



WHISTLEBLOWER POLICY

AMENDED AND RESTATED: FEBRUARY 1, 2023

I. SCOPE OF POLICY

This Whistleblower Policy (this “Policy”) has been adopted by the Audit Committee of Healthpeak Properties, Inc. (the “Company”) to govern the receipt, retention, and treatment of complaints and concerns of employees and other interested parties with respect to:

- questionable accounting, internal accounting controls, or auditing practices; fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the U.S. Securities and Exchange Commission (SEC) or members of the investing public; intentional error or fraud in the preparation, review or audit of any financial statement of the Company; violations of laws, rules or regulations applicable to the Company and related to corporate reporting and disclosure, accounting practices, accounting controls, auditing practices and other matters relating to fraud against Company stockholders; or significant deficiencies in or intentional noncompliance with the Company’s internal accounting controls (an “Accounting Complaint”);
- violations of laws, rules or regulations applicable to the Company, other than those that would constitute Accounting Complaints, or violations of the Company’s Code of Business Conduct and Ethics or Vendor Code of Business Conduct and Ethics, other than those that would constitute Accounting Complaints (a “Legal Complaint”); and
- disciplinary action or retaliation against employees who, in good faith, make or participate in investigations relating to Accounting Complaints or Legal Complaints (a “Retaliatory Complaint”).

As further described below, Accounting Complaints, Legal Complaints and Retaliatory Complaints (collectively, “Complaints”) will be reviewed by the Company’s General Counsel (the “General Counsel”) and/or the Audit Committee, or such other persons as the General Counsel or the Audit Committee determines to be appropriate.

Third parties engaged by the Audit Committee or the Company to handle any part of the complaint process must comply with this Policy.

II. PROCEDURES FOR MAKING COMPLAINTS

The Company encourages prompt reporting of Complaints using any of the options outlined below so that concerns can be investigated and resolved in a timely manner. When submitting a Complaint, including any Complaint submitted anonymously by employees, sufficient information should be provided to allow a full investigation of the

matters, including (as applicable) names, dates, places and events that took place and any other relevant information concerning the reported Complaint.

1. (OPTION 1) Telephone Hotline: Any employee with a Complaint can call 1-844-837-2227, and any vendor can call 1-866-291-5247, to submit his or her Complaint. Employees who call this number need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows in a manner that protects the confidentiality and anonymity of the employee making the call if requested. The intake phone call will be received by a third-party contractor specifically engaged to provide the hotline services, or an internal person specifically designated to receive hotline calls. Among other things, the following information may be requested by the person receiving the call:

- Name of the caller (unless the caller is an employee who wishes to remain anonymous);
- If a non-employee, where such person is employed or such person's relationship to the Company;
- Any relevant information concerning the allegations.

The information from the call will be documented in a format acceptable to the Company and shall include at a minimum a written description of the information received concerning the Complaint.

2. (OPTION 2) Website: Any employee may submit a Complaint via website by clicking [here](#) or by navigating to <https://secure.ethicspoint.com/domain/media/en/gui/5938/index.html>. Any vendor may submit a Complaint via website by clicking [here](#) or by navigating to <https://secure.ethicspoint.com/domain/media/en/gui/38920/index.html>. Employees submitting this information need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows in a manner that protects the confidentiality and anonymity of the employee submitting the Complaint if requested.

3. (OPTION 3) Report to Supervisor or General Counsel: An employee may report, openly, confidentially and/or anonymously, a Complaint directly to his or her supervisor or to the General Counsel. Any Complaint made directly to a supervisor must be reported by the supervisor to the General Counsel, unless it relates to or involves the General Counsel, in which case it must be reported by the supervisor to the Chief Executive Officer.

III. TREATMENT OF COMPLAINTS

1. Any Complaint made under these procedures shall be directed to the General Counsel or, if the Complaint relates to or involves any executive officer or any employee of the Company who would typically receive a copy of the Complaint, to the Chair of the Audit Committee. The General Counsel (or the Chair of the Audit Committee, as applicable) must promptly report all Accounting Complaints, Retaliatory Complaints and material Legal Complaints to the Audit Committee. If, during the course of any investigation, the General Counsel (or the Chair of the Audit Committee, as applicable) determines that any Complaint initially determined to be an immaterial Legal Complaint should instead be classified as a material Legal Complaint, the General Counsel (or the Chair of the Audit Committee, as applicable) shall promptly report such Legal Complaint to the Audit Committee.

