Welltower Inc. - Climate Change 2022

C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

Welltower is a real estate investment trust (REIT) that partners with leading seniors housing operators, post-acute providers and health systems to provide high-quality and affordable health care for an aging population. Through Welltower's capital investments, health care providers and operators are able to grow, innovate and ultimately improve people's wellness and overall health care experience.

Welltower's real estate portfolio mainly includes investments in medical office buildings and seniors housing communities. Welltower reports environmental data on its financial control boundary which includes 1) properties for which the Company has direct "operational control" related to its medical office portfolio and 2) properties in its seniors housing operating (SHO) portfolio where Welltower's operating partners provide property management services under a RIDEA management contract. Welltower does not have direct access to data or the ability to control direct operations of buildings in the SHO portfolio as restricted by law as a REIT. However, we work to encourage our operators to run the facilities in an efficient and sustainable manner and have tools and resources available for them to do so. Welltower's NNN portfolio is outside of the financial control boundary.

Welltower has implemented an award-winning environmental, social, and governance ("ESG") program that aims to promote sustainability and wellness for our employees, tenants and residents through a full range of initiatives. 2021 was a year of significant advances in ESG for Welltower in response to both investor expectations and employee engagement. Some of our ESG accomplishments include receipt of the 2022 ENERGY STAR Partner of the Year Award, at the level of 'Sustained Excellence' as recognition of our ongoing efforts to promoting energy efficiency across our portfolio, named by S&P to the 2022 Sustainability Yearbook, and named one of the Top 10 Most Sustainable REITs by Barron's.

C0.2

(C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	No	<Not Applicable>

C0.3

(C0.3) Select the countries/areas in which you operate.

Canada
United Kingdom of Great Britain and Northern Ireland
United States of America

C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.

USD

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Financial control

C-CN0.7/C-RE0.7

(C-CN0.7/C-RE0.7) Which real estate and/or construction activities does your organization engage in?

New construction or major renovation of buildings
Buildings management

C0.8

(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	US95040Q1040
Yes, a Ticker symbol	WELL

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	Ultimate management-level responsibility for Welltower's corporate sustainability program is with the CEO of the Company, who sits on the Board of Directors. The CEO meets with other Board members frequently. The CEO is kept up to date on sustainability topics by the CFO and the AVP, Capital Markets & ESG. The strong relationship between the most senior decision makers and those with responsibility for sustainability allows action points to be implemented into company operations effectively. Recently, Welltower launched the ESG Steering Committee co-headed by the CEO and the AVP, Capital Markets & ESG, as a cross functional committee to assist the Company in setting and implementing ESG strategy, identifying risks and opportunities, and to make recommendations regarding these matters. The CEO supported the decision to publicly disclose our 10% reduction in energy, water, and GHG by 2025 (against a 2018 baseline) and continues to request and monitor our progress against this goal as reported in our ESG report. Additionally, our CEO supports our ESG team in its engagement with operators around reporting their sustainability data and information, as well as supports the decision to incorporate sustainability goals in determining executive compensation including increased data coverage and progress towards reduction targets.
Board-level committee	The Nominating/Corporate Governance Committee of Welltower's Board of Directors has ultimate oversight of Welltower's sustainability program, which includes the Company's efforts to implement sustainability-related goals and targets, mitigate the impacts of climate change on the business and manage overall corporate governance and the social impacts of the Company's operations. For example, the CSR report and disclosure has broadened its focus by being renamed the ESG report which has fostered a wider engagement across Welltower.

C1.1b

(C1.1b) Provide further details on the board’s oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	Monitoring implementation and performance of objectives	<Not Applicable>	The Nominating/Corporate Governance Committee of Welltower’s Board of Directors reviews environmental sustainability matters and Welltower’s climate change environmental sustainability practices. The Nominating/Corporate Governance Committee met five times during the year ended December 31, 2021.
Scheduled – some meetings	Reviewing and guiding strategy Reviewing and guiding risk management policies	<Not Applicable>	The Board and the Nominating/Corporate Governance Committee oversee and review the management of risks including compliance, environmental sustainability and corporate governance. 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 program (based on the COSO Enterprise Risk Management Framework) and created an internal Enterprise Risk Management (ERM) Committee charged with identifying, monitoring and mitigating risks and exposures. The ERM Committee, through regular communication with business areas throughout the year, identifies and evaluates sustainability and climate-related enterprise risks that may affect the Company’s business functions. Opportunities are channelled back to management’s strategy setting process and risks are added to the central Risk Register (Excel based) where a qualitative description and mitigation measures for each risk are detailed. A report of the risks identified and results of mitigation efforts are reported to the Board regularly. In regards to climate-related mitigation measures, Welltower takes a multi-faceted approach including implementing water, energy and waste management programs to improve the efficiency of the portfolio and minimize GHG emissions. In addition, the implementation of disaster recovery plans and adequate insurance policies are used to mitigate risks associated with extreme weather events. This ERM structure enables information regarding significant risks and exposures to the Company to be monitored and communicated to Welltower leadership and the Board.

C1.1d

(C1.1d) Does your organization have at least one board member with competence on climate-related issues?

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Yes	Many board members have experience as real estate lenders and owners, which involve assessing the effect of climate risk on real estate as part of their due diligence and decision-making processes. We also have board members with experience in operations and environmental matters. Page 20 of Welltower's 2022 Proxy lists Directors with ESG skill sets.	<Not Applicable>	<Not Applicable>

C1.2

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Other, please specify (AVP, Capital Markets & ESG)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other, please specify (ESG Steering Committee)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

Ultimate management-level responsibility for Welltower's corporate sustainability program lies with the CEO, who sits on the Board of Directors and is Co-Chair of the ESG Steering Committee. The CEO has final approval for programs and major initiatives and receives regular progress reports from the AVP, Capital Markets & ESG and works closely with the Nominating/Corporate Governance Committee of the Board to report initiatives and progress towards goals.

To lead the advancement of ESG, Welltower has a dedicated team including the AVP, Capital Markets & ESG and the ESG Analyst. This team is functionally located within the Finance Department and has a direct reporting line to the CFO, who reports to the CEO. The AVP, Capital Markets & ESG and ESG Analyst are responsible for the day-to-day implementation of strategic climate-related initiatives and monitoring progress towards goals. The team is responsible for publishing the annual ESG Report as well as responses to GRESB, DJSI and CDP among other assessments. The AVP, Capital Markets & ESG is Co-Chair of the ESG Steering Committee and provides regular updates to the Board of Directors on a quarterly basis. The main focus of the ESG Analyst is to provide support to the AVP through a focus on sustainability data and benchmarking to help highlight and address sustainability improvements across the portfolio, and to stay informed of the latest municipal reporting requirements across the portfolio and maintain compliance.

The ESG Steering Committee is Co-Chaired by the CEO and AVP, Capital Markets & ESG with the Nominating/Corporate Governance Committee of the Board having oversight responsibility of the ESG Committee. The primary purpose of the ESG Steering Committee is to support Welltower's on-going commitment to environmental, health and safety, corporate social responsibility, human capital (including diversity and inclusion), corporate governance, sustainability, and other public policy matters relevant to the Company (collectively "ESG Matters"). The ESG Committee is a cross-functional committee of the Company that assists the Leadership Team of the Company regarding ESG Matters. Duties include assisting the Company's general strategy with respect to ESG Matters, identifying ESG risks and opportunities, and supporting integration of ESG systems to monitor, verify and report on ESG Matters.

C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	

C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target	A portion of monetary rewards are tied to leadership on ESG Matters, including the 10% reduction target in energy, GHG emissions & water by 2025, over a 2018 baseline.
Chief Financial Officer (CFO)	Monetary reward	Emissions reduction target	A portion of monetary rewards are tied to leadership on ESG Matters, including the 10% reduction target in energy, GHG emissions & water by 2025, over a 2018 baseline.
Other, please specify (AVP, Capital Markets & ESG)	Monetary reward	Emissions reduction target	Progress towards reduction targets and implementation of sustainability initiatives are included in the annual performance review and taken into account when determining monetary compensation.
Facilities manager	Monetary reward	Behavior change related indicator	Property managers are incentivized and measured based on their goals and work performance. Given that Welltower's publicly reported goals of a 10% reduction in greenhouse gas emissions, energy and water usage by 2025 over a 2018 baseline are based on a reporting framework that include facilities property managers are responsible for, their own performance is ultimately tied to supporting Welltower to meet these goals. As a result, property managers are encouraged to participate in energy and water benchmarking of their properties, identify waste/recycling initiatives, and energy efficiency programs.
Other, please specify (All other EVPs and SVPs)	Monetary reward	Emissions reduction target	A portion of monetary rewards are tied to leadership on ESG Matters, including the 10% reduction target in energy, GHG emissions & water by 2025, over a 2018 baseline.

C2. Risks and opportunities

C2.1

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?

Yes

C2.1a

(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	5	
Medium-term	5	10	
Long-term	10	20	From 10 years

C2.1b

(C2.1b) How does your organization define substantive financial or strategic impact on your business?

Welltower defines a substantive financial or strategic impact in relation to identifying or assessing climate related risks according to pg. 26 of our 2021 Form 10-K, which includes climate risks, and states "The events and consequences discussed in these risk factors could, in circumstances we may not be able to accurately predict, recognize or control, have a material adverse effect on our business, growth, reputation, prospects, financial condition, operating results, cash flows, liquidity, ability to pay dividends and stock price."

