
HUMAN RIGHTS POLICY

Commitment

At Four Corners Property Trust, Inc., and its wholly owned subsidiaries (“FCPT” or “we”) we are committed to respecting human rights. We believe all persons are entitled to be treated with dignity and respect and have adopted the following Human Rights Policy (the “Policy”), which is aligned with the United Nations’ Universal Declaration of Human Rights.

In accordance with our human resource policies, our Code of Business Conduct and Ethics and all applicable laws and regulations in the communities in which we operate, we aim to institute sound human rights practices within, and outside our operations that support responsible corporate citizenship.

Equal Opportunity

We are committed to equal opportunity in workplaces that are free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, political opinion, or any other status protected by applicable law.

Workplace Safety and Security

The safety and health of our team members is one of our top priorities. We strive to not only comply with applicable safety and health laws and regulations, but also address and remediate identified risks of accidents, injury, and health impacts. Our policies regarding health and safety are provided to our team members and apply to every FCPT employee. Each of our team members is entitled to a copy of our Employee Handbook, which sets forth detailed instructions regarding safety issues.

We are also committed to a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats.

Labor

We prohibit 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.

We have a no tolerance policy for team members, suppliers, vendors, and tenants in violation of our company standards regarding slavery, human trafficking and child labor and anyone in violation of those standards is subject to termination.

We comply with all local minimum working age laws and requirements and prohibit the use of child labor.

Compensation

We compensate our team members competitively relative to the industry and local labor market, and in accordance with applicable legal standards. We work 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. Each of our associates is entitled to clear, written information about their employment conditions with respect to wages before they enter employment and as appropriate throughout their term of employment.

Reporting Violations

Our team members should not accept any direction by their supervisor that is inconsistent with this Policy. If there is ever a concern that anyone connected with FCPT may have engaged or is about to engage in any conduct in violation of this Policy, our team members should promptly bring the matter to the attention of our head of Human Resources. If a team member does not believe that talking to our head of Human Resources is appropriate, if they are uncomfortable doing so, or if doing so does not result in a response with which they are comfortable, then they should contact our General Counsel or anonymously comment through our whistleblower hotline.

Board and Executive Governance and Oversight

FCPT's Audit and Risk Management Committee advises the Board in reviewing and recommending for approval the company's ESG (environmental stewardship, social responsibility, and governance) activities, goals, and policies on an annual basis. The Committee reviews the adequacy of our governance guidelines and focuses on reputational and corporate governance. FCPT executives have oversight over human rights, ethics, compliance, ESG, and inclusion and diversity practices.

Implementation and Enforcement

Every FCPT employee is responsible for their own business conduct and is encouraged to speak up if something does not seem right. Our Code of Business Conduct and Ethics and our Anti-Bribery and Corruption policies can be found on our website and are also shared with all employees. FCPT's suppliers and contractors follow policies and responsibilities set out in our Supplier Code of Conduct. FCPT's independently operated and anonymous Whistleblower Hotline is available to internal and external stakeholders to report potential misconduct or improper workplace practices at any time 365 days a year. The responsibilities of the FCPT Management Committee include setting and updating the ethics policy, overseeing employee ethics training, providing guidance and advice to employees, and investigating reported incidents of ethics non-compliance. All reports may be submitted anonymously and are thoroughly evaluated.

Reporting

Employees should report any conduct that they believe to be a violation of this policy to the Office of the General Counsel or the Human Resources Department. Alternatively, a report can be filed anonymously through FCPT's whistleblower hotline as outlined below:

- Via website at www.lighthouse_services.com/fourcornerspropertytrust
- Via electronic mail at reports@lighthouse_services.com (reference 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.