

AMERICAN HEALTHCARE REIT, INC.

VENDOR CODE OF CONDUCT

Adopted September 8, 2025

American Healthcare REIT, Inc. (“we,” “us” or “our”) is committed to operating with integrity, transparency and accountability. These principles apply not only to our internal practices but also to the standards we expect from those with whom we do business.

This Vendor Code of Conduct (the “Code”) sets forth our expectations for all third-party vendors, contractors, consultants, service providers, operators and other business partners (collectively, the “Vendors”) who provide goods or services to us or act on our behalf.

Compliance with Laws and Regulations

All Vendors must operate in compliance with applicable local, state, federal and international laws and regulations. This includes but is not limited to:

- Labor and employment law
- Health and safety regulations
- Data protection and privacy law
- Environmental standards
- Anti-corruption statutes
- State-specific statutes, such as the California Consumer Privacy Act (CCPA) and the Fair Employment and Housing Act (FEHA)

Human Rights and Labor Practices

We expect our Vendors to respect and abide by internationally recognized human rights standards, including those outlined by the International Labour Organization (ILO) Core Conventions and the UN Guiding Principles on Business and Human Rights, as well as to comply with key U.S. laws that regulate labor practices, prohibit discrimination and protect fundamental rights in the workplace.

Vendors must:

- Prohibit child labor and forced or compulsory labor, including human trafficking;
- Ensure fair wages and benefits, including compliance with all wage laws, overtime rules and working time limits;
- Respect freedom of association, including the right of workers to organize, join unions or engage in collective bargaining, as permitted by law;

- Maintain a workplace free from harassment and discrimination on the basis of race, ethnicity, gender, sexual orientation, religion, disability, age, veteran status, immigration status or any legally protected category; and
- Ensure workplace dignity and physical and psychological safety for all workers, contractors and subcontractors.

Health, Safety, and Workplace Environment

Vendors must provide a safe and healthy work environment and take proactive steps to minimize risk to employees, residents, tenants and visitors.

We expect our vendors to:

- Train employees on safety and emergency preparedness;
- Maintain all permits for workplace operations, equipment use and hazardous materials; and
- Responsibly manage workplace stress and injury prevention.

Vendors who provide services at or near senior care or patient-facing facilities must take additional precautions to safeguard patient and resident wellbeing and hygiene.

Environmental Sustainability

We are committed to environmental sustainability and expect our Vendors to contribute to that goal as well.

We expect our vendors to:

- Comply with all environmental laws and regulations, including those governing hazardous materials, emissions, energy use and waste disposal;
- Seek to reduce their carbon footprint, water usage and landfill waste; and
- Consider lifecycle environmental impacts when designing, sourcing or installing materials at our sites.

Vendors are strongly encouraged to implement environmental management systems or equivalent sustainable practices.

Ethical Business Conduct

We expect our Vendors to uphold the highest standards of business integrity and ethics.

Prohibited conduct includes:

- Bribery or corruption, including kickbacks, improper gifts or any other practice intended to improperly influence a decision-maker;
- Bid rigging, collusion or price fixing;
- Insider trading or misuse of confidential information; and

- Conflicts of interest, such as undisclosed relationships with our employees that could compromise impartiality.

Vendors may not give gifts to, or receive gifts from, our employees, except modest gifts given or received in the normal course of business, including travel or entertainment.

Data Privacy and Confidentiality

Vendors who process or access our proprietary or personal data must:

- Comply with applicable privacy laws, including the CCPA and the Health Insurance Portability and Accountability Act (HIPAA), if applicable;
- Implement reasonable safeguards to prevent unauthorized access, loss or misuse of information;
- Use such data only for purposes explicitly authorized by us and under secure protocols; and
- Notify us immediately in the event of a suspected breach or security incident.

Measures taken by Vendors should be proportional to the sensitivity of the information that they handle.