Pg. 36 of our 2021 Form 10-K, specific to climate risk, states "We may experience losses caused by severe weather conditions, natural disasters or the physical effects of climate change, which could result in an increase of our or our tenants' cost of insurance, unanticipated costs associated with evacuation, a decrease in our anticipated revenues or a significant loss of the capital we have invested in a property….To the extent that significant changes in the climate occur in areas where our communities are located, we may experience extreme weather and changes in precipitation and temperature, all of which may result in physical damage to or a decrease in demand for properties located in these areas or affected by these conditions. Should the impact of climate change be material, including significant property damage to or destruction of our communities, or occur for lengthy periods of time, our financial condition or results of operations may be adversely affected. In addition, changes in federal, state and local legislation and regulation based on concerns about climate change could result in increased capital expenditures on our existing properties and our new development properties without a corresponding increase in revenue, resulting in adverse impacts to our net income."

Specific quantifiable indicators include:

-FFO (Funds from Operations): Our 2021 normalized FFO per diluted share was $3.21. A negative impact to FFO per diluted share, of at least 1-2 cents would have a substantive financial impact as it could cause the Company to miss its publicly issued normalized FFO per diluted share guidance.

- Loss of capital invested in a property: Significant property damage or destruction of our properties because of climate change that result in losses of over tens of millions of dollars of capital invested in our properties

- Credit Rating: Our current credit rating is BBB+/Baa1. Any events that led to a negative impact on our credit rating, as a result of a decrease in cash flow from climate-related events, would have a substantive financial impact

C2.2

(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered
Direct operations
Upstream
Downstream

Risk management process
Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment
More than once a year

Time horizon(s) covered
Short-term
Medium-term
Long-term

Description of process
Welltower's Enterprise Risk Management system helps ensure structured, consistent and continuous risk management processes are in place across the entire organization, which includes all global operations. The Board and the Nominating/Corporate Governance Committee play an integral role in overseeing the management of Welltower's risks and regularly reviews Welltower's material risks and exposures, including operational, strategic, financial and compliance 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 program (based on the COSO Enterprise Risk Management Framework) and created an internal Enterprise Risk Management (ERM) Committee charged with identifying, monitoring and mitigating risks and exposures. The ERM Committee, through regular communication with business areas throughout the year, identifies and evaluates risks that may affect the Company's business functions. Opportunities are channelled back to management's strategy setting process and risks are added to the central Risk Register (Excel based) where a qualitative description and mitigation measures for each risk are detailed. A report of the risks identified and results of mitigation efforts are reported to the Board regularly. In regard to climate risk mitigation measures, Welltower takes a multi-faceted approach including implementing water, energy and waste management programs to improve the efficiency of the portfolio and minimize GHG emissions. In addition, the implementation of disaster recovery plans and adequate insurance policies are used to mitigate risks associated with extreme weather events. This ERM structure enables information regarding significant risks and exposures to the Company to be monitored and communicated to Welltower leadership and the Board.

Additionally, Welltower utilized Moody's ESG Solutions Climate Risk Application to perform a portfolio-wide climate change analysis to help identify and measure climate risk exposure. This climate change analysis enabled Welltower to group risks by timeframe and climate scenario as well as identify opportunities for risk mitigation. The outcome of the analysis was shared with the Risk Committee for incorporation into our company-wide risk register as part of our ERM system.

C2.2a

(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Welltower's ESG Team, development team and third-party consultants consistently monitor and assess current climate-related regulations applicable to our portfolio including any required building construction standards or municipal benchmarking reporting requirements for our portfolio. Non-compliance with municipal benchmarking may result in fines. In addition, the Audit Committee oversees Welltower's compliance program with respect to legal and regulatory requirements and our ERM Committee seeks to ensure there are mitigants in place for all compliance-related risks identified in the Risk Register.
Emerging regulation	Relevant, always included	The ESG Steering Committee, Audit Committee and Nominating/Corporate Governance Committee monitor potential emerging climate-related legislative and regulatory changes that will impact Welltower. For example, in the United States, the SEC has announced a proposal that would require public companies to report on their carbon emissions and risks. This rule change would require Welltower to publicly disclose the detail of their carbon emissions and provide information about their exposure to climate-related risks. There are also an increasing number of national, state and local policies and ordinances around energy and carbon reduction and benchmarking in the U.S., the U.K. and Canada. Legislation continues to increase and there is the potential for new legislation to require companies to meet certain energy/water efficiency or carbon reduction standards with potential fines for non-compliance.
Technology	Relevant, always included	As technology continues to advance, outdated and inefficient systems may need to be replaced or upgraded to optimize the operational efficiency of our buildings. Risks of not keeping up with the latest technology include not realizing potential energy and water consumption savings, not meeting our public GHG, energy, and water reduction goals, and not keeping up with consumer and tenant preferences. Welltower undertakes operational energy and water efficiency assessments across the portfolio and supports tenants to implement efficiency upgrades that provide improved environmental performance and could potentially lower utility consumption and costs. For example, Welltower earned the ENERGY STAR® Partner of the Year Sustained Excellence Award since 2021 and has facilitated 382 LED retrofit projects to date.
Legal	Relevant, always included	From time to time, we are directly involved or named as a party in legal proceedings, lawsuits and other claims. We also are named as defendants in lawsuits allegedly arising out of our actions or the actions of our operators/tenants or managers in which such operators/tenants or managers have agreed to indemnify, defend and hold us harmless from and against various claims, litigation and liabilities arising in connection with their respective businesses. There can be no assurance that we will be able to prevail in, or achieve a favorable settlement of, pending or future litigation. In addition, pending litigation or future litigation, government proceedings or environmental matters could lead to increased costs or interruption of our normal business operations. An unfavorable resolution of pending or future litigation or legal proceedings may have a material adverse effect on our business, results of operations and financial condition. Regardless of its outcome, litigation may result in substantial costs and expenses, significantly divert the attention of management, and could damage our reputation and our brand. In addition, any such resolution could involve our agreement to terms that restrict the operation of our business. We cannot guarantee losses incurred in connection with any current or future legal or regulatory proceedings or actions will not exceed any provisions we may have set aside in respect of such proceedings or actions or will not exceed any available insurance coverage.
Market	Relevant, always included	Tenants and operators continue to seek properties with strong energy management systems, environmental stewardship, and green practices. Welltower conducts assessments of its ESG reporting, recognitions and awards, and ESG strategies of its peers to seek to make sure Welltower keeps up to date with market trends and meets the changing expectations of its key stakeholders. If Welltower is unable to meet future market expectations, this may be a risk to growth and future earnings.
Reputation	Relevant, always included	Increasingly, clients and investors are looking to work with environmentally responsible companies. Negative perceptions of Welltower relative to the Company's response to environmental, social and corporate governance, including climate change, could negatively affect Welltower's access to capital, ability to deliver on being a thought leader within our industry, successful relationship-based investments, and the Company's ability to attract and retain the best talent. To manage this, Welltower has comprehensive employee, tenant and vendor engagement programs in place focused on operational strategies to drive energy and water efficiency.
Acute physical	Relevant, always included	We maintain or require our tenants to maintain comprehensive insurance coverage on our properties with terms, conditions, limits and deductibles that we believe are appropriate given the relative risk and costs of such coverage, and we frequently review our insurance programs and requirements. We also maintain a large and geographically diversified portfolio to mitigate exposure to acute physical risks. However, some of our properties are located in areas particularly susceptible to revenue loss, cost increase or damage caused by severe weather conditions or natural disasters such as hurricanes, earthquakes, wildfires, tornadoes and floods. We believe, given current industry practice and analysis prepared by outside consultants, that our and our tenants' insurance coverage is appropriate to cover reasonably anticipated losses that may be caused by hurricanes, earthquakes, tornadoes, floods, wildfires and other severe weather conditions and natural disasters, including the effects of climate change. Nevertheless, we are always subject to the risk that such insurance will not fully cover all losses. These losses may lead to an increase of our and our tenants' cost of insurance, a decrease in our anticipated revenues from an affected property and a loss of all or a portion of the capital we have invested in an affected property.
Chronic physical	Relevant, always included	We maintain a large and geographically diversified portfolio to mitigate exposure to chronic physical risks. However, some of our properties are located in areas particularly susceptible to revenue loss, cost increase or damage caused by longer-term shifts in weather patterns, such as heat and water stress. Therefore, we have taken extra steps to limit the impact of these longer-terms changes in the climate, such as retrofitting cool roofs on some of our properties or upgrading HVAC systems on older buildings.

C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

C2.3a

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

Risk 1

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Current regulation	Enhanced emissions-reporting obligations

Primary potential financial impact

Increased indirect (operating) costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

Welltower is a REIT, and as such our portfolio consists of operational real estate. Welltower's portfolio contains assets located in numerous states and local jurisdictions across the USA. Each state and local jurisdiction has varying municipal benchmarking reporting requirements that must be met in order to avoid fines. For example, in the state of California, non-residential properties which singly or together are 50,000 sq. ft or greater, are required to annually submit their benchmarking report for property energy usage.

