

HEALTHCARE REALTY TRUST INCORPORATED

Vendor and Supplier Code of Conduct

Healthcare Realty Trust Incorporated, together with its affiliates and subsidiaries (collectively “Healthcare Realty,” “we,” “us,” or “our”), is committed to ethical business conduct, consistent with our Code of Business Conduct and Ethics. While we understand that vendors and suppliers are independent entities, we believe that our vendors’ business practices can reflect on us.

We ask our vendors and suppliers to adhere to our Code of Vendor and Supplier Conduct, which sets forth Healthcare Realty’s expectations about ethical operations.

1. ETHICAL BUSINESS PRACTICES AND LEGAL AND REGULATORY COMPLIANCE

Each vendor, while conducting business on our behalf, must maintain ethical and professional standards and conduct its business in full compliance with all applicable laws and regulations.

- **Anti-Corruption, Anti-Bribery, and Anti-Money Laundering:** Vendors must comply with all applicable laws relating to anti-corruption, anti-bribery, and anti-money laundering.
- **Competition and Antitrust laws:** Vendors must not engage in any illegal anti-competitive conduct, unfair market practices, or deceptive trade practices.
- **Insider Trading:** Vendors may not, directly or indirectly, trade securities, including our securities, if they are in possession of material nonpublic information.
- **Conflicts of Interest:** Vendors should avoid conflicts of interests and situations that give the appearance of conflicts of interest.
- **Gifts and Entertainment:** When conducting business with Healthcare Realty, vendors may, for legitimate business purposes, occasionally offer gifts and entertainment to, and accept them from, Healthcare Realty employees, in accordance with Healthcare Realty’s gifts and entertainment policy found in the Company’s Code of Business Conduct and Ethics. Gifts and entertainment should never be used to gain an improper advantage.

2. HUMAN RIGHTS

We strive to respect and promote human rights in accordance with the United Nation’s Guiding Principles on Business and Human Rights, consistent with our Sustainability Principles and Policies. We expect our vendors to also treat people with respect and dignity.

- **Slavery, Forced Labor, and Human Trafficking:** We do not tolerate slavery, forced labor, or human trafficking in any form and do not knowingly work with vendors who engage in such practices.
- **Child Labor:** Vendors should not employ child labor and must take the necessary preventative measures to ensure they do not employ anyone under the applicable legal minimum age of employment.

3. EMPLOYMENT PRACTICES

We require that our vendors practice non-discriminatory practices in hiring and in the workplace. We expect our vendors to provide safe working conditions with the ultimate goal of protecting the health and safety of their employees.

- **Non-Discrimination in Hiring and the Workplace:** Vendors must comply with all applicable laws regarding non-discrimination in hiring and in the workplace.
- **Labor Laws:** Vendors must comply fully with applicable wage-, workhour-, overtime-, and benefit-related laws.
- **Health and Safety Laws:** Vendors must also comply with applicable health and safety laws and regulations.

4. CONFIDENTIALITY AND DATA PROTECTION

- **Confidential Information:** Vendors must safeguard and not disclose any information, including Healthcare Realty's information, that has been labeled as confidential or that a reasonable person would think is confidential.
- **Intellectual Property Rights:** Vendors must respect intellectual property rights.
- **Data Privacy Laws:** Vendors must comply with all applicable data protection, privacy, and information security laws and regulations.
- **Data Breach:** Vendors should promptly notify Healthcare Realty if they reasonably believe that any confidential information, including personal information, they are handling for us has been destroyed, lost, altered, accessed, or disclosed by an unauthorized third party.
- **Records Retention:** We also expect vendors to create and maintain complete and accurate records to ensure accountability. Vendors must retain and delete records in accordance with applicable laws and regulations.

5. ENVIRONMENT

Environmental stewardship is important to Healthcare Realty. We expect vendors to conduct their operations in a way that minimizes their impact on natural resources.

- **Environmental Laws:** Vendors must comply with all applicable environmental laws.
- **Environmental Permits:** Vendors must maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- **Regulated Substances:** Vendors must comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content, or handling of specific substances.
- **Energy, Water, and Waste Management:** Vendors should strive to reduce energy and water consumption and implement sustainable waste management programs.
- **Environmental Product and Process Standards:** Vendors should strive to use and provide sustainability-certified materials, products, supplies, and services that align with industry best practices to reduce both adverse environmental and human health impacts.

6. COMPLIANCE

We expect our vendors to share this Code with their employees and representatives. Vendors should consult with Healthcare Realty's legal counsel on any matter related to actual or potential noncompliance. Any feedback or suspected violations of this code should be sent to Healthcare Realty directly at communications@healthcarerealty.com. Failure to comply with Healthcare Realty's Vendor and Supplier Code of Conduct may result in termination of our relationship with a vendor or supplier.

7. NO CREATION OF THIRD-PARTY RIGHTS

This Code does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. For example, no employees or representatives of a vendor shall have any rights against Healthcare Realty by virtue of this Code, nor shall they have any rights to cause Healthcare Realty to enforce any provisions of this Code. The decision with respect to Code enforcement is reserved by Healthcare Realty in its sole discretion.

This Code of Vendor and Supplier Conduct was approved and made effective on November 30, 2020.