

Vendor Code of Conduct

ADOPTED 07.13.2018



Ventas, Inc. (together with its controlled subsidiaries, “Ventas” or the “Company”) is committed to fair and ethical business conduct, consistent with its Global Code of Ethics and Business Conduct. The Company requires its partners, suppliers, and vendors, as well as their employees, agents and subcontractors, to embrace this commitment to integrity by complying with the Ventas Vendor Code of Conduct (the “Code”).

1. COMPLIANCE WITH THE VENDOR CODE

The Code may not cover every situation a Vendor may face. When in doubt or when there are questions or concerns about a violation of the Code, Vendors can seek guidance from the Ventas legal department, or the Ventas whistleblower hotline, at <https://secure.ethicspoint.com>

Though Vendors must self-monitor, they should be able to demonstrate their compliance with this Code upon the Company’s request. If a Vendor is noncompliant, the Company reserves the right to take appropriate actions, including contract termination. The Company may require removal from the Ventas account of any Vendor personnel who behaves in manner that is unlawful or incompatible with this Code.

2. LEGAL AND REGULATORY COMPLIANCE PRACTICES

Vendors must conduct business in full compliance with laws and regulations applicable to their business.

Nothing in this Code grants additional rights or expectations to a Vendor or alters the Company’s contractual or legal rights. Ventas reserves the right to modify this Code at any time in its sole discretion, without prior notice.

3. CONFIDENTIALITY AND DATA PROTECTION

You may be entrusted with proprietary and personal information. Vendors should uphold all legal obligations and otherwise ensure protection of all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose beyond the scope of the business arrangement with the Company without prior authorization.

Vendors must also ensure information remains private by maintaining adequate cyber security and complying with all laws and regulations to mitigate risk of a data breach.

4. HUMAN RIGHTS AND LABOR STANDARDS

We expect our Vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture.

- **Wages and Benefits:** Vendors must comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. The Company

encourages Vendors to work toward improving standards of living and quality of life for their employees and communities.

- **Freedom of Association:** Ventas believes its employees are its most important asset and values employee engagement. The Company expects its Vendors to adhere to applicable laws regarding the right of their employees to affiliate with lawful organizations without interference.
- **Nondiscrimination:** The Company believes that employment should be based solely on a person's ability and not personal characteristics. Vendors shall maintain a workplace free of unlawful discrimination, which includes race, gender, marital status, age, color, religion, national origin, disability, veteran status, sexual orientation, or any other characteristic or status protected by law. Employees shall not be subject to verbal, physical, sexual or psychological abuse, harassment, and shall be treated with respect and dignity.
- **Prevention of Underage Labor:** Vendors must comply with all applicable minimum age labor laws and not use child labor. Workers must be no younger than the minimum age for employment under applicable law.
- **Human Trafficking:** Vendors must not engage in the recruiting, transporting, or use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons.

5. HEALTH AND SAFETY

Vendors shall incorporate health and safety management practices into all aspects of their business. Vendors must fully comply with all applicable safety and health laws, including in the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. Vendors shall minimize employee and visitor exposure to potential safety hazards by appropriately identifying, assessing and minimizing risks.

6. ENVIRONMENT

Ventas is committed to an environmentally sustainable future and expects that its Vendors comply with applicable environmental laws, including regarding hazardous materials, air emissions, waste, and wastewater discharges. Vendors are encouraged to reduce their carbon footprint and undertake sustainability initiatives to meet our objectives of protecting the planet while lowering operating costs and improving the efficiency of our portfolio.

7. ANTI-CORRUPTION, FAIR COMPETITION AND BUSINESS PRACTICES

- **Anti-Bribery and Anti-Corruption:** Vendors shall not engage in any form of corrupt practices including, without limitation, extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involvement with terrorist or organized crime organizations or activities. Vendors shall not offer bribes or kickbacks to any Ventas

representative, government official or third party with the intention of obtaining or retaining a business advantage.

- **Antitrust:** Vendors must comply with applicable antitrust and fair competition laws. Unethical business practices such as improper exchange of competitive information, price fixing, bid rigging, or improper market allocation are prohibited.
- **Conflicts of Interest and Fair Dealing:** Vendors must avoid offering gifts, favors or benefits that are intended (or could appear) to influence Ventas's employees to act in their personal interest ahead of Ventas's best interest. Vendors must avoid unfair dealing.
- **Licensing/Permits:** Vendors must obtain all required licenses and permits to conduct business in applicable jurisdictions.

8. FINANCIAL RESPONSIBILITY/ACCURATE RECORDS

Vendors must accurately record, maintain, and report business records, including financial account, quality reports, time records, expense reports, and any submission to regulatory authorities.

9. REPORTING

Vendors must allow employees to raise issues or concerns without fear of retaliation.

10. CODES OF CONDUCT AND SUB-TIER VENDORS

Vendors must have management systems in place to support compliance with laws, regulations, and this Code. We encourage our Vendors to implement their own written code of conduct.