



**Code of Conduct
of
Sunrise Senior Living**

Effective Date: November 28, 2019

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A Message from Sunrise's Executive Leadership Team

Dear Colleagues,

Sunrise Senior Living is committed in all we do to conduct ourselves ethically and with integrity. Each day we are required to be fair, consistent and honest, to be compliant with the laws that guide our activities and conduct, and to notify others when something needs to be addressed or corrected. Our Code of Conduct provides you with guidance in making the right choices when called upon to do so. Please become familiar with this Code, as well as Sunrise's Compliance Plan and other Company policies and procedures which guide your service to residents and each other. As you review these materials, please keep in mind that we must embrace not only the words, but also the meaning of this Code. Serving others with integrity and in an ethical manner is critical.

If you are faced with a situation that calls into question Sunrise's values or integrity, or if you believe an illegal activity is occurring, you should report the matter in accordance with Sunrise's Violation Reporting Process described in the Code. We all share the responsibility to uphold and enforce this Code, which will ensure everyone continues to be treated fairly, honestly and with respect.

Thank you for choosing to serve here at Sunrise. You are doing so much each day to serve the residents and enable Sunrise to continue to pursue its important mission to champion quality of life for all seniors. By pursuing our mission together with integrity and fairness, we will continue to make Sunrise a stronger and more successful company.

Sincerely,
Sunrise Executive Leadership Team

Introduction

This Code of Conduct (the “**Code**”) of Sunrise Senior Living, LLC and its affiliates, operating entities, and subsidiaries (collectively, the “**Company**”) covers a wide range of business practices and procedures. The Company conducts business ethically, honestly and in full compliance with all applicable laws and regulations (“**laws**”). This applies to every business decision in every area of the Company worldwide. Company employees (“**Team Members**”), contracted employees and independent contractors (“**Contractors**”), volunteers, and Members of the Board of Managers (“**Board Members**”) must conduct themselves according to these policies and seek to avoid even the appearance of improper behavior. In all of our interactions, we will conduct ourselves honestly and ethically and show respect for all stakeholders including each other, current and future residents and their families, vendors, business partners, government, and society. Team Members, Contractors, volunteers, and Board Members should also refer to the Company’s Compliance Plan, and other policies and procedures that may be established by the Company from time to time for additional guidelines on business conduct. All sections of the Code apply to Company Team Members, Contractors, and volunteers. Board Members shall adhere to the sections of this Code as applicable.

This Code is meant to alert you to many of the legal, compliance and ethical issues that may arise in the course of your employment or contractual relationship with the Company. However, it is not a detailed “rule book” and does not address every situation you may encounter. Therefore, it is important to ask questions and seek advice if an issue or situation arises and you are uncertain how to act or respond.

Our Mission, Principles of Service, and Core Values

- **Mission:** To Champion Quality of Life for all Seniors.
- **Principles of Service:** Encouraging Independence, Enable Choice, Preserving Dignity, Celebrating Individuality, Nurturing the Spirit, Involving Family and Friends.
- **Core Values:** Passion, Joy in Service, Stewardship, Respect, Trust

Compliance with Laws

The Company requires Team Members, Contractors, volunteers, Board Members, and all others with whom it does business to comply with all applicable laws in the cities, states, provinces, and countries where we operate. Obeying laws in letter and in spirit is fundamental to the Company’s compliance and ethical policies. Failure to comply with applicable laws may result in disciplinary action, up to and including termination.

You are not expected to know the details of all applicable laws. However, it is important to know enough to determine when to ask questions and seek advice. Additionally, you should be familiar with and understand in enough detail the laws that apply to your work and scope of responsibility so that you are able to determine when to ask questions and seek advice.

Some laws the Company expects you to understand are described below, including, but not limited to, the Anti-Kickback Statute, the False Claims Act, and the Stark Laws.

Anti-Kickback Statute

The Anti-Kickback Statute is a criminal law that prohibits the exchange of, or offer to exchange, anything of value in an effort to induce or reward the referral of federal health care program business (which practice is known as a “kickback”). The Anti-Kickback Statute could be implicated when parties solicit payment in exchange for referring Medicare or Medicaid patients or other related Medicare or Medicaid business. Under the statute, both the party who offers and the party who receives the kickback are liable for the crime, and may be subject to criminal and civil penalties. If the Company violates the Anti-Kickback Statute, it could be excluded from participating in federal health care programs.

