



Corporate Social
Responsibility Report

2016

welltower

Letter From The CEO



Thomas J. DeRosa
CEO, Welltower Inc.

Our business is about keeping people well. We create healthful environments and infrastructure for the care for the 200,000 plus residents in our seniors housing and post-acute care communities, and the 16 million people who visit our medical office buildings each year. This unique platform allows Welltower to be a leader in modern health care infrastructure to address the challenges of rising health care costs and aging population demographics.

No one entity can face these challenges alone, but we can do it together – and Welltower increasingly has a seat at the table. We are passionately advocating for a more sustainable model that delivers better care at lower cost, promotes wellness, and advances coordination between health care and senior care providers.

Much of the health care infrastructure in the developed world was built at a time when the acute care hospital was the centerpiece of the delivery of care. Now, as we move to a value-based model, health providers are measured on how effectively they are able to deliver health care. To make this transition

successful, they need to accelerate the shift in patient care to modern, efficient outpatient and post-acute settings and increase connectivity to senior care.

The rapid growth of the aging population is putting insurmountable pressure on our current health care system. People 65 and older are the highest risk population for health systems to manage, and by far the costliest in per capita health care spend. To meet the economic and clinical challenges and care for a growing physically and cognitively impaired patient population, we need to re-think the environments in which care is delivered.

Welltower communities are home to a population of elderly receiving wellness care (including nutrition, hydration, social and cognitive engagement and safety) from the country's best assisted living and memory care operators. We're also focused on healthful environments. This includes proper lighting, indoor air quality and availability of outdoor spaces, for example, impact the well-being of residents, families and employees in seniors housing and post-acute care communities and the patients

and health care professionals in our medical office buildings.

Our dialogue with health systems is beginning to bear fruit. We recently announced a strategic relationship with Johns Hopkins Medicine. This collaboration between Welltower and one of the world's pre-eminent patient care, research and teaching institutions, recognizes the need for health systems and senior care providers to work together to address demographic, disease and cost challenges facing health care.

As we look at our accomplishments from 2016, we are proud of our work to advance sustainability initiatives. One of our greatest achievements was being named to the Dow Jones North America Sustainability Index. The DJSI is considered among the most important global indicators of sustainability performance. It's an incredible milestone for Welltower as it demonstrates our commitment to being a global leader in sustainability.

Let me highlight a few of our other sustainability achievements from 2016:

- For the second consecutive year, Welltower received the GRESB Green Star designation.

- Our sustainability initiatives and outcomes were also recognized by CDP Leadership Band, FTSE4GOOD and MSCI.
- We were honored with a Leader in the Light Award from NAREIT for demonstrating superior and sustained sustainability practices.
- We launched the Welltower Foundation with its first gift of \$250,000 to the Alzheimer's Association; additional corporate and employee fundraising efforts brought our total donation to over \$3 million.

We are changing our organization to deliver more impact over the long term. During the year, we began implementation of a comprehensive, multi-year sustainability strategy that defines our sustainability path forward and ensures alignment with our vision. At the beginning of 2017, we also established new organizational structure to effectively utilize the power of our unique platform. This integrated approach will enhance our ability to drive best practices and sustainability across our property portfolio, collaborate with best-in-class operating partners and health systems and create superior value for our shareholders.

We are committed to using our capabilities, expertise, resources and partnerships to help make the world a more sustainable place where future generations not only live longer, but are better able to live well and age well.

I invite you to read more about our sustainability initiatives in our 2016 Corporate Social Responsibility Report. Thank you for your interest and investment in Welltower and our mission.

Sincerely,



Thomas J. DeRosa
CEO, Welltower Inc.





General Disclosures

welltower

General Disclosures

DISCLOSURE DESCRIPTION		RESPONSE
General Disclosures:		
G4-1	Statement from the most senior decision-maker of the organization	Refer to CEO letter on pages 2-3 of this report.
G4-2	Provide a description of key impacts, risks and opportunities	<p>We are committed to using our capabilities, expertise, resources and partnerships to help make the world a place where future generations not only live longer, but are better able to live well. Our materiality process (GRI G4-18 / 19) and Enterprise Risk Management System (GRI G4-45 /46/ 47) provide the necessary oversight to identify and manage the key impacts, risks and opportunities associated with our business operations.</p> <p>Key opportunities include reducing our environmental impact within our control boundary and influencing operating partners to do the same. Our critical areas of focus include resource conservation, operating efficiency, indoor environmental quality, waste reduction and diversion, workforce development and employee engagement. We have guidelines in place to ensure new construction and retrofitting of assets within our control boundary are carried out to high environmental standards. For further information on Welltower’s business impacts, risks and opportunities, (including a discussion on sustainability) see the CEO Statement within Welltower’s annual report.</p>
G4-3	Name of the organization	Welltower Inc.
G4-4	Primary brands, products and services	Welltower Inc. is driving the transformation of health care infrastructure. The company invests with leading seniors housing operators, post-acute providers and health systems to fund the real estate infrastructure needed to scale innovative care delivery models and improve people’s wellness and overall health care experience. Welltower™, a real estate investment trust (“REIT”), owns interests in properties concentrated in major, high-growth markets in the United States, Canada and the United Kingdom, consisting of seniors housing and post-acute communities.
G4-5	Location of the organization’s headquarters	Welltower is headquartered in Toledo, Ohio.
G4-6	Number of countries where the organization operates	Welltower operates in three countries: the United States, Canada and the United Kingdom.
G4-7	Nature of ownership and legal form	Welltower is a publicly traded company incorporated in Delaware, United States.
G4-8	Markets served	Additional information on our markets can be found within our Form 10-K, pages 43-44.

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G4-9	Scale of the organization	Additional information on our markets, including occupancy rates, can be found within our Form 10-K, pages 43-44. For total number of employees, see G4-10.
G4-10	Workforce by employment contract and gender.	As of December 31, 2016, Welltower employed 471 full time employees and 6 part-time employees. Welltower does not employ sub-contracted workers for construction or building services. Further information on the structure of Welltower's workforce can be found within G4-LA12.
G4-11	Percentage of total employees covered by collective bargaining agreements	Welltower is not party to collective bargaining agreements.
G4-12	Description of supply chain	<p>Our supply chain management includes a wide range of services reflecting the diverse nature of our operations from construction materials to office administrative support. These services are grouped into the following four categories: corporate operations, capital markets, investments and asset management and real estate services/development and renovations. Procurement from the first three groups largely consists of professional services, offices supplies and food and beverages for corporate offices. The real estate services group procurement is diverse and consists of goods, materials and services to support the operation of our medical office buildings. Wherever possible, we have sustainable procurement strategies in place to reduce the impact of our operators and stimulate environmental responsibility further down the value chain.</p> <p>We work to extend our influence through our Vendor Sustainability Code of Conduct, which seeks to ensure that we partner with companies that share our commitment to high environmental and social standards. As project managers, our team is accustomed to overseeing projects from design through construction to certification.</p> <p>We have both sustainable purchasing policies, aligned with LEED EBOM (Existing Buildings: Operations and Maintenance) and material selection requirements. In 2016, we did not receive any notices or fines for environmental regulatory violations with respect to buildings within our operational control or any grievances about environmental impacts.</p>
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain	No significant changes.
G4-14	How the precautionary principle is addressed by the organization	Welltower does not have a formal policy regarding the Precautionary Principle. However, we are committed to environmental sustainability and have internal environmental targets in place, therefore we will continue to work to prevent environmental degradation wherever feasible.

