

ESSENTIAL PROPERTIES REALTY TRUST, INC. HUMAN RIGHTS POLICY

Essential Properties Realty Trust, Inc. (together with its subsidiaries, the "Company" or "EPRT"), is committed to maintaining the highest degree of accountability for adherence to standards and guidelines associated with human rights of its employees and where possible its third-party service providers as articulated in this Human Rights Policy (the "Policy"). The Company's commitment is aimed at making a positive impact for all of its stakeholders, including its stockholders, employees, tenants, vendors, creditors and the communities in which it operates. Accordingly, the Company has adopted this Policy to promote fundamental human rights within the Company itself and, where possible, within the organizations of those with whom the Company conducts business.

1. <u>Commitment.</u> Respect for human rights, as defined by the United Nations Universal Declaration on Human Rights, is a core value of EPRT. The Company believes that human rights are fundamental to promoting sustainable operations, and the Company strives to promote human rights in all business functions, including by seeking to engage in business with other parties who share this commitment.

In accordance with the Company's human resource practices, the Company's Code of Business Conduct and Ethics and applicable laws and regulations, the Company seeks to employ sound human rights practices within its operations.

The Company endeavors to engage with its stakeholders, including stockholders, employees, tenants, vendors, creditors and the communities in which it operates, to promote the Company's standards for ethical and responsible operating behavior.

Respect for human rights and taking care of people are core values at EPRT. The Company seeks to respect and promote human rights in its relationships with its employees, tenants and, vendors. The Company's aim is to support and promote the principles of the United Nations Universal Declaration of Human Rights and the human rights protections set forth in the laws of the United States.

This Policy applies to all of the operations of EPRT, regardless of geographic location, and covers all of the Company's properties.

- 2. <u>Policy Objectives and Rationale.</u> This Policy is intended to:
 - Memorialize the Company's consistent and comprehensive approach to promoting human rights;
 - Provide the Company's directors, officers and employees with guidance on the Company's commitment to its stakeholders relative to basic human rights;



- Support ongoing compliance with applicable laws and regulations; and
- Demonstrate to the Company's key constituents and stakeholders that the Company is committed and accountable for its human rights policies.
- 3. <u>Policy Scope</u>. The scope of this Policy includes the following:
 - Expectations of Employees: This Policy applies to all employees of the Company and is intended to be in alignment with all relevant policies and procedures of the Company.
 - Expectations of Vendors: The Company expects its vendors to operate in a manner generally consistent with the principles underlying this Policy.
- 4. <u>General Provisions</u>. The general provisions of this Policy include the following:
 - *Diversity, Equity & Inclusion*. The Company is committed to an inclusive culture that encourages, supports, and celebrates the diverse voices and backgrounds of its employees. EPRT believes diversity encourages innovative thinking and the opportunity to be aligned with the Company's conduct of business, with its tenants, and the community in which the Company is headquartered. The Company values and advances the diversity, equity and inclusion of the people with whom the Company works, particularly its employees and Board of Directors.

The Company is committed to equal opportunity in its workplace, a workplace environment that is free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status or characteristic protected by applicable law. Recruitment, hiring, placement, development, training, compensation, and advancement decisions may not be based on any of these factors but should instead be based on rational factors such as qualifications, performance, skills and, experience.

The Company does not tolerate disrespectful or inappropriate behavior, harassment, or retaliation in the workplace or in any work-related circumstance outside the workplace.

The Company provides each of its employees with detailed policies and materials to provide information on equal opportunity and its prohibition against discrimination and harassment.

• Freedom of Association. EPRT respects the rights of employees and vendors to comply with relevant laws and regulations concerning the freedom of association and collective bargaining. EPRT adheres to the conventions of the



International Labour Organization, including Freedom of Association and Protection of the Right to Organize (No. 87) and Right to Organize and Collective Bargaining (No. 98). EPRT strives to create a workplace in which open and honest communications among all employees are valued. We respect our employees' right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. In the case of any employees represented by a legally recognized union, we are committed to bargaining in good faith with that union.

- Child Labor. EPRT complies with all local minimum working age laws and
 requirements and prohibits the use of child labor. The Company stands firmly
 against any employment practices that would violate any laws and regulations
 associated with child labor, and the Company will work closely with the proper
 authorities to address any such violations of child labor laws that the Company
 becomes aware of.
- Forced Labor & Human Trafficking. The Company stands firmly against the
 use of all forms of forced or compulsory labor and/or human trafficking. The
 Company will work closely with the proper authorities to address any violations
 of compulsory labor or human trafficking that the Company becomes aware of.

The Company expects that all parties with whom it does business will similarly respect human rights and conduct their business operations free from human rights abuses, such as child labor and human trafficking.

The Company prohibits the use of all forms of forced labor, whether prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. The Company has a no tolerance policy for employees, tenants, and vendors in violation of EPRT's standards regarding forced labor, compulsory labor, slavery and human trafficking and anyone in violation of those standards is subject to immediate termination.

• Safe, Secure, and Equitable Working Conditions. The Company complies with all applicable laws and regulations, including those addressing workplace safety and employee health. The safety and health of our employees is of critical importance to EPRT. Unsafe working conditions for the Company's employees are not tolerated. The Company strives to ensure that its workplace is free of recognized hazards, including workplace violence, harassment, intimidation, and other unsafe or disruptive conditions. In addition to complying with applicable laws, EPRT also uses reasonable efforts to address and remediate identified risks of accidents, injury and health impacts. The Company is committed to engaging its employees on a consistent and ongoing basis to continuously improve health and safety in the workplace.



- Work Hours, Wages & Benefits. The Company is committed to compensating its employees at competitive rates and seeks to ensure employees are being paid fair and equitable compensation and competitive benefits. The Company also works to ensure full compliance with applicable wage, work hours, overtime, and benefits and other labor laws. We are committed to paying living wages under humane conditions. The Company expects its vendors to be diligent in all employment matters and ensure fair, safe and equitable working conditions.
- *Transparency in the Supply Chain.* The Company recognizes that no business is immune from risks associated with its third-party relationships similar to supply chain risks. The Company does not directly source high-risk materials or employ individuals without working status.
- 5. Training & Reporting. In order to convey the Company's expectations, this Policy is shared when employees are hired and each new hire is required to execute an acknowledgement indicating that they have read this Policy, understand its provisions and will comply with those provisions contained herein. Annually, each Company employee is required to execute an acknowledgement indicating that they have read this Policy, understand its provisions and that they have complied and will comply with those provisions. Employees who believe there has been a violation or breach of this Policy may report such matter to the Company's Chief Executive Officer or Chief Financial Officer, or anonymously through the Company's Whistleblower Policy for potential investigation and, if appropriate, remediation.



- 6. <u>Applicability to Other Parties.</u> We follow the same standards of business conduct when interacting with tenants, and when engaging and managing the vendors, contractors and other parties with whom we do business. We expect that all parties with whom we do business will similarly respect individual human rights and conduct their business operations free from human rights abuses, such as forced or child labor, human trafficking and slavery, and generally support the principles underlying this Policy.
- 7. <u>Policy Oversight.</u> The Nominating and Corporate Governance Committee of our Board of Directors is charged with, among other things, supporting the Company's commitment to corporate social responsibility and effective corporate governance. In discharging this function, the Nominating and Corporate Governance Committee receives periodic management reports and will periodically review this Policy.

We may waive application of the policies set forth in this Policy where circumstances warrant granting a waiver, subject to appropriate terms and conditions. This Policy is not intended to, and does not, grant any rights to any director, officer, employee, tenant, vendor, stockholder or any other person or entity.

Adopted: July 27, 2022