

ORION OFFICE REIT INC. ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

November 2023

Purpose	Orion Office REIT Inc. General Environmental, Social and Governance Standards and Expectations
Applicable Parties	All Employees
Effective Date	November 2023
Related Policies	Orion Office REIT Inc. Climate Change 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”) will update this Environmental, Social and Governance Policy (this “Policy”) and its other ESG policies to reflect key and market standard ESG practices.

Oversight

The Nominating and Corporate Governance Committee (the “NCG Committee”) of the Orion Board of Directors oversees ESG matters relating to Orion, including, without limitation, climate change and related risks and diversity, equity and inclusion 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.

Environmental, Waste & Resource Management

Orion is committed to following environmentally friendly practices with regard to energy and water efficiency, alternative power sources, waste management, and other initiatives that will help Orion and its tenants preserve and protect the environment.

Orion understands the importance of waste and resource management. Orion’s corporate headquarters is located in a LEED green building, which certifies that the building is a healthy, efficient, carbon and cost-saving green building. With respect to general waste reduction, Orion does not generate hazardous waste. Because Orion does not generate hazardous waste, Orion does not have a hazardous waste management program. Orion’s corporate offices have implemented recycling programs. Orion’s offices are equipped with general waste receptacles as well as a variety of recycling receptacles for paper, plastics, glass, and aluminum. Orion encourages its employees to make smart choices when it comes to waste generation and disposal.

Orion is committed to environmental stewardship and to mitigating its potential impact on the environment, including, when applicable, environmental risk analyses and disclosing material environmental impacts that its operations may have. When Orion acquires new properties, Orion will perform environmental assessments, known as Phase I assessments, to identify potential environmental liabilities or risks associated with the property and will assess whether there are any environmental certifications or ratings. Finally, Orion manages the impact of natural disasters, including flooding and severe storms, by maintaining property and rental value insurance and environmental insurance.

In regard to its tenants, Orion owns a diversified portfolio of mission critical regional and corporate headquarters office

buildings located in high quality suburban markets across the United States leased primarily on a single-tenant net-lease basis to creditworthy tenants. A significant majority of Orion's tenants' leases are double or triple net-leases. Double and triple-net leases are leases in which the tenant occupies the property as if it is the owner. Therefore, Orion's tenants generally are solely responsible for the obligations related to the property, including paying all operating expenses associated with the property (e.g., real estate taxes, insurance, maintenance).

Because the tenant occupies the property as if it is the owner under the net-lease model, the tenant generally controls environmental practices and conditions at the property, such as waste management, and energy and water usage practices, and decides when and how to implement environmentally sustainable practices at the property. While Orion does not control the business operations of the tenant, as the property owner, Orion nevertheless recognizes that the operation of commercial real estate assets can have a meaningful impact on the environment – particularly with respect to resource consumption and waste generation – and on the health of building occupants. As such, Orion engages and collaborates with its tenants across its portfolio to better understand our climate-change related impacts and seek to identify areas of improvement.

Although Orion generally does not have direct control of its properties under the net-lease model, during 2022, to help inform its development of its ESG strategies and initiatives, Orion conducted a tenant survey to gather information regarding property specific environmental features for each property in Orion's portfolio. Information gathered includes information regarding building certifications and ratings, transportation initiatives, renewable energy programs, energy efficiency initiatives, and water and waste initiatives. For key results of this survey, please see Orion's 2023 Proxy Statement or Orion's Climate Change Policy.

Orion intends to similarly engage and collaborate with its tenants in the future. Additionally, in coordination with its tenants, Orion also intends to identify environmental initiatives that are designed to have a long-term, positive impact on Orion's stakeholders.

Commitment to the Future

Orion is committed to making ESG an integral component of its long-term strategy for the success of the company, as well as the communities and tenants that Orion serves. Orion intends to engage and collaborate with current tenants across its portfolio to implement ESG initiatives. Orion will also seek to acquire properties that further the ESG initiatives that are core to the company's strategy.

Therefore, consistent with applicable corporate fiduciary responsibilities, Orion will:

- Incorporate ESG issues into our strategic analysis and decision-making processes;
- Work to incorporate ESG issues into our policies and practices where it can be done in a way consistent with our net lease tenant practices;
- Request appropriate and relevant information and disclosure on ESG issues from our tenants; and
- Report, when appropriate, on our relevant activities and progress.

To ensure that Orion's executives are in alignment with Orion's commitment to ESG, the Compensation Committee of the Orion Board of Directors measures progress on ESG initiatives in determining executive officer compensation.

Orion is committed to monitoring its overall environmental impact and will engage in a continuous process of reviewing its operations to identify areas for improving our practices and reducing our impact.

Business with Integrity

Orion is committed to conducting business with integrity. This core value is embedded in Orion's culture and reflected in its commitment to conducting all its activities in accordance with the highest ethical standards, sound corporate governance policies, and in compliance with all legal and regulatory requirements, including all local, state, and federal

environmental-related legislation and regulations. Similarly, Orion expects its vendors and third-party providers to also comply with all relevant environmental legislation and regulations.

Our commitment to understanding the interests and perspectives of our stockholders is a key component of our corporate governance strategy. The Company is highly active in meeting with current and prospective investors and responding to investor queries.