

## **Vendor Code of Conduct**

*As of March 2024*

Sabra Health Care REIT, Inc. ("Sabra") 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. Sabra expects its Vendors to adhere to UN Guiding Principles on Business and Human Rights.

### **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. Vendors shall not require or allow workers to work more than the maximum legally permitted number of regularly paid hours worked per week. Any overtime hours are voluntary and must not exceed the maximum legally permitted number of overtime hours worked per week. Vendors shall allow workers to take reasonable rest and lunch breaks.

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. Vendors shall limit worker exposure to potential safety hazards, and work-related accidents and injuries. When necessary, Vendors shall supply their workers with proper personal protective equipment and ensure proper maintenance of the equipment.

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.

Sabra promotes economic inclusion and diversity, including within our supply chain. We value and will seek partnerships with a diverse group of suppliers, including businesses owned by women, businesses owned or staffed by members of underrepresented social groups, as well as small and medium-sized suppliers. Similarly, we expect Vendors to promote economic inclusion and diversity in their own businesses.

## **CYBERSECURITY INCIDENT RESPONSE**

As part of Sabra's ongoing focus on cybersecurity, we have implemented a formal incident response policy that applies to all employees, board members and certain third-party vendors and consultants. The policy describes the plan for preventing and responding to cybersecurity incidents at Sabra and outlines the roles and responsibilities to prevent, detect, evaluate and respond to cybersecurity incidents and reduce the likelihood of such incidents reoccurring.

As detailed in the policy, all actual or suspected cybersecurity incidents must be reported immediately by calling (949) 777-1914 or emailing [security@sabrahealth.com](mailto:security@sabrahealth.com). This includes suspicious host/network activity, anomalies, system performance issues, unauthorized access or potential breach scenarios. All reported activity or suspected activity will then be routed to Sabra's Incident Response Team for further investigation and evaluation.

It is the responsibility of everyone at Sabra to protect and maintain security over our information technology systems and we encourage you to remain vigilant and ask questions if you have any suspicions or concerns.

## **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. See our Code for more information on our policy regarding reporting violations.

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 Corporate Responsibility and Governance Committee and approved by the Board of Directors.