

**PHYSICIANS REALTY TRUST**  
**WHISTLEBLOWER POLICY**  
(Last Revised: December 13, 2022)

**POLICY STATEMENT**

Physicians Realty Trust (the "Company") is committed to fair, accurate and transparent accounting of its financial matters and expects all employees, officers and trustees of the Company or its subsidiaries to act in accordance with the highest ethical standards and its Code of Business Conduct and Ethics (the "Code"). The Company also requires full compliance with all applicable laws and regulations, including but not limited to, securities and commodities laws and regulations, accounting standards, accounting controls and audit practices and prohibits violations of applicable laws relating to fraud.

The Company relies on all employees, officers, trustees and agents of the Company or its subsidiaries to conduct themselves in accordance with the requirements and spirit of this policy and the Code and to report any suspected violations of this policy or other questionable financial, accounting or audit matters or potential legal violations without fear of retaliation.

The Company has adopted this policy in order to:

- Cause violations to be disclosed before they can disrupt the business or operations of the Company, or lead to serious loss;
- Promote a climate of accountability with respect to the Company's accounting, internal accounting controls and auditing matters;
- Encourage full compliance with the Code and all applicable laws and regulations, including but not limited to securities and commodities laws and regulations, and the timely and accurate reporting of any violations thereof or misconduct with respect thereto; and
- Ensure that no individual feels at a disadvantage or retaliated against for raising good faith concerns.

This policy provides a means whereby individuals can safely raise, internally and at a high level, serious concerns and disclose information they believe in good faith relate to Violations (as defined below). This policy applies to reports concerning Violations only. Nothing in this or any other policy is intended to restrict any rights individuals may have to share information about working conditions and terms and conditions of employment or to make complaints (or communicate) about such matters or make other protected disclosures to the authorities.

**REPORTING PERSONS PROTECTED**

This policy and the related procedures offer protection from retaliation to individuals who make any complaint with respect to, or that could give rise to, Violations (a "Reporting Person"), provided the complaint is made:

- in good faith;

- in the reasonable belief of the individual making the complaint that the conduct or matter covered by the complaint could give rise to a Violation; and
- Pursuant to the procedures outlined below.

"Good faith" means that the Reporting Person has a reasonably held belief that the complaint made is true even if the facts reported subsequently prove to be incorrect.

No one who in good faith makes a report or participates in an investigation regarding a violation of the applicable laws, rules, regulations or the Company's policies, or any laws regarding fraud may be retaliated against by the Company or its subsidiaries or any officer, employee or agent thereof. This includes, but is not limited to, retaliation in the form of adverse employment action including, up to and including, termination. Any such retaliation or reprisal by a Company representative is forbidden. Any representative who retaliates against a Reporting Person or a witness cooperating in an investigation will be subject to discipline, up to and including termination, in accordance with applicable law. Representatives who believe they are subject to retaliation because they have made a report or participated in an investigation should report such suspected retaliation to the Audit Committee using the procedures set out in this Policy. The protection from retaliation does not necessarily include immunity for any wrongdoing disclosed in a report or investigation.

## **SCOPE OF COMPLAINTS**

Reporting Persons are encouraged to report irregularities and other suspected wrongdoings regarding accounting, internal accounting controls or auditing matters and violations of or misconduct with respect to, the Code, and applicable laws and regulations, including but not limited to securities and commodities laws and the following (collectively, referred to as "Violations"):

- Violations of law which in any way may affect the Company or the properties owned by the Company, including, without limitation, any rule of the Securities and Exchange Commission (the "SEC"), federal laws related to fraud against the stockholders of the Company, and the laws and regulations of any jurisdiction in which the Company operates;
- Violations of the Company's policies, including the Company's Code of Ethics and the Company's Insider Trading Policy, or statutory or other requirements for good corporate governance;
- Improper accounting entries, violations of internal accounting controls or improper auditing matters which in any way may affect the Company or the properties owned by the Company, including, without limitation, the following:
  - Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
  - Fraud or deliberate error in the recording and maintenance of financial records of the Company;
  - Deficiencies in or noncompliance with the Company's internal accounting controls;

- Misrepresentation or false statement to or by a senior officer or accountant of the Company regarding any matters contained in the financial records or any financial or audit reports of the Company;
- Deviation from full and fair reporting of the Company's financial condition.