Time horizon
Short-term

Likelihood
Very likely

Magnitude of impact
Medium

Are you able to provide a potential financial impact figure?
Yes, an estimated range

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure – minimum (currency)
0

Potential financial impact figure – maximum (currency)
15000000

Explanation of financial impact figure
Welltower undertook an exercise with third-party consultants to assess each property from the Welltower asset list located in North America to flag any properties in a jurisdiction with a current or upcoming benchmarking requirement. The potential financial impact of up to $15,000,000 was calculated based on the total of the maximum fine for each benchmarking requirement per year or 30 days of non-compliance for properties in jurisdictions with daily fines (based on the assumption that properties are incentivized to address issues of non-compliance sooner with a daily late fee). For example, in the state of California non-residential properties which singly or together are 50,000 sq. ft or greater are required to annually submit their benchmarking report for property energy usage. Failure to comply could potentially result in over tens of thousands of dollars in fines for that one property.

Cost of response to risk
35000

Description of response and explanation of cost calculation
To minimize the potential financial impact of non-compliance with municipal reporting requirements, Welltower consistently works with third-party consultants to monitor and assess the municipal reporting requirements for each property, notifies property operators of the requirements and assists in submitting the required information to avoid potential fines. Welltower engaged a third-party consultant to assist with these efforts through a fixed $28,000 engagement fee. Welltower's ESG Analyst also supports these efforts, committing a general estimate of ~140 hours over the course of the year at a general estimated hourly cost rate of ~$50. Welltower is not able to accurately capture time and costs spent by operators and the MOB team to fulfil these reporting requirements. Therefore, the cost of Welltower's response to the risk of enhanced emissions reporting obligations is calculated by:

Third-party consultant fee ($28,000) + ESG Analyst Support (140 hours x $50/hour) = $28,000 + $7,000 = $35,000

Comment

Identifier
Risk 2

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Acute physical	Flood (coastal, fluvial, pluvial, groundwater)

Primary potential financial impact
Increased capital expenditures

Climate risk type mapped to traditional financial services industry risk classification
<Not Applicable>

Company-specific description
Welltower is a REIT, and as such our portfolio consists of operating real estate. Weather extremes such as flooding could result in loss of property and damage to properties. Change in rainfall conditions, size and frequency of possible floods could result in damage and/or loss of property, compromise infrastructure and create operational interruptions. Based on our Climate Change Analysis on pg. 40 of our 2021 ESG Report, less than 30% of 4Q21 in-place net operating income (IPNOI) and less than 30% of pro rata square feet has potential financial and geographic exposure to high frequency and/or severe rainfall or riverine flooding during a 100-year flood, and susceptibility to some flooding during rainfall or riverine flood events. The majority of our higher risk exposure is in California and Florida. In the analysis, risk exposures were grouped into three ranges including less than 30%, 30-60%, and over 60% exposure. For a discussion of supplemental reporting measures, such as IPNOI, and related reconciliations, see our 4Q21 Supplemental Information Report.

Time horizon
Medium-term

Likelihood
More likely than not

Magnitude of impact
Medium

Are you able to provide a potential financial impact figure?
Yes, an estimated range

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure – minimum (currency)
0

Potential financial impact figure – maximum (currency)
137599800

Explanation of financial impact figure
The minimum potential financial impact figure is calculated by multiplying 4Q21 quarterly IPNOI by the smallest % of properties at high risk of flooding (0.00*$1,834,664,000/4 = $0.00). The maximum impact figure is calculated by the largest % of properties at high risk of flooding (0.30*$1,834,664,000/4 = $137,599,800). If flooding events were to occur, the financial impact from loss of NOI could fall within this range. However, Welltower maintains a large and well diversified portfolio with near zero probability of recognizing the maximum financial impact figure calculated.

Cost of response to risk
8817000

Description of response and explanation of cost calculation
We maintain or require our tenants to maintain comprehensive insurance coverage on our properties with terms, conditions, limits and deductibles that we believe are appropriate given the relative risk and costs of such coverage. However, a large number of our properties are located in areas particularly susceptible to revenue loss, cost increase or damage caused by severe weather conditions or natural disasters such as hurricanes, earthquakes, tornadoes and floods, as well as the effects of climate change. We believe, given current industry practice and analysis prepared by outside consultants, that our and our tenants' insurance coverage is appropriate to cover reasonably anticipated losses that may be caused by hurricanes, earthquakes, tornadoes, floods, wildfires and other severe weather conditions and natural disasters, including the effects of climate change. Nevertheless, we are always subject to the risk that such insurance will not fully cover all losses and, depending on the severity of the event and the impact on our properties, such insurance may not cover a significant portion of the losses including but not limited to the costs associated with evacuation. The $8,817,000 represents insurance costs for the year ended December 31, 2021 related to our captive insurance company formed as of July 1, 2020, which acts as a direct insurer of property level insurance coverage for our portfolio.

Comment

Identifier
Risk 3

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Chronic physical	Heat stress

Primary potential financial impact
Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification
<Not Applicable>

Company-specific description
Welltower is a REIT, and as such our portfolio consists of operating real estate. Chronic physical weather extremes such as heat stress (defined by an increase in extreme temperatures) could cause increases in building cooling loads and associated operating and maintenance costs, heighten risk of brownouts / power outages as well as create stress in human health / labor force. Based on our Climate Change Analysis on pg. 39 of our 2021 ESG Report, less than 30% of 4Q21 IPNOI and less than 30% of pro rata square feet has potential financial and geographic exposure to relatively high changes in extremes compared to the global temperature average. The majority of our higher risk exposure is in the Midwest. In the analysis, risk exposures were grouped into three ranges including less than 30%, 30-60%, and over 60% exposure.

Time horizon
Short-term

Likelihood
More likely than not

Magnitude of impact
Medium-low

Are you able to provide a potential financial impact figure?
Yes, an estimated range

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure – minimum (currency)
0

Potential financial impact figure – maximum (currency)
1000000

Explanation of financial impact figure
In a study, the United States Environmental Protection Agency found that elevated temperatures from heat islands could cause an increase in electricity demand for air conditioning to cool buildings approximately 1-9% for each 2 degrees increase in temperature (1). Based on a broad high-level analysis of 2021 utility expenses in our SHO portfolio, a 2 degree increase in temperature could potentially lead to $1M annualized impact on operating costs assuming a 5% increase in energy cost on up to 30% of the portfolio in chronic high heat stress areas.

(1) https://www.epa.gov/heatislands/heat-island-impacts

Cost of response to risk
25000

Description of response and explanation of cost calculation
In order to alleviate the risks associated with heat stress, Welltower has implemented and will continue to implement new technologies and systems across the portfolio. These technologies and opportunities include installing cool roofing systems across applicable climate impacted assets to reduce the heat transfer, keep HVAC run times optimized, improve occupant comfort and reduce heat island effect. Welltower has already installed cool roofing systems at multiple properties. As these activities are part of Welltower's ongoing operations and capex budgets, the additional cost of the response has been calculated as $0 as these activities do not result in any obvious uplift in Welltower's yearly capital expenditure. A high-level estimate of time and salary of the ESG Team spending 10% of their time working with property managers and setting

capex budgets is $25,000.

Comment

C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?
Yes

C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

Identifier
Opp1

Where in the value chain does the opportunity occur?
Direct operations

Opportunity type
Resource efficiency

Primary climate-related opportunity driver
Reduced water usage and consumption

Primary potential financial impact
Reduced indirect (operating) costs

Company-specific description
Change in water supply and demand can increase water cost, erode social license to operate and/or damage Welltower properties' reputation. As a result, there is an opportunity to increase water efficiency throughout Welltower's portfolio through efficiency upgrades. Based on our Climate Change Analysis on pg. 39 of our 2021 ESG Report, 30-60% of 4Q21 IPNOI and pro rata square feet has potential financial and geographic exposure to areas where competition for water resources is high. The majority of our higher risk exposure is in California and Texas. In the analysis, risk exposures were grouped into three ranges including less than 30%, 30-60%, and over 60% exposure.

Time horizon
Medium-term

Likelihood
Very likely

Magnitude of impact
Medium-low

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
200000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact figure
The potential financial impact reflects the savings realized by upgrading to more water efficient equipment. As an example, Welltower's OM team piloted an irrigation management system that has shown ~$4k in operational cost savings and a 50% reduction in water usage a year. Welltower plans to roll out the irrigation management system to at least 50 of the least efficient properties in the US, starting in 2022, including six properties already identified in Texas. Based on cost savings estimates, if rolled out to these 50 properties, this initiative could result in operational cost savings of $200,000 per year (50 properties x $4,000 per year cost savings). Welltower engages in numerous other water efficiency practices in addition to the new irrigation management system, which have additional potential financial impacts.

Cost to realize opportunity
75000

Strategy to realize opportunity and explanation of cost calculation
Welltower's water usage is primarily made up of domestic water and irrigation. Our water conservation efforts include benchmarking usage and monitoring usage trends, utilizing low-flow and high-efficiency fixtures and equipment, installing leak detection technology that will alert staff to high usage or slow leaks, installing drip irrigation systems, planting drought tolerant landscaping, and aiding in the water management efforts of our partners outside of our operational control. This year Welltower has facilitated procurement of ENERGY STAR and other water efficient appliances for its communities and assisted operators in capex budgeting and planning, inclusive of water efficiency measures for at least 50 of the least water efficient properties in the US. This all has an annual fee of $1,500, per property. Therefore, roll out of the irrigation management system would have an annual estimated cost of $75,000 (50 properties x $1,500 annual fee = $75,000).

