<u>SONIDA SENIOR LIVING, INC.</u>

Amended and Restated Code of Business Conduct and Ethics

As adopted by the Board of Directors, effective June 3, 2026

Introduction

Sonida Senior Living, Inc. (together with its subsidiaries, the "***Company***") is committed to conducting its business in accordance with the highest standards of business conduct and ethics, and applicable laws, regulations, rules and standards. The Company's reputation for honesty and integrity is the sum of the personal reputations of our directors, officers and employees. To protect this reputation and to promote compliance with laws, rules and regulations, this Code of Business Conduct and Ethics (this "***Code***") has been adopted by our Board of Directors (the "***Board***") to help to foster a culture of honesty and accountability by setting forth principles that govern how the Company does business, guidance in dealing with ethical issues and mechanisms to ask questions and report concerns. This Code is only one aspect of our commitment. You must also be familiar with and comply with all other policies contained in the applicable Corporate Employee Policy Manual.

This Code sets out the basic standards of ethics and conduct to which all of our directors, officers and employees and all contractors and agents working on behalf of the Company (collectively, "***SNDA Personnel***") are held. These standards are designed to deter wrongdoing and to promote honest and ethical conduct but will not cover all situations. If a law or employment agreement conflicts with a policy in this Code, you must comply with the law or employment agreement; however, if a local custom or policy conflicts with this Code, you must comply with the Code.

If you have any doubts whatsoever as to the propriety of a particular situation, you should submit it in writing to the Company's Chief Legal Officer, who will review the situation and take appropriate action in keeping with this Code, our other corporate policies and applicable law. If your concern relates to the Chief Legal Officer, you should submit your concern, in writing, to the Chair of the Audit Committee of the Board (the "***Audit Committee***"). The mailing address of each of those individuals is included at the end of this Code. The Company has a separate policy for "Whistleblowers" for employees.

This Code is intended to satisfy the applicable code of conduct and ethics requirements of the New York Stock Exchange. In addition, with respect to the Company's Chief Executive Officer, Chief Financial Officer, principal accounting officer or controller and persons performing similar functions, this Code is intended to satisfy the requirements of Item 406 of Regulation S-K and Section 406 of the Sarbanes-Oxley Act of 2002.

1. Scope

If you are a director, officer or employee of Sonida Senior Living, Inc. or any of its subsidiaries, whether you are working at the Company's premises or at any other location, including working remotely, you are subject to this Code. You are required to become familiar with this Code and conduct yourself honestly, ethically and in compliance with applicable laws, regulations and standards and the Company's policies. You are required to certify, upon joining the Company and annually thereafter, as to your compliance with this Code.

All standards in this Code apply equally to contractors, agents, consultants and other third parties performing work on the Company's behalf. For the avoidance of doubt, all such third parties are fully subject to this Code whenever engaged in Company activities and must adhere to all applicable policies, procedures and legal requirements.

2. Honest and Ethical Conduct

For SNDA Personnel, we, as a company, require honest and ethical conduct from everyone subject to this Code. Each of you has a responsibility to all other SNDA Personnel, and to the Company itself, to act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated and otherwise in a manner that meets with our ethical and legal standards.

3. Compliance with Laws, Rules and Regulations

SNDA Personnel are required to comply with all applicable laws, rules and regulations, both in letter and in spirit, including, without limitation, federal and state securities and healthcare laws. Although you are not expected to know the details of all the applicable laws, rules and regulations, we expect you to seek advice from the Company's legal department if you have any questions about whether any legal requirement applies to the situation or what conduct may be required to comply with any law, rule or regulation or this Code.

A. Insider Trading

SNDA Personnel who have access to material, non-public information about the Company or any other company may not use or share that information for securities trading purposes, disclose that information to others who may trade on the basis of that information or use or share that information for any other purpose except the conduct of the Company's business. All non-public information about the Company should be considered confidential unless and until it has been publicly disclosed through appropriate channels.

The Company has adopted a separate Insider Trading Policy that contains additional restrictions and procedures, including pre-clearance requirements and scheduled and event-specific blackout periods that apply to directors, officers and certain employees. SNDA Personnel are required to comply with the Insider Trading Policy in addition to this Code.

B. Anti-Money Laundering

The Company requires compliance with all applicable anti-money-laundering laws. You must be alert to red flags such as requests for unusual payment structures, payments to or from third parties unrelated to a transaction, payments in cash or cash equivalents and counterparties that refuse to provide required identification or information. Report any suspicious activity promptly to the Chief Legal Officer.

