

CORPORATE CAPITAL TRUST, INC.

AUDIT COMMITTEE PROCEDURES FOR HANDLING COMPLAINTS AND CONCERNS

The Company seeks to ensure the integrity of its financial reporting and the compliance of the Company with applicable law. The Company also desires to conduct itself in a prudent and ethical manner. The Company believes that any measures which assist the Company in protecting the integrity of its financial reporting and promoting its compliance with applicable law benefits the interests of Company shareholders.

Pursuant to the requirements of Rule 10A-3(b)(3) of the Exchange Act, Section 303A.06 of the New York Stock Exchange Corporate Governance Rules, the Audit Committee Charter of the Company, and in accordance with Section 806 of the Sarbanes-Oxley Act of 2002, the Audit Committee has adopted the following procedures (the “**Procedures**”) for handling complaints and concerns to assist the Company in meeting certain legal obligations in connection with its accounting and auditing practices. These Procedures have also been adopted to address complaints and concerns and encourage reporting of any potential conduct that is dishonest, illegal or unethical, including, but not limited to, conduct which involves violations of any rules and regulations adopted by the SEC as well as any federal rules relating to fraud against shareholders. The goal of these Procedures is to reduce the prospect of illegal conduct.

Although the Company has officers, it has no employees. The Company contracts with third parties which provide management, administrative, custodial, accounting, auditing, transfer agency and other services to the Company. A list of current service providers (the “**Applicable Service Providers**”) that provide services to the Company is attached to these Procedures as Appendix A. The Committee relies on the Company’s officers and Applicable Service Providers for information about the Company’s accounting, internal accounting controls and auditing matters (collectively, “**Accounting Matters**”) as well as information concerning the daily operations of the Company (“**Operational Matters**”). Because the Committee is dependent upon the information provided to it by the Company’s officers and Applicable Service Providers, it is important for the Committee to ensure that open and effective channels of communication are available for the reporting of concerns and complaints regarding Accounting and Operational Matters.

The Committee has established these Procedures for the:

- receipt, retention and treatment of complaints received by the Company regarding Accounting and Operational Matters; and
- the confidential, anonymous submission by officers of the Company or employees of Applicable Service Providers (collectively, “**Reporting Persons**”) of concerns regarding questionable Accounting and Operational Matters.

1. Submission of Complaints and Concerns

(a) The Company encourages any officer of the Company or employee of an Applicable Service Provider who has a concern regarding a potentially questionable Accounting

and/or Operational Matter to bring this concern to the attention of the Company's Audit Committee Chairperson. A matter may be a potentially questionable Accounting Matter if, for example, it involves fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company; fraud or deliberate error in the recording and maintaining of financial records of the Company; deficiencies in or noncompliance with any internal accounting controls affecting the Company; any misrepresentation or false statement regarding a matter contained in the financial records, financial reports or audit reports of the Company; or any deviation from full and fair reporting of the Company's financial condition. A matter may be a potentially questionable Operational Matter if, for example, it involves fraud or intentional illegal conduct affecting the Company or its shareholders; potential violation of the applicable federal securities or other applicable federal laws governing the Company; or potentially unethical conduct impacting the operations of the Company.

(b) Any such concerns involving questionable Operational or Accounting Matters should be submitted directly to the Audit Committee Chairperson of the Company. The Audit Committee Chairperson may be contacted as follows:

CCT: James Kropp at jkropp@usrproperties.com or (305) 968-6294

If a Reporting Person does not want to be identified with the submission, he or she should mail his or her communications to the Audit Committee Chairperson, without including his or her name in the correspondence but, instead, prominently indicating on the submission that it is a "*Confidential, Anonymous Submission.*"

(c) Any complaint received by an officer of the Company or an employee of an Applicable Service Provider with respect to Accounting or Operating Matters should be promptly forwarded to the Audit Committee Chairperson. Given the sensitivity of such matters, any written correspondence regarding a complaint should be marked "Confidential."

(d) The Audit Committee Chairperson will observe the following procedures in investigating a complaint or concern:

- the Audit Committee Chairperson will take all appropriate action to investigate any complaints or concerns reported to the Audit Committee Chairperson, which actions may (but need not) include the use of internal or external counsel, accountants or other personnel; and
- the Audit Committee Chairperson will promptly report any complaint or concern he or she receives to the Chief Executive Officer of the Company and to the Company's legal counsel, although the Audit Committee Chairperson may refrain from notifying the Chief Executive Officer of the Company if after consultation with the Company's legal counsel or the Committee, the Audit Committee Chairperson believes that refraining would be in the Company's best interest.