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<p>G4-15</p>	<p>Externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses</p>	<p>We participate in national and state-level industry associations and groups focused on sustainability efforts, including ENERGY STAR, GRESB, Better Buildings Alliance and the United States Green Building Council (USGBC).</p> <p>We externally report on our sustainability performance and data on an annual basis through the CDP Climate Change Survey, the Global Real Estate Sustainability Benchmark (GRESB) and the ROBECOSAM - Dow Jones Sustainability Index sustainability survey. A corporate sustainability report is published annually by Welltower in accordance with GRI G4 reporting standards. Please see table below for a summary of Welltower’s sustainability reporting activity and performance.</p> <table border="1" data-bbox="835 591 1854 841"> <thead> <tr> <th>Sustainability Reporting Initiative</th> <th>Years Responding</th> <th>Latest Performance</th> </tr> </thead> <tbody> <tr> <td>GRI Aligned CSR Report</td> <td>4</td> <td>CORE</td> </tr> <tr> <td>Dow Jones Sustainability Index Corporate Sustainability Assessment</td> <td>1</td> <td>North America Index (2015)</td> </tr> <tr> <td>GRESB Real Estate Assessment</td> <td>4</td> <td>Green Star (2015)</td> </tr> <tr> <td>CDP</td> <td>4</td> <td>Leadership A Band</td> </tr> </tbody> </table>	Sustainability Reporting Initiative	Years Responding	Latest Performance	GRI Aligned CSR Report	4	CORE	Dow Jones Sustainability Index Corporate Sustainability Assessment	1	North America Index (2015)	GRESB Real Estate Assessment	4	Green Star (2015)	CDP	4	Leadership A Band
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<p>G4-16</p>	<p>Memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization</p>	<p>Welltower is a member of the following industry associations:</p> <ul style="list-style-type: none"> NAREIT American Health Care Association BOMA International ASHA Argentum NIC GRESB Urban Land Institute 															
<p>G4-17</p>	<p>All entities included in the organization’s consolidated financial statements or equivalent documents and whether any of these entities is not covered by the report</p>	<p>Our Form 10-K includes financial data for all the company’s operations unless otherwise noted.</p>															

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<p>G4-18</p>	<p>Process for defining the report content and the Aspects Boundaries</p>	<p>We continuously assess our sustainability priorities by actively engaging with our stakeholders. We use a systematic materiality process to identify the most important issues that impact our stakeholders and influence the success of our business.</p> <p>Internal expertise - We leverage our in-house industry sustainability expertise, as well as our technical staff, senior management, employees and external consultants to identify a broad list of sustainability-related risks and opportunities that have an impact on our business.</p> <p>External feedback - We integrate these observations with the views of our external stakeholders to gain a detailed assessment of our economic, environmental and social footprint. We collect feedback from our Outpatient Medical tenants through a comprehensive bi-annual survey and from our operating partners through regular and intensive meetings and interactions, periodic surveys, and our Welltower Collaborative, which is an exclusive forum that brings together up to 30 partners on an annual basis to share best practices and present new ideas and technologies. We also have well-developed reporting and feedback mechanisms and formal meetings with the investment community to obtain objective insights into specific stakeholder concerns.</p> <p>The output of this process is a comprehensive list of material topics which are assessed and prioritized by our risk management experts and members of the executive team.</p> <p>Please refer to pages 9-13 of Welltower's 2015 CSR report for more information.</p>
<p>G4-19</p>	<p>Material Aspects identified in the process for defining report content</p>	<p>In 2016, Welltower identified the following Material Aspects through our ongoing stakeholder engagement process:</p> <ul style="list-style-type: none"> Our overall economic performance Effective business partnerships Our people, training and development Financial regulatory compliance Healthful work environments Materials, construction and building efficiency

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G4-20	The Aspect Boundary within the organization for each material aspect	<p>The following table summarizes the aspect boundary for each defined material aspect.</p> <table border="1" data-bbox="835 337 1940 662"> <thead> <tr> <th>Aspect</th> <th>Boundary</th> <th>Aspect Boundary Against Lease Arrangement</th> </tr> </thead> <tbody> <tr> <td>Our overall economic performance</td> <td>Internal</td> <td>Inside control boundary</td> </tr> <tr> <td>Effective business partnerships</td> <td>Internal and External</td> <td>All operating partners (across geographic regions)</td> </tr> <tr> <td>Our people, training and development</td> <td>Internal</td> <td>Inside control boundary</td> </tr> <tr> <td>Financial regulatory compliance</td> <td>Internal</td> <td>Inside control boundary</td> </tr> <tr> <td>Healthful work environments</td> <td>Internal</td> <td>Inside control boundary</td> </tr> <tr> <td>Materials, construction and building efficiency</td> <td>Internal and External</td> <td>All operating partners (across geographic regions)</td> </tr> </tbody> </table>	Aspect	Boundary	Aspect Boundary Against Lease Arrangement	Our overall economic performance	Internal	Inside control boundary	Effective business partnerships	Internal and External	All operating partners (across geographic regions)	Our people, training and development	Internal	Inside control boundary	Financial regulatory compliance	Internal	Inside control boundary	Healthful work environments	Internal	Inside control boundary	Materials, construction and building efficiency	Internal and External	All operating partners (across geographic regions)
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Materials, construction and building efficiency	Internal and External	All operating partners (across geographic regions)																					
G4-21	The Aspect Boundary outside the organization for each material aspect	See table above.																					
G4-22	The effect of any restatements of information provided in previous reports, and the reasons for such restatements	There are no restatements of information from previous reports.																					
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	There are no significant changes in scope and aspect boundaries from previous reports.																					
G4-24	A list of stakeholder groups engaged by the organization	<p>We undertake extensive and continual engagement with a wide range of internal and external stakeholders. In October 2016, we held a two day sustainability summit involving multiple internal stakeholders from across the organization. In addition to our sustainability summit we engaged with the following stakeholders for the development of the 2016 materiality assessment:</p> <ul style="list-style-type: none"> • Employees • The Board of Directors • Tenants • Operating Partners • Industry Peers • Shareholders • Government agencies • Credit rating agencies • Debt investors • Investor service groups • Sustainability ranking organizations 																					

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G4-25	The basis for identification and selection of stakeholders with whom to engage	We engage with a wide range of stakeholders, through formal and informal mechanisms, in order to obtain a holistic overview of our material aspects. Each of the stakeholders we engage may have influence over our long-term successes or a vested interest in the work we do.
G4-26	The organization's approach to stakeholder engagement	We have a comprehensive stakeholder engagement management procedure which helps us track and plan stakeholder engagement through a number of channels. These include: <ul style="list-style-type: none"> • Our employee-wide Culture and Engagement Survey; • Our Welltower Collaborative, which connects our seniors housing operating partners with one another and with our management team; • Making use of regulatory filings, informal face-to-face discussions, company reporting and feedback mechanisms and formal meetings with the investment community to proactively engage with stakeholders; • Developing partnerships with non profit health systems and NGOs. • Tenant and operator engagement surveys.
G4-27	Report key topics and concerns raised through stakeholder engagement	See G4-19
G4-28	Report the period for information provided	January 1st 2016 - December 31st 2016.
G4-29	Date of most recent previous report	In July 2016, we published GRI G4 (core) aligned report covering the 2015 calendar year.
G4-30	Reporting cycle	Annual
G4-31	Provide the contact point for questions	Questions and comments about this report should be sent to info@welltower.com .
G4-32	Report the "in accordance" option the organization has chosen	This report is prepared in accordance with GRI G4 - Core.
G4-33	Report the organization's policy and current practice with regards to seeking external assurance for the report	The report is not assured against GRI G4 Core requirements.
G4-34	The governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision making on economic, environmental and social impacts	Our Board of Directors has established five standing committees: Audit, Compensation, Executive, Investment and Nominating/Corporate Governance. The Nominating/Corporate Governance Committee periodically reviews committee assignments and makes recommendations to the Board of Directors for rotations of assignments and appointment of committee chairs, as appropriate. The specific roles and responsibilities of each committee can be found in the "Investors" section on our website. Additional information on the composition of the Board of Directors is provided in the "About Us" section of the website.

