Service Properties Trust

Code of Business Conduct and Ethics

December 16, 2021

Introduction

This *Code of Business Conduct and Ethics* (this "Code") has been approved and adopted by the Board of Trustees of Service Properties Trust (the "Company"). *References to the Company in this Code include the subsidiaries of the Company, unless the context indicates or implies otherwise.*

This Code is based on the principle that the Covered Persons (as defined below) owe a duty to the Company to conduct the Company's business in an ethical manner that promotes the accomplishment of the Company's goals. All Covered Persons are expected to adhere to this general principle as well as to comply with all of the specific provisions of this Code that are applicable to them (and in some instances applicable to their family members).

"Covered Persons" means senior and executive officers of the Company and The RMR Group LLC, the Company's business and property manager ("RMR LLC"), members of the Board of the Company and The RMR Group Inc. ("RMR Inc.") and employees of RMR LLC who provide significant services to the Company.

The Company expects all Covered Persons to act in accordance with the highest standards of personal and professional integrity and to comply with all applicable laws, regulations and Company policies. Likewise, the Company also expects that its contractors, consultants and other agents, including their respective directors, officers, employees and other representatives, will conduct business with or on behalf of the Company in accordance with the highest standards of personal and professional integrity and ethics and in compliance with all applicable laws and regulations. RMR LLC and RMR Inc. have confirmed to the Company that each has adopted a Code of Business Conduct and Ethics that includes similar obligations for its officers and any employees.

This Code applies to all Covered Persons. This Code should be read in conjunction with other policies of the Company. It is each individual's responsibility to become familiar with this Code, these policies and any supplemental policies.

Failure to comply with this Code may result in disciplinary action. Furthermore, violations of this Code may also be violations of law and may result in civil or criminal penalties for you and/or the Company.

We do not have any employees. Personnel and services that we require are provided to us under contracts with RMR LLC.

SERVICE PROPERTIES TRUST

Code of Business Conduct and Ethics

This Code supplements our other applicable policies. If you have questions regarding this Code, you should contact an executive officer or the Director of Internal Audit of the Company. You also may use the Company's confidential message system at (866) 511-5038.

1. Company Records and Information

We promote full, fair, accurate, timely and understandable disclosure in all of our public communications, including reports and documents that are filed with, or submitted to, governmental authorities. We must maintain accurate and complete records, data and other information in sufficient detail so as to reflect accurately our transactions. Our financial information and statements must be prepared in accordance with generally accepted accounting principles as in effect in the United States, and, as applicable, statutory accounting practices and procedures for regulatory purposes, and must fairly present, in all material respects, our financial condition and operating results. You are personally responsible for the integrity of our information, reports and records under your care or control and for reporting all such information timely, accurately and completely to the appropriate personnel in accordance with our policies to enable us to appropriately report such matters in a timely manner. Misrepresenting facts or falsifying records will not be tolerated and will result in disciplinary action.

You should use common sense and be professional when choosing the content and language of business records and other documents (including e-mail).

You must comply with the Company's record retention policies. If any government agency or official requests access to any of our records, data or other information in our possession, you must advise an executive officer of the Company immediately. You may not destroy or alter any records, data or other documents which are potentially relevant to a violation of law or any litigation or any pending, threatened or foreseeable government investigation or proceeding or lawful request.

You must cooperate fully with appropriately authorized internal or external investigations. Making false or misleading statements to anyone, including internal or external auditors, in-house or external counsel or representatives or regulators can be a criminal act that can result in severe penalties. You must never withhold or fail to communicate information that should be brought to the attention of management.

2. Proprietary and Confidential Information

You may receive or create information about us that is proprietary and/or confidential information. In addition, you may receive information about our tenants, property managers, suppliers, competitors or others that is proprietary to our business or which we or they have an obligation to keep confidential. You must respect these confidences and comply with any applicable laws governing their use and disclosure.

Both during and after your association with us, you may not disclose any such proprietary or confidential information to anyone without proper authorization from us. You must take precautionary steps to prevent the unauthorized disclosure of proprietary or confidential information, including by protecting and securing documents and data containing this information. Disclosure of our proprietary or confidential information should not be made to any individual who is not authorized to receive it and has no need to know the information to perform his, her or their duties.

Our proprietary or confidential information includes, but is not limited to, non-public information that might be of use to our competitors, or harmful to us or our tenants, property managers, suppliers or other third parties, if disclosed. Examples of proprietary information include tenant lists and rent rolls, new leases and contracts and amendments to or termination of leases and contracts, plans for acquisitions, dispositions or financings and business

and strategic plans and budgets.

Examples of confidential information include customer information, tenant or property manager information, including, but not limited to, name, address, telephone number, e-mail address, medical and billing records, government issued identification (such as, social security number) and credit card, banking or other financial information.

3. Compliance with Laws

We conduct our business in accordance with all applicable laws and regulations. Compliance with the law does not comprise our or your entire ethical responsibility. Rather it is a minimum, essential condition for the performance of our and your duties.

