

## **Vendor Code of Conduct**

*As of February 2023*

Sabra Health Care REIT, Inc. ("Sabra" or the "Company") is dedicated to conducting our business ethically and with the highest level of integrity. Through our Code of Conduct and Ethics (our "Code"), we have established written standards designed to deter wrongdoing and to promote ethical principles. Our Code is applicable to all officers and other employees of Sabra and to all members of the Board of Directors of Sabra.

This Vendor Code of Conduct ("Vendor Code") communicates to our vendors, agents, suppliers, subcontractors, and other business relationships that provide goods or services to Sabra (collectively, our "Vendors") our expectations with respect to various ethics, labor and human rights issues, and environmental stewardship.

### **ETHICAL BUSINESS PRACTICES**

Sabra expects its Vendors to conduct business in accordance with their own applicable professional standards and comply with all applicable laws, rules, regulations, and other legal requirements within the jurisdiction in which they conduct their business, including but not limited to the following:

- a. Fair Competition: Vendors shall conduct their business in a manner that is compliant with all applicable antitrust and fair competition laws.
- b. Conflicts of Interest & Fair Dealing: Vendors should avoid conflicts of interests, which includes interactions with Sabra employees that may conflict, or appear to conflict, with that employee acting in the best interests of Sabra. Vendors must avoid unfair dealing.
- c. Anti-Bribery & Anti-Corruption: All forms of corruption, bribery and kickbacks are strictly prohibited. Vendors must comply with all applicable anticorruption laws of any country in which they operate, including the U.S. Foreign Corrupt Practices Act ("FCPA").
- d. Anti-Money Laundering: Vendors must comply with all applicable Anti-Money Laundering rules and regulations, including the Bank Secrecy Act, the USA PATRIOT Act, and applicable FINRA rules and regulations.
- e. Privacy & Data Protection: Vendors are expected to follow best security practices and methods in conducting their business to ensure that all employees' and business partners' privacy are protected and shall ensure the security of systems and data, including Sabra's data.
- f. Business Records: Vendors shall accurately record and report all business and financial information and comply with all applicable standards, laws and regulations concerning the completion, accuracy and retention of such records and reports.

### **LABOR & HUMAN RIGHTS**

We expect our Vendors to treat people with respect and dignity and uphold the human rights of their workers. This Vendor Code has been developed by reference to the International Labor Organization's ("ILO") standards. Our expectations include the following:

a. Freely Chosen Employment. Vendors shall not use, or participate in the exploitation of workers, or forced, or involuntary labor. All members of the workforce should be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

b. Freedom of Association. Vendors shall respect workers' rights to freedom of association and collective bargaining in accordance with applicable legal requirements.

c. Fair Compensation. Wage payments and benefits shall comply with all applicable laws and regulations. Sabra encourages Vendors to work toward improving standards of living and quality of life for their employees and communities.

d. Working Hours. Vendors shall comply with all applicable laws and regulations related to working hours in any jurisdiction where they operate.

e. Safe Working Environment. Vendors shall provide and maintain a safe and healthy work environment for their workers and encourage open discussion with them of their health, safety and environmental concerns.

f. Anti-Harassment & Anti-Discrimination. Vendors shall not tolerate any form of harassment or discrimination and are to comply with applicable legal requirements prohibiting conduct that could reasonably be construed as discrimination or harassment based on race, gender, age, color, religion, national origin, disability, sexual orientation, ancestry, genetic information, military service, creed, pregnancy, marital status, citizenship, gender identity, gender expression, or any other status protected by applicable law.

g. Child Labor. Vendors shall avoid any child labor in their business operations in accordance with the ILO's core labor standards, applicable laws and regulations. Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are excepted.

h. Diversity & Inclusion. Vendors shall commit to maintaining an inclusive work environment that welcomes diverse perspectives, respects the rights and cultural differences of others and encourages collaboration so that all can excel together.

## **ENVIRONMENTAL STEWARDSHIP**

Sabra is committed to implementing environmentally sustainable best practices for our own operations and to assist tenants in their efforts to address their environmental concerns, as outlined in our Corporate Environmental Statement. All Vendors are expected to support environmental sustainability by operating in an environmentally responsible and efficient manner to minimize adverse impacts of their operations on the environment. Vendors are encouraged to conserve natural

resources, to avoid the use of hazardous materials where possible, and to engage in activities that reuse and recycle.

#### **COMPLIANCE WITH THE VENDOR CODE & REPORTING VIOLATIONS**

Vendors are expected to inform Sabra of (i) any violations, alleged violations or investigations by a governmental authority into potential violations of laws or regulations related to goods or services that the Vendor provides to Sabra, and (ii) any violations of this Vendor Code by the Vendor.

Vendors are expected to allow employees to raise issues or concerns without fear or threat of retaliation.

Sabra reserves its right to amend or supplement the Vendor Code and the matters addressed herein, without prior notice, at any time. The Vendor Code has been recommended by the Nominating and Governance Committee and approved by the Board of Directors.