



**NETSTREIT**

**NETSTREIT CORP.**

**Code of Business Conduct and Ethics**

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## **INTRODUCTION**

### **Introduction to Our Code**

This Code of Business Conduct and Ethics (the “Code”) contains general guidelines for conducting the business of NETSTREIT Corp., a Maryland corporation (the “Company”), consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we adhere to these higher standards.

This Code applies to all of our directors, officers, employees and consultants. We refer to all persons covered by this Code as “Company employees” or simply “employees.” We also refer to our Chief Executive Officer, our Chief Financial Officer and our Chief Accounting Officer as our “principal financial officers.” In the case of the Company’s non-employee directors, compliance with this Code is subject to provisions of the Company’s Articles of Amendment and Restatement and Amended and Restated Bylaws.

After carefully reviewing this Code, you must sign the acknowledgment attached as Exhibit A hereto, indicating that you have received, read, understand and agree to comply with this Code. The one-time acknowledgment must be returned to the Company’s Chief Financial Officer and/or its designee at NETSTREIT Corp., 2021 McKinney Avenue, Suite 1150, Dallas, Texas 75201 within ten business days of your receipt of this Code.

### **Honest and Ethical Conduct**

Each employee must always conduct himself or herself in an honest and ethical manner. Each employee must act with the highest standards of personal and professional integrity and not tolerate others who attempt to deceive or evade responsibility for their actions. All actual or potential conflicts of interest between personal and professional relationships must be handled honestly, ethically and in accordance with the policies specified in this Code. In addition, all employees must be direct, honest and truthful in discussions with, or requests for information from, regulatory agency officials and government officials, as well as in all dealings with business partners and stockholders.

### **Seeking Help and How to Report**

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your manager for help first. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, contact the Chief Financial Officer and/or its designee.

All employees have a duty to report any known or suspected violation of this Code, including any questionable auditing, accounting and internal accounting control matters; violation of laws, rules or regulations that apply to the Company; violation of the Company’s policies; unethical behavior or practices; and endangerment to public health or safety.

If you have a reasonable belief that a potential violation of this Code has occurred or is occurring, you should immediately report such potential violation to your manager. Your manager will contact the Chief Financial Officer and/or its designee, who will work with you and your manager to investigate your concern. If you do not feel comfortable reporting the conduct to your manager or you do not get a satisfactory response, you may contact the Chief Financial Officer and/or its designee directly. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your manager, the Chief Financial Officer and/or its designee and the Company will protect your

confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.

In addition, you may report known or suspected violations of the Code anonymously. If the report is written and sent via mail, you should include the phrase "confidential and private" and send it to the following address:

NETSTREIT Corp.  
2021 McKinney Avenue  
Suite 1150  
Dallas, TX 75201  
Attention: Chief Financial Officer

You may also report known or suspected violations of the Code anonymously through the Ethics Helpline that is available 24 hours a day, 7 days a week at 800-916-7037 or [https://irdirect.net/NTST/whistleblower\\_iframe/](https://irdirect.net/NTST/whistleblower_iframe/). You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Helpline, although providing your identity may assist the Company in investigating your concern. If you wish to remain anonymous, please provide as much detail as possible to allow the Company to conduct an investigation. The Company has a detailed Whistleblower Policy, which may be obtained from your manager or the Chief Financial Officer and/or its designee.

All employees will be held accountable for adherence to this Code. It is Company policy that any employee who violates this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. An employee accused of violating this Code will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline. Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and many incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

### **Policy Against Retaliation**

The Company recognizes the decision to report a concern can be a difficult one to make. The Company prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations of this Code or of a law, rule or regulation. Retaliation is any conduct that would reasonably dissuade an employee from raising or reporting good faith concerns through our internal reporting channels or with any governmental body, or from participating in or cooperating with an investigation of such concerns. It includes conduct that would reasonably dissuade an employee from filing, testifying, or participating in a legal proceeding relating to a violation of law, or providing information or otherwise assisting a government or law enforcement agency pursuing a violation of law. Any reprisal or retaliation against an employee because the employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.

