

American Healthcare REIT, Inc.

## **CORPORATE RESPONSIBILITY POLICY**

Adopted June 12, 2025

### **Introduction**

American Healthcare REIT, Inc. (together with its subsidiaries, “AHR” or the “Company”), is a leading healthcare-focused real estate investment trust committed to maintaining ethical business practices and establishing a corporate responsibility program that benefits our residents, operators, tenants, employees, communities and investors. AHR has implemented a number of environmentally and socially responsible programs and practices across our operations and portfolio.

### **Oversight**

Our policies and other information relating to corporate responsibility are available on our website under the Corporate Responsibility tab under the “Investor Relations” section of our website at <https://ir.americanhealthcarereit.com/Corporate-Responsibility/default.aspx>. The development and regular enhancement of these policies are a company-wide effort that is overseen by our Board of Directors through the Nominating and Corporate Governance Committee and led by our Corporate Responsibility Committee, which is comprised of stakeholders from our Legal, Accounting and Finance, Human Resources, Investor Relations and Asset Management departments.

Our Corporate Responsibility Committee is responsible for providing oversight and guidance of our corporate responsibility strategy and program and for monitoring compliance with legal requirements and regulations. Our Corporate Responsibility Committee reports to, and is guided by, our Nominating and Corporate Governance Committee and provides regular updates to the Nominating and Corporate Governance Committee on our corporate responsibility initiatives.

### **AHR’s Commitment**

We are committed to delivering long-term value to our stakeholders and understand that a structured approach to corporate responsibility is integral to our responsibility to our residents, operators, tenants, employees, communities and investors. AHR was founded upon principles of integrity and strong corporate governance and continues to be committed to the highest levels of ethical standards. We are also dedicated to reducing environmental risks in our corporate operations and, in partnership with our operators and tenants, implementing responsible practices at our various properties.

Our commitments include:

- Monitoring compliance with all relevant regulations at the federal and state level related to corporate responsibility matters including corporate governance, social responsibility and environmental responsibility
- Developing a corporate responsibility strategy, including identifying and monitoring corporate responsibility priorities for the business and stakeholders
- Establishing corporate responsibility commitments and initiatives aligned with topics identified through our materiality assessment and implementing processes to measure internal performance of progress through data aggregation and reporting systems

- Maintaining our commitment to transparency through ongoing external corporate responsibility disclosures, including our SEC filings, information on our website and our Corporate Responsibility reports
- Developing corporate responsibility-related policies and implementing these policies across our business
- Identifying and evaluating current and emerging corporate responsibility risks and opportunities and their impacts on the Company's business and operations, including climate-related risks and opportunities
- Monitoring shareholder proposals related to corporate responsibility topics and addressing stakeholder concerns with transparency and diligence
- Reviewing the Company's performance in relevant corporate responsibility ratings and actively seeking opportunities for improvement

For some of our properties, e.g., our triple-net leased properties, our tenants are responsible for maintaining the properties, including implementing environmentally and socially responsible programs. While AHR does not have control over these operations, we encourage our tenants to adopt corporate responsibility considerations in their operations consistent with our values.

### **Other Relevant Policies**

In addition to this policy, in order to support our commitments and to provide guidelines and meaningful oversight for advancing our corporate responsibility priorities, we have adopted several key policies addressing corporate responsibility issues. These policies can be accessed under the Corporate Responsibility tab of the Investor Relations page of our website at, and include our:

- [Code of Business Conduct & Ethics](#)
- [Compensation Clawback Policy](#)
- [Corporate Governance Guidelines](#)
- [Corporate Responsibility Committee Charter](#)

This Corporate Responsibility Policy will be reviewed annually and revised as necessary. Implementation of this policy is the responsibility of AHR's management led by the Corporate Responsibility Committee and overseen by the Board of Directors through the Nominating and Corporate Governance Committee. This Corporate Responsibility Policy outlines AHR's commitments and initiatives. This is not a legally binding document.

For questions about this policy, please contact [corporateresponsibility@ahcreit.com](mailto:corporateresponsibility@ahcreit.com).

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Please see the next page for additional details on our corporate responsibility initiatives.

## **ADDITIONAL DETAILS ON AHR'S CORPORATE RESPONSIBILITY PROGRAMS**

### **Our Approach**

In 2022, we conducted a materiality assessment with the help of a third-party expert to identify corporate responsibility topics that have the greatest impact on our business and stakeholders, and to develop our corporate responsibility priorities. We have already taken key steps to address the priority corporate responsibility topics including conducting benchmarking activities, developing an inventory of current corporate responsibility initiatives across our business, and establishing key policies. As part of our corporate responsibility journey, we are continually enhancing our corporate responsibility strategy, documenting roles and responsibilities for our Corporate Responsibility Committee and developing our inaugural Corporate Responsibility Report which we plan to publish in 2025.

Over time our corporate responsibility program will continue to evolve with the aim of creating long-term value for our residents, operators, tenants, employees, communities and investors. Looking ahead, we plan to establish baseline data for key energy, water use, and waste metrics and are taking steps to comply with regulations such as the California climate disclosure laws by assessing and reporting on climate risks and opportunities and by providing our first greenhouse gas (GHG) emissions inventory.

