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# ANTI-BRIBERY AND CORRUPTION POLICY

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## Purpose, scope, and responsibility

Four Corners Property Trust, Inc. (“FCPT”) has established this Anti-Bribery and Corruption Policy (“Policy”) to outline principles that must govern our conduct to a) conform to the U.S. Foreign Corrupt Practices Act (“FCPA”) and similar anti-corruption laws worldwide and b) more broadly, reinforce our intention and obligation to act honestly and ethically in all our business dealings.

This policy applies to all employees in wholly and majority-owned entities of FCPT.

The Office of General Counsel oversees, administers, enforces, and ensures compliance with this Policy, and any questions related to any content contained herein shall be directed to it.

The Management Committee, in tandem with the Office of General Counsel, oversees the assessment of bribery and corruption risks across the enterprise, while evaluating controls, consulting, and reporting to other members of senior management and the Board of Directors regarding anti-bribery and corruption risks.

## Policy Statement

Bribery and corruption are not only against our company values, but they are also illegal and can expose both the employee and FCPT to fines and penalties, including civil and criminal prosecution and reputational damage.

At FCPT, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal, or harmful to our reputation of honesty and integrity. FCPT expects its employees, agents, and representatives to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign), this policy applies to non-government business partners as well.

## What is bribery and corruption?

Bribery is offering, giving, or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. This includes kickbacks, which are defined as providing a payment to

someone who helps facilitate a transaction. Note that kickbacks do not include fees paid to brokers as arranged and agreed to in the normal course of a real estate transaction. Please consult the Office of General Counsel if you have any questions.

On the other hand, corruption is dishonest or fraudulent conduct by those in a position of power, typically involving the act of bribing or bribery.

It's important to understand that a corrupt act has occurred even if:

- A bribe fails; or
- A person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid.

"Anything of value" includes, but is not limited to:

- Cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt;
- Gifts, meals, entertainment, and travel-any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion and comply with FCPT's Gift and Entertainment policy/standards as disclosed in our Team Member Handbook;
- Political contributions;
- Charitable contributions if made to a charity at the direct request of a government official or private business partner. This could be considered an indirect bribe made to obtain or retain business or to secure other improper business advantage; or
- Job offers or internship awards offers to government officials (or their relatives).

## Third Parties

Companies cannot avoid liability by using a third-party to give or receive a bribe. A third-party includes, but is not limited to, consultants, agents, representatives, subcontractors, and subadvisors.

FCPT trains its employees to clearly convey to third parties representing FCPT that we expect them to comply with this Policy. In some jurisdictions, FCPT can be convicted of a criminal offense if it fails to prevent bribery carried out on its behalf by a third-party even if no one at FCPT had actual knowledge of the bribe.

Whenever FCPT seeks to engage a third-party in which the third-party may interact with a government official for or on behalf of FCPT, the following guidelines apply:

1. Due diligence should be performed to ensure:
  - a. that the third-party is a bona fide and legitimate entity,
  - b. is qualified to perform services for which it will be retained, and
  - c. maintains standards consistent with the legal, regulatory, ethical, and reputational standards of FCPT.

## Government officials

Laws and regulations are strict around interactions with both state and federal government officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when government officials are involved.

**Before such expenses are incurred, employees must obtain approval from the Office of the General Counsel.**

A government official is any:

- individual elected or appointed to a governmental entity;
- official or employee of a government;
- official or employee of a company wholly or partially controlled by a government (such as state-owned companies);
- candidate for political office;
- political party or official of a political party; or
- person acting in an official capacity for any of the above regardless of rank or position.

The definition of what could constitute a bribe to a government official is broad and can occur even when the benefit being offered is small, such as gifts, entertainment, and even business meals.

Some laws allow expenses which relate to reasonable and bona fide travel, accommodation, and meal expenses in connection with a contract between the company and the third-party, or the demonstration of company capabilities relating to proposed business with the third party.

## Facilitation Payments

"Facilitation" or "grease" payments are payments that facilitate a normal governmental function, such as to expedite processing paperwork. While these types of payments may be accepted as "a cost of doing business" in some cultures, they are illegal and counter to the values of FCPT. They are not allowed under U.S. laws, and they are prohibited by this Policy.

## Reporting Violations

Employees, agents, and representatives should seek clarification on any questions or concerns regarding activities described in this Policy. If an Employee is offered a bribe from a person or entity doing business with or seeking to do business with the company, they must report it immediately to the Office of the General Counsel. If the Employee is offered something of value and is uncertain whether they are allowed to accept it, they should check with their supervisor or the Office of the General Counsel. Alternatively, a report can be filed anonymously via FCPT's whistleblower hotline as outlined below:

- Via website at [www.lighthouse\\_services.com/fourcornerspropertytrust](http://www.lighthouse_services.com/fourcornerspropertytrust)
- Via electronic mail at [reports@lighthouse\\_services.com](mailto:reports@lighthouse_services.com) (Include FCPT with the report)
- Via telephone at (844) 600-0068

## Disciplinary Actions

FCPT will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. FCPT has the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.