

## Human Rights Policy

*As of January 28, 2022*

Omega Healthcare Investors, Inc. (“Omega”) is committed to the protection and advancement of human rights and to ensuring that all members of our team function with integrity.

The principles outlined in this Human Rights Policy relate to and confirm key commitments and principles in both our [Code of Business Conduct & Ethics](#) and our Employee Handbook. Our Code of Business Conduct & Ethics is updated and provided to all employees annually. Employees provide written confirmation that they have read and understood the Code.

### PRINCIPLES

Omega’s Human Rights Principles, set forth below, are our own. In developing our Principles, we have been informed by reference to such third-party international organizations as the United Nations and such instruments as its *Universal Declaration on Human Rights*, its *Guiding Principles on Business and Human Rights*, and the International Labor Organization’s 1998 *Declaration on Fundamental Principles and Rights at Work*. However, these Principles represent Omega’s statement of its own standards on these subjects, rather than those of a third party.

- **Child Labor:** Omega prohibits the use of child labor, in accordance with ILO Convention 138.
- **Forced Labor:** Omega rejects the use of forced labor in all its forms, including prison or debt bondage labor, trafficking, and the lodging of deposits or identity papers by employers or by outside recruiters.
- **Occupational Health and Safety:** Omega recognizes the importance of the health, safety and environmental well-being of our employees and communities and is committed to safeguarding these objectives. We believe that health, safety and environmental goals can, and should, be consistent with the economic health of our Company. We will provide and maintain a safe and healthy work environment for our employees at all facilities and encourage open discussion with them of their health, safety and environmental concerns. A safe and healthy environment includes access to clean sanitary facilities and drinking water.
- **Discrimination:** As an equal opportunity employer, Omega values the diversity of the unique individuals who make up our team. We strive to protect the rights of people of color and women and do not discriminate on the basis of an individual’s race, gender, age, color, religion, national origin, disability, sexual orientation, ancestry, genetic information, military service, creed, pregnancy, marital status, citizenship, gender identity, gender expression or any other status protected by applicable law. 100% of employees receive mandatory unconscious bias and harassment prevention training.

- **Discipline:** Omega forbids any form of corporal punishment, mental or physical coercion, or verbal abuse.
- **Harassment:** Harassment – sexual or otherwise, both overt and subtle – is a form of employee misconduct that is demeaning to others, undermines the integrity of the employment relationship, and is strictly prohibited. The Company is committed to providing a work environment that is free from unlawful harassment, discrimination, and retaliation. The Company maintains a strict policy that prohibits unlawful discrimination and harassment in any form.
- **Collective Bargaining:** Omega adheres to all local laws and regulations, including those that provide the local workforce with the rights to collective bargaining and freedom of association. Interference with workers seeking to organize or carry out union activities, using intimidation, retaliation or harassment in violation of applicable law are wholly unacceptable.
- **Compensation:** Omega is committed to compensating its employees at competitive rates, in all cases at or above prevailing minimum wages. We are committed to paying compensation to all employees sufficient to meet their basic needs and to being a Living Wage Company.
- **Anti-Corruption:** Omega prohibits corruption in all its forms, including extortion and bribery.
- **Stakeholder Engagement:** We seek to foster engagement with key stakeholder groups, including our shareholders, clients, colleagues, and community. We encourage our employees to be good stewards and better the community, through philanthropy efforts and sponsorship events. Where appropriate, we engage with a wide range of stakeholders on human rights issues related to our business.

## GOVERNANCE

Omega's Nominating & Corporate Governance Committee reviews and, when appropriate, makes recommendations to the Board regarding the policies of the Company concerning environmental, social, and governance matters, including those of human rights.

Any concerns about violations of or misconduct related to our Human Rights Policy may be reported in confidence to our Director of Human Resources or through Omega's anonymous reporting hotline at 734-660-8844.