### **Governance Initiatives**

We are committed to conducting business with the highest degree of ethics and integrity to protect the long-term interests of our stakeholders. We believe that our approach to corporate governance supports transparency, accountability, oversight and risk minimization across our business. We adhere to all applicable laws and regulations and maintain a Code of Business Conduct and Ethics and Corporate Governance Guidelines, as well as additional corporate policies, that reflect our values and promote integrity.

In 2022 and 2023, we refreshed our Board of Directors, adding three new members who bring expertise from the real estate and healthcare sectors. The range of expertise of our Board of Directors offers valuable insights in critical areas of our business, such as strategic guidance, risk management and financial oversight. Our Board of Directors also provide oversight for the integration of corporate responsibility practices across the organization. Additionally, our nine-member Board of Directors includes six independent directors and all of our Board committees are made up of independent directors.

We have adopted several key initiatives to protect our shareholders and ensure the highest standard of corporate ethics and integrity including:

- Opting out of the Maryland Unsolicited Takeovers Act (a/k/a MUTA);
- Having a non-staggered Board of Directors;
- Having 2/3 of our Board of Directors made up of independent directors;
- Ensuring Board of Directors and shareholder alignment by paying a portion of Board compensation in the form of equity and adopting minimum stock ownership requirements for directors;
- Limiting the use of shareholder rights plans to avoid takeovers;
- Eliminating the use of insider blocking power related to takeovers; and

- Giving shareholders approval rights related to Charter and Bylaw amendments.

## **Social Initiatives**

### ***Our Facilities and Residents***

We understand that as one of the largest owners of U.S. healthcare facilities, and specifically senior housing facilities, we have an opportunity to positively impact those individuals that are in our facilities every day. Our top priority is optimizing the resident experience by partnering with operators that provide the highest quality care across our senior housing properties, skilled nursing facilities and outpatient medical buildings. We prioritize partnerships with operators that share our values and implement practices that focus on quality care, health outcomes and a positive living environment.

As part of our commitment to enhancing the resident care in the senior housing and long-term care space, we host an annual operator summit that brings together senior housing and care operators from across the country for education, advocacy, and the sharing of best practices. The event focuses on initiatives that improve the experiences of the residents and staff working in our facilities. Best-in-class operators can share innovative ideas that enhance operations and the quality of care widely across our portfolio.

### ***Our Employees***

We recognize that our employees are a reflection of our values and our greatest asset. We are dedicated to implementing programs that support our employees and provide the right tools to build a safe and healthy workplace. We have several programs and benefits to support our employees' professional development, personal health, and create a sense of belonging, including:

- Medical, dental and vision coverage with substantial employer funding and a wide menu of medical options, Flexible Spending Accounts and Health Savings Accounts;
- Generous vacation, holiday and personal time off policy, including floating holidays to acknowledge our diverse employee base;
- Financial support for professional association dues and memberships, continuing education credits, fees and travel expenses to attend relevant conferences and seminars;
- A 401(k) plan with an employer match;
- An employee stock purchase plan;
- New hire mentorship programs;
- Employee satisfaction surveys to measure employee engagement and satisfaction and implement change as appropriate;
- Employee engagement events for both employees as well as their families;
- Employee trainings related to health and safety and professional development;
- Company offset of fitness facility membership dues;
- Initiatives focused on maintaining our inclusive culture and equal opportunities for all our employees.

We are committed to full compliance 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. We seek to minimize employee and visitor exposure to potential safety hazards by appropriately identifying, assessing and minimizing health and safety risks in all workplaces that we control.

### ***Our Communities***

We are committed to engaging with our local communities and have partnerships with local organizations and charities to support initiatives such as affordable housing projects, community clean-up events, and educational programs. We aim to foster positive relationships and contribute to the well-being of the communities in which we operate. Every year, we support charities nominated by employees such as the Alzheimer's Association and other various non-profit charities. We also support the Trilogy Health Services Foundation, a nonprofit whose mission is to improve the lives of the employees of our largest operating partner, Trilogy Management Services, through education, financial stability and healthy living initiatives.

### **Environmental Initiatives**

Our environmental responsibility program is designed to comply with state and national environmental regulations. We manage our operations in a way that promotes improvement in areas such as energy efficiency, waste and water management and responsible procurement through initiatives including:

- Implementing energy efficiency measures, including LED lighting upgrades, smart thermostats, sensors to monitor building temperature and energy audits
- Incorporating energy-efficient infrastructure when developing real estate, redeveloping real estate or performing repairs and maintenance of our buildings, such as white roofs or coating
- Minimizing waste and water consumption across our properties through smart irrigation controls, improved policies and practices in our offices and properties and employee training to advance environmentally responsible practices in their daily work
- Evaluating our environmental performance to set targets for improvement
- Assessing climate-related risks and opportunities and developing a greenhouse gas emissions inventory to comply with the California requirements