

OMH-HealthEdge  
Holdings, Inc.<sup>1</sup> *dba*



Omega Healthcare Management Services®  
Code of Conduct

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<sup>1</sup> This document applies to OMH-HealthEdge Holdings, Inc. *dba* Omega Healthcare Management Services® and its controlled subsidiaries and affiliates.

## Message from the Chief Executive Officer

Every decision we make, no matter how routine, affects Omega Healthcare's reputation with our clients, our partners, and the communities they serve. This Code of Conduct expresses the values and standards that guide our work globally and helps each of us make choices that are consistent with our mission and with our commitment to integrity and ethical conduct.

Empowerment sits at the center of our purpose, mission, vision, and values. It starts with each of us working at or with Omega Healthcare. We not only have the responsibility to act with honesty, fairness, and respect, but also should feel empowered to have a voice, to ask questions, and to raise concerns when something does not feel right. Doing what is right may not always be easy, but it is never optional. Acting in alignment with our values means having the confidence and responsibility to speak up and, when necessary, to seek guidance from your manager, Compliance, or Legal, before acting.

Thank you for living our values every day and for helping Omega Healthcare remain a trusted leader and partner in healthcare operations, revenue cycle management, and technological innovation, driven by empowered people and united as One Omega.

Anurag S. Mehta

Chief Executive Officer

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## 1. Purpose

This Code of Conduct sets out the ethical principles and behavioral expectations that define how Omega Healthcare conducts business worldwide. It reflects our commitment to integrity, transparency, and accountability in every aspect of our operations and decision-making.

The Code is designed to help you recognize ethical issues, make informed decisions, and know where to seek guidance when questions arise. It is not intended to replace sound judgment or every detailed policy, but to provide a foundation for ethical decision-making across the enterprise. Each of us shares responsibility for living these standards every day.

## 2. Scope

This Code applies to all directors, officers, employees, contractors, consultants, and agents of Omega Healthcare and its subsidiaries and affiliates (“Covered Individuals”). Suppliers, vendors, and business partners are also expected to follow the principles in this Code and comply with the separate Supplier Code of Conduct.

Compliance with this Code is a condition of employment or engagement. Covered Individuals must also comply with all applicable laws, regulations, and internal policies wherever Omega Healthcare operates.

## 3. Our Values in Action

Omega Healthcare’s values express who we are and how we work together. They form the foundation of our culture, our ethical standards, and our success. These values guide how we collaborate, serve our clients, and make responsible choices in our daily work.

### 3.1 Integrity

We do what is right, even when no one is watching. Integrity means being truthful, fair, and consistent in all actions.

We build trust by speaking honestly, honoring our commitments, and refusing to compromise our principles for convenience or gain.

#### ***Integrity in Action***

*A colleague notices that billing information appears incomplete. Reporting the issue immediately, even if it delays a project, demonstrates Omega Healthcare’s commitment to doing what is right.*

### 3.2 Accountability

We take ownership of our words, decisions, and results. We keep our commitments and hold ourselves to the highest standards of performance.

We learn from mistakes, follow through on corrective actions, and support a culture where accountability strengthens teamwork.

#### **Accountability in Action**

*A team member realizes that a deliverable will be late due to an error. They alert their supervisor early, take corrective steps, and update the client proactively, showing ownership and professionalism.*

### 3.4 Respect

We treat everyone with dignity, empathy, and fairness. We value diversity, inclusion, and the perspectives of others.

We create an environment where every voice can be heard, and we resolve differences through collaboration and professionalism.

#### **Respect in Action**

*During a team discussion, an employee pauses to invite input from a quieter colleague. The idea shared improves the outcome and reinforces a culture where every voice matters.*

### 3.5 Human Rights and Working Standards

We respect and promote fundamental human rights in every place we operate. We reject all forms of forced or child labor and expect our suppliers and partners to uphold these same standards.

We speak up if we see any practice that compromises human dignity, fairness, or safety.

#### **Human Rights in Action**

*While reviewing a vendor's proposal, a team member learns that the supplier may use underage or unpaid labor. They stop the engagement and report the concern to Compliance, so due diligence can be completed before proceeding.*

### 3.6 Collaboration

We work as One Omega Healthcare team. We share knowledge, support colleagues, and communicate openly to achieve common goals.