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<p>G4-35</p>	<p>The process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.</p>	<p>Incorporating sustainability principles into our business is fundamental to manage corporate risk, promote wellness and contribute to a more inclusive and environmentally-respectful economy. Welltower is dedicated to being a global leader in corporate social responsibility in our sector and incorporating sustainable business practices into the everyday running of our business. The SVP Asset Management had direct responsibility for the design, implementation and oversight of our sustainability program, which is aligned with our business strategy.</p> <p>Sustainability business disciplines are embedded in the various business groups through the collaborative efforts of our sustainability team (comprised of two employees, whose full-time remit is sustainability management), business group leaders, and our enterprise risk management office. The sustainability team is responsible for communicating environmental sustainability, corporate governance and social responsibility considerations throughout the organization. The Board of Directors receives periodic updates on sustainability and related efforts and the annual CSR report is presented to the Board.</p> <p>In 2016, the charter of the Nominating/Corporate Governance Committee was updated to include oversight for the company's sustainability program. Specifically, the Committee has responsibility for reviewing Welltower's performance with respect to the annual CSR report and to review, recommend and provide guidance to management regarding environmental sustainability issues and integrating sustainability into Welltower's business.</p>
<p>G4-36</p>	<p>Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.</p>	<p>The SVP-Asset Management has responsibility for sustainability at Welltower and reports up to the EVP-Business and Relationship Management, who meets with the Board of Directors on a regular basis. The senior sustainability manager and sustainability analyst are directly responsible for executing Welltower's sustainability program. Sustainability is embedded in the various business groups through the collaborative efforts of our sustainability team, business group leaders, and our enterprise risk management office.</p>
<p>G4-37</p>	<p>Processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.</p>	<p>See G4-49</p>

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G4-38	The composition of the highest governance body and its committees	<p>The primary responsibility of our Board of Directors is to act in the best interests of the company and its shareholders. More specifically, our Board of Directors is responsible for selecting the Chairman of the Board of Directors and our Chief Executive Officer (CEO), as well as overseeing management's performance and assessing the leadership structure.</p> <p>In 2016, the Board of Directors was comprised of ten members, of which two were female. Nine of our Board of Directors members were independent non-employee directors, elected at the annual meeting of our shareholders.</p> <p>Please refer to our 2017 Proxy Statement, pages 11-17, for detailed information surrounding the highest governance body and its committees.</p>
G4-39	Whether the chair of the highest governance body is also an executive officer	<p>The Chair of the Board of Directors is not an executive officer. In 2014, we separated the roles of Chairman and CEO, which we believe best positions the CEO to focus his time and energy on operating and managing the company while increasing the Board of Directors' independent oversight.</p>
G4-40	The nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	<p>The Nominating/Corporate Governance Committee identifies and recommends to the Board of Directors the nominees to stand for election, fill vacancies or newly created positions on the Board of Directors. Potential Board members may also be identified by third party executive search firms or shareholders.</p> <p>Please refer to our 2017 Proxy Statement, pages 13-15, for a detailed discussion of the nomination and selection process for the highest governance body and committees.</p>
G4-41	Processes for the highest governance body to ensure conflicts of interest are avoided and managed	<p>The Board of Directors adopted Corporate Governance Guidelines and a Code of Business Conduct and Ethics and undertakes a regular review of director independence to ensure minimum independence requirements are met. Our policies meet the listing standards adopted by the New York Stock Exchange.</p> <p>Additional information can be found within the Corporate Governance Guidelines on the company website.</p>
G4-42	The highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental, and social impacts	<p>Welltower's Board of Directors has adopted Corporate Governance guidelines which address the Board of Directors' role in the development of the organization's purpose, vision statement and corporate strategies. The Nominating/Corporate Governance Committee, a sub-committee of the Board of Directors, has responsibility for the continued development of Welltower's sustainability program. For more information, see page 2 of the Nominating/Corporate Governance Committee Charter.</p>

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G4-43	The measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics	The Board of Directors is kept up-to-date with the progress of Welltower's sustainability program through meetings with the EVP-Business and Relationship Management, who has regular contact with the SVP-Asset Management (who has ultimate oversight of the sustainability program). In addition, the Board of Directors reviews Welltower's CSR report on an annual basis. Six members of the Board of Directors sit on the Nominating/Corporate Governance Committee, which has responsibility for overseeing the continual development of Welltower's CSR program.
G4-44	The processes for the evaluation of the highest governance body's performance with respect to governance of economic, environmental, and social topics	The Board of Directors and Nominating/Corporate Governance Committee conduct an annual self-evaluation of the Board of Directors and its committees to assess the size, composition and diversity of the Board of Directors and to determine whether it and its committees are functioning effectively. The Board of Directors will also review the Nominating/Corporate Governance Committee's recommendations concerning the performance and effectiveness of the Board of Directors and its committees. The Nominating/Corporate Governance Committee also conducts an individual evaluation of each director every year.
G4-45	The highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities	The Board of Directors, as a whole and at the committee level, plays an important role in overseeing the management of Welltower's risks. Management is responsible for identifying Welltower's significant risks, developing risk management strategies and policies and integrating risk management into Welltower's decision-making process. To that end, Welltower has implemented an enterprise risk management (ERM) program and created an internal risk management committee charged with identification, evaluation and management of such risks and exposures. This risk management structure helps ensure that necessary information regarding significant risks and exposures is transmitted to Welltower's leadership, including management, the appropriate Board of Directors committees and the Board of Directors.
G4-46	The highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental, and social topics	The Board of Directors regularly reviews Welltower's material risks and exposures, including operational, strategic, financial, legal, environmental sustainability and regulatory risks. The Board of Directors and the Audit Committee review the management of financial risk and Welltower's policies regarding risk assessment and risk management. The Board of Directors and the Compensation Committee review the management of risks relating to Welltower's compensation plans and arrangements. The Board of Directors and the Nominating/Corporate Governance Committee review the management of risks relating to compliance, environmental sustainability and Welltower's corporate governance policies.
G4-47	The frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities	The results of our ERM program are reported to the executive leadership team and the Board of Directors, who use the information to refine our business strategy. The ERM process is reviewed for its effectiveness by the Board of Directors on an annual basis, and updated and revised as needed.
G4-48	The highest committee or position that formally reviews and approves the organization's sustainability report	The annual CSR report is reviewed and approved by Internal Audit, Legal and Welltower Disclosure Committee.

