



GRANITE POINT MORTGAGE TRUST

VENDOR CODE OF CONDUCT

PURPOSE AND SCOPE

Granite Point Mortgage Trust Inc. (together with its affiliates, the “**Company**”) strives to conduct its business with integrity, in accordance with the highest ethical standards, and in compliance with all applicable laws, rules and regulations. The Company’s officers and employees and full-time and part-time temporary contractors who provide services to the Company are all subject to the expectations and standards set forth in the Company’s Compliance Manual. This Vendor Code of Conduct (the “**Code**”) sets forth the Company’s expectations and standards applicable to its vendors, suppliers, consultants, agents, service providers and other business partners, along with their employees, agents and subcontractors (collectively, “**Vendors**”).

This Code may be amended from time to time. Other policies that govern the conduct of Vendors may be established by the Company from time to time that supplement or are in addition to this Code.

ETHICAL BUSINESS CONDUCT

Compliance with Applicable Laws, Rules and Regulations

The Company is committed to conducting its business in strict compliance with all applicable governmental laws, rules and regulations, including laws, rules and regulations related to securities, labor, employment and workplace safety matters. Vendors are expected at all times to conduct their activities on behalf of the Company in accordance with this principle.

Fair Business Practices

Vendors are expected to comply with all applicable antitrust, trade-regulation and competition laws. Engaging in bid collusion or partnering with other of the Company’s Vendors regarding price fixing are not acceptable practices.

Conflicts of Interest

Vendors must disclose all actual or potential conflicts of interest to the Company and must make decisions concerning the Company’s business impartially.

Business Gifts and Entertainment

Vendors may not offer gifts and entertainment to Company personnel in an attempt to improperly influence a decision involving the Company’s business. Token gifts, which are not excessive in value or are consistent with customary business practices, and customary and appropriate business entertainment involving a clear business purpose are acceptable under this Code.

Anti-Bribery and Anti-Corruption

Vendors may not give bribes or kickbacks or otherwise offer anything of value to any person, organization or government official to obtain a particular result for the Company. All decisions made on behalf of the Company must be based on appropriate investment or business criteria, must be legal, and must be reasonable in relation to customary commercial practice. Similarly, Vendors may not accept or receive a bribe, kickback or anything of value from any party in exchange for or consideration of the award of any Company business.

Financial Reporting and Record Keeping

Vendors are expected to maintain and ensure accurate financial and operating records and reporting that apply to work done for the Company.

Protection of Company Assets

Vendors are expected to protect the assets of the Company, as well as assets of the Company's business partners, employees and other Vendors, from theft, waste or other types of loss.

CYBERSECURITY, PRIVACY AND CONFIDENTIALITY

Cybersecurity

Vendors are expected to maintain a secure information technology environment and adhere to the latest regulatory guidance, directives and regulations regarding cybersecurity and data protection. Vendors are also expected to cooperate in Company cybersecurity risk assessments and promptly notify the Company upon the occurrence of any cybersecurity incident that could adversely impact the Company.

Privacy

Vendors are expected to comply with all applicable laws and regulations pertaining to the privacy of individuals and never disclose personal information acquired in the course of work done for the Company to anyone outside the Company except as permitted by law and in the proper conduct of the Company's business. Personal information should be disclosed to Vendor personnel and to Company personnel only to the extent such persons need to know such information to do their jobs.

Confidentiality

Vendors are expected to comply with all applicable laws and regulations concerning the protection, use and disclosure of the Company's proprietary and confidential information, and to protect the Company's confidential or proprietary information from any unauthorized access or disclosure. The confidentiality expectations contained in this Code are in addition to any requirements set forth in any nondisclosure or other agreement between the Company and the Vendor.

Insider Trading

Vendors may not violate federal securities laws by trading in Company securities while in possession of material, nonpublic information about the Company or recommending such trades to others (or "tipping"). Vendors are expected to have policies in place that prohibit illegal insider trading.

HUMAN AND LABOR RIGHTS

Discrimination and Harassment

Vendors are expected not to tolerate or permit illegal discrimination or harassment of any kind in their workplaces.

Health and Safety

Vendors are expected to maintain safe and healthy work environments free from hazards, violence and threatening behavior.

Human Rights

Vendors are expected to operate their business in compliance with the following human rights principles:

- Employ only those individuals who meet the applicable minimum legal age requirements, and in no event utilize child labor;
- Do not use or engage in any forced labor, including prison labor, indentured labor, bonded labor, military labor, slavery, human trafficking or compulsory labor;
- Ensure that employees are entitled to working hours, breaks, holidays and leave periods in compliance with all applicable laws, rules and regulations;
- Comply with all minimum wage and compensation requirements as mandated by applicable law;
- Seek to provide a workplace that is free of all forms of abuse, exploitation or other inhumane treatment; do not engage in or permit corporal punishment or threatened or actual violence; and
- Seek to ensure that its activities do not negatively affect access to basic human needs, including access to food, water, sanitation or healthcare.

Freedom of Association

Vendors are expected to respect their employees' right to freedom of association and honor lawful rights of their workforce to exercise (or not exercise) their right to collective bargaining.

Nonretaliation

Vendors are expected to maintain a nonretaliation policy that permits employees to report concerns to Company personnel without fear of retaliation by management.

ENVIRONMENTAL RESPONSIBILITY

Vendors are expected to abide by the letter and spirit of all environmental laws and regulations applicable to their business. Vendors are also encouraged to limit the negative environmental impacts of their operations by adopting measures to conserve energy, reduce waste and minimize water usage.

CODE VIOLATIONS

Reporting Code Violations

Vendors are expected to read and understand this Code and its application to the performance of their business activities, to conduct themselves in accordance with this Code, and to seek to avoid even the appearance of wrongdoing or improper behavior. Vendors are asked to report a violation of this Code, or of any unethical behavior by an employee of the Company, in one of the following ways:

- alerting their primary relationship contact at the Company;
- sending an email to the Company's Chief Compliance Officer, at vendor.compliance@gpmtreit.com; or
- using the Company's whistleblower alert line, at 844-572-2197 or www.gpmortgagegetrust.ethicspoint.com.

Note that the Company's whistleblower alert line accepts anonymous reports.

Consequences to Code Violations

The Company regards any violation of this Code as a very serious matter. Failure to comply with the Code may result in consequences up to and including termination of the Vendor's relationship with the Company. In addition, the Company may report any violations of law to regulatory or law enforcement agencies.

May 2023