

# **Welltower Inc.**

## **Political Contributions and Lobbying Activities Policy**

This Political Contribution and Lobbying Activities Policy (this “Policy”) governs the making of political contributions, other campaign-related expenditures, and independent expenditures (as defined by 11 CFR 100.16) by Welltower Inc. and its subsidiaries (collectively, the “Company”). It also describes approval and compliance standards for lobbying activities. This Policy supplements the Company’s statement on political contributions reflected in the Company’s Code of Business Conduct & Ethics.

1. This Policy provides that, unless approved as provided below, the following types of contributions by or on behalf of the Company (“Company Political Spending”) are strictly prohibited:

- Contributions to or on behalf of any federal, state or local political officeholders or candidates, political parties, political action committees (“PAC”), “SuperPACs” or other political entities organized and operating under 26 U.S.C. Sec. 527 of the U.S. Code, or any other political organizations or funds, whether made directly or indirectly (including payments or contributions to support or oppose proposed legislation, referendums, or ballot measures), and whether made with respect to federal, state or local matters;
- Payment or reimbursement of campaign expenses, including advertisements;
- In-kind contributions, including, but not limited to, use of Company offices, computers, telephones, office supplies, or employee time to support or oppose an officeholder, candidate, political party, or campaigns related to proposed legislation, referendums, or ballot measures; and
- Independent expenditures.

2. Any Company Political Spending must receive prior written approval by the Company’s Chief Legal Officer and General Counsel and be in accordance with all federal state, and local laws. The Company’s Chief Legal Officer and General Counsel is responsible for taking appropriate measures to promote compliance with this Policy.

3. Any Company Political Spending approved by the Chief Legal Officer and General Counsel must reflect the Company’s business purposes, including, but not limited to tax reform, sustainability initiatives, housing finance reform, changes to financial standards and reporting, health care infrastructure and delivery systems, and the promotion of educational institutions and cultural assets, and promote the interests of the Company, not those of its individual officers or employees.

4. No Company funds or assets may be used for political contributions outside the United States, even where permitted by local law, without the prior written approval of the Company’s Chief Legal Officer and General Counsel.

5. The Company may belong to various industry trade associations and similar organizations that may engage in political spending or lobbying from time to time. Any amounts spent by such

industry trade associations or similar organizations on political spending shall not be attributed to the Company, provided that such activities are not controlled by the Company and are generally undertaken for the benefit of the industry or members of the organization as a whole. We have informed our major U.S. trade associations and relevant 501(c)(4) organizations that they are prohibited from applying any of the Company's funds to make or support contributions to any U.S. federal or state candidate or political party, for any independent expenditures, or for any advocacy related to proposed legislation, referendums, or ballot measures.

6. Officers and employees may participate in political activity in their individual capacity; they may not do so as representatives of the Company. Under no circumstances shall anyone be reimbursed for personal political contributions or expenses, or use Company resources to promote their personal political views, causes or candidates. Company resources include but are not limited to using employee working time, work equipment, such as telephones or computers, work space, such as conference rooms or offices, email distribution lists and mailing lists, and/or company logos, for the benefit of a political campaign. Political fundraising on Company premises is prohibited. Personal, non-corporate contributions and volunteer campaign efforts are not affected by this Policy. For purposes of clarity, any such personal political activities and contributions do not imply the Company's endorsement of, or participation in, such activities. However, the executive officers of the Company, including the Chief Executive Officer, are encouraged to refrain from making any political contribution or campaign expenditure that could create any confusion between acts of the executive officers in their personal capacities and acts of the executive officers in their official capacities as executive officers of the Company. Officers and employees are also subject to the Company's [Code of Business Conduct & Ethics](#), which, among other things, prohibits officers and employees from engaging in any personal activity (including making political contributions or campaign expenditures) that could create a conflict of interest, unless prior approval is obtained from the Company's Board of Directors Nominating/Corporate Governance Committee or otherwise as specified in the [Code of Business Conduct & Ethics](#).

7. The Company will not pressure or coerce employees to make any personal political contribution or campaign expenditure or take any retaliatory action against employees for failing to do so.

8. The Company shall comply with all federal, state and local laws that require disclosure of lobbying activities, including, but not limited to the federal Lobbying Disclosure Act and the Honest Leadership and Open Government Act. All lobbying activities, including those conducted by third-party consultants, shall be overseen and approved by the Chief Legal Officer and General Counsel. No employee may engage in any lobbying activity on behalf of the Company unless approved by the Chief Legal Officer and General Counsel.

9. The Company shall comply with all anti-bribery laws, and no contribution or expenditure will be given or made in anticipation of, in recognition of, or in return for an official act, as described further in the Company's Anti-Corruption Policy.

10. Company personnel who believe they have witnessed illegal or unethical behavior relating to the Company's political activities, including but not limited to potential violations of this Policy, must report what they have witnessed in accordance with the reporting guidelines outlined in the Company's [Code of Business Conduct & Ethics](#).

11. The Nominating/Corporate Governance Committee of the Company's Board of Directors shall review this Policy annually, and is responsible for oversight of the Company's Political Spending, any lobbying expenditures or activities, and any payments to trade associations and other tax-exempt organizations that may be used for political purposes.

12. Violations of this policy will be treated as violations of the Company's [Code of Business Conduct and Ethics](#). Welltower may enforce this policy in accordance with the provisions of the [Code of Business Conduct and Ethics](#).

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