

Franklin BSP Realty Trust, Inc.

Conflict Mineral Policy

April 27, 2023

The Dodd-Frank Wall Street Reform and Consumer Protection Act, enacted in July 2010, directed the Securities and Exchange Commission (SEC) to issue rules requiring publicly traded companies to disclose the extent to which their products contain so-called “conflict minerals” sourced from conflict mines in the Democratic Republic of the Congo (DRC), or adjoining countries. Congress included this provision in the Dodd-Frank Act in an effort to further the humanitarian goal of ending violent conflict and human rights abuses in the region since this conflict has been partially financed by the trade of certain minerals, known as “conflict minerals”. The SEC issued implementing rules in August 2012. These rules require companies to file an annual report on their use of conflict minerals from such sources.

Franklin BSP Realty Trust, Inc. (“FBRT”) is committed to the responsible sourcing of minerals, including tin, tantalum, tungsten and gold, and expects its external advisor and suppliers to conduct their operations in a socially and environmentally responsible and sustainable manner. FBRT does not manufacture any products and exercises no influence over the materials, parts, or components of any products. Due to this minimal influence, the conflict minerals rule does not require FBRT to include products and the related vendors in its conflict minerals disclosures.