This Code highlights a few laws and issues, but it does not attempt to cover every circumstance which may arise. There are complex, rapidly changing laws and issues which may affect your personal conduct outside of our business environment. You are responsible for knowing and complying with laws and regulations applicable to you and you should consult our legal group with any questions concerning these laws and regulations. If you have any compliance questions relating to us or our business, you should consult with one of our executive officers or Director of Internal Audit.

4. Insider Trading

To prevent unlawful insider trading or allegations of unlawful insider trading, and to protect the Company's reputation for integrity and ethical conduct, we have adopted insider trading policies and procedures that restrict your ability to trade in Company securities and to share with others material, non-public information concerning the Company. This insider trading policy also applies to trading in securities of (i) RMR Inc., (ii) other public companies to which RMR LLC or its affiliates provide management or other services and (iii) other public companies on the basis of material, non-public information that you may have learned in the course of performing your duties for the Company.

You are required to comply with any applicable policies and procedures relating to insider trading, which are set forth in full detail in the Insider Trading Policies and Procedures of the Company available from RMR LLC's Human Resources department or the Director of Internal Audit or on RMR LLC's SharePoint website.

You should contact the Director of Internal Audit if you have any questions regarding our Insider Trading Policies and Procedures.

5. Antitrust Laws

We are committed to fair competition and competing fairly and ethically for all business opportunities. In conducting our business you must adhere to all antitrust laws. These laws prohibit practices in restraint of trade, such as price fixing and boycotting suppliers or customers, and they also bar pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery; and kickbacks. Antitrust laws also prohibit agreements between competitors regarding prices to be charged, bidding, clients to be solicited or geographic areas to be served.

6. Fair Dealing with Others and Ourselves; Illegal and Questionable Gifts or Favors

We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices. We will not make materially false, misleading or unsubstantiated statements about competitors or ourselves. You are required to adhere to these standards in your conduct on our behalf. You may not publish information about us and may only speak for us if authorized to do so.

Buying, selling and bidding on our behalf must be done on an "arm's length" basis. You are not permitted to offer, give, solicit or accept any payment, gift, bribe, secret commission, favors or other business courtesies that constitute, or could be reasonably perceived as constituting, unfair business inducements or that would violate laws or regulations or our other policies.

The federal government, each state and many local jurisdictions have laws that restrict the ability of Covered Persons and the Company to give gifts (e.g., meals, entertainment, transportation, lodging and gift items) to public officials and employees, and in some cases to their spouses or children. These laws range from absolutely prohibiting such gifts, to permitting them as long as there is no intent to influence a specific official decision with the gift.

You are responsible for complying with any and all applicable gift laws and regulations in jurisdictions in which you may have contact with public officials and employees on behalf of the Company. Any questions regarding the appropriateness or legality of offering, giving, soliciting or accepting a gift or invitation should be addressed to one or more of the individuals listed at the beginning of this Code.

7. Political Contributions and Activities

United States federal laws generally prohibit companies from donating corporate funds, goods or services (including your work time), directly or indirectly, to candidates for federal office, political party committees or political action committees. State and local laws may also impose requirements and restrictions regarding similar matters, including restrictions, prohibitions and reporting requirements regarding political donations. As a result, any political contributions or expenditures made by the Company must be pre-approved by the Board of Trustees, a Managing Trustee or the Secretary of the Company. This includes not only monetary contributions but also "in-kind" contributions by the Company (such as using the Company's facilities or resources to benefit a campaign or committee).

In addition, while we encourage your involvement in civic affairs and your participation in the political process, that involvement and participation must be on an individual basis, on your own time and at your expense, using your own resources or those of the campaign, and never using the Company's facilities or resources, and not as our representative. Any political activity that could cause someone to believe that such actions reflect the Company's views or position requires the prior approval of the Board of Trustees, a Managing Trustee or the Secretary of the Company.

Lastly, certain U.S. federal, state and local "pay-to-play" laws may place additional restrictions on U.S. political contributions by a government contractor, its affiliates, and personal political contributions of its covered employees (and in some cases, their family members). In order to ensure compliance with these laws, if you hold a position with the Company or, as applicable, RMR LLC that falls into any of the categories listed below, you are required to notify the Director of Internal Audit prior to you, your spouse or your dependent child, directly or indirectly, making or soliciting any U.S. federal, state or local political contributions:

- Board member;
- Executive officer of the Company;
- Employees of RMR LLC who are subject to this Code and who interact with government agencies on behalf of the Company or with respect to its business, including:
    - Any such employee likely to be involved in or who it is reasonable to expect would be involved in soliciting business from or maintaining relationships with government clients on behalf of the Company or with respect to the Company's business;
    - Any such employee whose compensation is directly affected by government agreements with respect to the Company or its business (for example, an employee paid by commission or finder's

fees, and a regional market head who receives a percentage of each government agreement secured in his or her region); and

- Any such employee who administers or manages government contracts on behalf of the Company or with respect to the Company's business; and

- Any employee of RMR LLC who is subject to this Code and who is registered as a lobbyist in any U.S. state or local jurisdiction.

