

VENDOR CODE OF CONDUCT

A. INTRODUCTION

Welltower Inc. and its subsidiaries (collectively “Welltower” or the “Company”) are committed to operating in an ethical, responsible, transparent, and sustainable manner. The Company expects its vendors, operators, tenants, contractors, consultants, and other business associates (collectively “Vendors”), including Vendors’ subcontractors, suppliers and agents as well as their employees (collectively “Indirect Vendors”), to share in this commitment by adopting the practices outlined in its Vendor Code of Conduct (this “Code”). Any reference in this Code to Vendors applies equally to Indirect Vendors.

B. COMPLIANCE WITH LAWS AND REGULATIONS

Vendors shall comply with all applicable laws and regulations when conducting business activities with or on behalf of the Company. This includes, but is not limited to, laws and regulations pertaining to anti-bribery and anti-corruption, antitrust, insider trading privacy regulations, employment rights and workplace health and safety. Refer to Welltower’s Code of Business Conduct and Ethics, Anti-Corruption Policy and Insider Trading Policy, as well as Sections C and D below, for additional information.

C. HUMAN RIGHTS AND LABOR PRACTICES

Welltower is committed to promoting human rights as set out in the United Nations’ (“UN”) Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights and International Bill of Human Rights. Vendors are expected to cooperate with Welltower’s commitment to human rights and ethical labor practices. Vendors shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, set working hours that permit adequate time for rest and provide legally mandated benefits. Vendors shall not tolerate any form of modern slavery, including human trafficking, forced labor, child labor, bonded labor and servitude. No harassment, abuse, harsh or inhumane treatment, coercion or corporal punishment of any kind is to be tolerated by a Vendor in the conduct of its business.

D. HEALTH AND SAFETY

Vendors shall follow all applicable laws, regulations and other governmental directives in the jurisdiction in which they operate to promote a safe and healthy workplace for all personnel, including the personnel of their respective Indirect Vendors, as applicable. Vendors should implement recognized workplace systems, procedures and controls for the health and safety of all personnel in compliance with nationally-recognized standards. Health and safety practices may include, but are not limited to, occupational safety and training, emergency preparedness, precautions regarding the spread of infectious diseases, hygiene, food safety, and sanitation.

E. ENVIRONMENTAL SUSTAINABILITY

Welltower is committed to operating in a sustainable manner and reducing Welltower’s environmental impact. Vendors are expected to assist in this mission by following best practices of environmental sustainability, including, but not limited to, energy and water efficiency, greenhouse gas (GHG) and waste

reduction, and green technology implementation. Vendors are expected to set GHG emission reduction targets, track energy usage and promote and utilize renewable energy sources when possible. Refer to <https://welltower.com/esg/environment/> for the Company's initiatives, goals and achievements related to environmental sustainability.

F. DIVERSITY, EQUITY AND INCLUSION

Welltower values and is committed to its employees. Welltower believes that a diverse workplace produces a variety of perspectives, motivates employees and helps understand and better serve its stakeholders. Vendors are expected to support diversity, equity and inclusion as they compete for and foster talent in the ever-changing workforce.

G. CONFIDENTIALITY AND CONFLICT OF INTEREST

Vendors shall take appropriate steps to prevent unauthorized access to and use of Welltower confidential information. Vendors shall avoid any personal activity, investment, or association that could interfere with or appear to interfere with the best interests of Welltower. Refer to the Company's Code of Business Conduct and Ethics for more information regarding confidentiality and conflicts of interest.

H. USE OF COMPANY ASSETS AND DATA PRIVACY

Vendors shall exercise reasonable care to safeguard Welltower property from loss, theft, or unauthorized use. Welltower property includes physical resources and property, as well as its proprietary and confidential information, data, software, computers, office equipment and supplies. Vendors must comply with all applicable laws governing data privacy and information protection and shall immediately notify the Company should any potential data or privacy breaches occur. Vendors may not reference their relationship with Welltower or use Welltower's offices, equipment, supplies, data, information and other resources unless such use has been authorized by Welltower in writing.

I. REPORTING CODE OF CONDUCT VIOLATIONS

Vendors shall immediately report any known or suspected violations of this Code, with any relevant documents, to Welltower's General Counsel:

Matthew McQueen,
Executive Vice President, General Counsel and Corporate Secretary
Welltower Inc.
4500 Dorr Street
Toledo, Ohio 43615
419-214-5753
mmcqueen@welltower.com

Alternatively, any known or suspected violations of this Code by Vendors or Vendor personnel may be reported to Welltower's Corporate Governance Hotline by calling 844-797-8674 or using the internet-based reporting system at <http://welltower.ethicspoint.com>. Reports may be submitted on a confidential,

anonymous basis, although individuals are encouraged to identify themselves to facilitate follow-up and investigation.

J. COMPLIANCE WITH CODE OF CONDUCT

Vendors shall maintain and keep current appropriate management policies, procedures and controls the scope of which align with and support this Code. Vendors are expected to self-monitor their compliance with this Code and have a process for timely correction of any deficiencies or violations. Welltower reserves the right to assess Vendors' compliance with this Code, including, but not limited to, on-site inspections, environmental and social audits, assessing books, records, certifications, permits and other documentation evidencing compliance with this Code. Welltower may require the removal of any Vendor who behaves in a manner that is not in compliance with this Code.

Welltower reserves the right to amend or supplement this Code, without prior notice, at any time.

Reviewed and Approved by the Board of Directors of Welltower Inc. on March 1, 2024