



Code of Ethics and Business Conduct Policy

Effective as of October 3, 2024

1. Purpose of the Code; Covered Persons

It is the policy of FrontView REIT, Inc. (together with its subsidiaries and affiliates, the “Company”) that our business be conducted in accordance with the highest moral, legal, and ethical standards. Our reputation is our most important asset and each director, officer, and employee must contribute to the care and preservation of that asset. No code of business conduct or ethics can effectively substitute for the thoughtful behavior of an ethical director, officer, or employee.

This Code of Ethics and Business Conduct Policy (the “Code”) applies to (i) all employees and officers of the Company and (ii) all members of the Company’s Board of Directors (collectively, the “Covered Persons” and each a “Covered Person”) for the purpose of promoting:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the U.S. Securities and Exchange Commission (the “SEC”) and in offering documents, stockholder reports, and other public communications made by the Company;
- compliance with applicable laws and governmental rules and regulations;
- the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
- accountability for adherence to the Code.

Mere compliance with the letter of the law is not sufficient to attain the highest ethical standards. Good judgment and great care must also be exercised to comply with the spirit of the law and of this Code. Covered Persons generally have other legal and contractual obligations to the Company and this Code is not intended to reduce or limit those obligations.

The Code is drafted broadly and is not intended to be a comprehensive rulebook and cannot address every situation that you may face. No corporate code can cover every possible question of business practice. There will be times when you are unsure about how the Code applies. When in doubt, ask before you act.

Upholding the Code is the responsibility of every Covered Person. Department heads are responsible for Code enforcement in their departments and managers are accountable for the employees who report to them.

2. Questions About the Code; Reporting Suspected Violations

Covered Persons are encouraged to talk to officers or directors about observed illegal or unethical behavior and about the best course of action in a particular situation. Covered Persons who have questions or are concerned that violations of this Code or other illegal or unethical conduct has occurred or may occur should contact their manager. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, you should contact (anonymously, confidentially, or otherwise) the Company's Chief Financial Officer (the "CFO") or the Chairperson of the Audit Committee of the Board of Directors (the "Audit Committee").

No Covered Person will be penalized for making a good-faith report of violations of this Code or other illegal or unethical conduct, nor will the Company permit or tolerate retaliation of any kind against anyone who makes a good-faith report. If a Covered Person wishes to remain anonymous, he or she may do so.

You may also confidentially and anonymously report your concerns to the Company's Hotline, by telephone at (833) 208-6134 or online at frontviewreit.navexone.com. If you feel appropriate action is not being taken, you should contact either of the Company's Co-Chief Executive Officers or, in cases relating to the financial reporting or accounting matters, the Chairperson of the Audit Committee. You are not required to identify yourself when reporting a violation.

Each Covered Person is expected to act proactively by asking questions, seeking guidance, and reporting suspected violations of the Code, other policies and procedures of the Company, or any law, rule, or regulation applicable to the Company.

3. Conflicts of Interest

Covered Persons should avoid conflicts of interest with regard to the interests of the Company. A "conflict of interest" occurs when a Covered Person's private interest interferes in any way – or even appears to interfere – with the interests of, or his or her service to, the Company. For example, a conflict of interest would arise if a Covered Person, or a member of his or her family, receives improper personal benefits as a result of his or her position with the Company. Loans to, or guarantees of obligations of, Covered Persons or their family members are of special concern, may create conflicts of interest, and in certain instances are prohibited by law.

Each Covered Person must:

- a. not use his or her personal influence or personal relationships improperly to influence business decisions or financial reporting by the Company whereby the Covered Person would benefit personally to the detriment of the Company;
- b. not cause the Company to take action, or fail to take action, for the individual personal benefit of the Covered Person to the detriment of the Company;
- c. report any affiliations or other relationships related to conflicts of interest; and
- d. not engage in competition with the Company.

The overarching principle is that the personal interest of a Covered Person should not be placed improperly before the interest of the Company.

In order to avoid situations in which a conflict of interest involving a Covered Person may result in an improper benefit, all transactions involving a conflict of interest must be fully disclosed to the Company's Board of Directors and approved by the Audit Committee as fair and reasonable to the Company and on terms not less favorable to the Company than those available from unaffiliated third parties. Conflicts of interest may not

always be clear-cut, so if a Covered Person has a question, he or she shall promptly bring it to the attention of the CFO or Chairperson of the Audit Committee.