C. Bribery and Corruption

The Company prohibits bribery and corruption in all forms. A "bribe" is anything of value, including cash, gifts, entertainment, travel, favors, charitable contributions, employment offers or other benefits, given or offered to improperly influence a decision or obtain a business advantage. You may not offer, promise, give, solicit or accept a bribe, directly or through a third party, regardless of local custom or practice. The Company does not permit facilitating payments, even where they may be legal under local law.

D. Healthcare Laws; Fraud, Waste and Abuse

The Company is committed to complying with laws and regulations applicable to the healthcare and senior living industries, including laws that prohibit fraud, waste and abuse, false claims, kickbacks, self-referrals, improper inducements and improper billing or documentation, corporate practice of nursing, fee-splitting, healthcare provider ("***HCP***") licensure and credentialing, facility licensure and third-party payor reimbursement ("***Healthcare Laws***"). SNDA Personnel relationships with HCPs and potential referral sources, including any individuals or entities that directly or indirectly purchase, order, use, recommend or arrange for the purchase, order or use of any Company item or service, or who have the ability to do so, must comply with applicable Healthcare Laws and any applicable Company rules that apply to interactions with HCPs and potential referral sources. As an example, potential referral sources might include hospitals, skilled nursing facilities and physician practices, among others. You may not offer, pay, solicit or receive anything of value to induce or reward referrals, admissions, purchases, leases, orders or other Company-related business, or submit, cause to be submitted or assist with the submission of any false, inaccurate or unsupported claim, record or statement. The Company also expects SNDA Personnel to protect resident, patient, employee and other personal information, including protected health information, in accordance with applicable privacy and security laws, including the Health Insurance Portability and Accountability Act ("***HIPAA***") where applicable, and Company policies.

Questions regarding these requirements should be directed to the Chief Legal Officer.

E. Competition Laws

The Company competes vigorously but fairly. You must comply with all applicable antitrust and competition laws, which generally prohibit agreements among competitors to fix prices, allocate markets or customers, rig bids or boycott suppliers or customers, as well as certain unilateral conduct by companies with market power. Consult the Chief Legal Officer before engaging in discussions with competitors about any competitively sensitive topic.

F. Environment and Human Rights

You must comply with all applicable environmental laws and respect human rights, and expect the same of our business partners.

4. Conflicts of Interest

SNDA Personnel must avoid any actual or apparent conflict between their personal interests and the Company's interests. A conflict of interest may arise whenever a person's private interests interfere, or appear to interfere, with the interests of the Company or with that person's ability to perform his or her duties objectively and effectively.

Any actual, apparent or potential conflict of interest must be disclosed in advance and in writing to the applicable reviewing authority, as provided in this paragraph. Directors must disclose conflicts and comply with the recusal, resignation and other procedures applicable to directors under the Company's Corporate Governance Guidelines, the Company's bylaws, the Company's Related Person Transaction Policy, applicable Board or committee determinations and applicable law. Executive officers must disclose conflicts to the Audit Committee or such other independent committee of the Board as the Board may designate. SNDA Personnel who are not executive officers must disclose conflicts to the Chief Legal Officer or the Chief Legal Officer's designee. The applicable reviewing authority may approve, reject or condition approval of the activity, relationship, transaction or other matter giving rise to the conflict, including by requiring disclosure, recusal, divestiture, termination of the activity or relationship or other safeguards. Unless approved in accordance with the applicable process, the activity, relationship, transaction or other matter giving rise to the conflict is prohibited. Notwithstanding anything to the contrary contained in this paragraph, if a matter is subject to the Related Person Transaction Policy, the provisions of that policy shall supersede the terms of this paragraph.

In determining whether to approve a potential conflict, the reviewing authority may consider, among other things, whether the activity or relationship could interfere with the person's duties to the Company, affect the person's judgment on behalf of the Company, create an appearance of impropriety, involve misuse of Company information or assets or otherwise be inconsistent with the best interests of the Company.

Nothing in this section shall limit any approval, review, recusal, disclosure, resignation, disinterested director approval or other requirement under the Company's Related Person Transaction Policy, the Company's Corporate Governance Guidelines, the Company's bylaws, any Board committee charter or applicable law.

