

FRANKLIN BSP REALTY TRUST, INC.

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Franklin BSP Realty Trust, Inc. (“FBRT”, the “Company,” “we” or “our”) is committed to honest and ethical conduct and compliance with applicable laws, rules and regulations as well as best corporate practices.

It is the Company’s policy that no Supervised Person (as defined below) or agent of the Company shall advance the business or interests of the Company through the use of bribery or other corrupt activity, and that all business conducted on behalf of the Company shall occur in accordance with all applicable anticorruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“Bribery Act”) and any law applicable in the jurisdiction where a Supervised Person operates or visits.

This Policy applies to:

- Franklin BSP Realty Trust, Inc., its subsidiaries and affiliates (“FBRT” or the “Company”);
- Each of the officers, directors and employees of FBRT; and
- Any of the employees of FBRT’s external manager, and its affiliates that provide services to FBRT (which are referred to in this Policy, together with the officers, directors and employees of FBRT, as “Supervised Persons”) with respect to activities that are undertaken for or on behalf of FBRT.¹

In addition, this Policy sets out the standards which FBRT expects its consultants, contractors, and agents to meet when acting on behalf of the Company.

A. Payments and Benefits to Counterparties Generally

It is prohibited for any Supervised Person directly or indirectly to accept, make or authorize offers, promises or payments of anything of value with the intent of obtaining or retaining business, gaining improper advantage, or inducing or influencing the recipient to misuse his or her position or to act or fail to act in violation of his or her required duties or expectations of trust.

No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that prescribed by the documents supporting such payment. It is strictly prohibited for any person, directly or indirectly, to offer to make any bribes, kickbacks, rebates or other payments to anyone to obtain favorable treatment in receiving or maintaining business. No payments or deposits pursuant to any commitment made to any company with which the Company has business dealings shall be made to any individual or to bank accounts in the names of any individuals.

Except as otherwise prohibited herein, reasonable and bona fide benefits provided to a party in the

¹ Officers and employees of FBRT’s external manager are also subject to the policies of the external manager. This Policy shall not relieve such persons from any of their obligations under those policies.

course of a commercial relationship are permitted. All gifts and entertainment provided to any party must conform to the requirements of the Company's Code of Ethics (Gifts of All Kinds). Supervised Persons are prohibited from giving gifts to employees of an exchange or self-regulatory organization for any reason.

B. Payments and Benefits to Financial Institution Personnel

It is prohibited under federal law to give, offer or promise an officer, director, employee, agent or attorney of a financial institution² *anything* of value in connection with any transaction or business of such financial institution. It is also a federal crime for an officer, director, employee, agent or attorney of a financial institution to solicit or demand (for his or her benefit or the benefit of another person or entity), accept or agree to accept anything of value from any person with the intent to be influenced in connection with any business or transaction of such financial institution. The phrase "anything of value" is comprehensive and expansive and can include literally anything, big or small, tangible or intangible, including ordinary and customary business gifts, drinks, dinners, cab fare, flowers, use of telephones or automobiles, etc.

C. Payments and Benefits to Public Officials

1. General Prohibition

Unless otherwise permitted below, no Supervised Person may, directly or indirectly, offer, promise or provide money or anything of value to a Public Official for the purpose of (a) influencing that Public Official's actions or decisions; (b) inducing that Public Official to act in violation of any legal duty; or (c) inducing that Public Official to influence the actions or decisions of any Public Entity.

2. Definitions

A "Public Entity" is any government; any office, department, agency, board or instrumentality of a government; any entity or enterprise that is owned or controlled by a government; any political party; any public academic institution, state pension fund or sovereign wealth fund; or any public international organization such as the United Nations or European Union.

A "Public Official" is any officer, director, employee or representative of a Public Entity; any person who performs a public legislative, executive, judicial or administrative function; any political party; any candidate for political office; any agent of a Public Official; and immediate family member of a Public Official; or any former Public Official who continues to exercise direct influence over a public function.

² A "financial institution" includes (1) a bank holding company, (2) a savings and loan holding company, (3) any bank or other institution the deposits of which are insured by the Federal Deposit Insurance Corporation, (4) any member of the Federal Home Loan Bank System, (5) any Federal Home Loan Bank, (6) any credit union the accounts of which are insured by the National Credit Union Share Insurance Fund, (7) any federal land bank, federal land bank association, Federal intermediate credit bank, production credit association and bank for cooperatives and (8) a small business investment company.

3. Permitted Payments

Reasonable and bona fide expenses directly related to the following activities are permitted:

- Promotion or explanation of the Company’s offerings and/or services; for example, expenses incurred in connection with a prospective borrower’s visit to a Company office;
- Performance of a contract; for example, expenses incurred in connection with an existing investor’s attendance at an investors’ meeting; and
- Payments or benefits that are required by the written laws of the local jurisdiction, with the pre-approval of the Chief Compliance Officer.

4. Gifts, Meals and Entertainment

Supervised Persons may provide meals or entertainment to Public Officials only after obtaining pre-approval from the Chief Compliance Officer, provided that the meal or entertainment is not being provided in connection with any particular action or decision that has been or may be taken by a Public Official or Public Entity.

Supervised Persons are prohibited from giving gifts to Public Officials for any reason.

When entertainment is provided in connection with a Public Official’s travel, payments to cover expenses in excess of modest sightseeing or entertainment are prohibited, as are payments for any expenses of a person known to be an immediate family member or guest of a Public Official.

5. Travel and Lodging

All travel and lodging expenses to be provided for Public Officials must be pre-approved by the Chief Compliance Officer.

6. Facilitation Payments

The prohibition on bribery in subsection (1) includes a prohibition on “facilitation” payments to low-level government officials to secure or expedite the delivery of routine government services.

7. Charitable Donations

Supervised Persons are prohibited from making any donation on behalf of the Company or to advance the interests of the Company to any charitable organization that is known to be sponsored by or otherwise affiliated with a Public Official who may have influence over any actions or decisions of a Public Entity that affect the business of the Company, unless pre-approval is obtained in advance from the Chief Compliance Officer.

8. Books and Records

Supervised Persons must ensure that all records, receipts, invoices, vouchers and other financial documents concerning the use of Company assets to provide benefits to counterparties and Public Officials

are accurate and that they do not disguise or misrepresent the purpose of an interaction or the identity of the recipient.

D. Third Parties

The engagement of third parties can present an elevated risk for corrupt activity. Supervised Persons are prohibited from engaging third parties agents, representatives, brokers or consultants to take any action that the Supervised Person is prohibited from taking under this policy. Supervised Persons should ensure that proper attention is given to the due diligence conducted on third parties before they are engaged.