

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (“ESG”) POLICY

A. INTRODUCTION

Welltower Inc. and its subsidiaries (collectively “Welltower” or the “Company”) seek to embed ESG strategies and practices into our business to retain high standards of excellence and drive value for all Welltower stakeholders. Welltower aims to conduct its affairs with uncompromising honesty and integrity and to hold itself to the highest ethical standard. Welltower also believes that there is a critical interdependence between human health and the health of our planet, and this drives Welltower’s focus on incorporating environmentally-friendly and socially-responsible practices into our operations. As we work to make progress on our ESG goals, Welltower has disclosed relevant metrics to provide a high level of transparency and accountability.

B. ENVIRONMENTAL SUSTAINABILITY

Welltower is committed to operating in a sustainable manner that helps to reduce the Company’s environmental impact. Our goal is prudent environmental stewardship with a focus on reducing our greenhouse gas (“GHG”) emissions, energy consumption, water usage, and waste production; mitigating climate change risks; and implementing energy efficiency, water efficiency, and renewable energy technologies across our portfolio.

Welltower works with its stakeholders, including employees, vendors, operators, residents, and tenants, in its effort to meet these objectives by encouraging and following evolving practices of environmental sustainability, including, but not limited to:

- Measure and publicly report metrics related to GHG emissions, energy, and water for the portfolio on an annual basis.
- Obtain independent verification of our emissions, energy, water, and waste data.
- Commit to and report progress on goals related to the reduction of emissions, energy consumption, and water usage.
- Maintain a cross-functional management-level ESG Steering Committee, with oversight from the Nominating/Corporate Governance Committee of the Board of Directors, that sets and supports the ESG strategy for the Company.
- Implement green technologies to improve efficiencies and reduce consumption of non-renewable energy and identify opportunities for the use of renewable energy, including solar, across the portfolio.
- Analyze portfolio-wide physical and transition climate risks and identify opportunities to implement building resiliency strategies to help mitigate these risks.
- Obtain green building certifications, including LEED, BREEAM, and ENERGY STAR®, for eligible properties to demonstrate our focus on sustainability, indoor environmental quality, and health and wellness.
- Integrate ESG-related metrics and goals into employee performance reviews and the annual incentive program.
- Evaluate opportunities for sustainable procurement and responsible material sourcing to support the demand for recycled products and reduce Welltower’s environmental impact.
- Engage with and empower our stakeholders to identify and implement environmental sustainability initiatives and technologies.

- Establish and follow an energy management system aligned with ISO 14001, including tracking data in ENERGY STAR® Portfolio Manager®, to systematically achieve energy performance improvements.

Refer to [welltower.com/esg/environment](https://www.welltower.com/esg/environment) for the Company’s initiatives, goals, and achievements related to environmental sustainability.

C. SOCIAL WELL-BEING

Welltower aims to provide an inclusive, healthy, and safe environment for employees; to embrace diverse thinking in the workplace; and to offer opportunities for our employees to grow professionally. Welltower believes in promoting physical, mental, social, and financial well-being – the happier, healthier, and more comfortable our employees are, the better we can serve our stakeholders and communities. Welltower has encouraged and expanded its focus on inclusivity and diversity within the workplace through the successful launch and support of several Employee Network Groups (“ENGs”), whose leaders are members of the Diversity Council, along with a leadership advisory board. To support our broader community, the Welltower Charitable Foundation (the “Foundation”) provides cash and in-kind support to programs and communities through various initiatives, including employee matching, corporate charitable grants, and an allocation of funds to each ENG to make charitable contributions.

HUMAN RIGHTS AND LABOR PRACTICES

Welltower is committed to respecting and promoting human rights in accordance with the principles outlined in the United Nations’ (UN) Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. The Company does not tolerate any form of modern slavery, including human trafficking, forced labor, child labor, bonded labor and servitude. The Company is committed to an environment free of harassment, abuse, harsh or inhumane treatment, coercion or corporal punishment of any kind. Vendors are expected to cooperate with Welltower’s commitment to ethical labor practices. Refer to Welltower’s Vendor Code of Conduct, [Human Rights Policy](#) and [Modern Slavery Act Statement](#) for additional information.

HEALTH, WELLNESS, AND SAFETY

Welltower endeavors to treat employees with respect and fairness to foster a safe and healthy work environment free from harassment, including sexual harassment, and discrimination. Welltower strives to develop policies and programs that contribute to a positive work environment and support employees’ mental, physical, social, and financial well-being. Welltower offers trainings to promote occupational safety, including topics such as emergency preparedness, sanitation, hygiene, fall protection, and heat stress. In addition, Welltower expects vendors to take appropriate measures to promote a safe and healthy workplace for all personnel. Refer to the Vendor Code of Conduct for additional information.

Refer to [welltower.com/esg/social](https://www.welltower.com/esg/social) for the Company’s initiatives, goals, and achievements related to social well-being.

D. ETHICS, TRANSPARENCY, AND CORPORATE GOVERNANCE

Welltower is dedicated to evolving its corporate governance practices to meet the dynamic standards of stakeholders. There are many policies and procedures in place designed to support high ethical standards across the organization. Please refer to the following Governance policies for more details:

- Code of Ethics and Business Conduct
- Corporate Governance Guidelines
- Vendor Code of Conduct
- Audit Committee Charter
- Compensation Committee Charter
- Executive Committee Charter
- Nominating/Corporate Governance Committee Charter
- Committee Structure and Membership

Welltower expects directors, officers, and employees of Welltower to work in accordance with the law and ethical principles, conducting themselves in a manner that is beyond reproach. We believe a dedicated and demonstrated commitment to ethical behavior is the right thing to do, is good business, and is the surest way for us to remain a business leader, an employer of choice, and a good corporate citizen.

Refer to welltower.com/esg/governance for the Company's initiatives, policies, and achievements related to corporate governance.

E. REPORTING ESG INCIDENTS OR VIOLATIONS

All stakeholders, including vendors, operators, tenants, employees, and community members are expected to report any known or suspected violations of this Policy, with any relevant documents, to Welltower's General Counsel:

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

Alternatively, incidents or concerns may be reported to Welltower's Corporate Governance Hotline by calling 844-797-8674 or using the internet-based reporting system at <http://welltower.ethicspoint.com>. Reports may be submitted on a confidential, anonymous basis, although individuals are encouraged to identify themselves to facilitate follow-up and investigation, support productive dialogues, and allow for regular improvement. Individuals are to be kept safe from retaliation and encouraged to submit incidents or concerns through this accessible, transparent, legitimate, and safe reporting system.

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

This policy reflects the opinions, aspirations, and expectations of Welltower Inc as of the approval date noted above. This policy is not intended to create legal rights or obligations, and actual outcomes or results may vary.