

## **ORION OFFICE REIT INC. DIVERSITY, EQUITY, AND INCLUSION POLICY**

November 2023

Purpose	Orion Office REIT Inc. Diversity, Equity, and Inclusion Standards and Expectations
Applicable Parties	All Employees
Effective Date	November 2023
Related Policies	Orion Office REIT Inc. Code of Business Conduct and Ethics Orion Office REIT Inc. Human Capital Management Policy
Review Cycle	Annual
Last Reviewed	November 2023
Last Modified	November 2023

### **Introduction**

As environmental, social and governance (“ESG”) practices develop, Orion Office REIT Inc. (“Orion” or the “Company”) will update this diversity, equity and inclusion (“DEI”) policy and its other ESG policies to reflect key and market standard ESG practices.

The Nominating and Corporate Governance Committee (the “NCG Committee”) of the Orion Board of Directors oversees DEI matters relating to the Company, including, without limitation, DEI initiatives. To enable fulfillment of these responsibilities, the NCG Committee receives and discusses with management reports on Orion’s ESG management, strategy, disclosures, initiatives and policies on at least a quarterly basis.

Orion is committed to addressing DEI matters within our business, with respect to our Board of Directors, officers, and employees. The composition of the Company’s Board of Directors reflects the high priority Orion places on diversity of background. The Company believes that the diversity of our employees’ backgrounds, experiences, and perspectives adds value to our team and sets us up for success. The Company monitors DEI statistics of its workforce, including by gender and race and comparison with industry and national percentages, and periodically reports these statistics to the Board of Directors.

### **Equal Opportunity Employer and Harassment Free Environment**

Orion is committed to providing equal opportunity and fair treatment in all types of work situations, including hiring, firing, promotions, training, wages and benefits, and to all individuals on the basis of merit, without discrimination because of race, color, creed, religion, national origin or ancestry, sex (including pregnancy), marital status, sexual orientation, age, disability, veteran status, citizenship, physical or mental ability, genetic information, gender identity or expression, or any other characteristic protected by law. Orion pursues fair employment practices in every aspect of its business. Orion employees must comply with all applicable labor and employment laws, including antidiscrimination laws and laws related to freedom of association, privacy and collective bargaining.

Orion prohibits harassment in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, visual, verbal or physical conduct of a sexual nature, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive objects or pictures or any form of sexually offensive behavior.

If an employee has any complaints about discrimination or harassment in any type of work situation including, hiring, firing, promotions, training, wages and benefits, they should report such conduct to their supervisor, the Company's Human Resources Department, the Company's General Counsel or our Ethics Hotline. The Ethics Hotline is available 24 hours a day, 7 days a week, by telephone at (602) 675-0354. Employees who call this number need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from any employee call in a manner that protects the confidentiality and anonymity of the employee making the call.

All complaints will be treated with sensitivity and discretion. The employee's supervisor, the Human Resources Department and the Company will protect their confidentiality to the extent possible, consistent with law and the Company's need to investigate their concern. Where the Company's investigation uncovers harassment or discrimination, the Company will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation in any form against an employee who, in good faith, files a complaint.

### **Training**

Orion has established a team member training program to foster employee development and experience. Among other topics, the training program includes cyber and information security, DEI, ethics, and anti-harassment training.