect all human rights and treat others with respect and dignity at all times, including:

- **Wages and Benefits**: The Company expects Company Vendors to comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. The Company encourages Company Vendors to work toward improving standards of living and quality of life for their employees and communities.
- **Freedom of Association**: The Company expects Company Vendors to adhere to applicable laws regarding the right of their employees to affiliate with lawful organizations without interference.
- **Nondiscrimination**: The Company expects Company Vendors to maintain a workplace free of unlawful discrimination, which includes race, gender, marital status, age, color, religion, national origin, disability, veteran status, sexual orientation, or any other characteristic or status protected by law.

- Human Trafficking: The Company expects Company Vendors will not engage in human trafficking in any capacity.
- Prevention of Underage Labor: The Company expects Company Vendors to comply with all applicable minimum age labor laws and not use child labor.
- Anti-Discrimination, Anti-Harassment and Anti-Retaliation: The Company expects Company Vendors to meet the standards of all applicable anti-discrimination, anti-harassment and anti-retaliation laws.

6. Health and Safety

The Company expects Company Vendors will incorporate health and safety management practices into all aspects of their business and comply with all applicable safety and health laws, including in the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing.

7. Environment

The Company expects Company Vendors will comply with applicable environmental laws, including regarding hazardous materials, air emissions, waste, and wastewater discharges. Company Vendors are encouraged to reduce their carbon footprint and undertake initiatives towards protecting the planet.

8. Anti-Corruption

The Company expects Company Vendors will not engage in any form of corrupt practices including, without limitation, fraud, bribery, money laundering, supporting or involvement with terrorist or organized crime organizations or activities and that Company Vendors have their own internal policies prohibiting these corrupt practices. Company Vendors shall not offer bribes or kickbacks to any Company representative, government official or third party with the intention of obtaining or retaining a business advantage. Company Vendors should also avoid offering gifts, favors or benefits that are intended (or could appear) to influence Company employees to act in their personal interest ahead of the Company's best interest.

9. Antitrust; Competition and Fair Dealing

The Company expects Company Vendors will comply with applicable antitrust and fair competition laws. Unethical business practices such as improper exchange of competitive information, price fixing, bid rigging, or improper market allocation are prohibited.

10. Accurate Business Records

The Company expects Company Vendors will accurately record, maintain, and report business records, including financial account, quality reports, time records, expense reports, and any submission to regulatory authorities.

11. Reporting

The Company expects Company Vendors will allow employees to raise issues or concerns without fear of retaliation.