### **Waivers of the Code**

Waivers of this Code for employees who are not directors, executive officers or other principal financial officers may be made only by the Chief Executive Officer or Chief Financial Officer of the Company. Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board of Directors or the appropriate committee of our Board of Directors and

will be promptly disclosed to the public as required by law or regulation of the Securities and Exchange Commission (“SEC”) or the rules of the New York Stock Exchange.

## **SPECIFIC POLICIES**

### **Accurate Financial Reporting**

The Company is committed to full and accurate financial disclosure, and to maintaining its books and records in compliance with all applicable laws, rules and regulations, accounting standards, accounting controls, and audit practices. Accurate information is critical to our success. Our tenants must be confident that our records and statements are complete, truthful, and accurate. Accurate information is also essential to allow us to meet our legal, regulatory, and contractual obligations. It is our policy to maintain accurate and complete accounting records and accurately report our financial results at all times. If you are in any way involved with maintaining our accounting records or preparing our financial statements, you must ensure that all transactions are recorded and reported in accordance with generally accepted accounting principles and comply with our accounting policies and procedures, including our established systems of internal controls.

In addition to making and keeping accurate books, records, and accounts, it is also our policy to maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

- Transactions are executed in accordance with management’s general or specific authorization;
- Transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles, or any other criteria applicable to such statements, and to maintain accountability for assets; and
- Access to assets is permitted only in accordance with management’s general or specific authorization.

The Company wishes to encourage employees and interested third-party tenants, suppliers and business partners to make us aware of any practices, procedures, or circumstances that raise concerns about the integrity of our financial disclosures, books, and records.

The following is not an exhaustive list of matters that should be reported:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the SEC or the investing public;
- violations of SEC rules and regulations or any other laws applicable to the Company’s financial accounting, maintenance of financial books and records, internal accounting controls, and financial statement reviews or audits;
- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company; fraud or deliberate error in the accounting of, or the recording and maintaining of, the financial records of the Company;
- deficiencies in or intentional noncompliance with the Company’s internal accounting controls;

- misrepresentation or false statements regarding a matter contained in the financial records, financial reports, or audit reports of the Company; and
- deviation from the full and fair reporting of the Company's financial condition.

## **Company Records**

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, emails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record keeping policy. Ask your manager if you have any questions.

## **Accuracy of Financial Reports and Other Public Communications**

As a public company, we are subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the Accounting Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. In order to fulfill such obligation, the principal financial officers and each other employee working in the Accounting Department must:

- Carefully review drafts of reports and documents the Company is required to file with, or submit to, the SEC before they are filed, or submitted, and Company press releases or other public communications before they are released to the public, with particular focus on disclosures each such person does not understand or agree with and on information known to such person that is not reflected in the report, document, press release or public communication.
- Comply with the Company's Disclosure Controls and Procedures as in effect from time to time, which have been designed to ensure that the information required to be disclosed by the Company in its SEC filings is collected, processed, summarized and disclosed in a timely fashion and accumulated and communicated to the appropriate persons.
- Promptly bring to the attention of the Disclosure Committee or a member thereof any material information of which such person may become aware that affects the disclosures made by the Company in its public filings, any material information that may assist the Disclosure Committee in fulfilling its responsibilities, matters that such person feels could compromise the integrity of the Company's financial reports or disagreements on accounting matters.
- Always act with the highest standards of personal and professional integrity: do not tolerate others who attempt to deceive, or evade responsibility for actions.