The Audit Committee Chairperson will inform the Committee of any complaints or concerns reported under these Procedures at the next regularly scheduled Committee meeting, although the Audit Committee Chairperson will notify the Committee before the meeting if the Audit Committee Chairperson determines that the Committee should be notified more promptly.

The Committee in its discretion may take any action it deems appropriate to investigate any complaints or concerns of which it becomes aware, which may include referring the matter to the Chief Executive Officer of the Company or another Company officer or initiating an independent investigation. The Committee may also choose to take no action. If the Committee chooses to conduct an investigation, it may, at the Company's expense, use internal or external counsel, accountants and other personnel. The Committee will maintain records of all complaints and concerns reported under these Procedures, the disposition of such complaints and concerns and the basis for such disposition.

2. Freedom to Report (No Retaliation)

The Company will not tolerate any form of retaliation against a Company Trustee, Director or officer; or against an Applicable Service Provider employee (i) who submits a good faith complaint or concern about the Company's Accounting or Operational Matters or (ii) who assists in an investigation of challenged practices.

Accordingly, any Company Trustee, Director or officer, or employee of an Applicable Service Provider is prohibited from discharging, demoting, suspending, threatening, harassing, or in any other manner discriminating against a Reporting Person that would have an impact on the terms and conditions of the Reporting Person's employment because of any lawful act done by the Reporting Person to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the Reporting Person reasonably believes is reportable under these Procedures. Reporting Persons have the option, and are encouraged to, report any violation to the Audit Committee Chairperson with confidentiality. These procedures are intended to create an environment where Reporting Persons can act without fear of reprisal or retaliation. So as to ensure that Applicable Service Providers are aware of, and complying with, the Procedures, the Company may, as part of these Procedures, provide Applicable Service Providers with the Procedures and obtain annual affirmations of such Applicable Service Providers' receipt of, and compliance with, the Procedures.

In order to monitor whether the Reporting Person is being subjected to reprisals or retaliation, the Audit Committee Chairperson may contact the Reporting Person (if the Reporting Person's identity is known) to determine whether any changes in the Reporting Person's work situation have occurred as a result of providing such information. If the Audit Committee Chairperson determines that any reprisal or retaliation has occurred, a report of this shall be made to the Applicable Service Provider and to the Committee if consented to by the Reporting Person.

Any Reporting Person who feels he or she has been the subject of reprisal or retaliation because of his or her reporting under these Procedures should immediately notify the Audit Committee Chairperson.

Furthermore, the Company shall not enforce and shall seek to cause the Applicable Service Providers not to enforce any confidentiality agreement that prohibits a Reporting Person party to such agreement from reporting possible violations of federal law or regulation to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the SEC, the U.S. Congress, and any U.S. agency Inspector General, or making other disclosures

that are protected under the whistleblower provisions of federal law or regulation (or comparable laws or regulations that similarly prohibit the impediment of such protected disclosures). Notwithstanding the foregoing, the Company does not authorize the waiver of (or the disclosure of information covered by) the attorney-client privilege or work product protection or any other privilege or protection belonging to the Company, to the fullest extent permitted by law.

3. Trustee/Director Concerns

Any Trustee/Director who has a concern regarding what he or she views as questionable Accounting or Operational Matters should bring such concern to the attention of the Audit Committee Chairperson no later than the first Committee meeting held after he or she becomes concerned.

4. Retention of Records

The CCO, on behalf of the Company and the Committee, will maintain a confidential file of materials related to complaints or concerns received concerning the Company's Accounting or Operational Matters. These materials will be retained for a period of five (5) years or such longer period as may be required by law. Any records relating to a report may, if necessary, be redacted (or similar steps taken) to preserve the confidentiality of the person(s) submitting the report.

5. Communication and Training

The officers of the Company shall be responsible for ensuring that all persons involved with the Company's Accounting and Operational Matters (including employees of Applicable Service Providers) are made aware of and encouraged to report matters under these Procedures.

6. Review of Procedures

These Procedures shall be reviewed by the Audit Committee at least annually.

**APPENDIX A
TO
AUDIT COMMITTEE PROCEDURES FOR HANDLING COMPLAINTS AND
CONCERNS**

**APPLICABLE
SERVICE PROVIDERS**

As of April 9, 2018

This Appendix A may be modified from time to time by the CCO to reflect changes to a Company's Applicable Service Providers.

Investment Adviser

Corporate Capital Trust, Inc.: FS/KKR Advisor, LLC

Administrator

Corporate Capital Trust, Inc.: FS/KKR Advisor, LLC

Sub-Administrator

Corporate Capital Trust, Inc.: State Street Bank and Trust Company

Transfer Agent

Corporate Capital Trust, Inc.: DST Systems, Inc.

Custodian and Accounting Agent

Corporate Capital Trust, Inc.: State Street Bank and Trust Company