Comment

Identifier
Opp2

Where in the value chain does the opportunity occur?
Direct operations

Opportunity type
Resource efficiency

Primary climate-related opportunity driver
Move to more efficient buildings

Primary potential financial impact
Reduced indirect (operating) costs

Company-specific description
Inefficient and outdated lighting fixtures can increase energy costs and decrease quality of life for our tenants and residents. As a result, there is an opportunity to increase energy efficiency and improve lighting quality throughout Welltower's portfolio by installing LED retrofit lighting. With a focus on increasing lumens when necessary, eliminating shadowing, and putting the right color temperatures in the right spaces, upgrading lighting to LED fixtures has the potential to not only reduce costs and our environmental footprint, but also to improve the daily lives of our senior living residents and visitors in our outpatient medical facilities.

Time horizon
Medium-term

Likelihood
Very likely

Magnitude of impact
Medium

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
37000000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact figure
The financial impact reflects the compounding annual savings of Welltower's completed LED retrofit projects to date. Welltower has completed 382 total LED retrofit projects as of 12/31/2021, which will generate over $7.4 million in operational cost savings annually moving forward. Welltower has invested almost $37 million in our LED retrofit program, and the average return on investment of our LED retrofit projects is less than 5 years.

Cost to realize opportunity
36000000

Strategy to realize opportunity and explanation of cost calculation
Welltower works with supplier and partner Greenleaf Energy Solutions to facilitate LED retrofit projects. The cost to realize this opportunity was calculated by totalling our project costs from 2013 to date. As an example, Greenleaf helped Welltower identify a senior living community in Trumbull, CT as a property that could significantly benefit from the program, as it had outdated lighting fixtures and would be able to take advantage of numerous incentives. In 2021, Greenleaf and Welltower worked together to upgrade the lighting throughout the community's facilities to LED fixtures. With incentives, the final cost of installing the new lighting fixtures at the community was $17,000, and the upgraded lighting generated $20,000 in operational cost savings.

Comment

Identifier
Opp3

Where in the value chain does the opportunity occur?
Direct operations

Opportunity type
Markets

Primary climate-related opportunity driver
Access to new markets

Primary potential financial impact
Increased access to capital

Company-specific description
Since becoming the first U.S. health care REIT to successfully complete a public green bond offering in December 2019 and subsequently issuing a second green bond in March 2022, Welltower has begun expanding green bond projects from the offering's net proceeds in order to add sustainable value across the portfolio. Our Green Bond Allocation Report on proceeds utilized includes projects such as financing or refinancing properties which are anticipating high-level green building certification or energy rating from such organizations as LEED, BREEAM, and ENERGY STAR and could also include proceeds on energy and water efficiency upgrades designed to have 25% or higher efficiency gain, including LED lighting, HVAC and chiller replacements, irrigation systems and installation of low-flow fixtures. Issuing green bonds represents an opportunity to tap into a new and growing source of financing to further efforts to obtain green certifications for properties within our portfolio.

Time horizon
Medium-term

Likelihood
Virtually certain

Magnitude of impact
Medium-high

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
1050000000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact figure
The potential financial impact represents the proceeds from the issuance of our green bond in December 2019 of $500M and issuance in March 2022 of $550M that will be used to fund efficiency projects and green buildings.

Cost to realize opportunity
34675000

Strategy to realize opportunity and explanation of cost calculation
We already work to create solutions for climate-related issues to anticipate and meet investor expectations. There are minimal additional costs that could result from additional time or resources dedicated to issuing green bonds. The estimated cost represents the annual interest expense on both of our green bonds. (($500M*2.7%) + ($550M*3.85%)) = $34,675,000 per year

Comment

C3. Business Strategy

C3.1

(C3.1) Does your organization’s strategy include a transition plan that aligns with a 1.5°C world?

Row 1

Transition plan
No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a transition plan within two years

Publicly available transition plan
<Not Applicable>

Mechanism by which feedback is collected from shareholders on your transition plan
<Not Applicable>

Description of feedback mechanism
<Not Applicable>

Frequency of feedback collection
<Not Applicable>

Attach any relevant documents which detail your transition plan (optional)
<Not Applicable>

Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future
Welltower does not disclose a publicly available formal transition plan that aligns with a 1.5°C world. However, Welltower does informally make decisions at a company level that are influenced by activities such as the recent climate-related scenario analysis to highlight the risks and opportunities that Welltower will be facing in the short, medium and long-term. Additionally, Welltower was approved for SBTi in July 2022 and is awaiting final target publication, allowing us to have conversations about setting targets and formalizing our transition plan.

Explain why climate-related risks and opportunities have not influenced your strategy
<Not Applicable>

C3.2

(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	Yes, qualitative and quantitative	<Not Applicable>	<Not Applicable>

C3.2a

(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Physical climate scenarios RCP 8.5	Company-wide	<Not Applicable>	The methodology used characterises physical climate hazards that are important drivers of business risk: floods, heat stress, hurricanes & typhoons, sea level rise, water stress and wildfires. The methodology is data driven to quantify the risks to then develop qualitative statements. RCP 8.5 is used as we believe this scenario is the most valid for business purposes because any potential policy actions will not have a discernible impact on climate change until after 2050 and impacts between emission pathways do not significantly vary within this time frame. Each physical risk is assessed for short-, medium- and long-term impact based on likelihood for it to occur within the chosen timeframe.

C3.2b

(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.

Row 1

Focal questions

Welltower recognizes that climate-related events could impact our portfolio. In order to identify and implement appropriate preventative measures throughout our portfolio, we chose to focus on the two questions below when performing our climate-related scenario analysis. Focusing on these two questions allowed us to better understand which of our properties are at the greatest risk of climate-related events, where we may be lacking adequate insurance coverage, and where there may be opportunities to take preventative measures. Also, by using the RCP8.5 scenario, it allowed for the worst-case scenario operational impacts to be analysed and help drive change and investment where it is needed most.

1. Which properties are most susceptible to the following climate risks: heat stress, water stress, wildfires, floods, hurricanes & typhoons, and sea level rise?

2. Do we have adequate insurance coverage or are there other preventive measures we could put in place to prevent property damage and loss before these extreme weather events occur?

Results of the climate-related scenario analysis with respect to the focal questions

1. As a result of the analysis, Welltower was able to identify which properties are in the highest risk areas for these climate-related events and quantify both financial and geographic exposure. Financial exposure was measured as a percentage of 4Q21 in-place NOI, while geographic exposure was measured as a percentage of pro rata square feet owned as of 4Q21. Exposure was grouped into three categories: Low: less than 30%; Medium: 30-60%; and High: greater than 60%. Due to the large size and diversification of our portfolio, the financial and geographic exposure to heat stress, wildfires, floods, hurricanes and typhoons, and sea level rise are all low, while financial and geographic exposure to water stress is medium. Welltower considers transitional risks such as regulatory changes, technology upgrades, and reputational risks to be portfolio-wide risks.

2. The results of our analysis were shared with our Risk Team, and we have been performing additional analyses to compare certain insurance coverages, mainly related to flooding, with our climate analysis findings. As a result, Welltower has looked at other risk exposures including heat and water stress to prioritize efficiency projects across the portfolio, such as installing cool roofing systems to reduce heat transfer, keep HVAC run times optimized, improve occupant comfort, and reduce heat island effect.

C3.3

(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	Due to increasing energy efficiency compliance legislation across the country, Welltower has incorporated a budget for third-party consultants to assist with compliance to help ensure all properties meet requirements and avoid any related fines. Some of Welltower's facilities are in jurisdictions that have introduced climate change and energy related ordinances, such as energy benchmarking and disclosure ordinances. 194 Welltower owned properties are impacted by these ordinances in 2022, which potentially include fines for non-compliance. Cost and impact of compliance were minimal during the reporting period. In addition, there is reputational risk for buildings with less optimal energy efficiency initiatives and performance. This could potentially cause tenants to leave or not attract new tenants and lead to a decrease in occupancy at the property. Consequently, in these markets with municipal benchmarking regulations, as well as other major markets across the country, we expect tenants to seek "green" and/or efficient buildings.
Supply chain and/or value chain	Yes	During extreme weather events, some vendors may not be able to provide the goods and services that Welltower needs. This creates a significant risk if Welltower is not able to have buildings back up and running quickly to minimize tenant downtime and mitigate the inherent risk of potentially losing tenants. To mitigate this risk, Welltower has identified alternative providers in the event that the primary provider is unavailable. In addition, Welltower has preferred contracts in place with vendors to help to ensure that we have priority to access goods should there be an issue with our supply chain as a result of a weather event. In the reporting period, one example of crisis/emergency management is contracting with third-party restoration vendors in Texas and Florida. Some of Welltower's properties in Southern United States were adversely affected by the extreme weather events that caused the Texas power crisis. Fortunately, the risk of unexpected power outages due to extreme weather had influenced our strategy and our sites were prepared for this and had on-site generators. Welltower is continuing to use these generators and will bring more on-site in the long-term as the likelihood of extreme weather events continues.
Investment in R&D	Yes	Welltower's R&D activities are centered around piloting new and emerging technologies that reduce energy and water use and greenhouse gas emissions, while creating value for the asset and its occupants. These activities are at risk if discretionary funds are not available due to reduced occupancy or must be diverted to other unexpected expenses due to climate-related events in the short-medium term. This, however, did not impact the business during the reporting period. Welltower is also investing in certifying many of its new developments with LEED or BREEAM and has started to look into other certifications including WELL and Fitwel.
Operations	Yes	Extreme weather events can disrupt operations. Welltower's properties have measures and procedures in place aimed at ensuring that operations return to normal quickly after disruptive events. Welltower has preferred contracts in place with vendors to help to ensure that we have priority to access goods should there be an issue with our supply chain as a result of a weather event. One example of crisis/emergency management is contracting with third-party restoration vendors in Texas and Florida. In the reporting period, some of Welltower's properties in Southern United States were adversely affected by the extreme weather events that caused the Texas power crisis. Fortunately, the risk of unexpected power outages due to extreme weather had influenced our strategy and our sites were prepared for this and had on-site generators. Welltower is continuing to use these generators and will bring more on-site in the long-term as the likelihood of extreme weather events continues. Welltower also has a robust third-party engineering inspection program in-place to help provide recommendations and customize loss prevention measures at each property. Between 100-150 properties are inspected annually as part of this program.