In addition, these employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

## **Conflicts of Interest**

### *Identifying Potential Conflicts of Interest*

A conflict of interest can occur when an employee's private interest interferes, or even appears to interfere, with the interests of the Company as a whole. You should avoid any private interest that influences your ability to act in the interests of the Company or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of conflicts of interest:

- **Business Opportunities.** Employees may not: improperly divert a business opportunity away from the Company; take for themselves or for any third party a business opportunity discovered through the use of the Company's information, assets or property or the individual's position with the Company; use the Company's information, assets or property or the individual's position with the Company for their own gain or advantage or the gain or advantage of any third party; or compete with the Company. If an employee, officer or director learns through a source independent of the Company of a business opportunity in which the Company may be interested, the individual at his or her option may present the business opportunity to the Company for its consideration (unless the individual is prevented from doing so by an obligation he or she owes to another person or organization). However, once a business opportunity is introduced to the Company, in order to avoid even the appearance of a conflict of interest, the Company has the right of first refusal regarding the opportunity.
- **Outside Employment.** No employee should be employed by, serve as a director of, or provide any services to a company that is a tenant, supplier or competitor of the Company.
- **Improper Personal Benefits.** No employee, or family member (as defined below) of an employee, should obtain or receive any improper personal benefits or favors because of his or her position with the Company.
- **Financial Interests.** No employee should have a significant financial interest (ownership or otherwise) in any company that is a tenant, supplier or competitor of the Company. A "significant financial interest" means (i) ownership of greater than 1% of the equity of a tenant, supplier or competitor or (ii) an investment in a tenant, supplier or competitor that represents more than 5% of the total assets of the employee.
- **Loans or Other Financial Transactions.** No employee, or family member (as defined below) of an employee, should obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, the Company or any company that is a tenant, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- **Service on Boards and Committees.** No employee should serve on a board of directors or trustees or on a committee of any entity (whether a for-profit or not-for profit) whose

interests reasonably would be expected to conflict with those of the Company. Any employee invited to join the board of directors of another organization (including a nonprofit or other charitable organization) must obtain the prior approval of the Chief Financial Officer. Directors who are invited to serve on the board of directors of another organization must comply with the requirements of the Company's Corporate Governance Guidelines.

- **Actions of Family Members.** The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, parents, stepparents, children, stepchildren, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, and brothers- and sisters-in-law, and anyone residing your home (other than a tenant or employee).

### *Disclosure of Conflicts of Interest*

The Company requires that employees disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your manager or the Chief Financial Officer and/or its designee or, if you are a director, to the Chairman of the Nominating and Corporate Governance Committee of the Board. Your manager and the Chief Financial Officer and/or its designee, or the Chairman of the Nominating and Corporate Governance Committee of the Board, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in "Waivers of the Code" above.

### **Corporate Opportunities**

As an employee of the Company, you have an obligation to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity related to Company's business activities through the use of corporate property, information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee may use corporate property, information or his or her position with the Company for personal gain, nor may any employee compete with the Company.

You should disclose to your manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your manager will contact the Chief Financial Officer and/or its designee and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on substantially the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

### **Confidential Information**

Employees may, by virtue of their employment with the Company, obtain access to sensitive, confidential, restricted and proprietary information about the Company, its tenants, contractors or suppliers that is not generally known or made available to the public and that the Company, its tenants, contractors or suppliers have made reasonable efforts to keep confidential. Confidential information includes all nonpublic information that might be of use to competitors, or, if disclosed, harmful to the Company or its



tenants. The protection of such information is vital to the interests and the success of the Company. Such confidential information includes, but is not limited to, the following examples:

- business plans;
- employment information;
- compensation data (salary, bonus, vacation or sick time);
- computer programs, databases and software;
- sales and financial information;
- marketing strategies;
- research materials;
- pending projects and proposals; and
- research and development strategies.

Such confidential information shall be used solely by employees in the performance of their job duties for the Company and shall not be used in any other manner whatsoever during their employment. Employees shall not, without the prior written consent of the Company, use, access, disclose, divulge, or publish to others any such confidential information acquired in the course of their employment, except when such disclosure is legally mandated. This prohibition expressly includes such information in verbal, written, visual or electronic form. Such confidential information is the exclusive property of either the Company or its tenants, and under no circumstances whatsoever shall employees have any rights to use, access, disclose, divulge or publish to others such confidential information following the termination of their employment, unless the Chief Executive Officer or the Chief Financial Officer and/or their designees provides written authorization for an employee to disclose confidential information about the Company to persons outside the Company.