The following list provides examples of potential conflicts of interest under this Code, but Covered Persons should keep in mind that these examples are not exhaustive. Examples of potential conflicts of interest include:

- a. service as a director on the board of any other business organization;
- b. the receipt of non-nominal gifts;
- c. the receipt of entertainment from any company with which the Company has current or prospective business dealings, including investments in such companies, unless such entertainment is business-related, reasonable in cost, appropriate as to time and place, and not so frequent as to raise any questions of impropriety; or
- d. any ownership interest in, or any consulting or employment relationship with, any of the Company's service providers.

Any activity that enhances or supports the position of one of the Company's competitors to the detriment of the Company is prohibited, including employment by or service on the board of a competitor.

The Company encourages civic, charitable, educational, and political activities as long as they do not interfere with the performance of the duties of an officer or director of the Company. Each officer or director of the Company shall contact the Audit Committee before agreeing to participate in any civic or political activities that are likely to unduly interfere with the performance of his or her duties as an officer or director of the Company.

4. Corporate Opportunities

Covered Persons owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Covered Persons must offer to the Company any business opportunities related to the Company's target assets and business activities (as described in the periodic reports filed by the Company from time to time with the SEC, together with any other assets that the Board determines from time to time will be a target asset or potential investment or business of the Company). Covered Persons are prohibited from: (i) taking for themselves opportunities that are discovered through the use of Company property, information or position, unless such opportunities are presented to the Board and the Board declines to pursue such opportunities; (ii) using Company property, information or position for improper personal gain; or (iii) competing with the Company. Any employee, other than an officer, may only pursue a corporate opportunity if the Compliance Officer waives in writing the Company's right to pursue the corporate opportunity. Corporate opportunities available to trustees and officers may only be waived by the Board or the Audit Committee of the Board. If the Company waives its right to pursue a corporate opportunity, Covered Persons may pursue such opportunities in a manner consistent with this Code.

5. Protection and Proper Use of Company Assets

All Covered Persons shall protect the Company's assets and ensure their efficient and proper use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All assets of the Company should be used for legitimate business purposes. The Company's assets may not be used for personal benefit, sold, loaned, given away, or disposed of without proper authorization. Permitting Company property to be damaged, lost or used in an unauthorized manner is strictly prohibited. Covered Persons shall not use corporate, or other official stationery for personal purposes.

6. Confidentiality

Covered Persons shall maintain the confidentiality of confidential information entrusted to them by the Company or parties with which the Company transacts business, except when disclosure is authorized by the Company or required by laws, regulations, or legal proceedings. Whenever feasible, Covered Persons should consult with the CFO or the Chairperson of the Audit Committee if they believe they have a legal obligation to

disclose confidential information. Confidential information includes all nonpublic information that might be of use to competitors or harmful to the Company or parties with which the Company transacts business if disclosed, such as the Company's financial performance (e.g. quarterly financial results of the Company's operations), business, marketing and service plans, confidential contract terms, transactions and litigation matters, personally identifiable information pertaining to our Covered Persons, investors, customers or other individuals, and similar types of information provided to us by our customers, suppliers and partners.

Covered Persons shall not share confidential information with anyone outside of the Company, including family and friends who do not need to know the information to carry out their duties to the Company, other than the Company's outside accountants or its outside lawyers. Covered Persons remain under an obligation to keep all information confidential even if their relationship with the Company ends, and Covered Persons must return all of the Company's confidential and/or proprietary information in their possession when they cease to be employed by or otherwise serve the Company.

All reports and records prepared or maintained pursuant to this Code will be considered confidential and shall be maintained and protected accordingly. Except as otherwise required by law or regulation or this Code, such matters shall not be disclosed to anyone other than the Board of Directors, the Audit Committee, senior executive officers of the Company, and the Company's legal advisers and independent accountants.

7. Recordkeeping

All of the Company's books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and authorized by the Audit Committee.

Covered Persons must retain documents and other business records in accordance with the Company's Record Retention and Disposal Policy and Retention Schedule. All documents or records not required to be retained pursuant to the Record Retention and Disposal Policy and Retention Schedule, including draft work product, must be destroyed in compliance with said policy in order to reduce the cost and risk of storing and handling the vast amounts of material that would otherwise accumulate. For more information on recordkeeping, refer to the Company's Record Retention and Disposal Policy and Retention Schedule.