We celebrate collective success and recognize that our best results come from diverse strengths and a shared purpose.

**Collaboration in Action**

*Two departments disagree regarding a process change. Rather than escalating conflict, they hold a joint department meeting to find a solution that supports shared goals and client needs.*

### 3.7 Excellence

We strive to deliver outstanding results in every aspect of our work. We seek innovation, continuous improvement, and the highest quality in all that we do.

We hold ourselves to world-class standards, take pride in our work, and pursue better ways to serve our clients, colleagues, and communities.

**Excellence in Action**

*An operations leader identifies a way to automate a manual task that saves time and reduces error. Sharing the improvement across teams demonstrates commitment to innovation and quality.*

## 4. Speaking Up, Reporting Concerns, and Non-Retaliation

We strengthen our culture of integrity when we speak up, ask questions, and report concerns. Omega Healthcare wants every employee to feel safe doing so, knowing that retaliation is never tolerated.

### 4.1 Our Commitment to Speak Up

Omega Healthcare encourages an open culture where every person feels safe to ask questions, raise concerns, and report potential misconduct. Speaking up protects our people, our clients, and our reputation. Silence can create risk, while transparency builds trust.

If you see or suspect behavior that violates this Code, Omega Healthcare policy, or the law, you have both the right and the responsibility to report it promptly.

### 4.2 How to Seek Help or Report a Concern

**Q:** *I'm worried that reporting an issue might affect my job. Will Omega Healthcare really protect me from retaliation?*

**A:** *Yes. Retaliation in any form is strictly prohibited and is against the law. Omega Healthcare will investigate every report made in good faith and take prompt action if retaliation occurs. You may report anonymously through the Speak Up Hotline if local law allows.*

You can report issues or seek advice through any of the following channels:

- Your supervisor or another manager
- Human Resources

- The Compliance or Legal Department

The Omega Healthcare **Confidential and Anonymous Ethics and Compliance Hotline** (the “**Speak Up Hotline**”): available 24 hours a day, 7 days a week, online and by phone, with the option to remain anonymous where permitted by law.

All reports are handled confidentially and investigated promptly, with respect for everyone involved. Retaliation against anyone who raises a concern in good faith is strictly prohibited and may result in disciplinary action.

Where appropriate, Omega Healthcare may provide updates once a concern has been reviewed or resolved.

#### 4.3 Good-Faith Reporting and Confidentiality

“Good faith” means you sincerely believe the information you share is true, even if later found unsubstantiated. Omega Healthcare prohibits any form of retaliation against good-faith reporters or participants in an investigation. Investigations are conducted objectively and in confidence to the full extent possible.

All reports are reviewed promptly and fairly. Omega investigates concerns objectively, maintains confidentiality where possible, and takes corrective or disciplinary action when warranted.

#### 4.4 Decision Checklist — When in Doubt

Before acting, ask yourself:

- Is it legal?
  - Is it honest and fair?
  - Is it consistent with Omega Healthcare’s values and policies?
1. Would I be comfortable if my decision appeared in the news or on social media?

If any answer is “no” or “not sure,” pause and seek guidance before proceeding.

#### 4.5 Investigation Process

All reports are reviewed promptly and fairly. Investigations are conducted by authorized personnel who maintain confidentiality to the greatest extent possible. Those involved are expected to cooperate fully and provide truthful information. Findings may lead to corrective actions, including disciplinary measures or process improvements.

#### 4.6 Non-Retaliation and Good-Faith Protection

Omega Healthcare prohibits retaliation against anyone who raises concerns, participates in investigations, or refuses to engage in unethical conduct.

Acts of retaliation will result in disciplinary action, up to and including termination of employment.

Good-faith reporting means sharing information you believe to be accurate, even if an investigation later finds no violation.

***"Speaking Up" in Action***

*An employee notices discrepancies in expense reports. Unsure if it's a mistake or misconduct, they use the Speak Up Hotline to raise the concern anonymously. The investigation confirms a clerical error, and the process is improved to prevent future issues. Speaking up early helps maintain accuracy and integrity across the company.*

The Omega Healthcare Whistleblower & Non-Retaliation Policy outlines the above protections.