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G4-49	The process for communicating critical concerns to the highest governance body	Shareholders and other stakeholders can communicate directly with Board members in writing. In addition, we have established a Governance Hotline (which is published on our website) so that anyone who has a concern regarding questionable accounting, internal accounting controls or auditing matters relating to Welltower may communicate that concern to the Audit Committee by contacting the company's Corporate Governance Hotline. These calls are transcribed and submitted on a confidential, anonymous basis.
G4-50	The nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them	<p>We have established a governance hotline that allows anyone that has a concern regarding questionable accounting, internal accounting controls or auditing matters relating to Welltower to communicate that concern to the Audit Committee.</p> <p>In 2016, no correspondence was received through the hotline.</p>
G4-51	The remuneration policies for the highest governance body and senior executives	A detailed discussion of remuneration policies for the Board of Directors can be found within the 2017 Proxy Statement, pages 26-63.
G4-52	The process for determining remuneration	<p>The Compensation Committee, one of the standing committees of our Board of Directors, is comprised of at least three independent members of the Board of Directors and is tasked with defining executive officer compensation. The Committee is also tasked with reviewing and refining Welltower's compensation policies to ensure the management team is rewarded fairly, transparently and consistent with the market.</p> <p>The Committee meets at least four times a year and is advised by an independent compensation adviser specializing in the REIT industry and our outside legal counsel. Shareholders are also actively engaged to discuss proposed revisions to compensation plans.</p> <p>A detailed discussion of remuneration policies for the Board of Directors can be found within the 2017 Proxy Statement, pages 26-63.</p>
G4-53	How stakeholders' views are sought and taken into account regarding remuneration	At the 2017 Annual Meeting, approximately 96% of shareholder votes were cast in favor of the compensation of the named executive officers (also commonly referred to as "Say-on-Pay"). This represents a similar voting result for the 2016 Say-on-Pay proposal (97% in favor). The Compensation Committee and management continue to engage with shareholders as part of their continuing efforts to refine and enhance the executive compensation program. For more information on shareholder outreach initiatives, see page 30 of the 2017 Proxy Statement.

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<p>G4-56</p>	<p>The organization's values, principles, standards and norms of behaviour such as codes of conduct and codes of ethics</p>	<p>Our Code of Business Conduct and Ethics is publicly available in the investors section of our website. It details the high ethical standards and codes of conduct all executives, directors and employees must adhere to and outlines the procedure for reporting a suspected violation and the process used to respond to concerns.</p> <p>There are no waivers of any part of the Code for any officer or director except with the informed approval of the Board of Directors, which ascertains whether a waiver is appropriate and ensures that the waiver is accompanied by appropriate controls designed to protect Welltower.</p> <p>At Welltower, we strive to go beyond simply being compliant with laws, regulations and policies and also adhere to the highest ethical standards and abide by comprehensive anti-corruption policies.</p> <p>Additionally, we strive to protect the health and safety of our employees, our customers, suppliers, the community and the environment, and do not tolerate harassment of any kind.</p>
<p>G4-57</p>	<p>The internal and external mechanisms for seeking advice on ethical and lawful behaviour, and matters related to organizational integrity, such as helplines or advice lines</p>	<p>Given the international nature of our operations, we have comprehensive procedures in place to manage the risks associated with regulatory non-compliance which could have a damaging financial and reputational impact on our business. Our anti-corruption policy requires each director, officer and employee of Welltower to act with integrity and compliance with all applicable laws, regulations and policies. All employees receive anti-corruption training annually and are required to disclose any violations to the Corporate Secretary. If they do not feel comfortable reporting to the Corporate Secretary, they can report the conduct or violation to the Chair of the Audit Committee or the Corporate Governance Hotline.</p> <p>Financial compliance is a central component of our ERM program and is supported by officers responsible for monitoring day-to-day corporate activities as well as independent audits which are conducted on an annual basis.</p>
<p>G4-58</p>	<p>The internal and external mechanisms for reporting concerns about unethical or unlawful behaviour, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms, or hotlines</p>	<p>All Welltower directors, officers and employees are required to report possible violations of Welltower's Code of Business Conduct and Ethics. If a Welltower employee feels a violation has taken place, or is possible to take place, they should report the violation to their direct supervisor. If the employee is still concerned after speaking with their direct supervisor, or feels uncomfortable speaking with the supervisor, they may speak with or send a detailed note or email, with relevant documents, to the Audit Committee of Welltower's Board of Directors, or Welltower's legal counsel. Concerns may also be communicated to the Audit Committee by contacting Welltower's corporate governance hotline. These calls will be transcribed and submitted on a confidential and anonymous basis. Welltower will not take action against someone who reports suspected wrongdoing.</p> <p>In 2016, no reports were made by employees.</p>



Economic Performance

welltower

Economic Performance

DISCLOSURE DESCRIPTION		RESPONSE
Material Aspect: Economic Performance		
G4-DMA	Disclosure management approach	<p>Welltower is a real estate investment trust that invests with leading seniors housing operators, post-acute providers and health systems to fund the real estate infrastructure needed to scale innovative care delivery models and improve people’s wellness and overall health care experience.</p> <p>The economic performance of the company is overseen at the highest level of management, and our Board of Directors sets ambitious performance targets annually to drive consistent, reliable and growing shareholder returns, year-over-year. The company’s financial performance is evaluated on a regular basis by senior management teams and the Board of Directors, who implement operational and strategic changes to maximize shareholder returns. Supplemental Information, which includes a review of financial performance, is published quarterly on our website.</p> <p>For more information on our management approach, please refer to our 2016 Form 10-K pages 3-7.</p>
G4-EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments.	<p>For information on our revenues, operating costs, employee compensation, retained earnings and payments to capital providers and governments, please refer to our financial statements in our 2016 10-K, pages: 48, 78-121, 123.</p>
G4-EC8	Significant indirect economic aspects	<p>By creating jobs, providing equitable compensation to our people and contributing to tax revenues, our operations have a significant direct and indirect economic impact. Sound economic performance allows us to effectively fulfill our social and environmental responsibilities and support the communities within which we operate. The health of those communities is critical to our success in recruiting and retaining exceptional employees.</p> <p>Number of OM patient visits per year: 16,000,000 Number of residents in seniors housing communities, per night: 210,000 Property tax paid in 2016: \$104,494,980 Number of health care professionals supported : 62,965</p>

Economic Performance

Material Aspect: Effective Business Partnerships

G4-DMA	Disclosure management approach	<p>Building effective business partnerships with best-in-class seniors housing and post-acute care operators, health systems and long-term capital partners who share our vision is central to our mission to deliver better care at a lower cost. Increasingly, we play a convening role, bringing partners, ideas and capital together to drive best practices and create a more connected health care system.</p> <p>At the heart of our approach is a win-win philosophy and financial incentives and structures that align our success with the success of our partners. We look to foster long-term relationships with our partners and subsequently track the percentage of new investments that are undertaken with existing partners as a directly related KPI. Senior management representatives from business development teams are responsible for managing and evaluating the success of business partnerships. Quarterly updates on investments with new and existing partners are published on the investor relations section of our website.</p>
Welltower-specific	Investments made with existing partners	<p>Increasingly, we play a convening role, bringing partners, ideas and capital together to drive best practices and create a more connected health care system. One of the measures of the success of our partnerships is the percentage of new investments that are undertaken with existing partners.</p> <p>In 2016, we completed \$3 billion of new investments, 92% of which was with existing partners. For more information, For more information on our relationship investment history, see page 2 of our Q4 2016 Supplemental Information.</p>

Material Aspect: Financial Regulatory Compliance

G4-DMA	Disclosure management approach	<p>Given the international nature of our operations, we have comprehensive procedures in place to manage the risks associated with regulatory non-compliance, which could have a damaging financial and reputational impact on our business.</p> <p>Financial compliance is a central component of our ERM program and is supported by a risk management steering committee charged with identifying, monitoring and controlling such risks and exposures as well as independent audits which are conducted on an annual basis. The Board and the Audit Committee review the management of financial risk and our policies regarding risk assessment and risk management. The Board and Nominating/Corporate Governance Committee review the management of financial risks at least annually.</p> <p>Our anti-corruption policy and Code of Business Conduct and Ethics outlines the behavior expected from all Welltower directors, officers and employees. Employees are trained on these policies annually and are expected to report any violations to their supervisor. The anti-corruption policy and the Code of Business Conduct and Ethics are reviewed on an annual basis and any recommended changes are proposed to the Board of Directors for approval prior to being implemented into company operations.</p>
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Economic Performance

