

CIM REAL ESTATE FINANCE TRUST, INC.

WHISTLEBLOWER POLICY

The audit committee (the “**Audit Committee**”) of the board of directors (the “**Board**”) of CIM Real Estate Finance Trust, Inc., a Maryland corporation (the “**Company**”), has adopted this policy on reporting concerns about the Company regarding accounting, internal controls, auditing and other matters. The policy is intended to create an environment where individuals can act without fear of reprisal or retaliation and provide a channel of communications for reporting concerns relating to accounting, internal controls, auditing and other matters that may be violations of law (“**Reportable Concerns**”), including any of the following:

- Federal criminal law involving securities fraud, mail fraud, bank fraud, or wire, radio and television fraud;
- SEC rules or regulations;
- Accounting irregularities;
- Federal law relating to fraud against shareholders; or
- Other suspected wrongdoing which may affect the Company or its assets.

Any (i) director, officer, employee (if any) of the Company, (ii) all employees of CIM Group, LLC and any of its affiliates (“**CIM**”) acting for or on behalf of the Company pursuant to any management, advisory or other agreement to provide services to the Company, and (iii) any other interested party, including stockholders, who believe, in good faith, that a Reportable Concern has occurred, may make a report as set forth below. The Company will not retaliate against you for notifying it of a Reportable Concern and will not permit any officer, director, manager or supervisor of the Company or CIM to do so. You may submit your notification by doing any or all of the following:

- contacting your immediate supervisor (if applicable);
- contacting the Legal Representative¹;
- contacting the Chair of the Audit Committee:

CIM Real Estate Finance Trust, Inc.
2398 E. Camelback Road, 4th Floor
Phoenix, Arizona 85016
Attn: Audit Committee Chair

- contacting the Company’s third-party hosted “whistleblower” hotline at 855-832-5588 or website at <http://cimgroup.ethicspoint.com>. Complaints submitted in this way are handled by our outside whistleblower provider in order to assure confidentiality and anonymity.

Reportable Concerns that relate to accounting, internal controls, auditing matters, or which otherwise fall within the purview of the oversight of the Audit Committee shall be reported to the Audit Committee Chair, regardless of the method of submission. Otherwise, the information in the report will be reported to the

¹ Legal Representative means the lawyer designated by the Company or CIM Group LLC with primary responsibility for ‘34 Act matters for the Company.

Company's CEO or CFO, or the Chief Legal Officer or the Chief Compliance Officer of CIM, as circumstances dictate, and will be addressed in accordance with the applicable policies and procedures of the Company and/or CIM for remediating such reports. Your notification should contain as much detail as possible for the Company to appropriately address the matter (for example, the name(s) of the individual(s) involved and a description of the Reportable Concern). The Company strictly prohibits any retaliation for reporting a possible Reportable Concern. This policy operates in conjunction with any applicable CIM policies relating to the subject matter hereof.