A. Gifts and Entertainment

Gifts and entertainment can foster positive business relationships but may create an inappropriate expectation or feeling of obligation or give rise to a conflict of interest. Care must be exercised when giving gifts or extending hospitality to avoid being perceived as trying to influence a decision or outcome. You are required to understand and abide by this Code and the law when offering or accepting any gifts or entertainment from customers, suppliers, other business partners, government officials or their family members.

You are required to obtain approval from the Chief Legal Officer when offering or accepting gifts, entertainment, entertainment, meals, travel, hospitality or other items of value (a) of any amount to or from any government employee, official or representative of a government payor or program or other person for whom applicable law or Company policy requires approval, and (b) exceeding $250 in value. Special rules apply to items of value involving residents, patients, referral sources, vendors, suppliers, HCPs, government programs and healthcare industry participants; such items may require advance approval regardless of amount and in some cases are prohibited (*i.e.*, in the case of gifts and entertainment). Gifts of cash or cash equivalents are always prohibited.

For SNDA Personnel, personal gifts, which cannot be cash, or have a fair market value in excess of $250, and entertainment offered by persons doing business with the Company may be accepted when offered in the ordinary and normal course of the business relationships. However, the frequency of any such gifts or entertainment and cost of any entertainment may not be so excessive that your ability to exercise independent judgment on behalf of the Company is or may appear to be compromised. Property employees must comply with the policies set forth in the Employee Handbook.

Subject to the above, the following general guidance applies:

Do:

- Only accept unsolicited gifts and entertainment that are customary and commonly accepted, not excessive in value and given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift or entertainment.
- Ensure that any gifts and entertainment offered by the Company are in connection with Company business, in good taste, customary and commonly accepted, and not excessive in value.

Do Not:

- Accept any gifts or entertainment that could influence or be perceived to influence the donor's business decisions on behalf of the Company.
- Request or ask for gifts or entertainment from people doing business with the Company.
- Accept any gift of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) in any amount.
- Offer any gift or entertainment that would violate the any gift or entertainment policy applicable to the recipient.

B. Financial and Other Interests in Other Organizations

For directors, officers and employees, the determination whether any outside investment, outside employment, business arrangement, financial arrangement or other interest in or with another organization is improper depends on the facts and circumstances of each case. Your interest or relationship with or in another organization may be inappropriate if the other organization has a material business relationship with, or is a direct competitor of, the Company and your interest is of such a size or type that your ability to exercise independent judgment on behalf of the Company is or may appear to be compromised. As a general rule, an investment would not likely be considered improper if it: (i) is in publicly traded shares; (ii) represents less than 5% of the outstanding equity of the organization in question; and (iii) represents less than 5% of your net worth. Other interests also may not be improper, depending on the circumstances.

C. Outside Business Activities

Director service on other boards and other outside positions, affiliations or relationships of directors are governed by the Company's Corporate Governance Guidelines, not this Code.

For officers and employees, the determination of whether any outside position or relationship such person may hold is improper will depend on the facts and circumstances of each case. Involvement in trade associations, professional societies and charitable and similar organizations will not normally be viewed as improper. However, if those activities are likely to take substantial time from or otherwise constitute a conflict of interest with your responsibilities to the Company, you should obtain prior approval. Other outside associations or activities in which you may be involved are likely to be viewed as improper if they would interfere with your ability to devote proper time and attention to your responsibilities to the Company or if your involvement is with another entity with which the Company does business or competes. The position of director or other affiliation with a company with which the Company does business or competes must be fully disclosed to the Company's Chief Legal Officer and must satisfy any other standards established by applicable law, rule (including rule of any applicable stock exchange) or regulation and any other corporate governance guidelines that the Company may establish. Any outside position, affiliation or relationship of any officer or employee that may give rise to an actual, apparent or potential conflict of interest must be disclosed to, and if required approved by, the applicable reviewing authority under this Code before the position, affiliation or relationship is accepted or continued.

D. Indirect Violations

SNDA Personnel should not indirectly, through a spouse, family member, affiliate, friend, partner or associate, have any interest or engage in any activity that would violate this Code if they directly had the interest or engaged in the activity. Any such relationship should be disclosed in accordance with the applicable disclosure and review process under this Code or, in the case of directors, the Corporate Governance Guidelines.

