

FRANKLIN STREET PROPERTIES CORP.

ANTI-HEDGING POLICY

No director, officer, employee of Franklin Street Properties Corp. (“Company”), or family member of any of the foregoing who share the same address as, or are financially dependent on, any of the foregoing, or any other person who shares the same address as any of the foregoing, other than a tenant or employee, and including any and all corporations, partnerships, trusts or other entities owned or controlled by any of the foregoing, may engage in any of the following types of transactions:

- Short sales of Company securities, including short sales “against the box”; or
- Purchases or sales of puts or calls involving Company securities.

Violations of any of the foregoing (a) may result in the Company reporting such violation to the appropriate governmental and/or regulatory authority and (b) is grounds for disciplinary action by the Company, including termination of employment.