## 5. Respect in the Workplace

We work best in an environment where everyone feels safe, valued, and able to contribute. Omega Healthcare fosters dignity, inclusion, and respect across all locations, cultures, and teams.

### 5.1 Dignity, Inclusion, and Fair Treatment

Omega Healthcare is committed to a work environment where everyone is treated with dignity and respect. We celebrate diversity and strive to create a culture of belonging where different backgrounds, perspectives, and ideas are valued.

All employment decisions must be made based on qualifications, merit, and business needs and never based on race, color, religion, gender, age, sexual orientation, gender identity, disability, veteran status, or any other characteristic protected by law.

### 5.2 Harassment and Bullying

**Q:** *What if I witness a manager making jokes that make others uncomfortable?*

**A:** *Even if the comments are not directed at you, report them. Harassment can harm anyone in the workplace. Omega Healthcare investigates all reports confidentially and prohibits retaliation against anyone who raises a concern in good faith.*

Harassment of any kind (verbal, physical, visual, or sexual) is strictly prohibited. This includes unwelcome conduct that creates an intimidating, hostile, or offensive work environment or interferes with another person's ability to work.

Bullying, humiliation, and retaliatory behavior have no place at Omega Healthcare. If you see or experience misconduct, speak up immediately through your manager, Human Resources, or the Speak Up Hotline.

### 5.3 Health and Safety

Omega Healthcare is committed to providing a safe and healthy workplace. Each of us shares responsibility for identifying and reporting unsafe conditions or practices. We must comply with all occupational health and safety requirements and follow emergency procedures to protect ourselves and our colleagues.

Omega Healthcare prohibits violence, threats, intimidation, weapons in the workplace, and working while impaired by alcohol or drugs, including during work-related travel or events, and requires employees to promptly report any safety concerns in accordance with local law and HR policy. We also promote mental well-being and encourage employees to seek support through company resources if they experience stress, fatigue, or other wellness concerns.

Report any workplace injury, threat, or incident immediately to management or Human Resources.

### 5.4 Professional Conduct and Digital Courtesy

Professional behavior applies equally to in-person, virtual, and written interactions. Use courteous language, listen respectfully, and avoid offensive or discriminatory remarks in meetings, emails, and online communications.

Remember that internal collaboration tools are professional spaces. Treat them as extensions of the workplace.

#### ***Respect in the Workplace in Action***

*A team member overhears a colleague being spoken to in a dismissive tone during a busy shift. After the meeting, they check in with the colleague, then raise the concern privately with their manager to ensure everyone is treated with courtesy and professionalism. Taking quiet, respectful action helps strengthen Omega Healthcare's culture of dignity and inclusion.*

## 6. Doing Business with Integrity

Every business decision at Omega Healthcare must reflect our commitment to integrity and compliance with applicable laws. Acting ethically protects our reputation, strengthens client trust, and sustains our long-term success.

### 6.1 Our Commitment to Ethical Business

Integrity is the cornerstone of Omega Healthcare's reputation. We compete fairly, comply with all laws, and never compromise ethics for profit. Every action we take, large or small, must uphold the trust placed in us by our clients, partners, and communities.

## 6.2 Anti-Bribery and Anti-Corruption

Omega Healthcare has zero tolerance for bribery, corruption, or any improper advantage. We do not offer, give, solicit, or accept anything of value to influence a business decision or obtain favorable treatment.

All interactions with public and private partners must comply with the **Anti-Corruption, Sanctions & Business Conduct Policy** and applicable anti-bribery laws such as the United Nations (“UN”) Convention against Corruption – UNCAC, the Inter-American Convention Against Corruption, the Organization for Economic Co-operation and Development (“OECD”) Anti-Bribery Convention, U.S. Foreign Corrupt Practices Act (“FCPA”), the United Kingdom (“U.K.”) Bribery Act, the Indian Penal Code (1860), the Indian Prevention of Corruption Act (1988), the Indian Companies Act (“2013”), the Philippines Revised Penal Code, the Philippines Anti-Graft and Corrupt Practices Act, Colombia anti-corruption, and all other applicable anti-corruption laws and regulations, each as amended from time to time (collectively, the “Anti-Corruption Laws”).

