



LTC PROPERTIES, INC.

HUMAN AND LABOR RIGHTS POLICY

At LTC, we are committed to being a workplace that encourages respect, collaboration, communication, transparency, and integrity.

While crafting this policy, we referenced multiple third-party international and national organizations. Whenever possible, we have aligned our approach in this policy with the following:

- International Labour Organization Conventions
- United Nations Sustainability Development Goals (UN SDGs)
- United Nations Guiding Principles on Business and Human Rights
- Sustainability Accounting Standards Board (SASB) Human Capital Bulletin
- Bloomberg Gender Equality Index

The development and maintenance of this policy is a company-wide effort overseen by LTC's Board of Directors through its Environmental, Social and Governance Committee. We will review and evaluate this policy at least annually. All employees will receive a copy of this policy. Beyond this policy, employees and directors are expected to comply with LTC's Code of Business Conduct and Ethics, and partners, suppliers, and vendors are expected to comply with LTC's Vendor Code of Conduct. This policy and both codes are accessible on our website at www.ltcreit.com.

ANTI-CORRUPTION

LTC expects our employees and persons with whom we do business, including lessees, borrowers, and financing sources, to act ethically and with integrity. LTC does not tolerate corruption in any form. LTC will 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. LTC will not offer, and LTC personnel will not solicit or accept, bribes or kickbacks involving any government official or third party with the intention of obtaining or retaining a business advantage. We do not permit improper or excessive payments in dealing with the government or private sector. Our employees are prohibited from making payments or promises to influence acts or decisions. Our employees also are prohibited from receiving payments from our lessees, borrowers, and financing sources. Our employees are expected to observe all government rules, regulations and restrictions on gifts and entertainment.

ANTI-HARASSMENT AND NON-DISCRIMINATION

LTC is committed to maintaining a work environment that is free from unlawful discrimination, harassment, and retaliation. In keeping with this commitment, our company does not tolerate unlawful discrimination against, or harassment of, an applicant, employee, client, customer, or vendor based on any protected characteristic. LTC prohibits retaliation of any kind against an individual who complains of suspected harassment or discrimination, or who otherwise engages in protected activity.

CHILD LABOR

LTC prohibits the use of child labor in our business in accordance with International Labour Organization (“ILO”) Convention No. 138 and ILO’s related literature. LTC takes all necessary preventative measures to ensure that they do not employ anyone under the applicable legal minimum age of employment.

COMPENSATION AND BENEFITS

LTC recognizes the importance of committing to ensuring a living wage for all employees by complying with the national wage regulations, such as the minimum wage and overtime payments.

DISCIPLINE

LTC objects to any form of corporal punishment, mental or physical coercion, or verbal abuse in the workplace.

DIVERSITY, EQUITY & INCLUSION

LTC is an equal opportunity employer and does 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. This statement extends to specifically respect and protect minority groups and women’s rights under the internationally endorsed UN Guiding Principles on Business and Human Rights.

EMPLOYEE SAFETY AND HEALTH

Employee safety and health is an important element of LTC’s working environment, and we are dedicated to creating and maintaining a safe and healthy working environment. A safe and healthy environment includes access to clean sanitary facilities and drinking water as a fundamental human right.

FORCED LABOR

LTC rejects the use of slavery and other forms of forced or coerced labor or servitude, including prison and human trafficking.

FREEDOM OF ASSOCIATION

We recognize and do not interfere with our 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.

COMPLAINTS

LTC has implemented a whistleblower hotline and dedicated email address to enable all interested parties, including employees, to submit confidential complaints, concerns, unethical business practices, violations or suspected violations for all matters pertaining to accounting, internal control, or auditing. Our company will not tolerate retaliation for whistleblower reports made in good faith.

Please direct questions and input about this policy to Mandi Hogan mandi.hogan@ltcreit.com.

Reviewed May 24, 2023