E. Political and Charitable Contributions

SNDA Personnel have the right to participate in political and civic activities on their own time and at their own expense. However, Company funds, assets, personnel or facilities may not be used to support any political candidate, party or campaign without advance approval from the Chief Legal Officer. Charitable contributions on behalf of the Company require advance approval in accordance with Company policy.

5. Corporate Opportunities

Directors and officers owe a duty to the Company to advance the Company's legitimate business interests when the opportunity to do so arises. Other SNDA Personnel must also act in the Company's best interests in connection with opportunities learned of through their service to the Company. No SNDA Personnel may take for personal benefit, or direct to any other person or entity, a business opportunity discovered through the use of Company property, information or position, or that may reasonably be of interest to the Company, unless the opportunity has first been disclosed for review in accordance with this Code and any required approval, waiver or renunciation has been obtained.

Directors and executive officers must disclose any such opportunity to the Audit Committee or such other independent committee of the Board as the Board may designate. Other SNDA Personnel must disclose any such opportunity to the Chief Legal Officer or the Chief Legal Officer's designee. The applicable reviewing authority may determine, or refer to the Board or another appropriate committee for determination, whether the Company has an interest or expectancy in the opportunity and whether the person may pursue it personally. Any formal waiver, approval or renunciation of a corporate opportunity with respect to a director or officer must be obtained from the Board, the Audit Committee or such other independent committee of the Board as the Board may designate or other person or body authorized by the Board to grant such waiver, approval or renunciation under applicable law, the Company's governing documents and this Code.

6. Fair Dealing

For SNDA Personnel, you should endeavor to deal fairly with the Company's residents, suppliers, competitors and employees and with other persons with whom the Company does business. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

7. Public Disclosures

For SNDA Personnel, it is the Company's policy to provide disclosure in accordance with applicable law in all reports and documents that we file or furnish with the Securities and Exchange Commission (the "***SEC***") and in all other public communications made by the Company. The Company's Corporate Governance Guidelines provide that, as a general matter, only the Chief Executive Officer and senior executives to whom the Chief Executive Officer delegates authority may speak for the Company on matters related to Company performance, operations and strategy; directors should refer external inquiries to the Chief Executive Officer or the Chief Executive Officer's designee except as authorized by the Board or otherwise provided in the Corporate Governance Guidelines.

8. Accurate Books and Records

The Company's books, records, accounts and financial statements must accurately and fairly reflect the Company's transactions and must be maintained in reasonable detail and in accordance with applicable legal, accounting and internal control requirements. All financial activities and transactions must be recorded accurately in the Company's books and records in accordance with applicable laws and generally accepted accounting principles. SNDA Personnel must be honest, accurate and complete in preparing, maintaining and submitting Company records, including financial records, accounting records, business records, expense reports, time records, safety reports, personnel records and other Company documents.

No SNDA Personnel may make, or cause to be made, any false, artificial or misleading entry in the Company's books or records. No undisclosed or unrecorded fund, asset or liability may be established or maintained for any purpose. All payments and other transactions must be properly authorized and recorded in a manner that accurately describes the transaction.

SNDA Personnel must comply with the Company's internal accounting controls, disclosure controls and procedures and document retention policies. Any concerns regarding accounting, internal controls, auditing matters or the accuracy of Company records should be reported promptly in accordance with this Code and the Company's applicable reporting procedures.

9. Confidentiality

SNDA Personnel should maintain the confidentiality of all non-publicly disclosed information entrusted to them by the Company or by persons with whom the Company does business, except when disclosure is authorized by the Company or legally mandated. Confidential information includes all non-public information concerning the Company, including any such information that if disclosed might be of use to competitors of, or harmful to, the Company, residents, landlords, joint venture partners or other persons with whom the Company does business. Confidential information may also include, among other things, information regarding the Company's business, operations, financial results, strategies, plans, transactions, residents, employees, suppliers, business partners, potential business relationships, litigation, regulatory matters, technology, systems, pricing, contracts and other proprietary or sensitive information.

SNDA Personnel must not use confidential information for personal benefit or disclose it to anyone outside the Company except as authorized and appropriate for legitimate Company business purposes.

The obligation to protect confidential information continues after service or employment with the Company ends. Upon leaving the Company, SNDA Personnel must return or destroy, as directed by the Company, all Company documents, records and materials, including confidential information, in any form.