Under certain circumstances, such as litigation, governmental investigation, or if required by applicable state and federal law and/or regulations, the Company may notify you if retention of documents or other records is necessary. If the existence of any pending or threatened legal action, subpoena, or investigation is known or reported to you, promptly contact the CFO. You must retain all records that may relate to any pending or threatened legal action, subpoena, or investigation. If you have a question as to whether a record pertains to a pending or threatened legal action, subpoena, or investigation, contact the CFO before disposing of the record in question.

8. Fair Dealing

Each Covered Person shall deal fairly with the Company's tenants, contractors, real estate brokers/agents, partners, lenders, investors, suppliers, competitors, employees, and other third parties. No Covered Person should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice. The Company seeks competitive advantages through superior service, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. In no event shall a Covered Person use any trade secrets, proprietary information or other similar property, acquired in the course of his or her employment with another employer, in the performance of his or her duties for or on behalf of the Company.

Whenever the ethical or legal requirements of a situation are unclear, Covered Persons should contact their manager or the CFO.

9. Relationship with Competitors and Compliance with Antitrust Laws

The Company is committed to free and open competition in the marketplace through compliance with all laws that prohibit anti-competitive practices, including federal and state antitrust laws. Covered Persons should avoid all actions that could reasonably be construed as being anti-competitive practices under such laws. Antitrust laws can be very complex and violations may result in significant repercussions. Any questions regarding potential antitrust or anti-competitive issues should be directed to the CFO in a prompt manner.

10. Anti-Bribery and Anti-Corruption

The Company seeks to avoid even the appearance of impropriety resulting from the actions of Covered Persons. Corporate funds, property, or anything of value may not be, directly or indirectly, offered or given by a Covered Person or an agent acting on his or her behalf, to a domestic or foreign official, domestic or foreign political party, or official thereof or any candidate for a domestic or foreign political office for the purpose of influencing any act or decision of such person or inducing such person to use their influence or in order to assist in obtaining or retaining business for, or directing business to, any person. Under the Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Public Officials Act, anti-bribery laws and election laws, bribery and other corrupt conduct – including willfully ignoring such conduct – is a serious matter that can lead to significant legal repercussions, including but not limited to fines and criminal penalties, for the Company and for Covered Persons, individually. Further, the offer or payment of bribes or other corrupt payments by a Covered Person to any individual is prohibited. All Covered Persons are required to comply with the Company's Anti-Bribery and Anti-Corruption Policy.

11. Gifts, Entertainment, and Political and Charitable Contributions

It is important for Covered Persons to maintain and preserve independence when dealing with third parties. Accordingly, we must avoid any situation in which giving or receiving a gift or business entertainment would be – or could be – inappropriate, unlawful, or in conflict with the best interests of the Company.

As a general rule, no Covered Person should receive a payment or anything of value in exchange for a decision involving the Company's business. Further, Covered Persons are always prohibited from the solicitation of gifts, gratuities, or business entertainment for the benefit of a Covered Person or a Covered Person's friend or family member.

Occasional unsolicited gifts of nominal value or business entertainment may be permissible if they meet the following criteria: (i) they are customary in the trade or industry; (ii) they are given in connection with the development of a business relationship; (iii) they do not exceed a value considered reasonable and prudent by the Company's management; (iv) they are given and accepted without an express or implied understanding or expectation of personal obligation; and (v) they comply with Company policies and any applicable government laws, rules, and regulations. Such gifts or business entertainment should be given infrequently and any gifts or business entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be offered, given, or accepted.

No Covered Person or other Company representative is permitted to directly or indirectly give, offer, ask for, or accept a gift or gratuity, or business entertainment, from an employee or other representative of any current or potential tenant, vendor, or service provider in connection with an ongoing transaction or a proceeding between the Company and such other organization.

Additionally, the use of the Company's funds, resources, or other assets for political purposes is prohibited and contributions on behalf of the Company may not be made to any political candidate, referendum, or initiative. Further, Covered Persons may not make any political or charitable contributions on behalf or at the request of a third party with the intent to improperly influence a business decision. Notwithstanding the foregoing, personal non-corporate contributions made solely by Covered Persons are allowed provided they are made in compliance with this Policy and the Company's Political Spending Policy.

