SONIDA SENIOR LIVING, INC.

Whistleblower Policy

Effective June 3, 2026

Sonida Senior Living, Inc. ("***Sonida***") and its subsidiaries (collectively with Sonida, the "***Company***") are committed to conducting business with integrity and in compliance with applicable laws, regulations, accounting standards and Company policies. As a public company, Sonida is subject to legal and regulatory requirements designed to promote accurate financial reporting, effective internal controls, ethical conduct and accountability. The purpose of this memorandum is to notify you of the procedures that you may follow if you have reason to believe that any laws, regulations or Company policies are being violated or that other misconduct may have occurred. This memorandum supplements your Employee Manual, and you are reminded that you must continue to comply with the policies in the Employee Manual.

This policy is intended to comply with the requirements of Section 301 of the Sarbanes-Oxley Act of 2002 and the whistleblower protections reflected in Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Nothing in this policy is intended to limit or restrict any rights or protections available under other applicable whistleblower laws.

This policy applies to all directors, officers and employees of the Company and to contractors, independent contractors, agents, consultants and other third parties performing work for or on behalf of the Company, in each case consistent with the scope of the Company's Code of Business Conduct and Ethics (collectively, "***SNDA Personnel***"). The Company will also accept and review reports from any other person with relevant Company-related information, including residents, patients, residents' or patients' family members or representatives, customers, vendors, suppliers, referral sources, business partners and other third parties. For purposes of this policy, a "***concern***" means any question or report about a potential, suspected or known violation of applicable law, regulation, rule or standard, the Code of Business Conduct and Ethics or any other Company policy.

Policy

It is the policy of the Company to establish and maintain a reporting program to facilitate: (1) the receipt, retention and treatment of reports of concerns, including reports regarding financial statement disclosures, accounting, internal accounting controls, auditing matters, corporate fraud, unethical business conduct, violations of law or Company policy, violations of the Code of Business Conduct and Ethics, or substantial and specific dangers to health and safety; and (2) the confidential and anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters. The Company may also accept anonymous reports of concerns from other reporting persons through the reporting channels described below.

All SNDA Personnel should report, either orally or in writing, any concern relating to the Company, including any potential, suspected or known incident, conduct, condition or practice that may constitute:

- Corporate fraud;
- Unethical business conduct;
- A violation of state or federal law, regulation, rule or standard, the Code of Business Conduct and Ethics or any other Company policy; or
- Substantial and specific danger to the health or safety of employees, residents, patients or the public.

The Company prohibits retaliation against any person who in good faith reports a concern, participates in a related investigation, judicial or administrative action, or otherwise engages in conduct protected by applicable whistleblower laws. For employees, prohibited retaliation includes, but is not limited to, any unfavorable employment action, threat, harassment or other discrimination in the terms and conditions of employment that is directly related to the disclosure of such report, participation in a related investigation, judicial or administrative action or otherwise as specified in applicable law. Making a report in "***good faith***" means that the reporting person has provided the information available to the reporting person and reasonably believes that there may have been a reportable incident, even if the report is later unsubstantiated. Note, however, that reporting a concern does not provide immunity for any complicity in the matters that are the subject of the report or an ensuing investigation. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of state or federal law. If you have a good faith belief that you have been subject to retaliation because you filed a report under this policy or engaged in any lawful act that is protected or allowed under applicable whistleblower laws, you may report the retaliation using the processes outlined in this policy for filing a report or otherwise available to you under applicable law.

Reporting Procedures

No particular form is required to report a concern, and reports may be made orally or in writing. Where reasonably practicable, the Company will acknowledge receipt of a report through the reporting channel used to submit it.

If you believe that any SNDA Personnel or any other person acting in connection with the Company's business has violated any law, regulation, rule, standard, the Code of Business Conduct and Ethics or other Company policy, or that other misconduct has occurred, you may contact your immediate supervisor or the supervisor's manager. In instances where you are not satisfied with the supervisor's or manager's response, do not have a supervisor or manager or are uncomfortable for any reason addressing such concerns to your supervisor or the manager of your supervisor, you may contact our Chief Human Resources Officer by telephone at (972) 308-8360 or by email at anoel@sonidaliving.com, or you may contact our Chief Legal Officer by telephone at (972) 308-8366 or by email at tabitha.bailey@sonidaliving.com. The Chief Human Resources Officer and the Chief Legal

Officer may also be contacted by mail at Sonida Senior Living, Inc., 14755 Preston Road, Suite 810, Dallas, TX 75254.