C3.4

(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Direct costs Capital expenditures Access to capital Assets Liabilities	Earnings may be impacted in the long term due to significant increases in property insurance costs from the physical impacts of climate change and/or requirements to implement energy-efficiency measures from local jurisdictions that are outside of the general Welltower capital investment process. Welltower invests capital each year in measures that reduce consumption and costs across the portfolio, such as the LED retrofit project, generating an estimated $7.4M in operational cost savings with a return on investment of under five years. We treat energy as a controllable expense resulting in our active management and negotiation of energy rates and considerable efforts to reduce our environmental impact through the procurement of renewable energy. Welltower dedicates capital investment in its portfolio year after year to reduce consumption, greenhouse gas emissions, and costs. For example, over $36M in capital has been spent on the 382 LED retrofit projects to date. Over the last two years, capital expenditure has been consistent and climate change has only had a minimal impact. Looking forward, we expect this to be the same in the short term. For example, one of Welltower's developments in the United Kingdom, Wandsworth Common, includes low carbon technologies such as combined heat and power units, photovoltaic roof panels, and energy efficient technologies such as motion-sensor lighting. This is expected to lead to savings of 89 tons (35%) of regulated CO2 annually. It is expected that investors will start to expect more climate change disclosure and will consider this in their decisions in the short-medium term. Welltower also sees opportunities in improving its reputation and environmental performance. For example, Welltower was the first U.S. health care REIT to successfully complete a public green bond offering of a $500 million, 7-Year Note at 2.7% due in 2027. Demand was 7.0x oversubscribed and WELL's lowest coupon on a 7-year note. Some of our assets are geographically more at risk than others from the effects of climate change, therefore we adhere to annual property insurance modelling to assess climate related risk which may increase premiums in the long-term. Additionally, the assets located in mandatory compliance jurisdictions may have to include additional compliance processes and implementation costs in financial plans in order to review and report required metrics, especially where this information is publicly reported. Impacts of climate-related issues have had a minimal impact on this process in the reporting period.

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

Intensity target

C4.1b

(C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).

Target reference number
Int 1

Year target was set
2019

Target coverage
Company-wide

Scope(s)
Scope 1
Scope 2

Scope 2 accounting method
Market-based

Scope 3 category(ies)
<Not Applicable>

Intensity metric
Metric tons CO2e per square foot

Base year
2018

Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)
1.74

Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)
4.45

Intensity figure in base year for Scope 3 (metric tons CO2e per unit of activity)
<Not Applicable>

Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)
6.19

% of total base year emissions in Scope 1 covered by this Scope 1 intensity figure
100

% of total base year emissions in Scope 2 covered by this Scope 2 intensity figure
100

% of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this Scope 3 intensity figure
<Not Applicable>

% of total base year emissions in all selected Scopes covered by this intensity figure
100

Target year
2025

Targeted reduction from base year (%)
10

Intensity figure in target year for all selected Scopes (metric tons CO2e per unit of activity) [auto-calculated]
5.571

% change anticipated in absolute Scope 1+2 emissions
-5.6

% change anticipated in absolute Scope 3 emissions
0

Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)
1.75

Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)
4.19

Intensity figure in reporting year for Scope 3 (metric tons CO2e per unit of activity)
<Not Applicable>

Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)
5.94

% of target achieved relative to base year [auto-calculated]
40.3877221324717

Target status in reporting year
Underway

Is this a science-based target?
No, but we anticipate setting one in the next 2 years

Target ambition
<Not Applicable>

Please explain target coverage and identify any exclusions
Our reporting framework for these goals is based on a financial control boundary and includes Welltower managed outpatient medical properties and seniors housing communities owned and operated under a RIDEA management agreement in our SHO portfolio. Welltower-owned senior living communities under a triple-net lease structure will be considered out of the financial control boundary and included as Scope 3 emissions data only. Welltower works to collect data from all properties and uses

estimates when data is not collected.

Plan for achieving target, and progress made to the end of the reporting year

The activities we have in place to enable us to meet this intensity target include, but are not limited to:

· Benchmarking performance
· Investing in energy reduction projects that make good business sense for our outpatient medical portfolio
· Implementation of our LED Retrofit program
· Negotiating energy rates and providing sustainable purchasing options in our seniors housing portfolio
· Participating in the Clean Energy Buyers Association
· Procuring renewable energy where feasible through green power contracts and on-site solar generation

In 2021, we continued our successful implementation of the LED retrofit program, completing an additional 15 LED retrofit programs to reduce the energy consumption (and consequently, the energy intensity) of our properties.

List the emissions reduction initiatives which contributed most to achieving this target

<Not Applicable>

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

Other climate-related target(s)

C4.2b

(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.

Target reference number
Oth 1

Year target was set
2019

Target coverage
Company-wide

Target type: absolute or intensity
Intensity

Target type: category & Metric (target numerator if reporting an intensity target)

Energy consumption or efficiency	million Btu

Target denominator (intensity targets only)
square foot

Base year
2018

Figure or percentage in base year
0.083

Target year
2025

Figure or percentage in target year
0.075

Figure or percentage in reporting year
0.089

% of target achieved relative to base year [auto-calculated]
-74.9999999999998

Target status in reporting year
Underway

Is this target part of an emissions target?
Int 1

Is this target part of an overarching initiative?
No, it’s not part of an overarching initiative

Please explain target coverage and identify any exclusions
Our reporting framework for these goals is based on a financial control boundary and includes Welltower managed outpatient medical properties and seniors housing communities owned and operated under a RIDEA management agreement in our SHO portfolio. Welltower-owned senior living communities under a triple-net lease structure will be considered out of the financial control boundary and included as Scope 3 emissions data only. Welltower works to collect data from all properties and uses estimates when data is not collected.

Plan for achieving target, and progress made to the end of the reporting year
The activities we have in place to enable us to meet this intensity target include, but are not limited to:

· Benchmarking performance
· Investing in energy reduction projects that make good business sense for our outpatient medical portfolio
· Implementation of our LED Retrofit program
· Negotiating energy rates and providing sustainable purchasing options throughout our seniors housing portfolio
· Participating in the Clean Energy Buyers Association
· Procuring renewable energy where feasible through green power contracts and on-site solar generation

In 2021, we continued our successful implementation of the LED retrofit programme, completing an additional 15 LED retrofit programs to reduce the energy consumption of our properties.

List the actions which contributed most to achieving this target
<Not Applicable>

C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.
Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	0	0
To be implemented*	0	0
Implementation commenced*	0	0
Implemented*	2	1917.5
Not to be implemented	0	0

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Energy efficiency in buildings	Lighting

Estimated annual CO2e savings (metric tonnes CO2e)
646.38

Scope(s) or Scope 3 category(ies) where emissions savings occur
Scope 2 (location-based)
Scope 2 (market-based)

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
202313

Investment required (unit currency – as specified in C0.4)
1311211

Payback period
4-10 years

Estimated lifetime of the initiative
11-15 years

Comment

Initiative category & Initiative type

Waste reduction and material circularity	Product/component/material recycling

Estimated annual CO2e savings (metric tonnes CO2e)
1271.1

Scope(s) or Scope 3 category(ies) where emissions savings occur
Scope 3 category 5: Waste generated in operations

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
0

Investment required (unit currency – as specified in C0.4)
0

Payback period
No payback

Estimated lifetime of the initiative
3-5 years

Comment

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Financial optimization calculations	As part of an effort during the capital budget planning process, Welltower identifies opportunities to implement energy reduction measures that would impact emissions reduction. Welltower utilizes financial operational cost calculations to determine the viability of energy / emission reduction initiatives.
Internal incentives/recognition programs	Internal incentives promote and reward the environmentally conscious business practices of Welltower through our NEO's short term incentive goals which include specific targets related to progress towards our public GHG, energy and water reduction goals and goals related to our publicly reported climate related disclosures.
Employee engagement	Welltower conducted employee engagement programs throughout the reporting year aimed at educating and encouraging employees to reduce their energy consumption and carbon footprint. For Earth Day 2022 the ESG team shared a learning module and challenge to all Welltower employees to "Protect Our Planet". In addition, the Welltower ESG team developed and released an internal podcast which included steps that employees could take to reduce their environmental footprints and hosts a department speaker series for new and existing employees on sustainability and the work of the ESG team. For the outpatient medical portfolio, where Welltower has operational control, the ESG team is consistently meeting with property managers and maintenance teams to discuss sustainability initiatives in place, results, and the potential for additional efficiency programs at our properties.