12. Disclosure and Compliance

Each Covered Person shall be required to:

- a. familiarize him/herself with the disclosure requirements generally applicable to the Company;
- b. not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's directors and auditors, and to governmental regulators and self-regulatory organizations;
- c. to the extent appropriate within his or her area of responsibility, consult with employees, officers, and directors of the Company, with the goal of promoting full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the SEC and in offering documents, stockholder reports, and other public communications made by the Company; and
- d. promote compliance with the standards and restrictions imposed by applicable laws, rules, and regulations.

13. Accountability

Each officer and director of the Company must:

- a. upon adoption of the Code (or thereafter as applicable, upon becoming a Covered Person), affirm in writing to the Board that he or she has received, read, and understands the Code; and
- b. annually thereafter affirm in writing to the Board that he or she has complied with the requirements of the Code.

Each Covered Person must:

- a. not retaliate against any other Covered Person for reports of potential violations that are made in good faith; and
- b. notify the Chairperson of the Audit Committee or the CFO promptly if he or she knows of any material violation of this Code.

14. Accounting Complaints; Improper Influence on the Conduct of Audits

The Company's policy is to comply with all applicable financial reporting and accounting regulations applicable to the Company. If any Covered Person of the Company has concerns or complaints regarding questionable accounting or auditing matters (including, but not limited to, knowingly providing any false or misleading representation to an auditor) which in any way affects the Company, then he or she is encouraged to submit those concerns or complaints (anonymously, confidentially, or otherwise) to the Chairperson of the Audit Committee.

It is unlawful for any Covered Person, or any other person acting under the direction of such person, to take any action to fraudulently influence, coerce, manipulate, or mislead the independent accountants engaged in the performance of an audit of the Company's financial statements for the purpose of rendering such financial statements materially misleading. Any such action is a violation of this Code.

15. Administration and Violations of the Code of Ethics and Business Conduct

This Code shall be administered and monitored by the CFO. The CFO will handle the Company's day-to-day compliance matters, including:

- a. Receiving, reviewing, investigating, and resolving concerns and reports on the matters described in the Code;
- b. Providing guidance on the meaning and application of the Code; and
- c. Reporting periodically and as matters arise to management, the disclosure committee of the Company, if established, and the Audit Committee on the implementation and effectiveness of the Code and other compliance matters and recommending any updates or amendments to the Code that he deems necessary.

Any questions and further information on this Code, including any Company policies referenced herein, should be directed to the CFO.

Covered Persons are expected to follow this Code at all times. Generally, there should be no waivers of this Code. For members of the Board and the Company's executive officers, the Board or the Audit Committee shall have the sole and absolute discretionary authority to approve any deviation or waiver from or amendments to this Code. Any such waiver from or amendment to this Code applicable to or directed at the members of the Board and executive officers shall be disclosed to stockholders as required by applicable law. Any waivers of this Code for non-executive officers and all other employees of the Company may be made by the CFO or the Board.

16. Public Reporting

It is important that the Company's filings with the SEC and the Company's offering documents, stockholder reports, and other public disclosures of information be complete, fair, accurate, and timely. An employee, officer, or director of the Company may be called upon to provide necessary information to ensure that the Company's public reports are complete, fair, and accurate. The Company expects each employee, officer, and director of the Company to take this responsibility seriously and to provide prompt, complete, fair, and accurate responses to inquiries with respect to the Company's public disclosure requirements. All employees, officers, and directors of the Company who may be participating in the preparation of reports, press releases, forms, or other information to be publicly disclosed, including through filings with the SEC or as mandated by the SEC, are expected to use their diligent efforts to ensure that such reports, press releases, forms or other information are complete, fair, accurate, and timely.

17. Transactions Involving Company Securities

"Insider trading" refers generally to buying or selling a security while in possession of material, non-public information about the security. Insider trading is illegal and against the Company's Insider Trading Policy. Such trading can cause significant harm to the Company's reputation. Federal securities laws impose civil and criminal penalties upon persons who use inside information when buying and selling securities or who give inside information to others who use it when buying or selling securities. Liability for violating the laws against "insider trading" can extend not only to the Company's senior executives, but also to other Covered Persons and to relatives and friends of those persons.

No Covered Person may trade in the securities of the Company if he or she possesses material, non-public (i.e., "inside") information about the Company. In addition, an insider who is aware of inside information must not disclose such information to family, friends, business or social acquaintances, other employees (unless such employees have a position with the Company giving them a right and need to know), or other third parties.