G4-SO5	Communication and training on anti-corruption.	<p>We have a comprehensive anti-corruption policy in place to ensure compliance with different regulations that impact our business. Our anti-corruption efforts have three primary components:</p> <p>ASSESSMENT: Assessing the relative risks of corruption is inherent within our ERM program. As noted above, the results of our ERM program are reported to the executive leadership team and the Board of Directors.</p> <p>TRAINING: The policy seeks to ensure all of our employees receive necessary training to fully understand and mitigate the risks associated with bribery and corruption.</p> <p>COMPLIANCE: At an operational level, officers are responsible for monitoring compliance and analyzing expense reports, contracts and actions that could implicate anti-corruption laws.</p> <p>100% of employees received training on insider trading and anti-corruption in 2016.</p>
G4-SO5	Confirmed incidents of corruption and actions taken.	No incidents of anti-corruption were reported in 2016.
G4-SO6	Political Contributions	Our political contribution policy prohibits direct or indirect contributions to or on behalf of political officeholders, candidates, political parties, political action committees (PACs), "SuperPACS" or other political entities organized and operating under 26 U.S.C Sec. 527 of the Internal Revenue Code, or any other political organization or funds, on behalf of the Company. Payment or reimbursement of campaign expenses and in-kind contributions are also prohibited.



Our People, Training & Development



welltower

Our People, Training & Development

DISCLOSURE DESCRIPTION		RESPONSE																																							
Material Aspect: Our People, Training & Development																																									
G4-DMA	Disclosure management approach	<p>One of Welltower's strengths is our people. Attracting and retaining the best people is vital to the long-term success of our business. We value our employees for their talents, backgrounds and experiences, and are committed to supporting their personal and professional advancement.</p> <p>We continuously strive to embrace and measure inclusion and diversity, promote health and wellness and encourage engagement with local organizations aimed at strengthening the health and well-being of our communities.</p> <p>We set internal targets to drive the professional development of employees, enhance diversity and promote employee wellness. Our Human Capital team is responsible for the ongoing development of employees through training, educational programming and well-being programs, which are reported annually within the CSR Report.</p>																																							
G4-LA1	Total number and new employee hires by gender and minority	<p>New Hires by Gender and Minority Status</p> <table border="1"> <thead> <tr> <th colspan="3">Gender 2016</th> <th colspan="2">Minority 2016</th> </tr> <tr> <th></th> <th>Count</th> <th>%</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>40</td> <td>58</td> <td>Asian</td> <td>9</td> </tr> <tr> <td>Male</td> <td>29</td> <td>42</td> <td>Black or African American</td> <td>3</td> </tr> <tr> <td>Total</td> <td>69</td> <td></td> <td>Hispanic or Latino</td> <td>4</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Two or more races</td> <td>1</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Voluntary Turnover</th> </tr> <tr> <th>2014</th> <th>2015</th> <th>2016</th> </tr> </thead> <tbody> <tr> <td>10.9%</td> <td>8.9%</td> <td>8.2%</td> </tr> </tbody> </table>	Gender 2016			Minority 2016			Count	%			Female	40	58	Asian	9	Male	29	42	Black or African American	3	Total	69		Hispanic or Latino	4				Two or more races	1	Voluntary Turnover			2014	2015	2016	10.9%	8.9%	8.2%
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Our People, Training & Development

<p>G4-LA6</p>	<p>Types of injury, injury rate (IR), occupational diseases rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities, for the total workforce (that is, total employees plus supervised workers).</p>	<p>Protecting the health and safety of our employees is critical to Welltower and failing to do so would put our business and our customers at risk. To demonstrate our commitment to employee health and safety, we have a zero lost time incidents goal that we strive to achieve. To provide our employees with safe work environments and meet our goal, we give our employees safety training and provide them with the proper equipment. In addition, we track lost time incidents that have occurred and report our lost time incident rate and progress to our goal.</p> <p>Employee Lost Time Incident Rate (lost time hours/million hours worked)</p> <table border="1" data-bbox="989 545 1402 621"> <thead> <tr> <th>2014</th> <th>2015</th> <th>2016</th> </tr> </thead> <tbody> <tr> <td>116.35</td> <td>3.08</td> <td>199.66</td> </tr> </tbody> </table> <p>There have been no work-related fatalities of Welltower employees or contractors at Welltower managed properties in the past three years.</p> <p>In 2016, 67 property management team members underwent 422 hours of health and safety training.</p>	2014	2015	2016	116.35	3.08	199.66
2014	2015	2016						
116.35	3.08	199.66						
<p>G4-LA9</p>	<p>Average hours of training per employee</p>	<p>Welltower employees had an average of 11.86 hours training in 2016. This training covered a variety of topics aimed at fostering employee knowledge and growth within the organization.</p>						

Our People, Training & Development

<p>G4-LA10</p>	<p>Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing their career endings.</p>	<p>Well+CORE In 2016, our Womens Network, Well+CORE, continued to focus on the advancement and development of women leaders in the organization by providing educational opportunities and hosting events that encourage networking and relationship building. In 2016, 9 events were held. These events included high profile speakers, book clubs and networking workshops. The average attendance for these events was about 10% of employees.</p> <p>Rotational Associate Program The Rotational Associate Program was developed to attract and retain talent and allows new employees to gain exposure to multiple areas of our business over 12 to 18 months. During this time, new employees gain exposure to multiple areas of our business, in-depth, hands-on experience, ongoing mentorship, and targeted training so they will better understand our business and contribute at a higher level at a faster rate. We expect that this program will provide our company with a pipeline of candidates and successfully position us as an employer of choice for top performing students. In 2016, we welcomed a class of four rotational associates to Welltower.</p> <p>Manager Development Program Effective managers are a critical factor to ensure teams are highly functional and successful. In 2016, 71% of managers with direct reports participated in a manager development series that coached managers on how to take a more intentional and purposeful approach to leadership by developing their teams and impacting business growth.</p>
<p>G4-LA11</p>	<p>Percentage of employees receiving regular performance and career development reviews, by gender and by employee category</p>	<p>100% of employees completed the annual performance review process in 2016.</p>

Our People, Training & Development

<p>G4-LA12</p>	<p>Composition of governance bodies and break-down of employees per employee category according to gender, age group</p>	<p>Total Employees by Age and Gender</p> <table border="1"> <thead> <tr> <th>Age Group</th> <th>Female %</th> <th>Male %</th> <th>% of Total</th> </tr> </thead> <tbody> <tr> <td>20-29</td> <td>52</td> <td>48</td> <td>12</td> </tr> <tr> <td>30-39</td> <td>48</td> <td>52</td> <td>30</td> </tr> <tr> <td>40-49</td> <td>47</td> <td>53</td> <td>28</td> </tr> <tr> <td>50-59</td> <td>50</td> <td>50</td> <td>20</td> </tr> <tr> <td>60-69</td> <td>49</td> <td>51</td> <td>9</td> </tr> <tr> <td>70+</td> <td>25</td> <td>75</td> <td>1</td> </tr> </tbody> </table> <p>Number of Employees at Different Levels of Management and Gender</p> <table border="1"> <thead> <tr> <th>Role</th> <th>Male</th> <th>Female</th> <th>% of Employee</th> </tr> </thead> <tbody> <tr> <td>Part Time</td> <td>4</td> <td>2</td> <td>1%</td> </tr> <tr> <td>Hourly</td> <td>65</td> <td>74</td> <td>29%</td> </tr> <tr> <td>Non Manager</td> <td>99</td> <td>86</td> <td>39%</td> </tr> <tr> <td>Manager</td> <td>37</td> <td>63</td> <td>21%</td> </tr> <tr> <td>Vice President</td> <td>25</td> <td>4</td> <td>6%</td> </tr> <tr> <td>Senior Vice President</td> <td>11</td> <td>2</td> <td>3%</td> </tr> <tr> <td>Executive</td> <td>4</td> <td>1</td> <td>1%</td> </tr> </tbody> </table> <p>Welltower was named as 2020 Women on Boards Winning Company in 2016 for having 20% or more of our board seats held by women.</p>	Age Group	Female %	Male %	% of Total	20-29	52	48	12	30-39	48	52	30	40-49	47	53	28	50-59	50	50	20	60-69	49	51	9	70+	25	75	1	Role	Male	Female	% of Employee	Part Time	4	2	1%	Hourly	65	74	29%	Non Manager	99	86	39%	Manager	37	63	21%	Vice President	25	4	6%	Senior Vice President	11	2	3%	Executive	4	1	1%
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<p>G4-LA13</p>	<p>Ratio of basic salary remuneration of women to men</p>	<p>Compensation Equity (Base Salary)</p> <table border="1"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>Non-management</td> <td>1</td> <td>1.2</td> </tr> <tr> <td>Management</td> <td>1</td> <td>1.53</td> </tr> <tr> <td>Executive</td> <td>1</td> <td>1.24</td> </tr> </tbody> </table>		Female	Male	Non-management	1	1.2	Management	1	1.53	Executive	1	1.24																																																
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Our People, Training & Development