If you are subject to a confidentiality, nondisclosure, restrictive covenant or similar agreement with the Company, your obligations under that agreement are in addition to, and are not limited by, this Code. With respect to directors, this Section supplements, and does not limit, the director-specific confidentiality obligations set forth in the Company's Corporate Governance Guidelines, including with respect to Board and committee information, discussions, deliberations, materials and other non-public information obtained by reason of service as a director. Notwithstanding the foregoing, nothing in this Code shall prohibit any SNDA Personnel from reporting possible violations of law or regulation to any governmental agency or entity, making disclosures that are protected under whistleblower laws or cooperating with any governmental investigation or proceeding, in each case without notice to or approval from the Company.

10. Protection and Proper Use of Company Assets

For SNDA Personnel, you should protect the Company's assets and promote their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All corporate assets should be used for legitimate business purposes.

A. Technological Equipment

Company-provided computers, phones, tablets and other technological equipment are Company assets and must be used primarily for Company business. You are responsible for exercising appropriate security precautions, including safeguarding passwords, locking devices when not in use and promptly reporting lost or stolen equipment.

B. Intellectual Property

Your obligation to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, copyrights and know how, as well as business, marketing and service plans, designs, databases, records, salary information, any unpublished financial data and reports or information described as proprietary in any employment agreement with the Company. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties. You are also required to respect the intellectual property rights of others.

C. Data Privacy, Security, and Artificial Intelligence

The Company collects and processes personal data about SNDA Personnel, residents and others in the course of its business. SNDA Personnel must access or use this data, including protected health information and other sensitive personal information, only as necessary for legitimate business purposes and in compliance with applicable privacy, information security and data-protection laws, including HIPAA where applicable, and Company policies. SNDA Personnel must exercise care when handling personal data, including by using approved communication channels, limiting access to authorized individuals, safeguarding passwords and credentials and following other Company privacy and security requirements.

Unauthorized access, disclosure or misuse of personal information is strictly prohibited. SNDA Personnel must immediately report any known or suspected privacy or security incident.

SNDA Personnel using artificial intelligence ("***AI***"), machine learning or automated technologies in connection with Company business must do so responsibly and in accordance with Company policies and applicable legal and contractual requirements. Confidential information (including personal information) may only be entered into approved AI systems authorized by the Company for such use. SNDA Personnel remain responsible for the accuracy, appropriateness, confidentiality and legality of work product generated or assisted by AI tools. AI-generated outputs should be reviewed for accuracy, bias, intellectual property concerns, confidentiality risks, data privacy and compliance with applicable laws.

D. Electronic Communications

Company e-mail, messaging and other electronic communications systems are provided for business purposes. Limited personal use is permitted so long as it does not interfere with your work or violate Company policy. You should have no expectation of privacy in communications or files stored on Company systems, which the Company may monitor and access to the extent permitted by law.

E. Records Management

You must create and maintain Company records in accordance with applicable laws and the Company's records retention policies. When the Company is subject to a litigation hold or a legal or regulatory inquiry, you must preserve all potentially relevant records and refrain from destroying or altering them until the hold is lifted.

F. Responding to Inquiries

Inquiries from the media, investors, analysts, regulators or other third parties should be referred to the Company's designated spokespersons. You may not speak on behalf of the Company unless you are expressly authorized to do so.

11. Interpretations, Amendments and Waivers of the Code of Business Conduct and Ethics

For SNDA Personnel, if you are uncertain whether a particular activity or relationship is improper under this Code or requires a waiver of this Code, you should disclose it to the Company's Chief Legal Officer, who will make a determination first whether a waiver of this Code is required and second, if required, whether a waiver will be granted. You may be required to agree to conditions before a waiver or a continuing waiver is granted. However, any waiver of this Code for an executive officer or director of the Company may be made only by the Board or the Audit Committee and will be promptly disclosed to the extent required by applicable law, rule (including any rule of any applicable stock exchange) or regulation.

The Audit Committee shall periodically review this Code and recommend to the Board any amendments or other modifications that the Audit Committee determines to be appropriate.

This Code, and any amendment or other modification hereto, shall be effective only upon adoption by the Board.

12. Maintenance of a Safe and Fair Workplace

A. Fair Employment

The Company is committed to fair employment practices and to providing equal employment opportunities. Employment decisions, including hiring, promotion, compensation, discipline and termination, are based on merit, qualifications and job-related factors, without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status, genetic information, marital status or any other characteristic protected by applicable law. The Company provides reasonable accommodations for qualified individuals with disabilities and for sincerely held religious beliefs and practices, as required by law. The Company does not use child labor or forced labor and expects its business partners to do the same.