Each Covered Person is prohibited from: (i) buying or selling Company stock based on material, non-public information, (ii) buying or selling stock of another company that the Company is considering or working on acquiring, if the information is material, non-public information, (iii) buying or selling stock of another company that the Company is negotiating or contracting with, if the information is material, non-public information, or (iv) sharing material, non-public information about the Company and its business dealings with others, including family members.

For more information, please refer to the Company's Insider Trading Policy. If you have any questions, please consult the CFO.

18. Discrimination and Harassment

The Company is committed to maintaining a workplace free from all forms of harassment and discrimination, and where all individuals are treated with dignity and respect. The Company will not tolerate harassment or discrimination in any form by any employee, consultant, or third-party vendor for any reason.

All employees are required to work in a manner designed to prevent harassment and discrimination in the workplace and are encouraged to report any harassment or other discriminatory conduct in accordance with the provisions of this Code and/or other applicable Company policy. Furthermore, any member of management who has received a report of harassment or discrimination or otherwise has reason to believe that an employee has been the victim of harassment or discrimination is required to report it to the head of the Human Resources department immediately. All Covered Persons are required to comply with applicable Company policies regarding a harassment free workplace and non-discrimination.

19. Equal Opportunity

The Company is an equal opportunity employer, and all employment decisions are and will be based on merit, qualifications, and abilities. As part of the Company's commitment to providing equal employment opportunities for all employees and job applicants, the Company's policies for recruitment, retention, and advancement of employees prohibits discrimination on the basis of any criteria protected by law, including: race, color, sex, age, disability, religion, citizenship, national origin, ancestry, military status or veteran status, marital status, pregnancy, familial status, sexual orientation, gender identity or expression, domestic violence victim status, predisposing genetic characteristics and genetic information, an employee's or dependent's reproductive health decision making, including the decision to use or access a particular drug or medical service, and any other status or characteristic protected by law. All Covered Persons are required to comply with applicable Company policies regarding equal opportunity.

20. Health and Safety

The Company strives to provide its employees with a safe, healthy, and efficient work environment. Each employee shares responsibility in maintaining such work environment and is required to follow all safety and health rules and practices. Employees must report accidents, injuries and unsafe equipment, practices, or conditions to his or her manager or the head of the Human Resources department.

Employees must comply with applicable Company policies regarding the abuse of alcohol and the possession, sale, and use of controlled substances. Employees must report to work in a condition to perform their duties and free from the influence of alcohol or controlled substances. Drinking alcoholic beverages while on duty or on the premises of the Company is prohibited unless such consumption occurs as part of an approved Company event or activity. The possession, use, sale, or other transfer of illegal drugs and controlled substances by employees is prohibited under all circumstances while on duty or on the premises of the Company.

Additionally, employees are expected to resolve problems respectfully and never resort to acts or threats of violence. The Company has zero tolerance for violence and employees are prohibited from committing, joking

about, threatening, or otherwise displaying violence in the workplace. The Company does not permit employees to have any weapons of any kind on Company property or while engaged in Company business, regardless of whether such employee has obtained a legal permit to carry weapons.

All Covered Persons are required to comply with applicable Company policies regarding the maintenance of a safe, healthy, and efficient work environment.

21. Compliance with Laws, Rules, and Regulations

Pertinent laws, rules, and regulations of every jurisdiction in which the Company operates must be followed. Each Covered Person is charged with the responsibility of acquiring sufficient knowledge of the laws relating to his or her particular duties in order to recognize potential dangers and to know when to seek legal advice. No Covered Person shall engage in any unlawful activity in conducting the Company's business or in performing his or her day-to-day duties, nor shall any Covered Person instruct others to do so. In any instance where the law is ambiguous or difficult to interpret, the matter should be reported to the Company's management who in turn will seek legal advice from the CFO as appropriate.

FRONTVIEW REIT, INC.

Code of Ethics and Business Conduct Policy Certification

I have received a copy of and read the Code of Ethics and Business Conduct Policy of FrontView REIT, Inc. and its subsidiaries (the “*Company*”). I understand and agree to comply with the policies and procedures set forth in the Code of Ethics and Business Conduct Policy.

I understand and agree that my failure to comply with Code of Ethics and Business Conduct Policy in all respects may constitute a basis for the termination for cause of my employment by or other service relationship with the Company, or other appropriate disciplinary action.

Signature: _____

Name: _____

Date: _____