False Claims Act

The federal False Claims Act imposes liability on companies and individuals who submit claims or records to the federal government that those companies and individuals know (or should know) are false. One example is submitting a claim to Medicare for a service that was not provided. Another example is submitting claims for physical, occupational, and speech therapy services that are not medically necessary. Additionally, the False Claims Act imposes liability on companies or individuals who obtain money from the federal government when the company or individual is not entitled to that money. This scenario could occur if a company files a false Medicare cost report or receives a Medicare overpayment and fails to repay it.

The Stark Law

Generally, the Stark Law limits certain physician referrals of patients. The Stark Law and comparable state laws forbid physicians from referring Medicare and Medicaid patients for designated health services (“DHS”) if the physician (or an immediate family member) has a financial relationship with the entity providing the DHS. There are some limited and specific exceptions to these laws that are heavily fact-dependent.

Anti-Bribery

The Company is subject to laws that prohibit a company or individual from offering or promising anything of value in order to influence the judgment or conduct of a person in a position of trust (“bribery”). Anti-bribery laws apply to virtually all commercial and governmental transactions in the United States, Canada and United Kingdom. The rule here is simple – do not bribe anybody, anytime, for any reason. You should also be careful when you give a gift, gratuity, or cash, provide a free service, or pay for entertainment or other business courtesies (“favors”) on behalf of the Company. Never give favors in order to influence a decision of a third party. Never accept favors from people who want to influence your decisions.

HIPAA and Privacy Laws

The Company is committed to maintaining the confidentiality of Residents’ Protected Health Information (“PHI”) in conformity with applicable federal and state privacy laws, including the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). HIPAA requires all team members to maintain the confidentiality of Residents’ PHI. PHI is any information that relates to the past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual and that

identifies or reasonably can be used to identify an individual. State laws may also require team members to maintain the privacy of Residents' health, financial and other personal information. Violation of these laws may subject the Company to substantial penalties.

Money Laundering

People involved in criminal activities, such as terrorism, drug trafficking, bribery, gangs, or fraud, may try to hide, conceal or "launder" the proceeds of their crimes in order to make them appear legitimate. Many countries, including the United States, have laws against money laundering, which prohibit conducting transactions that involve proceeds from criminal activities. In the United States, it is a federal crime to engage in money laundering.

The Company is committed to complying with all laws related to money laundering. We will conduct business only with reputable vendors involved in legitimate business activities and with funds derived from legitimate sources. You should remain vigilant against money laundering and suspicious uses of money by others at the Company. Indications of money laundering include attempts to make large payments in cash, or attempting to have a person or company who is not a party to a contract with the Company make a payment on someone else's behalf.

Antitrust Laws

Federal and state antitrust laws generally prohibit companies from making arrangements with competitors, customers, or business partners to raise prices, reduce competition, or engage in unfair business practices. Engaging in such practices is against Company policy and may be illegal. It is also illegal to steal information from competitors and use it to the Company's advantage without the competitor's consent. All of the Company's proprietary and confidential business information shall be kept safe and must not be disclosed to third parties who are not authorized to know or learn such information.

Violation Reporting Process

The Company expects you to report any compliance and ethical concerns, and to maintain individual responsibility for identifying, monitoring and reporting any activity that violates or appears to violate any law, the Company's Compliance Plan, this Code, or other Company policies and procedures. If you become aware of an actual or suspected violation, you must report the improper conduct. The Company will treat these reports as confidential.

The Company has established several reporting mechanisms. Community Team Members, Contractors, and volunteers should make every effort to resolve issues and concerns within their communities. In most circumstances, community and regional Managers are best able to address and resolve the issues given their proximity to local operations. Community Support Office ("CSO") Team Members, Contractors, and volunteers should make every effort to resolve issues and concerns with their Managers or CSO Department Leaders.

You should use the following Violation Reporting Process to report compliance and ethical concerns, as well as actual or suspected violations of laws, the Company's Compliance Plan, this Code, or other Company policies and procedures, including concerns about billing, accounting, internal control over financial reporting, or auditing matters:

