

ORION OFFICE REIT INC. HUMAN CAPITAL MANAGEMENT POLICY

November 2023

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

Overview

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

The Senior Vice President, Chief Administrative Officer sets our human capital strategy in collaboration with the Company’s Executive Team taking into consideration Orion’s Occupational Health and Safety Policy, Orion’s Code of Business Conduct and Ethics and the Company’s Diversity, Equity, and Inclusion Policy.

Work Environment

The Company strives to provide an engaging, inclusive and safe work environment for its employees. The Company’s human capital strategy includes attracting, developing and retaining its people and actively engaging with them throughout the year to address their needs and support their growth. Employee engagement is greatly simplified at Orion given the modest size of its workforce which comprises 36 employees and 10 independent contractors as of June 30, 2023. As part of the Company’s team engagement initiatives, our Chief Executive Officer provides periodic business updates to the team and the Company maintains an “open door” policy to welcome questions, ideas and feedback from each team member at all levels and departments of the Company. Additionally, the Company is conducting an employee survey to monitor employee satisfaction and engagement.

Human Capital Strategy

The Company’s human capital program seeks to identify specific skills, training, and metrics necessary for employees to develop into new roles and levels within the organization. Through engagement with their direct supervisors, employees receive structured support with goal setting, performance reviews, and building cases for promotion in the organization. Orion also offers informal mentoring programs with leaders from other areas in the company. This provides alternative perspectives on how employees can grow in their career.

Training & Education

The Company’s training and education initiatives are essential to supporting the career paths and growth of its employees. Orion conducts periodic internal training sessions led by department heads to support employee understanding of the

Company strategy and to build cross-functional talent. The Company also encourages employees to pursue job-specific training and offer networking and education opportunities through membership in industry associations, such as Nareit. The Company has established a team member training program to foster employee development and experience. Among other topics, the training program includes cyber and information security, diversity, equity, inclusion (DEI), ethics and anti-harassment training.

Community Outreach

The Company's culture is driven by our team's connection to each other and the communities in which we live and work. Community partnerships give our team opportunities to effect positive change within our company, our industry and our communities. The Company has formed a community outreach program, called O2. This initiative allows the Company to make an impact in its communities and our team members to support important causes that they are passionate about. As part of this program, the Company and its team members have contributed time, money and non-perishable foods to 501(c)(3) non-profit organizations located in Phoenix and New York. Additionally, the Company has sponsored local charitable events in which the Company's employees have the opportunity to participate.

Employee Benefits

In addition to competitive salaries and wages, the Company provides a suite of employee benefits including medical, dental, and vision insurance coverage and 401(k) plan participation and employer matching. The Company has adopted an unlimited paid time off (PTO) policy, as part of which it encourages its employees to utilize PTO to volunteer in their communities and support causes that are important to them.

Whistleblower Reporting

Orion also provides the ability for employees to report potential issues through its Ethics Hotline: (602) 675-0354. Employees are encouraged to call this number to leave anonymous tips for management to investigate. The Company maintains a policy against retaliation. Reasonable efforts will be made to protect the confidentiality and anonymity of the employee. Refer to the Company's Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters and the Code of Business Conduct and Ethics for more information.