

GLOBAL TAX STRATEGY

Revised: December 31, 2023

Overview:

The following document outlines the global tax strategy of Omega Healthcare Investors, Inc. & Subsidiaries. Omega Healthcare Investors, Inc. (“Omega”) was incorporated in the State of Maryland on March 31, 1992. Omega is a self-administered real estate investment trust (“REIT”), investing in income producing healthcare facilities, principally long-term care facilities located in the United States (“U.S.”) and the United Kingdom (“U.K.”). Through its subsidiaries, Omega, or collectively the Company, provides lease or mortgage financing to qualified operators of skilled nursing facilities and, to a lesser extent, assisted living facilities, independent living facilities and rehabilitation and acute care facilities. Please refer to the Company’s financial reports, which are available on its website (www.omegahealthcare.com), for additional detail on the Company’s business.

Tax Strategy:

It is the Company’s goal to comply with applicable rules and regulations of jurisdictions where the Company is organized, conducts trade or business, derives income, and/or has an economic interest, in order to ensure its ability to continue to conduct trade or business in an uninterrupted manner, protect its investments, maintain its status as a publicly traded REIT, and comply with its Code of Business Conduct & Ethics, Human Rights Policy, Corporate Environmental Policy, Audit Committee Charter, and various other corporate governance documents. These documents can be found under the [Corporate Governance Documents](#) section of our website. The Company puts this strategy into practice in the regular course of trade or business when considering: a) the acquisition, sale, set-up, or termination of subsidiaries and/or b) undertaking necessary or elective restructuring efforts in order to:

- ensure the Company’s compliance with applicable rules and regulations;
- structure new deals and/or other transactions contemplated by the Company;
- hold the Company’s properties, investments, and/or other assets/liabilities;
- encapsulate the Company’s various business activities and/or functions;
- improve the Company’s organizational efficiency;
- facilitate the Company’s investment strategy; and
- ensure the Company is deploying capital in an efficient manner.

This strategy, which is effective for the year ending December 31, 2023, has been approved by the Company’s Chief Executive Officer, Chief Financial Officer (“CFO”), and Chief Accounting Officer (“CAO”) and complies with requirements outlined in section 161 and section 19 of Schedule 19 of the Finance Act 2016.

Tax Compliance:

The Company ensures compliance with applicable rules and regulations by maintaining supporting documentation and accounting records in a manner that allows it to reliably identify, complete, and submit required tax reports, disclosures, and/or other documentation in a timely manner and with reasonable confidence that such tax reports, disclosures, and/or other documentation are substantially correct and materially accurate. In cases where missed tax reports, disclosures, and/or other documentation, mistakes, or other concerns are identified by the Company, its consultants, and/or applicable jurisdictions, the Company exerts reasonable effort to submit missed tax reports, disclosures, and/or other documentation, correct mistakes, and address concerns in a timely manner. In order to achieve this, the Company appoints qualified personnel (managers, subject matter experts, and/or certified professionals), engages reputable consultants with necessary expertise and experience, and tries to cultivate relationships with tax authorities of applicable jurisdictions based on respect, professionalism, honesty, transparency, cooperation, and mutual understanding. With regard to this process, the Company regularly reviews and updates applicable process narratives and internal controls, which are subject to internal and external audit.

Tax Planning:

The Company ensures structuring of new deals and/or other transactions is conducted in a manner that, with a reasonable degree of confidence, is not expected to result in a material risk to its ability to continue to conduct trade or business in an uninterrupted manner, protect its investments, and maintain its status as a publicly traded REIT. This approach imposes strict constraints on the Company's risk tolerance with respect to tax planning and tax compliance and ensures that any structuring and/or restructuring efforts are conducted in a manner where form does not supersede substance. In order to achieve this, the Company relies on appointed personnel and engaged consultants to propose optimal alternatives for structuring new deals and/or other transactions, and restructuring existing organizational relationships in order to enhance its ability to meet and exceed expectations of its stakeholders, while mitigating applicable risks. With regard to this process, the Company regularly reviews and updates applicable process narratives and internal controls, which are subject to internal and external audit. In addition, the Company's Investment Committee is responsible for reviewing certain material transactions outlined in the Investment Committee Charter. The Investment Committee Charter can be found under the [Corporate Governance Documents](#) section of our website.

Pertaining to the structuring of new deals and/or other transactions, and restructuring of existing organizational relationships, the Company evaluates the acquisition, sale, set-up, or termination of subsidiaries, some of which are outlined in its financial reports, which are used: a) to hold its properties, investments, and/or other assets/liabilities, and b) to encapsulate various business activities and/or functions. The Company primarily uses U.S. corporations, U.S. partnerships, various other U.S. disregarded entities, and U.K. limited companies in its organizational structure. When applicable, the Company makes appropriate U.S. and/or U.K. tax elections.

Tax Risk:

The Company exerts reasonable effort in order to attain an appropriate level of understanding of material risks associated with the conduct of its trade or business and protection of its investments and to enhance its ability to mitigate such risks. The Company manages tax risks by evaluating new deals and/or other transactions (on a case-by-case basis) and reviewing its existing structure and regular trade or business activity (on a quarterly basis), in order to identify: a) any meaningful and unfavorable change(s) that would

affect its status as a publicly traded REIT, b) possible errors and omissions, c) unnecessary increases in volume and/or complexity of required tax reports, disclosures, and/or other documentation, and d) potential exposure to unwarranted taxation. In addition, the Company considers pertinent available information to identify and track changes in tax reports, disclosures, and/or other documentation required to be filed by the Company and applicable deadlines.

In order to mitigate risks attributed to tax compliance and tax planning efforts, the Company relies on multiple layers of review (internal and external) and implements practical and commonly accepted structuring approaches made available by applicable jurisdictions, a) that meet the Company's various goals and needs and b) that are not intended or expected to result in tax avoidance. The Company's CAO, who reports to the Company's CFO, oversees all tax planning and general tax compliance efforts. In order to accomplish this, the CAO works with appropriate Company personnel and consultants, following applicable process narratives and internal controls. The CAO executes tax reports, disclosures, and/or other documentation required to be filed by the Company. Appropriate officers execute structuring and/or restructuring documents after receiving approval from the Company's Board of Directors, when appropriate.

Tax Relationships:

Over its history, the Company has consistently made an effort to cultivate relationships with tax authorities of applicable jurisdictions based on respect, professionalism, honesty, transparency, cooperation, and mutual understanding. The Company's approach to dealing with such tax authorities is evidenced by its focus on appointing qualified personnel, engaging reputable consultants, and implementing a Code of Business Conduct & Ethics, Human Rights Policy, Corporate Environmental Policy, and Audit Committee Charter, all of which are intended to ensure a reasonable degree of confidence in its tax compliance and tax planning efforts and a high degree of professionalism when working with tax authorities. These documents can be found under the [Corporate Governance Documents](#) section of our website.

Summary:

It is the Company's overall goal to meet and exceed expectations of its stakeholders, while continuing to build its reputation as a responsible member of the global business community. This strategy is intended to help facilitate this goal, while treating existing and potential jurisdictions as stakeholders and balancing their needs and concerns with those of the Company and the rest of its stakeholders. For additional detail on the Company's business, risks, taxation, or other items referenced in and/or related to its global tax strategy please refer to its website (www.omegahealthcare.com) and links provided below.

- [Most Recent Annual Report](#)
- [Quarterly Reports](#)
- [Corporate Governance Documents](#)