1. **Discuss the issue with your Manager:** Managers are familiar with the laws and Company policies and procedures that relate to your work and will be able to handle most matters. Therefore, they should be given the first opportunity to resolve the matter.
2. **Discuss the issue with your community Executive Director or the CSO Department Leader.** If the issue or concern is not resolved, or, due to the nature of the matter, the issue or concern cannot be discussed with the Manager, you should speak with your community Executive Director or your CSO Department Leader.
3. **Discuss the issue with your regional Manager (e.g., Director of Operations, Vice President of Operations, Senior Vice President of Operations, etc.) or the respective Senior Vice President at the CSO:** If the issue or concern remains unresolved, you should speak with the regional Manager or the respective Senior Vice President at the CSO.
4. **Speak with Sunrise’s Compliance Officer or General Counsel at the CSO:** If the issue or concern cannot be satisfactorily resolved by the regional Manager or the respective Senior Vice President at the CSO, you should raise the issue or concern with Sunrise’s Compliance Officer or General Counsel.
5. **Report the matter to Sunrise Ethics and Compliance Hotline:** If none of the above steps resolves your issue or concerns, or if you prefer, you should contact the Sunrise Ethics and Compliance Hotline at <https://secure.ethicspoint.com> or by calling 1-888-310-6744. All calls are confidential, and you may call anonymously if you choose.

The Company has established an Ethics and Compliance Hotline (the “Hotline”) for reporting compliance and ethical concerns or violations of this Code, the Compliance Plan, or other Company policies and procedures. The Hotline permits anonymous reporting, if desired. All reports will be investigated, and appropriate follow-up action will be taken. The reporting options are available to all Team Members, Contractors, volunteers, residents, family members, vendors, business partners, and others we serve. We encourage you to report actual or suspected violations by following the Violation Reporting Process described above. You may also report such violations as follows:

- Contact the Sunrise Ethics and Compliance Hotline

Sunrise Ethics and Compliance Hotline

Telephone: 1-888-310-6744

Website: <https://secure.ethicspoint.com>

- Mail written correspondence to:

Compliance Officer
Sunrise Senior Living, LLC
7902 Westpark Drive
McLean, VA 22102

Applicable federal and state laws and the Company prohibit retaliation, including adverse employment consequences, against anyone for reporting in good faith any improper activity or a violation of this Code, the Compliance Plan, Company policies and procedures, or the law, as well as concerns about billing, accounting, internal control over financial reporting, or auditing matters. Retaliation against a reporter in violation of the law, this Code, the Compliance Plan, and the Company’s policies and procedures will result in disciplinary action, up to and including termination.

Deliberately making false complaints is a violation of the Code and will result in disciplinary action, up to and including termination.

While the Company fully intends to keep all reports confidential, there may be occasions when it is necessary for such information to be disclosed in order to fully investigate the issue or because such disclosure is required by law.

It is impossible to spell out every possible ethical and compliance scenario that may arise. Therefore, this Code is intended to supplement and reinforce your daily exercise of good judgment and ethical and compliant conduct. It is possible that identifying or understanding the right thing to do may not always be clear. If you are uncertain about a potential violation of this Code, the Compliance Plan, Company policies and procedures, or law, you are expected to ask questions and raise your concerns. You may do so without fear of retaliation.

When Should You Call the Hotline?

You should call the Sunrise Ethics and Compliance Hotline anytime if you have compliance or ethical concerns, including concerns about billing, accounting, internal control over financial reporting, or auditing matters, or you are aware of actual or suspected violations of laws, this Code, the Company's Compliance Plan, or other Company policies and procedures, and

- You feel that you cannot go to your Manager or to other personnel designated in the Violation Reporting Process described above, or
- You prefer to call the Sunrise Ethics and Compliance Hotline confidentially and anonymously.

When Should You Not Call the Hotline?

If you have questions about employment related policies or procedures, or if you would like to discuss employee relations issues, talk to your Manager or Human Resources Representative. You may also call the Human Resources Support Center at 1-866-448-3520 to speak with a Human Resources Representative.

Human Resources Call Center

1-866-448-3520

Company Expectation of Team Members and Contractors

The Company takes compliance with this Code very seriously. Anyone, regardless of position, who violates this Code, the Compliance Plan, Company policies and procedures, or the law, may be subject to disciplinary action, up to and including termination of employment. If you have questions or concerns, speak up and raise them. If your concern is not resolved, pursue the issue through an alternative Company channel as described above.

Community Executive Directors, regional Managers, and CSO Department Leaders:

- Are responsible for educating their Team Members, Contractors, and volunteers about the specific Company policies and procedures and laws applicable to each Team Member's, Contractor's and volunteer's role and responsibilities.
- Are charged with identifying heightened compliance risks and/or violations, and cooperating with the Compliance Department in connection with periodic compliance reviews.
- Must take prompt corrective action to respond to and address identified compliance weaknesses, and when necessary, take appropriate disciplinary actions.

