

Vendor Code of Conduct

Adopted April 21st, 2022

General

Omega Healthcare Investors, Inc. (“Omega,” “we” or the “Company”) is dedicated to conducting our business ethically and with the highest level of integrity. Through our Code of Business Conduct & Ethics (our “Business Code”), we have established Company standards for ethical business practices and regulatory compliance. Our Business Code is applicable to all of our employees, directors and officers, each of whom has a personal responsibility to uphold our standards.

This Vendor Code of Conduct (“Vendor Code”) communicates to our vendors, agents, suppliers, subcontractors, and other business partners that provide goods or services to Omega (collectively, our “Vendors”) our expectations with respect to various ethics, labor and human rights issues, and environmental stewardship.

1. ETHICAL BUSINESS PRACTICES

Omega expects its Vendors to conduct business in accordance with their own applicable professional standards and comply with all applicable laws, rules, regulations, and other legal requirements within the jurisdiction in which they conduct their business, including but not limited to the following:

a. Fair Competition

Vendors shall conduct their business in a manner that is compliant with all applicable anti-trust and fair competition laws.

b. Conflicts of Interest & Fair Dealing

Vendors should avoid conflicts of interests, which includes interactions with Omega employees that may conflict, or appear to conflict, with that employee acting in the best interests of Omega. Vendors must avoid unfair dealing.

c. Anti-Bribery & Anti-Corruption

All forms of corruption, bribery and kickbacks are strictly prohibited. Comply with all applicable anti-corruption and anti-money laundering laws of any country in which they operate, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and, when applicable, the U.K. Bribery Act.

d. Anti-Money Laundering

Vendors must comply with all applicable Anti-Money Laundering rules and regulations, including the Bank Secrecy Act, the USA PATRIOT Act, and applicable FINRA rules and regulations.

e. Privacy & Data Protection

Vendors shall ensure that all employees’ and business partners’ privacy are protected and shall ensure the security of systems and data, including Omega’s data. Vendors shall comply with all laws and regulations regarding the privacy of information, data protection and cross-border data flows and shall notify Omega of any breach at Vendor of the privacy or security of data or systems.

f. Business Records

Vendors shall accurately record and report all business and financial information and comply with all applicable standards, laws and regulations concerning the completion, accuracy and retention of such records and reports.

2. LABOR & HUMAN RIGHTS

We expect our Vendors to treat people with respect and dignity and uphold the human rights of their workers. Expectations include the following:

a. Freely Chosen Employment

Vendors shall not use, or participate in the exploitation of workers, forced, or involuntary labor. All members of the workforce should be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

b. Freedom of Association

Vendors shall respect worker's rights to freedom of association and collective bargaining in accordance with applicable legal requirements.

c. Fair Compensation

Wage payments and benefits must comply with all applicable laws and regulations. Omega encourages Vendors to work toward improving standards of living and quality of life for their employees and communities.

d. Working Hours

Vendors shall comply with all applicable laws and regulations related to working hours issues in any jurisdiction where they operate.

e. Safe Working Environment

Vendors shall provide and maintain a safe and healthy work environment for their employees and encourage open discussion with them of their health, safety and environmental concerns.

f. Anti-Harassment & Anti-Discrimination

Vendors shall not tolerate any form of harassment or discrimination and are to comply with applicable local, state and federal legal requirements prohibiting conduct that could reasonably be construed as sexual in nature, or discrimination or harassment based on race, color, age, gender or gender identity, sexual orientation, ethnicity, genetic information, disability, pregnancy, religion, political affiliation, medical condition, veteran status, ancestry, union membership, or marital status.

g. Child Labor

Suppliers shall not use child labor in their operations. Suppliers shall avoid any child labor in their business operations in accordance with the International Labor Organization's core labor standards, applicable laws and regulations. Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are supported.

h. Diversity & Inclusion

Vendors shall commit to maintaining an inclusive work environment that welcomes diverse perspectives, respects the rights and cultural differences of others and encourages collaboration so that all can excel together. Vendors shall also conduct their business without unlawful bias, discrimination or harassment.

3. ENVIRONMENTAL STEWARDSHIP

Omega is committed to implementing environmentally sustainable best practices for our own operations and to assist our tenants in their efforts to address their environmental concerns, as outlined in our Corporate Environmental Policy.

All Vendors are expected to support this same level of environmental sustainability by operating in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Vendors are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, and to engage in activities that reuse and recycle.

4. COMPLIANCE WITH THE VENDOR CODE

Vendors are expected to follow all relevant national, state and local laws and regulations, including, but not limited to, those related to labor, health and safety, and the environment. Vendors are expected to inform Omega of any violations, alleged violations or investigations by a governmental authority into potential violations of laws or regulations related to goods or services that the Vendor provides to Omega.

5. REPORTING VIOLATIONS OF THE VENDOR CODE

Vendors must allow employees to raise issues or concerns without fear of retaliation.

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Omega reserve the right to amend or supplement the Vendor Code and the matters addressed herein, without prior notice, at any time.

The Vendor Code has been recommended by the Nominating and Corporate Governance Committee and approved by the Board of Directors.