**LTC PROPERTIES, INC.**

**VENDOR CODE OF CONDUCT**

At LTC Properties, Inc. (“LTC”), we are committed to operating our business in an ethical manner and with a strong sense of integrity consistent with the LTC Code of Business Conduct and Ethics and other company policies and guidelines. We expect our partners, suppliers, and vendors (each, a “Vendor”) to demonstrate a similar commitment by adhering to this Vendor Code of Conduct.

The development and maintenance of this Vendor Code of Conduct is a company-wide effort overseen by LTC’s Board of Directors through its Environmental, Social and Governance Committee. The standards reflected in this Vendor Code of Conduct are consistent with the standards that LTC follows in our Human and Labor Rights Policy.

This Code has been developed by reference to the United Nations Sustainable Development Goals, the International Labour Organization’s (“ILO”) [eight fundamental conventions, and other established frameworks.](https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm) LTC encourages Vendors to utilize these and other recognized sources to engage in ethical business practices.

**TREATMENT OF EMPLOYEES**

**ANTI-HARASSMENT AND NON-DISCRIMINATION**

Vendors must maintain a work environment that is free from unlawful discrimination, harassment, and retaliation. In keeping with this commitment, LTC does not tolerate unlawful discrimination against, or harassment of an applicant, employee, client, customer, or Vendor based on any protected characteristic. Vendors should provide an environment that allows employees to ask questions or raise concerns without fear of retaliation. Vendors should prohibit retaliation of any kind against any individual who complains of suspected harassment or discrimination, or who otherwise engages in protected activity.

**CHILD LABOR**

In accordance with the International Labour Organization (“ILO”) Convention No. 38, Vendors shall not employ child labor and should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment.

**COMPENSATION AND WORKING HOURS**

Vendors must comply with applicable wage and benefits laws and regulations governing work hours and overtime. LTC believes Vendors should offer a fair living wage to all employees. LTC encourages Vendors to abide by the International Labour Organization’s standards on working time to provide working hours that permit for adequate time for rest and leisure.

**DIVERSITY, EQUAL OPPORTUNITY AND GENDER EQUALITY**

Vendors must not discriminate based on an individual’s race, gender, age, color, religion, national origin, mental or physical disability, sexual orientation, ancestry, genetic information, military or veteran status, creed, pregnancy, marital status, citizenship, gender identity, gender expression, or any other status protected by applicable law.

**FORCED LABOR**

LTC does not tolerate the use of slavery and other forms of forced or coerced labor or servitude, including prison and human trafficking. We will not knowingly work with a Vendor who engage in these practices. All work must be performed under and in accordance with contracts and arrangements that have been entered into voluntarily.

**FREEDOM OF ASSOCIATION**

LTC expects Vendors to recognize, and not interfere with, their employees’ right to self-organization, to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection.

**SAFETY AND HEALTH**

Employee safety and health is an important element of LTC’s working environment. We expect Vendors to provide a safe and healthy working environment that includes access to clean sanitary facilities and drinking water as a fundamental human right.

**ETHICS AND BUSINESS PRACTICES**

**ANTI-CORRUPTION AND ANTI-BRIBERY**

LTC does not tolerate corruption or bribery in any form, and we expect Vendors to comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act. Vendors must not pay or offer bribes or kickbacks to any LTC representative, government official or third party with the intention of obtaining or retaining an unfair business advantage.

**CONFIDENTIALITY AND DATA PROTECTION**

Vendors are entrusted with proprietary and personal information and 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 LTC without prior authorization.

Vendors should also ensure that information remains private by implementing and maintaining adequate cybersecurity measures and complying with all applicable laws and regulations to mitigate risk of data breach.

**ENVIRONMENTAL STEWARDSHIP**

LTC recognizes the importance of corporate environmental stewardship and believes Vendors should strive to be environmentally conscious and conduct operations to minimize the impact on water, energy, and other natural resources. LTC encourages Vendors to adhere to best practices to protect and improve our shared environment.

**LEGAL AND REGULATORY PRACTICES**

LTC expects Vendors to conduct their business in full compliance with laws and regulations applicable to their business. Vendors should be cooperative with the regulators and strive to implement best practices to avoid violations of law.

**COMPLIANCE**

Vendors are expected to self-monitor and may be requested to demonstrate compliance by LTC. If a Vendor has questions or concerns about this Vendor Code of Conduct, the Vendor should seek guidance from their LTC relationship contact. LTC also has implemented a whistleblower hotline and dedicated email address to enable all interested parties, to submit confidential complaints, concerns, unethical business practices, violations or suspected violations for all matters pertaining to the LTC Code of Business Conduct and Ethics and this Vendor Code of Conduct. LTC will not tolerate retaliation for whistleblower reports made in good faith.

LTC is committed to continuously reviewing and updating this Vendor Code of Conduct, and it is subject to modification from time to time.

The contents of this Vendor Code of Conduct are additional to and do not in any way affect or prejudice any of LTC’s rights and remedies under a relevant contract, if any, with a Vendor.

*Adopted , 2022*