

ESSENTIAL PROPERTIES REALTY TRUST, INC. VENDOR CODE OF CONDUCT POLICY

Essential Properties Realty Trust, Inc. (together with its subsidiaries, the “Company” or “EPRT”) is committed to conducting its business with the highest ethical standards, which extends to the relationships the Company has with its vendors, including suppliers, service providers and other third parties that have a business relationship with EPRT.

This Vendor Code of Conduct (the “Vendor Code”) describes EPRT’s expectations for how its vendors conduct business. All vendors engaged in providing products and services to EPRT are expected to act in a manner that is materially consistent with this Vendor Code.

Though our vendors are independent entities, the business practices and operations of our vendors could impact our business or reputation. To support our efforts with regard to corporate responsibility, it is important that EPRT’s vendors are aware of the guidelines set forth in this Vendor Code.

EPRT’s vendors are expected to understand that the Company has established this Vendor Code and to operate in accordance with the expectations outlined herein. At a minimum, vendors are expected to comply with all applicable laws and regulations and to maintain appropriate policies and procedures designed to promote such compliance. This document summarizes EPRT’s expectations of its vendors and their employees.

1. **Ethical Business Practices.** EPRT expects its vendors to act with integrity and demonstrate a commitment to legal, ethical, safe, fair and environmentally responsible business practices. EPRT seeks to work with vendors that operate in compliance with all applicable environmental laws and that make efficient and effective use of natural resources, as applicable. EPRT has an inclusive culture and believes discrimination in any form should not be tolerated. EPRT expects its vendors to demonstrate a commitment to inclusive business practices, including without limitation, diversity in their workplace.

a. **Anti-Bribery and Anti-Corruption.** EPRT does not tolerate bribery or corruption involving its people, vendors, agents or other business partners. Vendors are expected to fully comply with requirements of all applicable laws and regulations designed to combat bribery and corruption, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as local anti-bribery and anti-corruption laws.

Vendors are prohibited from corruptly offering, providing, paying, soliciting, or otherwise paying or receiving anything of value, directly or indirectly, for the purpose of obtaining or retaining a business relationship with EPRT or achieving an improper business advantage. Anything of value includes, but is not limited to, cash bribes, fees, commissions, gifts of meals, entertainment, charitable or political contributions, offers of employment or similar placements, goods or services, etc.

- Vendors are strictly prohibited from acting on behalf of EPRT to direct or facilitate illegal or inappropriate payments to third parties, governmental organizations, etc.
- b. Gifts, Travel & Entertainment. Vendors may not provide lavish or otherwise inappropriate gifts, fees, favors, or other compensation, including travel, entertainment, or other accommodations that are intended to influence, or may give the appearance of attempting to influence an employee of EPRT, or business decisions of EPRT, generally.
 - c. Conflicts of Interest. EPRT expects its vendors to avoid improprieties and conflicts of interest or the appearance of either, that may adversely impact their objectivity when doing business with EPRT, or which are intended to impact the objectivity of business decisions made by EPRT.
 - d. Privacy and Data Protection. Vendors are expected to protect confidential information. EPRT expects its vendors to maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of EPRT. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational or financial consequences for the vendor, the individuals whose personal information may be implicated, and for EPRT. In addition, vendors must comply with all applicable privacy / data protection and information security laws and regulations.
 - e. Access to Grievance Resolution. Vendors are expected to have formal policies and procedures in place that provide their employees with access to a process for raising concerns regarding the vendor's workplace or business practices without fear of retaliation or reprisals.
2. Human Rights. Vendors are expected to (i) treat all of their workers fairly and with dignity, (ii) adopt an approach to human rights consistent with the United Nations Universal Declaration of Human Rights, (iii) support and respect the protection of internationally proclaimed human rights, and (iv) ensure that they are not complicit in human rights abuses.
- a. Employment Practices. Vendors of EPRT should not (i) use any form of indentured or involuntary, forced, bonded, or slave labor, and should fully comply with all laws that prohibit the use thereof. Further, vendors should not engage in, support or otherwise condone (i) human trafficking or exploitation of anyone, (ii) import goods or utilize services that are tainted by the use of any of the aforementioned improper labor sources or human trafficking, and (iii) retain employees' government issued identification (including passports, work permits, etc.) as a condition of employment.
 - b. Underage Labor. Vendors should not utilize underage labor, as defined by applicable law, and should take the necessary preventative measures to ensure that they do not employ anyone that is under the legal applicable minimum age of

employment. Vendors should not use underage labor as defined by applicable law regulating minimum legal age to work. Workers below the age of 18, if permitted by law, should not be employed in jobs that are likely to jeopardize the health and safety of young workers.

- c. **Compensation and Working Hours.** Vendors should provide wages and benefits that meet or exceed the requirements of applicable laws. In addition, vendors are encouraged to commit to paying a living wage to all of their employees. At a minimum, vendors should pay workers regularly and timely, the legal minimum wage, the prevailing industry wage, or the wage negotiated in an applicable collective agreement. All other types of legally mandated benefits should be provided as required by law, including, as applicable, paid leave, retirement benefits/programs, health benefits, and maternity leave. All overtime work performed should be compensated in accordance with the law and the individual's employment contract or other applicable contract or collective agreement. Workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Workers should be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include, for example, holidays, maternity/parental leave, family care leave and sick leave.
- d. **Freedom of Association.** Vendors are expected to respect worker's rights to freedom of association and collective bargaining, and otherwise meet or exceed the relevant requirements imposed by law.
- e. **Respect, Inclusion and Non-Discrimination.** Employees of EPRT's vendors should be treated with respect and dignity at all times. Vendors are required to comply with all applicable laws regarding discrimination in hiring and employment practices.

Consistent with EPRT's core values and policies, vendors should maintain a workplace free of discrimination, harassment, victimization, and to not tolerate any other form of inappropriate behavior or abuse on any grounds, including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status. Vendors are expected to maintain an environment free of harassment, violence and abuse (physical or verbal) at all times.

- 3. **Diversity, Equity, and Inclusion.** EPRT believes diversity, equity (or equality among employees), and inclusion are social and economic imperatives. The Company expects its vendors to engage a workforce that is inclusive of diverse groups and is reflective of a hiring practice that has historically added underrepresented groups to the vendor's workforce – including minorities, veterans, people with disabilities, or members of the LGBTQ community.

4. Environmental & Sustainability Stewardship. The Company is committed to sustainable business practices within its own operations and at the properties it owns. EPRT encourages its vendors to manage their operations, particularly as it pertains to utility consumption and property maintenance, responsibly and in a manner that is cognizant of conservation or the avoidance of waste with regard to the consumption of energy, water and waste.

5. Social Responsibility. The Company expects its vendors to be fair and just in all business dealings including treating those they employ and serve with respect and dignity. Consistent with a vendor's commitment to diversity, equity and inclusion, EPRT expects its vendors to actively foster diversity of thought and background, create opportunities for its employees that are equitable, and otherwise promote a culture of inclusiveness, non-discrimination, and care.

* * *

Adopted: July 27, 2022