



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 Sustainability and Corporate Responsibility Committee.

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.

PREVENTION OF UNDERAGE LABOR

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.

EQUAL OPPORTUNITY

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.

VOLUNTARY 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' ability under the law 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.

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.

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 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 submissions 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.

Ratified May 20, 2026