An employee's obligation to protect confidential information continues after he or she leaves the Company. Upon termination of employment, employees must deliver to the Company immediately any and all confidential information, whether stored electronically or in paper format, including but not limited to all copies of such documents prepared or produced in connection with their employment with the Company that pertain to the Company's business or the employee's services for the Company, whether made or compiled by the employee or furnished to the employee in connection with such services to the Company. In addition, at termination, employees must return to the Company all of the Company's non-confidential property, documents, or electronic information.

Unauthorized disclosure of confidential information could cause competitive harm to the Company or its tenants and could result in legal liability to you and the Company. Personnel who improperly use or disclose confidential information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information, as well as possible prosecution. Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Chief Financial Officer and/or its designee.

## **Competition and Fair Dealing**

All employees should endeavor to deal fairly with fellow employees and with the Company's tenants, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

#### *Relationships with Tenants*

Our business success depends upon our ability to foster lasting tenant relationships. The Company is committed to dealing with tenants fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with tenants:

- Information we supply to tenants should be accurate and complete to the best of our knowledge. Employees should not deliberately misrepresent information to tenants.
- Tenant entertainment should not exceed reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for, tenant purchase decisions.

#### *Relationships with Suppliers*

The Company deals fairly and honestly with its suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers should carefully guard their objectivity. Specifically, no employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier's products and prices. Employees can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Entertainment or gifts received from suppliers should not exceed reasonable and customary business practice.

#### *Relationships with Competitors*

The Company is committed to free and open competition in the marketplace. Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including federal and state antitrust laws. Such actions include misappropriation and/or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices. For a further discussion of appropriate and inappropriate business conduct with competitors, see "Compliance with Antitrust Laws" below.

#### *Gifts and Entertainment*

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. However, gifts and entertainment should not compromise, or appear to compromise, your ability to make objective and fair business decisions.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from tenants, contractors, real estate brokers/agents, partners or lenders only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. All gifts and entertainment expenses should be properly accounted for on expense reports. The following specific examples may be helpful:

- Meals and Entertainment: You may occasionally accept or give meals, refreshments, or other entertainment if:
  - The items are of reasonable value;
  - The purpose of the meeting or attendance at the event is business related; and
  - The expenses would be paid by the Company as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include food and tickets for sporting and cultural events if they are generally offered to other tenants, contractors, real estate brokers/agents, partners or lenders.

- Advertising and Promotional Materials: You may occasionally accept or give advertising or promotional materials of nominal value.
- Personal Gifts: You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a graduation, promotion, new job, wedding, retirement, or a holiday. A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business involved between the individuals.
- Gifts Rewarding Service or Accomplishment: You may accept a gift from a civic, charitable, or religious organization specifically related to your service or accomplishment.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your manager. Your manager will bring the gift to the attention of the Chief Financial Officer and/or its designee, which may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your manager or Chief Financial Officer and/or its designee for additional guidance.

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer or employee should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment.

*Note: Gifts and entertainment may not be offered or exchanged under any circumstances to or with any employees of the U.S., state, local or foreign governments. If you have any questions about this Code, contact your manager or Chief Financial Officer and/or its designee for additional guidance.*

## **Protection and Proper Use of Company Assets**

Employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness and waste have a direct impact on the Company's profitability. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

To ensure the protection and proper use of the Company's assets, each employee should:

- exercise reasonable care to prevent theft, damage or misuse of Company property;
- report the actual or suspected theft, damage or misuse of Company property to a manager;
- use the Company's telephones, computers, electronic communication services, written materials and other property primarily for business-related purposes;
- safeguard all electronic programs, data, communications and written materials from inadvertent access by others; and
- use Company property only for legitimate business purposes, as authorized in connection with your job responsibilities.

Employees should be aware that Company property includes all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

### **Compliance with Laws and Regulations**

Each employee has an obligation to comply with all laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your manager or the Chief Financial Officer and/or its designee.

