

Welltower Inc., Modern Slavery and Human Trafficking Statement,
for fiscal year ending December 31, 2023

This Statement is made by Welltower Inc. (“Welltower”) pursuant to the UK Modern Slavery Act 2015. We describe below our efforts in tackling modern slavery and human trafficking within our business and supply chain.

At Welltower we are committed to high ethical standards. As detailed in our Human Rights Policy, we are committed to respecting human rights as set out in the Universal Declaration on Human Rights and in the International Bill of Human Rights. Our approach is moreover guided by the United Nations Guiding Principles on Human Rights. We aim to ensure that these standards are upheld throughout our organization and supply chain including through actions intended to eradicate the risk of modern slavery and human trafficking.

Our business and supply chain

We are a real estate investment trust that invests with leading seniors’ housing operators, post-acute providers and health systems to fund real estate infrastructure needed to build innovative care delivery models and to improve people’s wellness and overall aging and health care experience. Our business relies on other businesses from which we purchase goods and services. Likewise, those businesses have suppliers which form our extended supply chain.

The way we do business

Welltower’s business philosophy is enshrined in our [Code of Business Conduct and Ethics](#), which applies to our directors, officers and employees. It provides that all such persons must comply with applicable laws, regulations and policies. Also that such persons must work according to Welltower’s ethical principles and endeavor to conduct ourselves in a manner beyond reproach. We expect the same high standards from all of our business partners, suppliers and contractors, and we expect our suppliers to hold their own suppliers to those high standards as well. Welltower operates in the United States, Canada and the United Kingdom.

Statement on modern slavery and human trafficking

Ethical behavior is at the heart of our business. We do not tolerate any form of modern slavery or human trafficking, and we expect the same standard of our partners, suppliers and contractors. This includes forced labor, child labor, bonded labor and labor where persons are held in servitude through financial control or control of their freedom of movement.

Whistle-Blower Hotline Reporting

We have implemented a global hotline [844-797-8674](tel:844-797-8674) which is available to callers on a confidential, anonymous basis. Any person may report suspected issues around modern slavery and human trafficking via this whistleblower hotline. Welltower maintains a strict non-retaliation policy, which allows Welltower employees and those of our suppliers to report any concerns with assurance that they will not risk reprisal.

How we check compliance with our standards

We use risk assessments both within our business and in relation to our suppliers, where appropriate. These assessments are conducted periodically and enable us to identify if there are risks of modern slavery and human trafficking that need to be addressed. Where any such risks are identified, we move to eradicate such risks. We work with experts to ensure that our procedures mitigate modern slavery risks.

This statement is made by Welltower Inc. pursuant to the UK Modern Slavery Act 2015, and covers January 1, 2023 to December 31, 2023, and has been approved by the Welltower Board of Directors.

Shankh Mitra
CEO and Director
Welltower Inc.
March 1, 2024