

SUPPLIER CODE OF CONDUCT

A. INTRODUCTION

Welltower is committed to operating in a responsible, transparent and sustainable manner. As part of this commitment, Welltower strives to reduce environmental impact, promote social responsibility and conduct affairs with integrity and transparency. Welltower encourages its suppliers to share in this commitment and adopt the practices listed below. Suppliers are also expected to operate in compliance with applicable federal, state and local laws and regulations. For the purposes of this document, “supplier” refers to Welltower’s direct suppliers involved in the provision of goods, services and products to Welltower.

B. ENVIRONMENTAL STANDARDS

Reducing our environmental impact and operating in a sustainable manner is a priority for Welltower. We encourage our suppliers to aid us in this mission by minimizing their environmental impact as well by following best practices, including:

- Suppliers are expected to comply with the environmental laws and regulations to which they are subject.
- Suppliers are encouraged to minimize their impact on the environment by reducing waste, operating efficiently, conserving energy and water, reusing and recycling of materials where possible and minimizing excess packaging.

C. SOCIAL STANDARDS

Welltower expects suppliers to conduct employment practices in compliance with applicable laws and regulations, including:

- Suppliers are expected to comply with relevant laws regarding the minimum age for workers and to refrain from the use of child labor.
- Suppliers are expected to only use voluntary labor and avoid the use of forced and bonded labor.
- Suppliers are expected to comply with applicable health and safety regulations and to provide a safe working environment for employees, free from harassment and discrimination.

D. GOVERNANCE STANDARDS

Welltower is committed to conducting business with integrity and transparency and expects the same from its vendors, including:

- Suppliers are expected to comply with applicable anti-bribery and anti-corruption regulations and not engage in bribery or corrupt practices.
- Suppliers should avoid conflicts of interests, which includes interactions with Welltower employees that may conflict or appear to conflict with that employee acting in the best interests of Welltower.
- Suppliers should adhere to relevant anti-trust laws and ensure that statements, communications and representations are accurate and truthful.