<p>Welltower-specific</p>	<p>Community engagement and giving/employee volunteerism</p>	<p>Welltower values being a good corporate citizen and is involved in the local communities where we work. Through community outreach programs, employee volunteering and corporate giving, we continue to make a difference in the communities where we operate. In 2016, as part of our corporate giving strategy, we launched the Welltower Foundation to support the causes that align with our mission to help seniors age well. Our corporate giving strategy aligns with UN Sustainable Development Goal number 3, good health and wellbeing.</p> <p>Community Outreach and Engagement Some of our community outreach and engagement highlights from 2016 are:</p> <ul style="list-style-type: none"> • Facilitated an employee fundraising campaign in tandem with the Welltower Foundation's first gift to the Alzheimer's Association for their Brain Ball, in which Welltower CEO Tom DeRosa was the national honoree • Organized an employee-run to fundraise for juvenile diabetes • Conducted a school supply drive where over 1000 backpacks were donated to school children in Northwest Ohio • Partnered with a local elementary school for a day of teaching • Ran a toy drive for children in the area around the holidays • Continued our matching gifts program in which we match employee gifts to their University <p>Corporate Giving In 2016, 13 organizations received gifts of \$10,000 or more. The primary focus areas of our giving included Health Care, Education, Community and the Arts, allocated as follows:</p> <p>Health Care: \$654,617</p> <p>Education: \$17,483</p> <p>Community and the Arts: \$ 320,000</p> <p>Other: \$621,500</p> <p>For more information on the Welltower Foundation and giving at Welltower see the giving section of our website.</p>
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Our People, Training & Development

Material Aspect: Healthful Work Environments

G4-DMA	Disclosure management approach to the material aspect	<p>Our people are central to the success of our organizations. To attract and retain the best talent, we invest in our employees in a variety of ways. We strive to provide a safe, effective and healthful working environment. We also focus our efforts on lifestyle initiatives such as the company-wide wellness program (Well+Being), which equips employees with the knowledge and tools to make positive lifestyle decisions. Our programs address mental and physical well-being and include fitness, nutrition, stress-relief programs as well as health screenings and CPR training.</p> <p>We measure employee participation in our Well+Being program, and track lost-time injuries frequency rate to determine the success of our workplace initiatives.</p> <p>In 2016, Welltower established a target to achieve zero lost-time incidents in the workplace. Accompanied by renewed health and safety management plans, this will consolidate Welltower's efforts to ensure a healthy and safe working environment for all employees.</p>
Welltower-specific	Participation in the Well+Being program	<p>We're proud to be focused on wellness; not just for the residents who live in our seniors housing communities or the patients who visit our medical office buildings, but for our employees too. Our corporate wellness program, Well+Being, aims to equip employees with the knowledge and tools to make healthy and positive lifestyle decisions. The Well+Being program addresses mental and physical health challenges that commonly affect employees and offers tools such as fitness classes, gym membership reimbursements, healthy meal options, stress relief programs, seminars and health screenings to address those challenges. Our goal is to achieve over 50% employee engagement in one or more of the Well+Being programs, fitness challenges or health screenings and have a measured increase in positive health outcomes year-over-year from employee health screenings and lifestyle-related health insurance claims.</p> <p>In 2016, 30% of employees received gym reimbursements, 33% of our employees participated in health screenings, 55% of employees participated in fitness challenges and 74.5% of employees engaged in Well+Being program communications.</p> <p>We received gold, the highest level award, in 2016 from the Heathy Ohio Business Council for our applied vision of our corporate wellness plan (enrich your mind, empower you body and engage your community) and our commitment to the health and wellbeing of all employees.</p>



Environmental Performance

welltower

Environmental Performance

Materials, Construction & Building Efficiency

G4-DMA	Disclosure management approach to the material aspect	<p>Achieving best-practice environmental management in all buildings over which we have operational or split control makes business sense. By reducing our energy costs and the risks associated with rising resource prices and stronger legislation, we are investing in the long-term profitability of our company and deepening relationships with our tenants and our operating partners. Our commitment is to understand our impact and take action to minimize it, as well as to share and promote best practices across our network of partners, vendors and suppliers.</p> <p>In 2016, we continued to gather environmental data from those properties within our control boundary. This accounts for 15% of the 1399 properties in the portfolio and our three corporate offices. This data is audited by an independent third-party. While we do not have operational control over 85% of properties in our portfolio, we work with our operating partners to collect data, share best practices, and in some cases, provide capital to invest in conservation measures. Environmental data coverage (according to the portfolio control boundary) is captured in the table within tab G4-DMA materials.</p> <p>We manage the environmental impact of our properties by monitoring internal targets for environmental performance for properties within our control boundary. They are reviewed by the sustainability team and management committee and are reported annually in our CDP Disclosure. Welltower tracks performance to internal goals and we are currently evaluating long term public targets. We have also updated our Vendor Code of Conduct, which outlines how our suppliers and contractors are expected to adhere to our strict environmental standards. Our outpatient medical buildings' designs (and renovation plans) are guided by Leadership in Energy and Environmental Design (LEED) standards. By reducing our energy costs and the risks associated with rising resource prices and stronger legislation, and aligning ourselves to shifting consumer preferences, we are investing in the long-term profitability of our company.</p>
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Environmental Performance

G4-DMA	Disclosure management approach to the material aspect (continued)	Breakdown of Operational Control Within Welltower's Portfolio (as of December 31, 2016)						
			Corporate Headquarters and Offices	Outpatient Medical Facilities	Seniors Housing Operating	Seniors Housing Triple Net and Long-Term Care/Post Acute		
		Property Count	1 owned building 2 rented offices	257	487	655		
		% of Portfolio	N/A	18%	35%	47%		
		Control Type	Operational Control	Operational Control: 209 Split Control: 48	Influence	Limited Influence		
		Environmental Data Coverage						
			Energy % Captured	Goal	Water % Captured	Goal	Waste % Captured	Goal
		Control Boundary	96	95	92	95	76	75
		Influence	64	75	49	75	0	50
		Energy Star Benchmarking						
		80% of control boundary properties benchmarked in Energy Star.						
		20% of properties outside of control boundary benchmarked in Energy Star.						