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.

Level of aggregation

Product or service

Taxonomy used to classify product(s) or service(s) as low-carbon

Green Bond Principles (ICMA)

Type of product(s) or service(s)

Buildings construction and renovation	Other, please specify (Funds available for eligible green projects)

Description of product(s) or service(s)

Since becoming the first U.S. health care REIT to successfully complete a public green bond offering in December 2019 for $500M and subsequently issuing a second green bond in March 2022 for $550M in accordance with Green Bond Principles of the International Capital Markets Association (ICMA), Welltower has begun expanding green bond projects with a lower carbon footprint from the offering's net proceeds in order to add sustainable value across the portfolio. Our Green Bond Allocation Report on proceeds utilized includes projects such as financing or refinancing properties which are anticipating high-level green building certification or energy rating from such organizations as LEED, BREEAM, and ENERGY STAR and could also include proceeds on energy and water efficiency upgrades designed to have 25% or higher efficiency gain, including LED lighting, HVAC and chiller replacements, irrigation systems and installation of low-flow fixtures. Issuing green bonds represents an opportunity to tap into a new and growing source of financing to further efforts to obtain green certifications for properties within our portfolio. As of 9/30/21, Welltower has allocated $277.7M in proceeds to eligible projects that promote and contribute to our use of low-carbon goods.

Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

No

Methodology used to calculate avoided emissions

<Not Applicable>

Life cycle stage(s) covered for the low-carbon product(s) or services(s)

<Not Applicable>

Functional unit used

<Not Applicable>

Reference product/service or baseline scenario used

<Not Applicable>

Life cycle stage(s) covered for the reference product/service or baseline scenario

<Not Applicable>

Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

<Not Applicable>

Explain your calculation of avoided emissions, including any assumptions

<Not Applicable>

Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0.59

C5. Emissions methodology

C5.1

(C5.1) Is this your first year of reporting emissions data to CDP?

No

C5.1a

(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

Row 1

Has there been a structural change?

No

Name of organization(s) acquired, divested from, or merged with

<Not Applicable>

Details of structural change(s), including completion dates

<Not Applicable>

C5.1b

(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	No	<Not Applicable>

C5.2

(C5.2) Provide your base year and base year emissions.

Scope 1

Base year start

January 1 2018

Base year end

December 31 2018

Base year emissions (metric tons CO2e)

115845

Comment

Scope 2 (location-based)

Base year start

January 1 2018

Base year end

December 31 2018

Base year emissions (metric tons CO2e)

310589

Comment

Scope 2 (market-based)

Base year start

January 1 2018

Base year end

December 31 2018

Base year emissions (metric tons CO2e)

296630

Comment

Scope 3 category 1: Purchased goods and services

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
2143

Comment

Scope 3 category 2: Capital goods

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
198481

Comment

Scope 3 category 4: Upstream transportation and distribution

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 5: Waste generated in operations

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
11708

Comment

Scope 3 category 6: Business travel

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
1490

Comment

Scope 3 category 7: Employee commuting

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
952

Comment

Scope 3 category 8: Upstream leased assets

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 9: Downstream transportation and distribution

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 10: Processing of sold products

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 11: Use of sold products

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 12: End of life treatment of sold products

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 13: Downstream leased assets

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
434538

Comment

Scope 3 category 14: Franchises

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3 category 15: Investments

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3: Other (upstream)

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

Scope 3: Other (downstream)

Base year start
January 1 2018

Base year end
December 31 2018

Base year emissions (metric tons CO2e)
0

Comment
N/A

C5.3

(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

C6. Emissions data

C6.1

(C6.1) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

Gross global Scope 1 emissions (metric tons CO2e)
147308

Start date
<Not Applicable>

End date
<Not Applicable>

Comment

C6.2

(C6.2) Describe your organization’s approach to reporting Scope 2 emissions.

Row 1

Scope 2, location-based
We are reporting a Scope 2, location-based figure

Scope 2, market-based
We are reporting a Scope 2, market-based figure

Comment

C6.3

(C6.3) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

Scope 2, location-based
360343

Scope 2, market-based (if applicable)
353174

Start date
<Not Applicable>

End date
<Not Applicable>

Comment

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?
No

C6.5

(C6.5) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
605.87

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
30

Please explain
Data was collected from 30% of properties in our control boundary to calculate emissions from purchased goods and services related to purchased r water. This has been multiplied by the appropriate emissions factors for water, as provided by DEFRA 2021.

Capital goods

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Given the nature of Welltower’s business as a REIT, emissions from capital goods are considered immaterial.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
259756

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
59

Please explain
Electricity data was collected for 59% of properties in the portfolio. Emissions associated with electricity transmission and distribution (T&D) losses and well-to-tank (WTT) emissions from generation and T&D losses as related to the portfolio are calculated using emission factors from DEFRA 2021 for the UK and IEA 2019 for Canada and the United States. The WTT emissions from fuel consumption, natural gas and propane, are also included within this category – these have also been calculated using the emissions factors provided by DEFRA 2021.

Upstream transportation and distribution

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Given the nature of Welltower's business (i.e., a REIT), any upstream transportation/distribution emissions are di minimis and considered immaterial.

Waste generated in operations

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
34665

Emissions calculation methodology
Waste-type-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
20

Please explain
Emissions cover waste data collected from 20% of properties in the portfolio. Welltower employs a third-party vendor to compile data on actual waste streams from locations serviced by waste haulers directly. We then calculate waste emissions utilizing EPA's Waste Reduction Model (WARM) tool (Version 15, updated November 2020). WARM calculates emissions based on a lifecycle approach. Avoids emissions from recycling and composting are quantified through the WARM tool's baseline alternative scenario comparison but are not included in this Scope 3 emissions figure. Only emissions generated from waste that is sent to landfill have been included in this category.

Business travel

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
478

Emissions calculation methodology
Distance-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Please explain
This covers business travel emissions associated with flights, for which all flights have been included. Air travel mileage data was collected from a third-party vendor. Emissions were calculated according to the Greenhouse Gas Protocol (Revised Edition) utilizing air travel emissions factors for short, medium and long-haul flights from DEFRA (2021)

Employee commuting

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
1055

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
89

Please explain
Emissions from employee commuting covers 89% of employees. Calculations exclude employees in the NYC office since it is assumed they use mass transit. Emissions from commuting were calculated by modelling commuting distances of employees based on distances between home and work addresses. The DOT average fuel efficiency of US light duty vehicles was then applied to estimate the total gallons consumed through employee commuting. The Climate Registry 2019 emissions factor was then applied to estimate emissions associated with commuting.

Upstream leased assets

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Welltower has no upstream leased assets. All assets are considered downstream due to the nature of the business.

Downstream transportation and distribution

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Given Welltower’s business (i.e., a REIT), there are no relevant emissions from downstream transportation and distribution.

Processing of sold products

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Given Welltower’s business (i.e., a REIT), our sold products (i.e., buildings) are not processed.

Use of sold products

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Given Welltower’s business (i.e., a REIT), our sold products (i.e., buildings) are leased, not sold.

End of life treatment of sold products

Evaluation status

Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Given the nature of Welltower's business, our sold products are buildings, and thus the end of life treatment of sold products is not relevant.

Downstream leased assets

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

312361

Emissions calculation methodology

Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

59

Please explain

Welltower receives utility data that covers approximately 59% of calculated emissions for its downstream leased assets portfolio. Portfolio average intensity factors based on portfolio type and region are calculated and applied to sites where data was unavailable. Welltower gathers energy usage data from our operating partners to calculate greenhouse gas emissions from downstream leased assets that fall outside of Welltower's financial control boundary. Welltower uses the GHG Protocol standards to calculate the emissions from electricity consumption and fuel burning at these sites, using EPA e-grid emissions factors and the Climate Registry emissions factors, where appropriate. Where data is not available, Welltower uses average energy intensity factors based on portfolio type and region to estimate usage and greenhouse gas emissions from these sites.

Franchises

Evaluation status

Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Welltower does not operate any franchises. Therefore, this category is not relevant.

Investments

Evaluation status

Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Welltower mainly invests in real estate assets and these emissions have been accounted for in downstream leased assets. Welltower's other investments include loans and equity investments, which have been deemed immaterial.

Other (upstream)

Evaluation status

Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

n/a

Other (downstream)

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
n/a

C-CN6.6/C-RE6.6

(C-CN6.6/C-RE6.6) Does your organization assess the life cycle emissions of new construction or major renovation projects?

	Assessment of life cycle emissions	Comment
Row 1	No, but we plan to for upcoming projects	Welltower does not currently assess the life cycle emissions of new construction or major renovation projects, but is actively discussing how to capture environmental data for new developments in the future.