B. Non-Harassment

The Company prohibits harassment in any form. Harassing behavior includes, without limitation, unwelcome verbal, physical or visual conduct that denigrates or shows hostility or aversion toward an individual because of a protected characteristic; unwelcome sexual advances, requests for sexual favors or other conduct of a sexual nature; offensive jokes, slurs, epithets, name-calling or insults; intimidation, threats, ridicule or mockery; and the display or circulation of offensive images or materials.

C. Safe and Healthy Workplace

Providing a safe and healthy workplace is core to the Company. SNDA Personnel are expected to comply with all applicable health and safety policies, to report unsafe conditions promptly and to refrain from conduct that poses a risk to themselves or others. Violence, threats of violence and weapons on Company premises are prohibited. The use, possession, sale or distribution of illegal drugs is prohibited, and the Company prohibits reporting to work under the influence of alcohol or controlled substances. Offensive materials, including sexually explicit or demeaning content, may not be displayed, circulated or stored on Company premises or systems.

13. Reporting Any Illegal or Unethical Behavior

The Company has a separate policy for “whistleblowers.” Any report or allegation of a violation of this Code need not be signed and may be sent anonymously. All reports of violations of this Code, including reports sent anonymously, will be promptly investigated and, if found to be accurate, acted upon in a timely manner. If any report of wrongdoing relates to accounting or financial reporting matters, or relates to persons involved in the development or implementation of the Company’s system of internal controls, a copy of the report will be promptly provided to the Chair of the Audit Committee, which may direct or participate in the investigation and resolution of the matter. It is the policy of the Company to prohibit actual or threatened retaliation, harassment or discrimination against any employee who, in good faith, reports suspected misconduct, raises a concern or participates in, assists with or provides information in connection with an investigation. Employees are expected to cooperate in internal investigations of misconduct. Reports submitted through any of the channels specified above will be handled confidentially to the extent reasonably possible, consistent with the need to conduct an adequate investigation and comply with applicable law.

14. Compliance Standards and Procedures

This Code is intended as a statement of basic principles and standards and does not include specific rules that apply to every situation. Its contents have to be viewed within the framework of the Company's employment agreements, other policies, practices, instructions and legal requirements. This Code is in addition to other policies, practices or instructions of the Company that must be observed. Moreover, the absence of a specific corporate policy, practice or instruction covering a particular situation does not relieve you of the responsibility for exercising ethical standards applicable to the circumstances.

In some situations, it is difficult to know right from wrong. Because this Code does not anticipate every situation that will arise, it is important that each of you approach a new question or problem in a deliberate fashion:

(a) Determine if you know all the facts.

(b) Identify exactly what it is that concerns you.

(c) Discuss the problem with a supervisor.

(d) Seek help from other resources such as other management personnel or the Company's legal department.

(e) Seek guidance before taking any action that you believe may be unethical or dishonest.

You will be governed by the following compliance standards:

- You are personally responsible for your own conduct and for complying with the provisions of this Code and for properly reporting known or suspected violations;

- No one has the authority or right to order, request or even influence you to violate this Code or the law; a request or order from another person will not be an excuse for your violation of this Code;

- Any attempt by you to induce another director, officer or employee of the Company to violate this Code, whether successful or not, is itself a violation of this Code and may be a violation of law; and

- Any retaliation or threat of retaliation against any SNDA Personnel for refusing to violate this Code, or for reporting in good faith the violation or suspected violation of this Code, is itself a violation of this Code and may be a violation of law.

Violation of any of the standards contained in this Code, or in any other policy, practice or instruction of the Company, can result in disciplinary actions, including dismissal and civil or criminal action against the violator. In addition, the Company may, in its sole discretion, refer misconduct to appropriate governmental or regulatory authorities for civil or criminal prosecution.

This Code should not be construed as a contract of employment and does not change any employment agreement or any person's status as an at-will employee.

This Code is for the benefit of the Company, and no other person is entitled to enforce this Code. This Code does not, and should not be construed to, create any private cause of action or remedy in any other person for a violation of the Code.

Current contact information for the Chief Legal Officer is set forth below:

Chief Legal Officer

Tabitha T. Bailey
Sonida Senior Living, Inc.
14755 Preston Road, Suite 810
Dallas, TX 75254
e-mail: tabitha.bailey@sonidaliving.com