Facilitation payments (small, unofficial payments to secure routine actions) are prohibited. When faced with pressure to make such a payment, refuse politely, explain our policy, and immediately report the incident to Compliance.

## 6.3 Gifts, Entertainment, and Hospitality

**Q:** *A vendor offered me a gift card as a thank-you for meeting a project deadline. Can I accept it?*

**A:** *No. Cash and cash equivalents, including gift cards, are never permitted. Politely decline and inform the vendor that Omega Healthcare’s policy prohibits accepting such items. If you’re unsure about another type of gift or invitation, ask Compliance before accepting.*

Modest and infrequent gestures of goodwill may be appropriate in certain business settings, but they must never influence or appear to influence objective decision-making.

All Gifts & Entertainment must be transparent, properly recorded in the Gifts & Entertainment Register, and approved according to Omega Healthcare’s thresholds.

Any Gifts & Entertainment involving a Government Official<sup>2</sup> requires prior written approval from Compliance and Legal (or the Chief Compliance Officer’s delegate).

## 6.4 Trade Controls and Sanctions

We comply with all applicable trade control laws, including economic sanctions, export controls, and anti-boycott rules. Do not do business with restricted parties or in embargoed regions without

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<sup>2</sup> Government Official includes any officer or employee of a government or government-controlled- entity, candidates for public office, political parties or party officials, and employees of public international organizations.

Legal approval. Screening and required licenses must be completed before any transaction proceeds.

## 6.5 Conflicts of Interest

**Q:** *My sibling recently joined a vendor that does business with Omega Healthcare. Do I need to disclose it?*  
**A:** *Yes. Family relationships with vendors, clients, or competitors can create the appearance of a conflict even if no improper influence occurs. Disclose the relationship to Compliance so it can be reviewed and managed appropriately.*

Covered Individuals must act in Omega Healthcare’s best interests and avoid situations where personal interests could interfere or appear to interfere with professional judgment.

Examples of potential conflicts include:

- Outside employment or consulting that competes with Omega Healthcare
- Financial interests in a supplier, client, or competitor
- Hiring or supervising a close relative

If you think a conflict may exist, disclose it promptly to Compliance or Legal for review and guidance. Follow Omega Healthcare’s **Conflict of Interest Policy** for disclosure timing and review procedures (on hire, annually, and upon changes).

## 6.6 Fair Competition and Honest Dealings

Omega Healthcare competes vigorously and fairly. We never engage in price-fixing, bid-rigging, market allocation, or other anti-competitive practices.

All marketing, sales, and communications must be truthful and not misleading. We gather competitive intelligence only through lawful and ethical means.

Consult Legal before participating in benchmarking or trade association activities that could involve competitors or competitively sensitive information.

## 6.7 Material Non-Public Information and Securities Trading

**Q:** *I learned during a client meeting that their company may soon be acquired. Can I buy their stock?*  
**A:** *No. That information is material and non-public. Trading on it or sharing it with anyone would violate securities laws and Omega Healthcare’s policies.*

In the course of our work, we may learn information about Omega Healthcare, its clients, or business partners that is not publicly available and could influence investment decisions. This is called material non-public information (“MNPI”).

You must never buy or sell securities, or advise others to do so, based on MNPI obtained through your role at Omega Healthcare. Sharing such information (“tipping”) is also prohibited.

If you are unsure whether information is material or public, contact Legal before trading or sharing it with anyone.

***Doing Business with Integrity in Action***

*A project manager declines an unapproved gift from a supplier and immediately records the offer in the Gifts & Entertainment Register. By following policy and documenting transparently, they protect Omega Healthcare’s reputation and demonstrate integrity in everyday business.*

## 7. Protecting Company and Client Information

### 7.1 Protecting Confidential and Proprietary Information

All Covered Individuals must protect confidential information belonging to Omega Healthcare, its clients, and business partners from unauthorized access, disclosure, or misuse.