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?
No

C6.10

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure
0.006025

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
507651

Metric denominator
square foot

Metric denominator: Unit total
84255861.13

Scope 2 figure used
Location-based

% change from previous year
0.9

Direction of change
Decreased

Reason for change
The reason for the decrease in our intensity metric is mainly owed to our energy efficiency and PV solar installations reducing the quantity of electricity purchased (-4.2%), relative to the growth of Welltower's footprint in the reporting year.

Intensity figure
0.000107052

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
507651

Metric denominator
unit total revenue

Metric denominator: Unit total
4742115000

Scope 2 figure used
Location-based

% change from previous year
3

Direction of change
Increased

Reason for change
Welltower acquired over 200 properties in 2021. This partially led to an increase in scope 1 and 2 emissions of 6%, whilst revenue did not grow at the same rate, leading to an increase in total revenue intensity metric.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?
No

C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
United States of America	98027.29
Canada	39236.27
United Kingdom of Great Britain and Northern Ireland	10044.54

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.
By business division

C7.3a

(C7.3a) Break down your total gross global Scope 1 emissions by business division.

Business division	Scope 1 emissions (metric ton CO2e)
Outpatient Medical	17014.12
Corporate Office	0.78
Senior Housing	130293.2

C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
United States of America	338269.6	331101.57
Canada	14253.21	14253.21
United Kingdom of Great Britain and Northern Ireland	7819.71	7819.71

C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By business division

C7.6a

(C7.6a) Break down your total gross global Scope 2 emissions by business division.

Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Outpatient Medical	149532.71	142364.68
Corporate Office	390.81	390.81
Senior Housing	210419	210419

C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Increased

C7.9a

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	3317	Increased	0.7	In 2021, 24,738 MWhs of renewable electricity was consumed (this has fallen from 33,317 MWhs in 2020). This has been multiplied by the IEA's emission factor for the US (0.3839 kgCO2e/kWh) to give 9,497 tCO2e. This is the amount of emissions savings from renewable energy consumption. However, these emissions savings are down from 12,814 tCO2e compared to 2020, creating a difference of 3,317 tCO2e. Our total scope 1 and 2 market-based emissions in the previous year was 468,991 tCO2e, therefore we arrived at +0.7% through (+3,317/468,991) * 100 = 0.7%
Other emissions reduction activities	646.38	Decreased	0.1	As reported in 4.3b, LED retrofit projects have saved 646.38 tCO2e in the reporting year. The annual kWh savings for each project was multiplied by the appropriate US eGrid subregion CO2 total output emission rate (https://www.epa.gov/system/files/documents/2022-04/ghg_emission_factors_hub.pdf). In total, LED retrofit projects reduced Welltower's emissions by over 1,425,021 pounds of CO2e in 2021, or (1,425,021.22 / 2,204.62) = 646.38 tCO2e. 646.38 tCO2e is approximately 0.1% of the emissions from last year. (-646.38/468,991) *100 = -0.1%).
Divestment		<Not Applicable>		
Acquisitions	37991	Increased	8.1	Scope 1 & 2 emissions in 2021 from 164 properties acquired in 2021. Our total scope 1 and 2 market-based emissions in the previous year was 468,991 tCO2e. Therefore, we arrived at +8.1% through (+37,991/468,991) * 100 = 8.1%
Mergers		<Not Applicable>		
Change in output		<Not Applicable>		
Change in methodology		<Not Applicable>		
Change in boundary		<Not Applicable>		
Change in physical operating conditions		<Not Applicable>		
Unidentified	9170	Decreased	2	Overall, scope 1 and 2 market-based emissions increased by only 31,491 tCO2e, up from 468,991 in 2020. Therefore, by summing the above changes in emissions, it leaves a reduction of 9,170 tCO2e unaccounted for. Therefore, we arrived at -2.0% through (9,170/468,991) * 100 = 2.0%.
Other		<Not Applicable>		

C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Market-based

C8. Energy

C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

C8.2a

(C8.2a) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	808878	808878
Consumption of purchased or acquired electricity	<Not Applicable>	24566	1181143	1205708
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	0	1757	1757
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	173	<Not Applicable>	173
Total energy consumption	<Not Applicable>	24738	1991778	2016516

C8.2b

(C8.2b) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	No
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Other biomass

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Other renewable fuels (e.g. renewable hydrogen)

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Coal

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Oil

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Gas

Heating value
HHV

Total fuel MWh consumed by the organization
808878

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Other non-renewable fuels (e.g. non-renewable hydrogen)

Heating value
Unable to confirm heating value

Total fuel MWh consumed by the organization
0

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

Total fuel

Heating value
HHV

Total fuel MWh consumed by the organization
808878

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration
<Not Applicable>

Comment

C8.2d

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	172.7	172.7	172.7	172.7
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in C6.3.

Sourcing method
Green electricity products from an energy supplier (e.g. green tariffs)

Energy carrier
Electricity

Low-carbon technology type
Wind

Country/area of low-carbon energy consumption
United States of America

Tracking instrument used
US-REC

Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)
24566

Country/area of origin (generation) of the low-carbon energy or energy attribute
United States of America

Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

Comment
Commissioning year is unknown

C8.2g

(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.

Country/area
Canada

Consumption of electricity (MWh)
171272

Consumption of heat, steam, and cooling (MWh)
0

Total non-fuel energy consumption (MWh) [Auto-calculated]
171272

Is this consumption excluded from your RE100 commitment?
<Not Applicable>

Country/area
United Kingdom of Great Britain and Northern Ireland

Consumption of electricity (MWh)
36841

Consumption of heat, steam, and cooling (MWh)
0

Total non-fuel energy consumption (MWh) [Auto-calculated]
36841

Is this consumption excluded from your RE100 commitment?
<Not Applicable>

Country/area
United States of America

Consumption of electricity (MWh)
973030

Consumption of heat, steam, and cooling (MWh)
1757

Total non-fuel energy consumption (MWh) [Auto-calculated]
974787

Is this consumption excluded from your RE100 commitment?
<Not Applicable>

C9. Additional metrics

C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6

(C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

	Investment in low-carbon R&D	Comment
Row 1	No	

C-RE9.9

(C-RE9.9) Does your organization manage net zero carbon buildings?

No, but we plan to in the future

C-CN9.10/C-RE9.10

(C-CN9.10/C-RE9.10) Did your organization complete new construction or major renovations projects designed as net zero carbon in the last three years?

No, but we plan to in the future

C-CN9.11/C-RE9.11

(C-CN9.11/C-RE9.11) Explain your organization’s plan to manage, develop or construct net zero carbon buildings, or explain why you do not plan to do so.

Welltower has a public goal to reduce Scope 1 and Scope 2 GHG emissions 10% by 2025 over a 2018 baseline. In addition, Welltower was approved for the Science Based Targets initiative in July 2022 and is awaiting final target publication. Through SBTi, Welltower has committed to a 28% reduction in Scope 1 and Scope 2 GHG emissions by 2030 over a 2019 baseline and to measuring and reducing our scope 3 emissions. In order to meet these goals, Welltower will continue to identify opportunities to construct new buildings to LEED and BREAAM building standards to lower our carbon footprint, including Balfour at Brookline development which is targeting LEED Gold. In our existing portfolio, we will continue to implement energy efficiency projects and look into purchasing additional renewable energy.

C10. Verification

C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Limited assurance

Attach the statement
Welltower CY2021 Verification Report Final.pdf

Page/ section reference
All

Relevant standard
ISO14064-3

Proportion of reported emissions verified (%)
100

C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach
Scope 2 location-based

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Limited assurance

Attach the statement
Welltower CY2021 Verification Report Final.pdf

Page/ section reference
All

Relevant standard
ISO14064-3

Proportion of reported emissions verified (%)
100

Scope 2 approach
Scope 2 market-based

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Limited assurance

Attach the statement
Welltower CY2021 Verification Report Final.pdf

Page/ section reference
All

Relevant standard
ISO14064-3

Proportion of reported emissions verified (%)
100

C10.1c

(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Scope 3 category
Scope 3: Waste generated in operations
Scope 3: Business travel
Scope 3: Employee commuting
Scope 3: Downstream leased assets

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Limited assurance

Attach the statement
Welltower CY2021 Verification Report Final.pdf

Page/section reference
All

Relevant standard
ISO14064-3

Proportion of reported emissions verified (%)
100

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?
Yes

C10.2a

(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C8. Energy	Energy consumption	ISAE 3000 ISAE 3410	All of the energy consumption data within module 'C8. Energy' has been verified, as per our annual company-wide assurance of our environmental data performed by Lloyd's with limited assurance. This is to help to ensure that all raw energy data is fairly stated and accurate. Welltower CY2021 Verification Report Final.pdf

C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?
No, and we do not anticipate being regulated in the next three years

C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?
No

C11.3

(C11.3) Does your organization use an internal price on carbon?
No, and we do not currently anticipate doing so in the next two years

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?

Yes, our suppliers
Yes, other partners in the value chain

C12.1a

(C12.1a) Provide details of your climate-related supplier engagement strategy.

Type of engagement

Information collection (understanding supplier behavior)

Details of engagement

Other, please specify (Welltower continuously tracks sustainable building supply purchases from HD Supply, one of our key vendors. In addition, Welltower encourages all vendors to follow best practices of environmental sustainability.)

