

Welltower Inc.

Human Rights Policy

Welltower Inc. (“Welltower”) strives to respect and is committed to taking appropriate measures to promote human rights as set out in the United Nation’s (“UN”) International Bill of Human Rights. Our approach is moreover guided by the UN Guiding Principles on Business and Human Rights. Welltower’s aim is to promote and respect human rights within our own business, the communities we serve and to encourage our vendors and suppliers to do the same.

The Board of Directors of Welltower has adopted this Human Rights Policy (the “Policy”), which applies to directors, officers and employees of Welltower. These stakeholders are responsible for adhering to this Policy and raising questions when in doubt about the best course of action and for reporting possible violations promptly after they come to their attention. Details of how to report possible violations can be found in the Code of Ethics and Business Conduct.

- Welltower is committed to high ethical standards, as enshrined in our Code of Business Conduct and Ethics.
- Welltower does not tolerate any form of modern slavery, human trafficking, forced labor, child labor, bonded labor, or servitude. We support the elimination of these forms of labor.
- Welltower is committed to treating its employees with respect and fairness and providing them with a safe and healthy work environment - free from harassment including sexual harassment, and discrimination based on race, color, religion, sex, age, national origin, marital status, sexual orientation, veteran status, physical or mental disability, genetic information, or any other classification protected by law, as outlined in Welltower’s harassment, bullying, and equal employment opportunity policies in Welltower’s Employee Handbook and the [Code of Business Conduct and Ethics](#). All employees are required to complete anti-harassment training at least biennially and should comply with any request to participate in human rights training.
- Employees can expect equal pay for equal work. Welltower adheres to all local laws and regulations, and respects workers’ rights to collective bargaining, freedom of association, and union rights. Welltower is committed to acting in accordance with the standards set out in the International Labor Organization’s Declaration on the Fundamental Principles and Rights at Work.
- Welltower is committed to protecting women’s rights and the advancement of women in the workplace. We have programs and initiatives in place to support that commitment, including an Employee Network Group and professional development opportunities.
- Welltower recognizes that belonging and inclusion are vital differentiators for our organization, and we have programs in place to increase and foster belonging and inclusion in the workplace.

- Welltower is committed to stakeholder engagement, including with its employees, vendors, operators, tenants, other business partners and members of the community in which it operates, in the development and implementation of this Policy. Welltower encourages feedback from stakeholders as it continuously develops, implements and evaluates the effectiveness of this Policy.
- Welltower engages with local communities through volunteer and philanthropic efforts to strengthen these communities. Welltower also engages with national organizations aimed at advocating for the health and well-being of the senior population.

Approved by the Board of Directors of Welltower Inc. on February 26, 2026