Confidential or proprietary information includes, but is not limited to:

- Business plans, strategies, pricing, and financial data
- Software, source code, algorithms, and databases
- Training materials, operational processes, and workflow designs
- Research, analytics, and performance metrics
- Inventions, discoveries, creative works, or product designs
- Client, patient, employee or vendor information shared under contract
- Internal communications, policies, and non-public presentations

Do not share this information outside Omega Healthcare, unless authorized and legally permitted to do so, and ensure that any disclosure is protected by appropriate agreements.

**Q:** *I found an online tool with helpful code snippets for a project. May I copy Omega Healthcare data into the tool?*

**A:** *Not without confirming the license. Only approved open-source or properly licensed materials may be used. When in doubt, check with Technology or Legal before incorporating third-party content.*

All inventions, discoveries, creative works, or software developed in connection with Omega Healthcare’s business are the company’s property. We also respect the intellectual property rights of others and never copy, use, or distribute copyrighted or licensed materials without proper authorization.

Confidential materials, whether digital or physical, must be returned and not retained when employment or engagement ends. Always handle Omega Healthcare’s and clients’ information responsibly, using secure systems and following applicable privacy, data protection, and information security policies.

## 7.2 Healthcare Compliance (PHI, HIPAA, and FWA)

Omega Healthcare provides revenue cycle, business process services to healthcare organizations and payers in the United States. In performing these services, we handle Protected Health Information (PHI) and are required by law and by client contracts to comply with the Health Insurance Portability and Accountability Act (HIPAA), its implementing regulations, and comparable international standards.

We strictly prohibit all forms of fraud, waste, and abuse (FWA) in our operations and in services we perform for clients. Coding, billing, and claims activities must always be accurate, truthful, and compliant with applicable regulations. Omega Healthcare further prohibits offering, paying, soliciting, or receiving any remuneration, directly or indirectly, to induce or reward referrals, the generation of healthcare business, or the purchase, order, or recommendation of any healthcare item or service.

“Remuneration” includes anything of value, such as gifts, meals, travel, charitable contributions, free or discounted services, employment or consulting arrangements, or other financial or non-financial benefits.

All healthcare-related arrangements must have a legitimate business purpose, be commercially reasonable, consistent with fair market value, documented in a written agreement, and approved through Omega Healthcare’s contracting and compliance processes. If an arrangement could reasonably be viewed as an inducement or kickback, do not proceed and contact Compliance or Legal

Follow Omega Healthcare’s **Privacy Policy**, Data Protection and Information Security Policies, and **Anti-Fraud & Abuse Policy** at all times, and promptly report any suspected violation or data breach through the Speak Up Hotline or to Compliance or Legal.

## 7.3 Data Privacy and Security

**Q:** *I sometimes need to email large data files to a client. Can I use my personal Gmail or a free file-sharing site?*

**A:** *No. Always use Omega Healthcare-approved, encrypted systems for transmitting data. Personal accounts and public sharing tools are not secure and can violate privacy or client contracts. Any PHI should remain in the client environment, not emailed into the Omega Environment, and, if emailed, must be done so with a secure platform.*

We are committed to respecting and protecting the confidentiality and privacy of health and personal information (PHI/PII). Access and use such information only for legitimate business purposes and in accordance with applicable privacy laws and Omega Healthcare's Data Protection and Information Security Policies.

Do not upload Omega Healthcare or client content to unapproved AI tools or cloud-based platforms; use only enterprise-approved platforms; and follow the terms of the Omega Healthcare's **Global AI Policy**.

Always follow secure handling protocols and report any suspected data loss, breach, or unauthorized disclosure immediately to IT Security and Compliance.

#### **7.4 Proper Use of Company Assets**

Use Omega Healthcare's equipment, systems, and data responsibly and only for business purposes. Personal use must not compromise productivity, security, or compliance.

All software and data must be properly licensed and used in compliance with Omega Healthcare's technology standards.

Protect Omega Healthcare's intellectual and physical assets from loss, theft, or misuse. Do not use company systems or data for outside employment, personal gain, or activities inconsistent with Omega Healthcare's policies or values. Omega Healthcare reviews or monitors the use of its systems and devices, in accordance with law and company policy, to protect information, ensure security, and maintain reliable operations. Always use Omega Healthcare resources responsibly and for appropriate business purposes.