Conflicts of Interest

The Company requires all Team Members, Contractors, volunteers, and Board Members to exercise the utmost good faith in all transactions touching upon his or her duties to the Company and those we serve.

You have an obligation to always do what is best for the Company and those we serve. It is very important to be sensitive to activities that might interfere with, or even appear to interfere with, your ability to act in the best interest of the Company. You are held to a strict rule of honesty and fair dealing between yourself and the Company, and between yourself and any third party that provides referrals, materials or services to the Company. You shall not use your position at the Company to secure any item or benefit that you would not ordinarily receive in the performance of your official duties. You shall not accept gifts, favors, or hospitality that might influence your decision-making or create an appearance of impropriety. When you are in a position to influence a decision or situation that may result in personal benefit for you, your friends and/or family, at the expense of the Company, you may be subject to conflict of interest.

You are also required to promptly report and make a full disclosure to your Manager of the possible existence of any known or potential conflict of interests.

The Company expects Team Members, Contractors, volunteers, and Board Members who are engaged in consulting or other outside employment to avoid using any information obtained in the course of their work for the Company in any fashion that could harm the Company, or create any appearance of (or actual) conflict of interest.

Situations that may present a conflict of interest include:

- Personal investments
- Outside employment
- Outside board memberships
- Business opportunities found through work
- Personal relationships at work
- Accepting money, gifts, favors, food, drinks, and/or entertainment from others

Personal Investments

When considering a personal investment in, or contract with, a vendor, business partner or competitor of the Company, you should ask yourself two questions first:

1. Is the investment or value of the contract so significant that someone might reasonably think that it could influence the decisions you make so that you might put the benefit of your personal investment or contract ahead of what is best for the Company?
2. Are you in a position of authority at the Company so that you have the ability to influence or direct the Company in ways that could benefit your personal investment or contract at the expense of the Company?

If the answer to both of these questions is yes, the investment likely creates at least the appearance of a conflict of interest, and the investment should not be made.

Outside Employment

As with personal investments or contracts, taking a job with a Company vendor, business partner or competitor (including as a consultant or advisor, whether paid or unpaid) may create a conflict of interest. You should not take another job or engage in personal business with companies that compete with the Company. In addition, you should not accept employment, fees or compensation of any kind from a vendor or business partner of the Company.

Under certain specific circumstances, this type of outside employment may not be considered a conflict of interest. However, before proceeding with outside employment, Community Team Members and Contractors must consult with the Community Executive Director and obtain written approval from their Regional Human Resources Representative. Executive Directors, regional and CSO Team Members and Contractors must consult with their Department Leader and obtain written approval from the CSO Human Resources Department.

If you have another job, it is important that you do not use your position at the Company to solicit customers or work for your other employer, use confidential Company information to benefit your other employer, or participate in an outside employment activity that could impact your ability to serve the best interests of the Company.

Outside Board Membership

Membership on the boards of vendors, business partners and competitors of the Company is especially problematic from a conflict-of-interest perspective, as board seats generally involve the sharing of confidential information and the ability to influence the actions of the outside business. Membership on such boards, especially at competing companies, may also raise antitrust issues in some circumstances. You should not accept a seat on the board of directors or the advisory board of any company or organization that does business with or competes with the Company without prior written approval from the General Counsel. Please contact the General Counsel before accepting an outside board membership in any company or organization.

Business Opportunities

Business opportunities discovered as a result of your employment or contractual relationship with the Company belong first to the Company. You should not take a business opportunity learned about through your job at the Company for personal gain or benefit, or that was otherwise discovered or developed through the use of Company property or information.

Direct Reporting to Spouse, Partner or Immediate Family

Team Members, Contractors, and volunteers may not directly supervise, report to, or be in a position to influence the hiring, work assignments or evaluations of an immediate family member (such as a spouse, sibling, child, parent, grandparent, significant other, and/or any child or relative who shares the Team Member's or Contractor's home), or someone with whom a Team Member or Contractor has a close or an intimate relationship.

In addition, employing a relative or family member of a Company Human Resources Representative or Executive Director may create conflicts or the appearance of conflicts due to the confidential nature of particular job responsibilities. Therefore, relatives of Team Members, Contractors, or volunteers who perform these sensitive functions may not be employed in any capacity in the same community or CSO department without prior written consent from the Regional Human Resources Representative or Vice President of Human Resources at the CSO, respectively. This also applies to the use of Interns and Contractors.