8. Conflicts of Interest

You must be sensitive to activities, interests or relationships that interfere with, or appear to interfere with, our interests. These activities, interests or relationships are considered "conflicts of interest."

Conflicts of interest arise from financial or other business relationships with our tenants or property managers, suppliers or competitors that might impair, or appear to impair, the independence of any judgment you may need to make on our behalf. They may arise from your personal investing, your outside business activities, your consideration of our business opportunities and dealings with related parties. Examples include accepting gifts, payment or services from those seeking to do business with us that constitute, or could be reasonably perceived as constituting, unfair business inducements or that would violate laws or regulations or our other policies, or your receipt of improper personal benefits as a result of your position with us; accepting loans or guarantees from us; and owning, or having a substantial interest in, a company that is a competitor, tenant, property manager, customer or supplier of us. If something would constitute a conflict of interest if it involves you directly, it will likely constitute a conflict of interest if it involves a family member or business associate of yours.

You are under a continuing obligation to disclose any situation that presents a conflict of interest; disclosure is the key to remaining in compliance with this policy. Disclosure permits our representatives who are independent of the conflict of interest to understand the conflict of interest and to determine whether our interests as a whole are being protected. If you think that you have a conflict of interest, or something that others could perceive as a conflict of interest, you should report it to the Director of Internal Audit.

You may pursue transactions or relationships which involve a conflict of interest that are not otherwise expressly permitted by our governing documents or our agreements with RMR LLC only if (i) that transaction or relationship does not impair the independence of any judgment you may need to make on our behalf and (ii) the transaction or relationship has been approved as provided in the following two paragraphs.

In the case of an executive officer or board member, you must seek approval from disinterested trustees for investments, related person transactions and other transactions or relationships which you would like to pursue and which may otherwise constitute a conflict of interest or other action falling outside the scope of permissible activities under this Code. If there are no disinterested trustees, the approval must come from both the affirmative vote of a majority of our entire Board of Trustees and the affirmative vote of a majority of our independent trustees.

In the case of other persons subject to this Code, you must seek approval from an executive officer of the Company who has no interest in the matter for which approval is being requested.

If you discover that, as a result of changed circumstances or otherwise, you have become involved in a conflict of interest or are in competition with us in a way that violates or may violate this Code, you must report that conflict as provided above. Unless you obtain appropriate approval, you must promptly eliminate that conflict or competitive situation.

Because it is impossible to describe every potential conflict of interest, we rely on you to exercise good judgment, to seek advice when appropriate and to adhere to ethical standards in the conduct of your professional and personal

affairs.

9. Reports of Violations

We require anyone who knows of a violation of laws, rules, regulations or this Code to report that violation to our Director of Internal Audit or a member of our Audit Committee. You may report such violations as follows:

- By written correspondence to:

  Service Properties Trust
  Director of Internal Audit
  Two Newton Place
  255 Washington Street, Suite 300 Newton, MA 02458

- By toll-free telephone to: (866) 511-5038
- By e-mail to: Internal.Audit@svcreit.com
- By use of the Company's web site at: http://www.svcreit.com.

We have adopted procedures for handling concerns or complaints about accounting, internal accounting controls or auditing and we will handle complaints or reports of violations in accordance with those procedures.

Similarly, if you are an RMR LLC employee, we encourage you to speak with your supervisor, manager or other appropriate personnel and, if you are a board member or officer of the Company, we encourage you to speak to the Director of Internal Audit when in doubt about the best course of action in a particular situation. The Company's interests are never served by unlawful or unethical business practices.

Any report or information that you submit must be made in good faith. This does not mean that you have to be certain or correct when you raise a concern, but it does mean that you believe the concern you are raising is legitimate and the information you are providing is accurate. Submitting a report or information that you know to be inaccurate is a violation of this Code. We prohibit any retaliatory action against any individual for raising legitimate concerns or questions regarding ethics or compliance matters or for reporting violations or suspected violations in good faith.

10. Accountability for Adherence to this Code

Covered Persons who violate this Code will be subject to appropriate discipline. This determination will be based upon the facts and circumstances of each particular situation. Disciplinary measures include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension or termination of the violating party's relationship with us and restitution.

Persons who may be subject to disciplinary measures include, in addition to the violator, others involved in the wrongdoing such as (i) persons who fail to use reasonable care to detect a violation, (ii) persons who, if requested to divulge information, withhold or misrepresent material information regarding a violation and (iii) persons who approve or condone the violations or attempt to retaliate against persons for reporting violations or violators.

Any waiver of the applicability of this Code or of a violation by an individual covered by this Code, other than an executive officer of the Company or board member, requires the approval of our Director of Internal Audit or an executive officer of the Company. Any waiver for an executive officer or board member requires the approval of the Board of Trustees or one of its committees authorized to do so by the Board of Trustees and may be promptly publicly disclosed as may be required by applicable federal securities laws. Waivers will be granted only as permitted by law and in extraordinary circumstances.

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