Alternatively, reports may be made anonymously through the Company's toll-free reporting hotline at (877) 587-2461, which is available 24 hours a day, 7 days a week. Individuals making a report may, but are not required to, provide their name, telephone number or other contact information. Providing contact information can assist the Company in obtaining additional information and responding more effectively; however, anonymous reports will be accepted, reviewed and handled in accordance with this policy. Anonymous reporters should provide sufficient detail to permit the Company to review the concern, including, where known, the relevant facts, dates, persons involved, documents, witnesses and any other information that may assist in the review. Where the reporting channel permits, anonymous reporters should retain any case number or other reference information so that they may provide additional information or receive follow-up communications. The Company will treat reports, and the identity of any reporting person, as confidential to the extent reasonably practicable and consistent with applicable law and the need to conduct an appropriate review or investigation.

In addition, the Audit Committee of Sonida's Board of Directors has established additional procedures to address the receipt, retention and treatment of reports received by the Company regarding concerns relating to financial statement disclosures, accounting, internal accounting controls or auditing matters. First, the Company shall promptly forward to the Audit Committee any reports that it has received regarding concerns relating to financial statement disclosures, accounting, internal accounting controls or auditing matters. Any SNDA Personnel may also submit, in addition to the above, on a confidential, anonymous basis, reports regarding any concerns relating to financial statement disclosures, accounting, internal accounting controls or auditing matters directly to the Audit Committee. All such reports may be set forth in writing and forwarded in a sealed envelope to the chair of the Audit Committee, in care of the Company's Chief Legal Officer, with a legend such as "To be opened by the Audit Committee only." If a reporting person would like to discuss any matter with the Audit Committee, then such reporting person should indicate this in the submission and include a telephone number at which he or she might be contacted if the Audit Committee deems it appropriate. Any such envelopes received by the Chief Legal Officer shall be forwarded promptly and unopened to the chair of the Audit Committee.

While the Company encourages internal reporting of concerns, nothing in this policy requires internal reporting before reporting to, or otherwise restricts or limits any person's ability to communicate with, any governmental or regulatory agency, law enforcement authority or self-regulatory organization regarding possible violations of law or regulation. Nothing in this policy requires any person to notify or obtain approval from the Company before making any such report or communication.

Investigations

Following the receipt of any report submitted hereunder, the Audit Committee, Chief Legal Officer or other appropriate designee will promptly review and may investigate each matter so reported. Reports regarding financial statement disclosures, accounting, internal accounting controls or auditing matters shall be promptly forwarded to the Audit Committee. Depending on the nature of the concern reported and the persons involved, the review or investigation may be conducted or coordinated by Legal, Human Resources, Internal Audit, the relevant business unit or corporate function, the Audit Committee, the Board of Directors or outside advisors. The person who is the subject of an investigation shall be notified in a timely manner when appropriate and consistent with the needs of the investigation.

Where a concern implicates the Chief Legal Officer, the Legal Department or any person who would otherwise be responsible for receiving or reviewing the report of the concern, the matter shall be reported to the Audit Committee or another independent person or group designated by the Audit Committee or Board of Directors for review and appropriate action. The Audit Committee, Chief Legal Officer or other appropriate designee shall use reasonable efforts to protect the confidentiality and anonymity of the reporting person in undertaking any investigation of reports of concerns received hereunder, except as necessary to conduct the investigation, take corrective action or comply with applicable law. All employees and members of management have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of retaliation resulting from the reporting or investigation of such matters, and to keep confidential any information received as part of an investigation unless disclosure is protected or permitted by applicable law.

Where questionable conduct has occurred, those matters will be corrected, and the persons responsible for the misconduct, or those failing to cooperate or who provide false information during an investigation, will be subject to disciplinary action, up to and including termination. Any corrective action that consists of discipline of Company personnel should be discussed in advance with Human Resources and should be consistent with applicable law and Company policies. The Chief Legal Officer or an appropriate designee shall maintain a log of reports of concerns and the status of related investigations and corrective actions, monitor the status of corrective actions and report on such matters to the Audit Committee at least quarterly and more frequently as circumstances require. Where appropriate and reasonably practicable, the Company may provide the reporting person with information regarding the status or resolution of a report, subject to confidentiality, legal, privacy and business considerations.

The Audit Committee shall review this policy periodically.

Questions

If you have any questions regarding this policy, please contact our Chief Legal Officer.