Environmental Performance

G4-EN3	Energy consumption within the organization	<p>Energy Management: Energy efficiency and energy conservation is important to Welltower. By running our buildings efficiently, we reduce costs and maximize the life of equipment. We promote energy efficiency in our control boundary through behavioral and operational changes, such as upgrading to high efficiency lighting and encouraging tenants to turn off the lights when they leave for the day. In addition, we periodically conduct feasibility studies for renewable energy systems across our portfolio.</p> <p>In 2016, the gross energy consumption of our portfolio increased by 3.4 % and the energy intensity of the portfolio increased 6.2% . This reflects the fact that the control boundary portfolio is increasing, more tenant data is being captured and there were a greater number of patient visits in 2016 as compared to 2015.</p> <p>Scope 1 and Scope 2 Energy Consumption for Properties Inside the Control Boundary *</p> <table border="1" data-bbox="831 688 1835 935"> <thead> <tr> <th></th> <th>2014</th> <th>2015</th> <th>2016</th> <th>% change (2015-2016)</th> </tr> </thead> <tbody> <tr> <td>Scope 1 (MWh)</td> <td>35,764</td> <td>38,108</td> <td>42,607</td> <td>+11.8%</td> </tr> <tr> <td>Scope 2 (MWh)</td> <td>266,647</td> <td>313,001</td> <td>320,327</td> <td>+2.3%</td> </tr> <tr> <td>Total (MWh)</td> <td>302,411</td> <td>351,019</td> <td>362,934</td> <td>+3.4%</td> </tr> <tr> <td>Energy Intensity (kWh/1000 SqFt)</td> <td>22.95</td> <td>21.49</td> <td>22.82</td> <td>+6.2%</td> </tr> </tbody> </table> <p>* Scope 1 sources include natural gas, propane, solar PV and gasoline used on site. Scope 2 energy usage refers to purchased electricity</p> <p>Renewable Energy at Welltower 3 sites with on site geothermal generation** 1 site using cogeneration system** 1 MW of onsite PV installed</p> <p>** Refers to properties outside of Welltower’s control boundary</p>		2014	2015	2016	% change (2015-2016)	Scope 1 (MWh)	35,764	38,108	42,607	+11.8%	Scope 2 (MWh)	266,647	313,001	320,327	+2.3%	Total (MWh)	302,411	351,019	362,934	+3.4%	Energy Intensity (kWh/1000 SqFt)	22.95	21.49	22.82	+6.2%
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G4-EN6	Reduction of energy consumption	See G4-EN3																									

Environmental Performance

G4-EN8	Total water consumption	<p>The table below shows yearly water consumption data for properties within our control boundary. Declining availability of freshwater (a direct consequence of climate change) has been identified as a potential threat to our business operations. As state and local governments across North America place restrictions on urban water consumption, we have implemented mitigation measures at our properties, including the installation of smart irrigation systems and low flow fixtures.</p> <p>Water Consumption for Control Boundary</p> <table border="1"> <thead> <tr> <th></th> <th>2014</th> <th>2015</th> <th>2016</th> <th>% change (2015-2016)</th> </tr> </thead> <tbody> <tr> <td>Water Consumption (1000 gallons)</td> <td>282,580</td> <td>319,630</td> <td>337,081</td> <td>+5.5%</td> </tr> <tr> <td>Water Intensity (gallons/sq. ft.)</td> <td>26.0</td> <td>25.04</td> <td>26.41</td> <td>+5.5%</td> </tr> </tbody> </table> <p>Water Conservation Projects Within Control Boundary 18 tenants water usage submetered 4 cooling tower replacements in 2016 37 properties use smart irrigation meters to conserve water 9 properties upgraded to low flow fixtures</p>		2014	2015	2016	% change (2015-2016)	Water Consumption (1000 gallons)	282,580	319,630	337,081	+5.5%	Water Intensity (gallons/sq. ft.)	26.0	25.04	26.41	+5.5%
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Water Intensity (gallons/sq. ft.)	26.0	25.04	26.41	+5.5%													

Environmental Performance

G4-EN15	Direct greenhouse gas (GHG) emissions scope 1	<p>GHG Management: Reducing the greenhouse gas emissions from our activities is a key priority of Welltower's environmental commitment. We undertake energy reduction projects where financially viable to increase efficiency and reduce emissions. We also look to purchase green power and develop on-site renewable technology where it makes financial sense. To solidify our commitment to sustainability, we track performance to internal goals and are currently evaluating long term public targets. By reducing our greenhouse gas emissions, we hope to reduce our climate change impact. Along with managing our energy usage and greenhouse gas emissions, we are dedicated to transparently disclosing these issues and have reported to CDP since 2013. In 2016, we scored an A- on our CDP disclosure, placing us in the "Leadership Band" for disclosure.</p> <p>In 2016, total (scope 1, 2 and 3) emissions decreased by 4%. Emissions intensity increased slightly due to an increased control boundary, expanded tenant data coverage and a greater number of patient visits.</p> <p>GHG Emissions Breakdown for Operation Control Boundary</p> <table border="1"> <thead> <tr> <th></th> <th>2014</th> <th>2015*</th> <th>2016</th> <th>% change (2015-2016)</th> </tr> </thead> <tbody> <tr> <td>Scope 1</td> <td>6,491</td> <td>6,930</td> <td>7,690</td> <td>+11%</td> </tr> <tr> <td>Scope 2</td> <td>156,482</td> <td>162,274</td> <td>158,798</td> <td>-2%</td> </tr> <tr> <td>Scope 3**</td> <td>10,577</td> <td>17,739</td> <td>13,617</td> <td>-23%</td> </tr> <tr> <td>Emissions Intensity (MTCO₂e/1000 sq. ft.)***</td> <td>14.77</td> <td>13.79</td> <td>13.90</td> <td>+0.80%</td> </tr> </tbody> </table> <p>* 2015 ghg emissions published here reflect market based methodology and will differ from location based ghg emissions published in the 2015 CSR report **Welltower reports Scope 3 emissions resulting from waste generated from our operations, business travel and employee commuting ***Emissions intensity is based on Scope 1 and Scope 2 emissions, using actual data.</p> <p>Emissions Reductions Activities Within Control Boundary: 8 properties have EV charging stations 21 LED lighting retrofits 12 HVAC upgrades 27 properties have bike racks 7 EMS/BAS Installations</p>		2014	2015*	2016	% change (2015-2016)	Scope 1	6,491	6,930	7,690	+11%	Scope 2	156,482	162,274	158,798	-2%	Scope 3**	10,577	17,739	13,617	-23%	Emissions Intensity (MTCO ₂ e/1000 sq. ft.)***	14.77	13.79	13.90	+0.80%
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G4-EN16	Direct greenhouse gas (GHG) emissions scope 2	See G4-EN15																									
G4-EN18	Greenhouse gas (GHG) emissions intensity	See G4-EN15																									