#### **7.5 Accurate Records and Reporting**

Financial and operational records must be complete, accurate, and maintained in reasonable detail to reflect transactions truthfully. Creating false or misleading entries, or maintaining "off-book" accounts, is strictly prohibited. Any payments made with Omega Healthcare funds must be made in accordance with existing treasury protocols and required approvals without exception.

If you identify an error or irregularity, report it immediately to Legal, Finance or Compliance or through the Speak Up Hotline.

#### **7.6 Records Management and Legal Holds**

All business records must be created, retained, and disposed of according to Omega Healthcare's Records Management requirements and any applicable client or legal obligations. Never alter, conceal, or destroy documents that may be relevant to an investigation, audit, or legal proceeding.

When a legal hold is issued, immediately suspend routine deletion or modification of affected materials and follow all instructions from Legal or Compliance until the hold is formally lifted. If you are contacted by a government agency, regulator, law enforcement, or auditor, or receive any request

for records or information related to Omega Healthcare or our clients, do not respond on your own. Notify Legal or Compliance immediately and follow their guidance.

***Protecting Information in Action***

*A team member notices that a shared project folder contains unredacted client data. They immediately restrict access and alert IT Security to secure the files. Quick reporting prevents a potential data breach and demonstrates accountability for protecting client information.*

## 8. Communicating Responsibly

Clear, accurate, and professional communication protects Omega Healthcare’s reputation and builds trust with our stakeholders. Whether speaking externally or online, each of us is responsible for ensuring that information about Omega Healthcare is shared appropriately and reflects our values.

### 8.1 External Communications and Social Media

Only authorized spokespeople may make official statements on behalf of Omega Healthcare. Direct all inquiries from the media, investors, or public officials to Corporate Communications or Legal and comply with Omega Healthcare’s **Social Media Policy**.

**Q:** *Someone tagged me in a social media post about Omega Healthcare’s client win. Can I repost it?*

**A:** *Yes, if the information is already public and you add a professional comment that reflects Omega Healthcare’s values. Avoid sharing non-public client details or internal metrics.*

When using social media or participating in online forums, never disclose confidential, proprietary, or client information, and do not post content that could harm Omega Healthcare’s reputation or imply company endorsement of personal views.

Use good judgment and professionalism at all times. If you are uncertain whether a communication is appropriate, seek guidance from your supervisor, Corporate Communications, or Compliance before sharing it. Internal posts, comments, and email chains should be professional and limited to those with a legitimate business need to know.

### 8.2 Public Disclosures and Use of Omega Healthcare’s Name and Brand

All public communications, marketing materials, and presentations must accurately represent Omega Healthcare’s services and values. Only authorized teams may issue press releases, marketing statements, or disclosures to clients, regulators, or the public.

Do not use Omega Healthcare’s name, logo, trademarks, or visual identity for personal or outside purposes without prior written approval from Corporate Communications or Legal.

### 8.3 Political and Charitable Activities

Omega Healthcare respects the right of individuals to participate in personal civic, political, or charitable activities on their own time and at their own expense. Such participation must not appear to represent or obligate the company.

Corporate political contributions or advocacy on behalf of Omega Healthcare require advance approval from the Chief Legal Officer or Compliance.

Charitable donations, sponsorships, or fundraising in Omega Healthcare's name must be pre-approved and aligned with the **Global ESG Policy** and Charitable Giving Guidelines.

Employees are encouraged to support community and charitable initiatives consistent with Omega Healthcare's Global ESG Policy and Charitable Giving Guidelines.

#### **Communicating Responsibly in Action**

*A recruiter receives a media inquiry about Omega Healthcare's hiring plans. Instead of answering directly, they must forward it to Corporate Communications. This ensures accurate, consistent information and protects Omega Healthcare's reputation.*

## 9. Corporate Responsibility

Omega Healthcare conducts business with a commitment to integrity, sustainability, and respect for people and the planet. Each of us plays a role in supporting these goals through ethical decision-making, responsible use of resources, and engagement in the communities where we live and work.

### 9.1 Acting Responsibly in the Global Community

Omega Healthcare is committed to conducting business responsibly and contributing positively to the communities where we operate. We pursue sustainable growth that respects people, protects the environment, and upholds ethical governance.