If two Team Members and/or Contractors in a reporting relationship currently are, become relatives, or become involved in an intimate relationship, the Company will consider transfer opportunities that may be available for such Team Members. The Team Members and/or Contractors have the option to accept any offered transfer position or may resign. Team Members, Contractors, and volunteers who fail to disclose family or intimate relationships with other Team Members and Contractors may be subject to discipline, up to and including termination.

Gifts, Entertainment and Discounts

No Team Member, Contractor, volunteers or member of his or her immediate family may seek, accept or give gifts, payments, fees, services, special or valuable privileges or favors, including vacation trips, accommodations, or anything of value from or to a resident, a resident's family member, vendors, business partners, suppliers or anyone else who is doing business, or is seeking to do business, with the Company, except as authorized by the Compliance Officer or General Counsel.

If you receive or inadvertently give a gift that would violate this Code or the Company's policies and procedures, you should disclose and discuss the situation with the Compliance Officer, or the General Counsel, who will then determine how to proceed, including whether the gift should be kept, returned to the donor, or turned over to the Company. Team Members, Contractors, or volunteers who violate this section of the Code may be subject to discipline, up to and including termination.

Political Activities

Individual Political Activities

The Company respects and supports Team Members', Contractors' and volunteers' personal decisions to participate in the political process. However, Team Members, Contractors and volunteers should engage in the political process on their own time and with their own personal resources. Team Members, Contractors and volunteers should not use company time, funds, property or equipment for personal political activities.

Company Political Activities and Governmental Relationships

The Company may sometimes express its views on local and national issues that affect its business. The Company may also make limited contributions to political parties or candidates in jurisdictions where it is legal and customary to do so and with the approval of the General Counsel.

Confidentiality and Privacy

One of the Company's most valuable assets is confidential information. You must maintain the confidentiality of information entrusted to you by the Company and its residents, vendors, and business partners, except where disclosure is required by law. You must safeguard confidential information of the Company by keeping it secure, complying with Company policies and procedures, and limiting access to those who have a need to know in order to do their job. You shall avoid discussing confidential information in public areas within Company buildings (such as dining areas, building entrances, public hallways and activity rooms), and outside of Company buildings (such as in restaurants, elevators and other public areas).

For purposes of this Code, confidential information includes, but is not limited to:

- Personal information of our residents and their family members, including legally protected health information;
- Financial information, forecasts, analyses and other information or documents relating to the Company;
- Information relating to Company acquisitions, dispositions, business ventures, leases and other transactions;
- Information relating to the Company's owners, investors, business partners, vendors, or contractual counterparties;
- Marketing information, including current, historical, and future pricing and expansion plans;
- Computer user IDs and passwords; and
- Proprietary information that provides the Company with an advantage over our competitors (e.g., development plans, business strategies).

You are expressly required to maintain the confidentiality of this information even after termination of your employment. You and other individuals providing services to the Company are prohibited from realizing any personal gain as a result of disclosing or using the Company's confidential information learned during the course of employment or service to the Company, even after such employment or service ends. Disclosing confidential information in violation of this Code, the Company's policies and procedures, or applicable law may result in disciplinary action, up to and including termination of employment and referral to law enforcement. In instances where an individual engaged in such conduct is not employed by the Company, disclosing the Company's confidential information may result in the Company terminating that person's access to the Company's information systems and facilities and referring the matter to law enforcement.

Responding to Questions from the Media

All media questions regarding Company activities, results, plans or its position on public issues shall be directed to Sunrise's Communication Department at the CSO.

Use of Company Property

The Company provides resources to Team Members, Contractors and volunteers in order to do their jobs effectively. It is your responsibility to use the resources provided wisely. Theft, carelessness, and waste have a direct impact on the Company's profitability and ability to serve our residents. Company equipment, computers, telephones, credit cards, and other physical assets are to be used for legitimate Company business purposes only.

Use Restriction of Company and Personal Technology / Social Media

The Company provides technology resources to Team Members, Contractors and volunteers for use in carrying out their responsibilities at work. You shall not use Company-provided telephones, mobile devices, computers, tablets, e-mail, the internet, fax machines, or other electronic communications systems or resources for excessive personal use or to access, store, or distribute content that is illegal, harassing, offensive or inappropriate. You are expected to abide by the Company's policies and procedures on this topic.

Team Members, Contractors and volunteers are prohibited from taking photographs, recording visual images, or accessing or using social media on personal or company-issued devices like cell phones or tablets while serving residents. Team Members, Contractors and volunteers are also prohibited from taking photographs or videos of a resident, unless appropriate authorization is obtained. Sharing, transmitting, or sending any photographs or videos of a resident, including posting on social media, is prohibited and will result in disciplinary action, up to and including termination. This policy is intended to protect resident privacy and dignity, as well as Team Members and Company data.