% of suppliers by number

0.4

% total procurement spend (direct and indirect)

38

% of supplier-related Scope 3 emissions as reported in C6.5

0

Rationale for the coverage of your engagement

Welltower engages with its top 15 suppliers as identified through its national supplier programs and professional services contracts to gain an understanding of their sustainability and ESG practices. The top 15 suppliers selected align with the critical suppliers identified per Welltower's DJSI submission. Welltower's top suppliers largely consist of organizations that provide professional services (including legal, insurance, audit and advisory, etc. services) or suppliers that provide office supplies and food/beverages. Welltower has ~450 suppliers it identifies as Tier 1 with over $100k in spend, but over 3,000 vendors total in 2021. The evaluation consists of data and information collection on each vendor's environmental programs and governance controls. Welltower encourages its suppliers to share in its commitment to operating in a responsible, transparent and sustainable manner in its Vendor Code of Conduct and to follow best practices of environmental sustainability, including, but not limited to, energy and water efficiency, greenhouse gas (GHG) and waste reduction, and green technology implementation.

Impact of engagement, including measures of success

Success for engagement with our suppliers is understanding the sustainable practices, products and service offerings and increasing the percentage of sustainable supply purchases, year on year. In 2021, Welltower purchased over $238,000 in sustainable building supplies from one of its top vendors, representing 23% of total spend with the vendor (up from 14% in 2020). The threshold for success for next year will be to increase total spend coming from sustainable building suppliers above 23% and continue to gather additional data on sustainable spend and products from vendors.

Comment

Emissions from these purchased goods and services are not yet captured in the scope 3 footprint, hence share of emissions is reported as 0%.

C12.1d

(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.

Welltower works together with both internal and external stakeholders to seek to understand and implement the most effective engagement strategies that meet the expectations and needs of each unique stakeholder group. Each of the stakeholders we engage may have influence over our long-term success or a vested interest in the work we do. We engage with our stakeholders year-round through our ESG website, annual ESG Report, financial data and reports, social media communications, press releases, meetings, and more.

i. Methods of engagement:

Welltower plans and tracks stakeholder engagement through several channels, including internal employee communication platforms, public filings, informal face-to-face discussions, formal meetings with the investment community, tenant and operator engagement surveys, and more. See section iv. for more details on how we engage with each of our stakeholder groups.

ii. Prioritization

Welltower prioritizes engagement with the most vital parts of our value chain: our operators and tenants, starting with areas where we have operational control and operators that allow for the greatest impact. We work with our operators and medical office building staff to gather utility data, benchmark our properties, and implement efficiency measures. Welltower also prioritizes engagement with our employees, recognizing that we will not be able to achieve our environmental goals without the support of all departments and teams throughout our organization.

iii. Measurement of success

Success is measured by several different factors, including the quantity of stakeholders approached, the amount of sustainability data gathered throughout the year, the response rate to engagement and satisfaction surveys, and the number of efficiency measures implemented. Success is also measured by benchmarking sites' energy, water, and waste data across the portfolio.

iv. Stakeholders engaged and methods of engagement

Employees

· Engagement through periodic employee surveys, dedicated internal communication platforms, town halls and new hire onboarding

· “The Now” internal podcast

· Whistleblowing and the Governance Hotline

· Welltower Code of Business Conduct and Ethics

· Workshops and training sessions

Tenants and Operating Relationships

· Green lease utilization

· Newsletters and the Performance Playbook

· Events throughout the year on efficiency topics

· Welltower Advisory Services

· Welltower Vendor Code of Conduct

· ESG Materiality Assessment

· Tenant Survey

Investors and Financial Community

· Periodic face-to-face discussions, meetings, conferences and roadshows

· Publication of our annual ESG Report

· Governance Hotline

· Participation in investor ESG surveys and ESG-related conversations

· Welltower Vendor Code of Conduct

· ESG Materiality Assessment

Supply Chain

· Business review meetings with key national suppliers

· Welltower Vendor Code of Conduct

· Modern Slavery and human trafficking statement

· Communication and engagement tools

· Biennial vendor evaluation questionnaire to measure vendor risk and opportunities, including ESG criteria

Local Community Cohorts

· Hosting community events at Welltower properties

· Periodic face-to-face discussions and meetings

Government Agencies

· Responding to and consulting with government bodies

· Working to comply with municipality ordinances which often result in cost savings for Welltower and operators

· Working with regulatory bodies and local authorities on local and state planning and policy matters

Industry Peers

· Participating in multi-stakeholder forums and roundtables

· Presenting at industry-wide events and conferences

· Joining and leading industry initiatives

· Belonging to trade and industry associations

v. Case studies

A Performance Playbook

In 2021, we continued to leverage and share our important engagement tool, "Performance Playbook: A Guide for Senior Housing Efficiency and Excellence," with our seniors housing operators. The Playbook is a user-friendly tool and resource to help our seniors housing operators find ways to reduce utility costs, increase NOI, and enhance the comfort of residents and staff. Each section contains a simple overview, links to additional resources, and a printable Action Plan that property managers can use to help their communities run more efficiently and effectively. The Playbook is shared with operators regularly via email, newsletters, trainings, and other meetings.

Sustainability Newsletter

In November 2021, we shared our 4Q21 Sustainability Newsletter with both internal and external stakeholders. This newsletter included information on various topics, including Welltower's green bond, our diversity and inclusion initiatives, and how to use ENERGY STAR Portfolio Manager to track energy and water use. Our “Performance Playbook: A Guide for Senior Housing Efficiency and Excellence” was included in the newsletter along with links to various training resources and contact information for Welltower’s ESG Team.

C12.2

(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization’s purchasing process?
No, and we do not plan to introduce climate-related requirements within the next two years

C12.3

(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?

Row 1

Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate
Yes, we engage indirectly through trade associations

Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?
No, but we plan to have one in the next two years

Attach commitment or position statement(s)
<Not Applicable>

Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy
Welltower is a member of Nareit, a trade association that serves as the worldwide representative voice for REITs and real estate companies with an interest in U.S. real estate. Welltower’s ESG Team serves on Nareit’s Real Estate Sustainability Council, whose mission is to help shape and lead the REIT industry as it continues to address a variety of complex ESG issues. Welltower’s ESG Team regularly engages with the ESG leaders of other Nareit members to discuss best practices and find solutions to common problems. Welltower recently joined a series of conversations related to the SEC Climate Change Disclosure Proposal in which RESC members developed and submitted a letter to the SEC in response to the proposal (https://www.sec.gov/comments/s7-10-22/s71022-20131801-302236.pdf). Welltower chooses to have its ESG Team represent the organization on the RESC and in ESG-related conversations to seek to ensure engagement activities are consistent with the organization’s overall climate change strategy. Welltower’s ESG Team regularly discusses upcoming and in-progress initiatives with Nareit peers to understand how others have approached similar projects and issues, and supports Nareit peers in achieving their own sustainability goals.

Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate
<Not Applicable>

Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate
<Not Applicable>

C12.3b

(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.

Trade association
Other, please specify (NAREIT)

Is your organization's position on climate change consistent with theirs?
Consistent

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)
Nareit supports the growing number of REITs which are taking climate action and assessing climate risk, enhancing reporting on greenhouse gas emissions, and embracing science-based targets, in line with the Paris Agreement. They also aim to influence public policy through representing REITs in matters of legislation and public policy. For example, Nareit recently sent comments from their members to the SEC regarding the proposed rules of climate change disclosure.

https://www.sec.gov/comments/climate-disclosure/cll12-8911339-244295.pdf

Additionally, Nareit offers events, webinars, reports, guides, and other resources to support ESG progress in the REIT and commercial real estate industry. We publicly disclose our relationship with Nareit and frequently discuss the Nareit activities in which we participate publicly. Most recently, Welltower attended a Real Estate Sustainability Council webinar hosted by Nareit that focused on discussing how REITs can commit to setting an SBTi approved target. Welltower also attends Nareit's annual REITWeek Investor Conference.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)
232000

Describe the aim of your organization's funding
Through our funding, Welltower aims to support Nareit's industry-leading research and continued national and state advocacy. As a Nareit member, Welltower not only benefits from the ability to more closely collaborate with its peers, but also from exclusive access to investors, increased visibility, and member-only events and savings.

Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication
In mainstream reports

Status
Complete

Attach the document
Welltower_ESG-Report_2021_063022_v2.pdf

Page/Section reference
All

Content elements
Governance
Strategy
Risks & opportunities
Emissions figures
Emission targets
Other metrics

Comment

C15. Biodiversity

C15.1

(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	No, and we do not plan to have both within the next two years	<Not Applicable>	<Not Applicable>

C15.2

(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	No, and we do not plan to do so within the next 2 years	<Not Applicable>	<Not Applicable>

C15.3

(C15.3) Does your organization assess the impact of its value chain on biodiversity?

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, and we do not plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

C15.4

(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity- related commitments
Row 1	No, and we do not plan to undertake any biodiversity-related actions	<Not Applicable>

C15.5

(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No	Please select

C15.6

(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
No publications	<Not Applicable>	<Not Applicable>

C16. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C16.1

(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Chief Executive Officer (CEO)	Chief Executive Officer (CEO)

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

Please confirm below

I have read and accept the applicable Terms