Environmental Performance

G4-EN19	Reduction of greenhouse gas (GHG) emissions	See G4-EN15										
Welltower-specific	Building certifications	<p>Building Certifications</p> <p>Wherever possible, we look to certify the properties within and outside of our control boundary to industry leading building and energy efficiency standards, including ENERGY STAR® and LEED standards in North America and BREEAM in the UK. Our corporate headquarters in Toledo, Ohio holds LEED Platinum and Gold certifications for new construction as well as LEED Gold certification for the operation and maintenance of the facility.</p> <p>In addition, we developed our own rigorous Green Arrow Building Certification program in 2014, an independently verified standard to recognize the best performing outpatient medical buildings in our portfolio. The Green Arrow Building Certification program builds on the existing Energy Star benchmarking tool and analyzes buildings based on energy performance, water performance, waste management and recycling, indoor environmental air quality, and innovation in sustainability. After going through the assessment, buildings that meet or exceed performance thresholds can be recognized in one of three levels, achiever, performer or leader.</p> <table border="1" data-bbox="835 784 1766 998"> <thead> <tr> <th data-bbox="835 784 1144 849">Number of Certifications:</th> <th data-bbox="1144 784 1457 849">Green Arrow Building Certification:</th> <th data-bbox="1457 784 1766 849">UK Energy Performance Certificates:</th> </tr> </thead> <tbody> <tr> <td data-bbox="835 849 1144 914">LEED: 13</td> <td data-bbox="1144 849 1457 914">Achiever: 6</td> <td data-bbox="1457 849 1766 914" rowspan="3">33 properties with a B or higher</td> </tr> <tr> <td data-bbox="835 914 1144 954">Energy Star: 57</td> <td data-bbox="1144 914 1457 954">Performer: 11</td> </tr> <tr> <td data-bbox="835 954 1144 998">BREEAM: 5</td> <td data-bbox="1144 954 1457 998">Leader: 52</td> </tr> </tbody> </table> <p>Property Management and Operations</p> <p>To ensure our properties are operating efficiently and providing a healthful environment, our property management teams monitor their performance, conduct routine sustainability audits and are encouraged to use green cleaning and integrated pest management techniques. We use Energy Star to benchmark properties inside and outside our control boundary. In 2016, we introduced a green lease and green tenant improvement program for our tenants. These programs allow us to benchmark energy usage, minimize waste to landfill, maximize natural lighting and high efficient LED lighting, conserve water and avoid precautionary list chemicals to enhance indoor environmental quality.</p> <p>Over 75,000 sq ft leased under Welltower's Green Lease. 63% of properties within control boundary have green cleaning and integrated pest management programs. Goal of 20 green tenant improvement projects in 2017.</p>	Number of Certifications:	Green Arrow Building Certification:	UK Energy Performance Certificates:	LEED: 13	Achiever: 6	33 properties with a B or higher	Energy Star: 57	Performer: 11	BREEAM: 5	Leader: 52
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Environmental Performance

Welltower-specific	Building certifications (continued)	<p>Engaging Our Partners and Tenants</p> <p>We understand that mitigating the effects of climate change will involve engaging our partners outside of our control boundary and we have programs in place to do so. Through the Welltower Collaborative, we bring together operating partners on an annual basis to share best practices and present new ideas and technologies. In 2016, 20 operating partners participated in these meetings. We also work with operating partners to gather their utility data and benchmark their properties. In 2016, we completed LED light upgrades at 65 seniors housing properties. These upgrades lower operating costs, reduce energy usage and greenhouse gas emissions and can improve indoor lighting quality for residents. 31 seniors housing properties installed smart irrigation meters in 2016. The use of smart irrigation lowers costs and conserves water, a precious resource.</p> <p>Our materials purchasing program allow operators and MOB tenants to purchase selected materials that are low in VOC, minimize precautionary list chemicals and can be recycled at end of life. In 2016, over 30,000 cubic yards of flooring materials were purchased through the program.</p> <p>In 2016, we held tenant engagement events at 78 properties that were focused on sustainability and social responsibility. These events focused on education and outreach on sustainability and included a tree planting, recycling campaigns, handing out seedlings, a heart walk and green vendors providing educational presentations.</p>																				
G4-EN23	Total weight of waste by type and disposal method.	<p>Welltower strives to increase its waste diversion rate and reduce its impact on landfills by working with tenants and real estate managers to promote recycling. In 2016, Welltower held a number of tenant engagement events that included an educational component focusing on recycling. Welltower also recycles lightbulbs, ballasts, electronic waste and holds events during the year where tenants and employees can bring electronics and batteries from home for recycling.</p> <table border="1" data-bbox="835 1109 1850 1295"> <thead> <tr> <th></th> <th>2014*</th> <th>2015</th> <th>2016</th> <th>E-waste Recycling in 2016</th> </tr> </thead> <tbody> <tr> <td>Composted:</td> <td>1 ton</td> <td>8 ton</td> <td>23 ton</td> <td>Over 35,000 fluorescent light bulbs and 2021 ballasts</td> </tr> <tr> <td>Recycled:</td> <td>2190 tons</td> <td>4889 tons</td> <td>5,102 tons</td> <td>Over 10,000 pounds of e-waste</td> </tr> <tr> <td>Sent to Landfill:</td> <td>17,679 tons</td> <td>33,687 tons</td> <td>31,007 tons</td> <td>172 pounds of batteries</td> </tr> </tbody> </table> <p>*Welltower started collecting waste data from properties within the control boundary in 2014. The increase in waste sent to landfill from 2014 to 2015 is due to increased data coverage and full year (2015) vs. partial year (2014) data availability.</p>		2014*	2015	2016	E-waste Recycling in 2016	Composted:	1 ton	8 ton	23 ton	Over 35,000 fluorescent light bulbs and 2021 ballasts	Recycled:	2190 tons	4889 tons	5,102 tons	Over 10,000 pounds of e-waste	Sent to Landfill:	17,679 tons	33,687 tons	31,007 tons	172 pounds of batteries
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Environmental Performance

<p>Welltower-specific</p>	<p>Biodiversity screening assessments and due diligence</p>	<p>Biodiversity Welltower recognizes the importance of biodiversity in the preservation of a healthy environment, and the potential implications that the company’s operations may have for biodiversity surrounding Welltower-owned real estate. Welltower monitors biodiversity impacts at existing sites within the portfolio, as well as at new acquisitions, and undertakes biodiversity screenings to assess the implication of new developments on biodiversity.</p> <p>Welltower has implemented internal assurance processes to identify biodiversity related risks at sites within the existing portfolio, at new acquisitions and for new developments. This process is managed and reviewed by the sustainability team. The company’s commitment in each of these areas is outlined below:</p> <ul style="list-style-type: none"> • Existing Portfolio: Welltower uses the EPA Envirofacts database to monitor the following biodiversity related parameters of its existing portfolio: IUCN status, rare ecosystem presence, total number of at risk aquatic, and terrestrial and wetland species. Screenings are carried out annually by the sustainability team. • Direct New Developments: Welltower’s strategy involves developing in large metro areas in some cases using existing infrastructure. Therefore, Welltower’s impact on biodiversity through the development process is minimal. However, Welltower obtains necessary permits and complies with local regulations during the development process. <p>In 2016, biodiversity screenings were undertaken within 63% of the the existing portfolio.</p> <p>Sustainability Inclusion in Due Diligence In 2016 we updated our due diligence process to include sustainability factors such as green building certifications, presence of onsite renewables, access to alternate transit, cool roof presence, LED lighting presence and the use of water conserving technologies such as smart irrigation.</p> <p>75% of acquisitions within 10 minutes of public transit in 2016.</p>
<p>Welltower-specific</p>	<p>Social Integration</p>	<p>Welltower seeks to develop in major metro areas, allowing us to use existing infrastructure and reduce our impacts on greenfields. In addition to reducing impacts, by developing in major metro areas we are allowing seniors to remain in their communities and retain access to the culture and services those communities provide. For an example of one of Welltower’s urban revitalization projects in action, please read about our Sumach by Chartwell development in Toronto, Canada.</p> <p>Access to public transit: 62% of our properties are within 10 minutes of a public transit hub.</p> <p>Americans with Disabilities Act Welltower complies with the Americans with Disabilities Act where applicable.</p>

Environmental Performance

Other Disclosures

G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	We did not have any significant fines or non-emergency sanctions for non-compliance with environmental laws and regulations.
G4-EN34	Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms	No grievances were filed.