Our decisions should reflect long-term impact and take into account not only profitability but also social responsibility, environmental stewardship, and community well-being.

### 9.2 Environmental and Social Stewardship

Omega Healthcare upholds international standards for human rights, labor practices, and environmental responsibility. We prohibit all forms of forced, bonded, or child labor, human trafficking, and discrimination in employment.

We expect our suppliers, contractors, and business partners to share these commitments, in alignment with the Global ESG Policy and Supplier Code of Conduct.

Any concern about unsafe, unfair, or unethical working conditions within Omega Healthcare or our supply chain must be reported promptly through the Speak Up Hotline or to Compliance.

Social responsibility also includes supporting community health initiatives, employee volunteerism, and local economic development consistent with our mission and values.

***Corporate Responsibility in Action***

*A local operations team partners with a nonprofit to sponsor a community health camp and organize employee volunteers. The event improves access to care for underserved residents and reinforces Omega Healthcare's commitment to people and the planet. The team also implements a waste-reduction plan at the site, demonstrating how small actions can support global sustainability goals.*

## 10. Governance, Monitoring, and Review

Strong governance ensures that Omega Healthcare's ethical standards remain effective, current, and transparent. Oversight, review, and training are essential to maintaining a culture of integrity and accountability.

### 10.1 Policy Ownership and Oversight

The Chief Compliance Officer (CCO) is responsible for maintaining this Code of Conduct and ensuring its effective implementation throughout Omega Healthcare.

The Compliance and Risk Management Committee provides oversight of the Code and the overall ethics and compliance program. The Committee reviews periodic reports on training, investigations, and trends, and approves any material revisions to this document, pursuant to the Committee's **Charter**.

### 10.2 Review and Continuous Improvement

This Code is reviewed at least annually (or sooner if laws, regulations, or business operations change) to ensure continued relevance and alignment with Omega Healthcare's values, ESG commitments, and governance framework.

Feedback from employees, management, and stakeholders is encouraged and helps strengthen our culture of integrity. Updates are communicated through corporate channels and made available on Omega Healthcare's intranet or similar human capital management website.

### 10.3 Training and Certification

All Covered Individuals must complete Code of Conduct training upon being hired and annually thereafter. By completing this training, you affirm your understanding of the Code and your commitment to uphold Omega Healthcare's ethical standards.

Managers are responsible for reinforcing these expectations and ensuring their teams comply with all related policies and procedures.

#### 10.4 Local Law and the Code

Omega Healthcare operates in multiple countries and complies with all applicable laws and regulations. If a requirement of this Code conflicts with local law, employees must follow the local law and promptly seek guidance from Legal or Compliance to resolve the issue.

Where this Code sets a higher ethical or professional standard than local law, employees are expected to follow the higher standard whenever possible.

***Governance, Monitoring, and Review in Action***

*After completing annual Code of Conduct training, a team member identifies a new potential conflict of interest and promptly discloses it to Compliance. This proactive step reflects ongoing accountability and awareness.*

#### 10.5 Enforcement

Violations of this Code or related policies may result in disciplinary action, up to and including termination of employment or engagement, consistent with applicable law. Covered Individuals are expected to cooperate fully and provide truthful information in any company investigation or review.

### 11. References

- This Code should be read together with the following Omega Healthcare policies and standards:
- Anti-Corruption, Sanctions & Business Conduct Policy
- Conflict of Interest Policy
- Enterprise Risk Management (ERM) Policy
- Fraud, Waste and Abuse Policy
- Global AI Policy
- Global ESG Policy
- Information Security Policies
- Privacy and Data Protection Policies
- Social Media Policy
- Supplier Code of Conduct
- Whistleblower & Non-Retaliation Policy

For additional guidance, consult the Compliance or Legal Department or visit the Ethics and Compliance page on the Omega Healthcare intranet or similar human capital management website.

## **Board Approval Statement**

This Code of Conduct has been reviewed and approved by the Board of Directors of OMH-HealthEdge Holdings, Inc., upon the recommendation of the Chief Compliance Officer, Compliance and Risk Management Committee and Executive Leadership Committee.

It supersedes prior versions of the Code and is effective as of January 31, 2026.