### **Political Contributions and Activities**

The Company encourages its employees to participate in the political process as individuals and on their own time. However, federal and state contribution and lobbying laws severely limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds or assets not be used to make a political contribution to any political party or candidate, unless prior approval has been given by the Chief Financial Officer.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- Contribution of Funds. You may contribute your personal funds to political parties or candidates. The Company will not reimburse you for personal political contributions.
- Volunteer Activities. You may participate in volunteer political activities during non-work time. You may not participate in political activities during working hours.

- Use of Company Facilities. The Company's facilities may not be used for political activities (including fundraisers or other activities related to running for office). The Company may make its facilities available for limited political functions, including speeches by government officials and political candidates, with the approval of the Chief Financial Officer.
- Use of Company Name. When you participate in political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. For instance, Company letterhead should not be used to send out personal letters in connection with political activities.

These guidelines are intended to ensure that any political activity you pursue is done voluntarily and on your own resources and time. Please contact the Chief Financial Officer if you have any questions about this policy.

### **Compliance with Antitrust Laws**

Antitrust laws of the U.S. and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business.

#### *Actions that Violate U.S. Antitrust Laws*

In general, U.S. antitrust laws forbid agreements or actions "in restraint of trade." All employees should be familiar with the general principles of the U.S. antitrust laws. The following is a summary of actions that are violations of U.S. antitrust laws:

- Price Fixing. The Company may not agree with its competitors to raise, lower or stabilize prices or any element of price, including discounts and credit terms.
- Limitation of Supply. The Company may not agree with its competitors to limit its production or restrict the supply of its services.
- Allocation of Business. The Company may not agree with its competitors to divide or allocate markets, territories or tenants.
- Boycott. The Company may not agree with its competitors to refuse to sell or purchase products from third parties. In addition, the Company may not prevent a tenant from purchasing or using non-Company products or services.
- Tying. The Company may not require a tenant to purchase a product that it does not want as a condition to the sale of a different product that the tenant does wish to purchase.

#### *Meetings with Competitors*

Employees should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior approval of the Chief Financial Officer and/or its designee. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of

time. The contents of your meeting should be fully documented. Specifically, you should avoid any communications with a competitor regarding:

- Prices;
- Costs;
- Market share;
- Allocation of sales territories;
- Profits and profit margins;
- Supplier's terms and conditions;
- Product or service offerings;
- Terms and conditions of sale;
- Production facilities or capabilities;
- Bids for a particular contract or program;
- Selection, retention or quality of tenants; or
- Distribution methods or channels.

#### *Professional Organizations and Trade Associations*

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose. At such meetings, you should not discuss pricing policy or other competitive terms, plans for new or expanded facilities or any other proprietary, competitively sensitive information. You are required to notify the Chief Financial Officer and/or its designee prior to attending any meeting of a professional organization or trade association.

#### *Seeking Help*

Violations of antitrust laws carry severe consequences and may expose the Company and employees to substantial civil damages, criminal fines and, in the case of individuals, prison terms. Whenever any doubt exists as to the legality of a particular action or arrangement, it is your responsibility to contact the Chief Financial Officer and/or its designee promptly for assistance, approval and review.

#### **Compliance with Insider Trading Laws**

Directors, officers and employees of the Company are prohibited from trading in the common stock or other securities of the Company while in possession of material, nonpublic information about the Company. In addition, Company employees are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell stock or other securities of the Company on the basis of material, nonpublic information. Company employees who obtain material nonpublic information about another company in

the course of their employment are prohibited from trading in the stock or securities of the other company while in possession of such information or “tipping” others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment.

“Material, nonpublic information” is information that is not generally available to the public that could affect the market price of a security and which a reasonable investor would regard as important in deciding whether to buy, sell or hold a security. Common examples of material information are:

- forecasts, estimates or projections of earnings or results of operations for current or future periods;
- news of a pending or proposed merger, acquisition, tender offer, divestiture or disposition of significant assets;
- significant new products, services or markets;
- actual or threatened major litigation, or the resolution of such litigation;
- major events regarding securities, including the declaration of a stock split or the offering of additional securities (debt or equity);
- new major contracts, tenants, or finance sources, or the loss thereof;
- a change in management; or
- financial liquidity problems.