Records Integrity and Management

Always create and maintain records carefully, accurately and honestly. Remember that other Team Members and Contractors most likely need to refer to these records for various reasons, and they may not necessarily have the benefit of information known only to you that is not properly recorded or documented. The importance of keeping accurate records applies to all Company records, including resident health and care records, billing and accounting records, Team Member time cards, expense account records, contractor invoices, and reports of an alleged compliance violation or other matters. Each Team Member and Contractor is responsible for ensuring that all statements contained in such records (including verbal reports) are complete, accurate and honest. The Company prohibits providing false or misleading records, or altering them inappropriately. Such conduct is not only wrong under any circumstance, it may also violate applicable laws.

You shall maintain all records as required by law and Company policy. This also applies to any records subject to a "legal hold" for current or potential litigation, investigations or audits. Please see the Company's policies and procedures for more information.

Embracing Diversity and Non-Discrimination

The Company embraces diversity and does not tolerate or permit discrimination on the basis of race, creed, color, sex, age, religion, disability, sexual orientation, gender, national origin, citizenship,

marital status, veteran status or any legally-protected status. This non-discrimination policy is critical to maintaining a positive work environment.

Inappropriate Conduct and Harassment

The Company does not tolerate verbal, physical, sexual or emotional harassment or conduct that creates an intimidating, offensive, abusive or hostile work environment.

Health and Safety

All Team Members, Contractors and volunteers are required to follow safety rules and to take an active part in protecting themselves, the residents, and their colleagues from hazardous conditions and materials. Furthermore, you should report to work free from the influence of substances that could prevent or impair you from performing your job safely and effectively.

Dealing Fairly With Others

The Company seeks to outperform our competitors fairly and honestly. This means that we seek competitive advantages through superior performance and value, never through unethical or illegal practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's permission, or inducing such disclosures by past or present employees of other companies is prohibited. You should never take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Resident Neglect and Abuse

The health and safety of our residents are the Company's paramount interest. The Company will not tolerate any type of resident abuse, neglect and exploitation. Team Members, Contractors and volunteers are mandated reporters of abuse and neglect under the Company's policy and applicable laws, and team members, Contractors and volunteers must immediately report known or suspected resident abuse, neglect and/or exploitation.

Violation of this Code

The Company takes compliance with this Code very seriously. Anyone, regardless of position, who violates this Code, the Compliance Plan, Company policies and procedures, or law is subject to disciplinary action, up to and including termination of employment, and where appropriate, civil liability and criminal prosecution.

Waivers or Changes of this Code

Any waiver of the applicability of this Code requires the approval of the Compliance Officer, General Counsel, and/or our Board of Directors.

Conclusion

It is impossible to describe or list every possible ethical and compliance scenario that may arise. Therefore, this Code is intended to supplement and reinforce your daily exercise of good judgment and ethical and compliant conduct. Because identifying or understanding the right thing to do may not always be clear, if you are uncertain about your own or another Team Members', Contractors' or volunteers compliance with this Code, Compliance Plan, Company policy or procedure, or law, you are expected to ask questions and raise your concerns. You may do so without fear of retaliation.

* * *

SUNRISE SENIOR LIVING
Code of Conduct

Certification and Agreement of Compliance

I have received, read and understand the Sunrise Senior Living Code of Conduct (the “Code”). I understand the Company also has a Compliance Plan and Company policies and procedures in addition to this Code, and that the Company may periodically update or amend such documents from time to time. I agree to comply with this Code, the Compliance Plan and the Company’s other policies and procedures, as they may be amended from time to time, while carrying out my duties for the Company. I understand that the Code is and will remain posted on TeamLink and on Sunrise’s website at: <http://www.sunriseseniorliving.com>.

I understand that my agreement to comply with this Code, the Compliance Plan, and other Company policies and procedures neither constitutes nor should be construed to constitute either a contract of employment for a definite term or a guarantee of continued employment. I understand that I may be subject to disciplinary action, up to and including termination of my employment or other business relationship with the Company, for violating this Code, the Compliance Plan, other Company policies and procedures, or failing to report known or suspected compliance violations.

Printed Name: _____

Signature: _____

Date: _____

This signed and completed form must be returned to your Manager or HR Representative. Failure to do so will not affect the applicability of the Code or any of its provisions.