2. If requested by the employee, the Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Vendors, customers, business partners and other parties external to the Company will also be given the opportunity to submit Complaints; however, the Company is not obligated to keep Complaints from non-employees confidential or to maintain the anonymity of non-employees.

3. The General Counsel (or the Chair of the Audit Committee, as applicable), shall review the Complaint, and, unless otherwise directed by the Audit Committee, may investigate it himself or herself or may assign another employee, outside counsel, advisor, expert or third-party service provider to investigate, or assist in investigating, the Complaint, provided that none of such persons are the subject of the Complaint. The General Counsel may direct that any individual assigned to investigate a Complaint work at the direction of or in conjunction with the General Counsel or any other attorney in the course of the investigation.

4. Unless otherwise directed by the General Counsel or the Audit Committee, the person assigned to investigate will conduct an investigation of the Complaint and report his or her findings or recommendations to the General Counsel. Complaints will be investigated as promptly as reasonably practicable, taking into account the complexities of the allegations raised by the Complaint and other relevant circumstances. If the investigator is in a position to recommend appropriate remedial or corrective action, the investigator also may recommend remedial or corrective action. The findings and recommended remedial or corrective actions, if any, with respect to the investigation of each Complaint shall be documented in writing and, if directed by the Chair of the Audit Committee, discussed at a meeting of the Audit Committee prior to concluding the investigation. Upon conclusion of the investigation of a Complaint, all final recommended

remedial or corrective actions, if any, that are determined to be appropriate shall be taken and documented.

5. If determined to be necessary by the General Counsel or the Audit Committee, the Company shall provide for appropriate funding, as determined by the General Counsel or the Audit Committee, to obtain and pay for additional resources that may be necessary to conduct the investigation, including without limitation, retaining outside counsel and/or expert witnesses; provided that funding in excess of \$150,000 with respect to the investigation of any individual Complaint must be approved by the Audit Committee.

6. At each regularly scheduled meeting of the Audit Committee and whenever else as deemed necessary, the General Counsel (or the Chair of the Audit Committee, as applicable) shall submit a report to the Audit Committee and any other member of Company management that the Audit Committee directs to receive such report, that summarizes each Complaint made within the last 12 months and shows specifically: (a) the complainant (unless anonymous, in which case the report will so indicate), (b) a description of the substance of the Complaint, (c) the status of the investigation, (d) any conclusions reached by the investigator, (e) findings and recommendations, and (f) the status of any applicable remedial or corrective actions.

7. At any time with regard to any Complaint, the General Counsel or the Audit Committee, as the case may be, may specify a different procedure for investigating and treating such a Complaint, such as when the Complaint concerns pending litigation.

IV. PROTECTION OF WHISTLEBLOWERS

Consistent with these procedures, the Audit Committee, the Company, and its directors, officers, employees, contractors, subcontractors and agents shall not retaliate, and shall not tolerate or permit disciplinary action or retaliation, against anyone who, in good faith, makes a Complaint or provides assistance to the Audit Committee, management, or any other person or group, including any governmental, regulatory or law enforcement body, investigating a Complaint.

V. RECORDKEEPING AND DISCLOSURE OF INVESTIGATION RESULTS

All reports and records associated with Complaints are considered confidential information and access will be restricted to members of the Audit Committee, the Company's legal department, certain other employees of the Company or outside counsel or other third parties involved in investigating a Complaint as contemplated by these

procedures. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at the time.

All Complaints and documents relating to such Complaints made through the procedures outlined above shall be retained in accordance with the applicable provisions of the Company's records retention policy, after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry, or investigation and thereafter as necessary.

VI. AUDIT COMMITTEE ADOPTION, OVERSIGHT AND AMENDMENT

This Policy was adopted by the Audit Committee. The Audit Committee is responsible for overseeing compliance with this Policy and will annually review this Policy and consider any revisions, modifications, supplements or amendments, which it determines to be necessary, advisable or otherwise appropriate. This Policy shall not be revised, amended, modified or supplemented other than with the approval of the Audit Committee.

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