For more information, please refer to the Company’s Insider Trading Policy. The laws against insider trading are specific and complex. Any questions about information you may possess or about any dealings you have had in the Company’s securities should be promptly brought to the attention of the Chief Financial Officer.

## **Public Communications and Regulation FD**

### *Public Communications Generally*

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of material nonpublic information. To ensure compliance with this policy, all news media or other public requests for information regarding the Company should be directed to the Authorized Spokespersons (as defined below).

### Social Media:

Social media includes personal email, postings on personal or public blogs, online social networking websites and other similar public communication venues (including, but not limited to,

Facebook, Instagram, Twitter or LinkedIn), as well as posting to and use of video- and photo-sharing websites (including, but not limited to, youtube or flickr).

Participation in online forums is permitted when it is personal; however, employees are not authorized to act as representatives or spokespersons the Company. Employees also may not disclose, post or disseminate nonpublic, confidential Company information including, but not limited to: trade secrets, customer information, financial figures, sales, intellectual property or business plans.

### *Compliance with Regulation FD*

In connection with its public communications, the Company is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for “fair disclosure”). Regulation FD prohibits the Company from disclosing material nonpublic information to securities professionals (including, for example, analysts, investment advisers and portfolio managers) and investors unless the information is simultaneously disclosed to the public generally.

To ensure compliance with Regulation FD, we have designated the following officials as “Authorized Spokespersons:”

- The Chief Executive Officer;
- The Chief Financial Officer;
- The Senior Vice President, Finance; and
- The Investor Relations Director.

Only the Authorized Spokespersons are authorized to communicate any information regarding the Company to third parties. Company employees who regularly interact with securities market professionals are specifically covered by Regulation FD and have a special responsibility to understand and comply with Regulation FD. Contact the Chief Financial Officer if you have any questions about the scope or application of Regulation FD. The Company also has a detailed policy on Regulation FD, which may be obtained from the Chief Financial Officer or the investor relations department at the Company.

### **Environment, Health and Safety**

The Company is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees must comply with all applicable environmental, health and safety laws, regulations and Company standards. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your manager or the Chief Financial Officer and/or its designee. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Chief Financial Officer and/or its designee if you have any questions about the laws, regulations and policies that apply to you.



The Company is committed not only to comply with all relevant health and safety laws, but also to conduct business in a manner that protects the safety of its employees. All employees are required to comply with all applicable health and safety laws, regulations and policies relevant to their jobs.

## **Employment Practices**

The following is intended to be a summary of our employment policies and procedures. You may request a copy of the Company's Employee Handbook, which describes the following policies in more detail, through the Chief Financial Officer and/or its designee.

The Company pursues fair employment practices in every aspect of its business. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association, privacy and collective bargaining. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. Please contact the Chief Financial Officer and/or its designee if you have any questions about the laws, regulations and policies that apply to you.

### *Anti-Harassment and Discrimination Policies*

The Company is committed to providing equal employment opportunities and fair treatment to all individuals on the basis of merit, without regard to race, color, religion, national origin, ancestry, citizenship status, physical disability, mental and/or intellectual disability, medical condition, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information, sexual orientation, or other protected status in accordance with applicable federal, state and local laws. The Company prohibits harassment in any form, whether physical or verbal and whether committed by managers, non-managerial personnel or nonemployees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive objects or pictures.

If you have any complaints about discrimination or harassment, you should report such conduct to your manager, the Chief Financial Officer and/or its designee or the Ethics Helpline that is available 24 hours a day, 7 days a week at 800-916-7037 or [https://irdirect.net/NTST/whistleblower\\_iframe/](https://irdirect.net/NTST/whistleblower_iframe/). All complaints will be treated with sensitivity and discretion. The Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Managers are required to report any complaint that they receive, or any harassment that they observe to the Chief Financial Officer and/or its designee, even when the concerns raised address a manager's own behavior. The Company may discipline any managers or managers who fail to follow this policy, up to and including termination of employment.

