

U.K. Modern Slavery Act of 2015 Slavery and Human Trafficking Statement

At Welltower we are committed to high ethical standards and respecting human rights. We aim to ensure that these standards are upheld throughout our organization through actions intended to eradicate the risk of modern slavery and human trafficking within our business and supply chain.

The Way We Do Business

We are committed to ensuring transparency in our own business and in our approach to eliminating modern slavery throughout our supply chain, consistent with the obligations of the U.K. Modern Slavery Act. Our philosophy is enshrined in our Code of Business Conduct and Ethics, where we express our commitment that our directors, officers and employees must do more than be compliant with laws, regulations and policies: we must work according to our 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.

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.

Our stance on modern slavery

Ethical behavior is at the heart of our business. We do not use persons held in Modern Day Slavery, nor accept the use of them by our suppliers. This includes people who have been trafficked, forced into labor, bonded into labor and those people held in servitude through financial control or control of their freedom of movement.

Whistle-Blower Hotline Reporting

We have implemented a global hotline which is available to callers on a confidential, anonymous basis. Our employees, and those of our suppliers, may report suspected issues around Modern Slavery via the whistle-blower hotline. Welltower maintains a strict non-retaliation policy, which allows employees and others to report with assurance that they will not risk reprisal.

How we check compliance with our standards

We have conducted risk assessments both within our business and in relation to our suppliers. These assessments enable us to identify where there are risks of Modern Slavery and to target those risks throughout our work. We work with experts to ensure that our procedures react to, and mitigate, Modern Slavery risks.

This statement covers January 1, 2016 to December 31, 2016 and has been approved by the Welltower Board of Directors.