For a complete description of the Company's Equal Opportunity Policies, please review the Company's Employee Handbook.

### *Drug and Alcohol-Free Workplace*

The Company is committed to maintaining a drug-free work place. All Company employees must comply strictly with Company policies regarding the manufacturing, distribution, dispensing, possession or use of illegal substances or alcohol on the job or on Company property. Drinking alcoholic beverages is prohibited while on Company premises or while conducting Company-related business or activities offsite, provided that Company policy does not prohibit responsible (as determined by the Company), lawful consumption of alcoholic beverages at Company-sponsored social events that take place on Company property or at other Company-sponsored venues. Possessing, manufacturing, dispensing, distributing, selling or being under the influence of illegal drugs and other controlled substances is prohibited under all circumstances while on Company premises or while conducting Company-related business or activities offsite. Likewise, you are prohibited from reporting to work, or driving any vehicle on Company business, while under the influence of alcohol or any illegal drug or controlled substance which is prohibited under any local, state or federal law. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of his or her job effectively, in a safe manner, and in a way which does not endanger others in the workplace. Employees have the responsibility to consult with their doctors or other licensed health care professionals about the effect of prescribed medications on their ability to perform their specific job duties in a safe manner, and to promptly disclose any work restrictions to their supervisor or Chief Financial Officer and/or its designee.

#### *Workplace Violence Prevention and Weapons*

The Company is committed to preventing workplace violence and to maintaining a safe work environment. The Company will not tolerate conduct that threatens, intimidates, or coerces another employee, tenant, supplier or a member of the public at any time, including employees' off-duty periods. Employees who experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business must immediately report the situation to their manager or the Chief Financial Officer and/or its designee.

The Company strictly prohibits weapons of any type on Company property and at any Company-sponsored event. This includes visible and concealed weapons, even those for which the proper permits have been obtained. The only exception to this rule is where state law requires that a person with a current state license to carry a firearm be permitted to keep a firearm and ammunition in his or her locked, privately owned vehicle, so long as they are transported and stored in strict accordance with state law. Such lawfully possessed firearms and ammunition may not be removed from the employees' personal vehicle or displayed to others. Unless state law provides otherwise, anyone who brings a firearm onto Company property under this exception must provide a copy of his or her license to carry to the Chief Financial Officer and/or its designee. Additionally, this policy does not restrict the ability of police officers, security guards or other persons to lawfully carry a weapon on the premises where the Company has given its express consent.

#### **CONCLUSION**

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your manager, the Chief Financial Officer and/or its designee, or the Ethics Helpline at 800-916-7037 or [https://irdirect.net/NTST/whistleblower\\_iframe/](https://irdirect.net/NTST/whistleblower_iframe/). We expect all Company employees, to adhere to these standards.

*The sections of this Code of Business Conduct and Ethics titled "Introduction," "Accurate Financial Reporting," "Company Records," "Accuracy of Financial Reports and Other Public Communications," "Conflicts of Interest," and "Compliance with Laws and Regulations," as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406*

*of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder, including Item 406 of Regulation S-K.*

*This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.*

**NETSTREIT CORP.**

**CODE OF BUSINESS CONDUCT AND ETHICS ACKNOWLEDGMENT**

I hereby acknowledge that I have received, read, understand and will comply with the NETSTREIT Corp. Code of Business Conduct and Ethics.

I will seek guidance from, and raise concerns about possible violations of the Code of Business Conduct and Ethics with my manager, NETSTREIT Corp.'s Chief Financial Officer and/or its designee, or through NETSTREIT Corp.'s Ethics Helpline.

I understand that my agreement to comply with the Code of Business Conduct and Ethics does not constitute a contract of employment.

Please sign here: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

**This signed and completed form must be returned to NETSTREIT Corp.'s Chief Financial Officer and/or its designee at NETSTREIT Corp., 2021 McKinney Avenue, Suite 1150, Dallas, Texas 75201 within ten business days of receiving this Code.**