## **CONFIDENTIALITY OF COMPLAINT**

The Company will strive to keep the identity of any Reporting Person confidential unless such confidentiality is incompatible with a fair investigation, there is an overriding reason for identifying or otherwise disclosing the identity of such person or such disclosure is required by law in certain situations, such as where a governmental entity initiates an investigation of allegations contained in the complaint. Furthermore, the identity of any Reporting Person may be disclosed if it is reasonably determined that a complaint was made maliciously, recklessly or in bad faith, or if disciplinary proceedings are invoked against any individual as a result of making a malicious, reckless or bad faith complaint.

## **SUBMITTING COMPLAINTS**

Any person who has complaints or concerns about the Company's compliance with the Code, laws and regulations, accounting, internal accounting controls, or auditing matters, or who becomes aware of questionable activities regarding compliance with the Code, laws and regulations, accounting or auditing matters, or who becomes aware of any violations by any person of law or the Company's policies, including the Code, is strongly encouraged to report such matters to the Company's Audit Committee.

Supervisors and managers who become aware of any possible Violations must immediately report them to the Audit Committee in accordance with this policy and must consult with the Audit Committee before undertaking an investigation or other action. The Audit Committee will oversee any investigation and handling of any concerns or complaints that arise under this policy.

Reporting Persons should submit complaints concerning Violations in accordance with the following procedures:

- Complaints must be submitted in writing and should be sent by email to the following address: [whistleblower2023@docreit.com](mailto:whistleblower2023@docreit.com) where they will be received by the Chairperson of the Company's Audit Committee.
- The Company recommends that Reporting Persons provide the information contained in the complaint form attached as Exhibit A to this policy when reporting Violations.
- Reporting Persons who are employees of the Company or its subsidiaries may report Violations on an anonymous basis. The Company urges any such employee that is considering making an anonymous complaint to strongly consider that anonymous complaints are, by their nature, susceptible to abuse, less reliable, and more difficult to resolve. In addition, such employees considering making an anonymous complaint should be aware that there are significant rights and protections available to them if they identify themselves when making a complaint, and that these rights and protections may be lost if they make the complaint on an anonymous basis. Therefore, the Company encourages such employees to identify themselves when making reports of Violations

without resort to the anonymity that is available to each such employee. In responding to anonymous complaints, the Company will pay due regard to:

- the fairness to any individual named in the anonymous complaint;
  - the seriousness of the issue raised;
  - the credibility of the information or allegations in the complaint, with allegations that are conclusory or that do not have a specific factual basis most likely receiving less credence; and
  - the ability to ascertain the validity of the complaint and to appropriately resolve it without the assistance and cooperation of the person making the complaint.
- Reporting Persons who are not employees of the Company or its subsidiaries are required to disclose their identity in any complaints submitted under this policy. Complaints submitted by non-employees on an anonymous basis may not be reviewed.

## **INVESTIGATION OF COMPLAINTS**

Upon receipt of a complaint, the Chairperson of the Audit Committee, or his or her designated representative, will confirm the complaint pertains to a Violation. Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the complaint and the issues raised therein. Any complaints submitted pursuant to this policy that do not relate to a Violation may be referred by the Chairperson of the Audit Committee to be handled by the Company's General Counsel (or, if the Company has no General Counsel, then the Company's Secretary) for review and resolution as he or she deems appropriate.

The Chairperson of the Audit Committee may enlist employees of the Company and outside legal, accounting and other advisors, as appropriate, to conduct an investigation of a complaint.

Following each investigation, prompt and appropriate remedial action will be taken as warranted in the judgment of the Audit Committee. Any actions taken in response to a complaint and conclusions made with regards to a complaint will be timely reported to the Reporting Person, unless such Reporting Person submitted the complaint on an anonymous basis.

A Reporting Person who is not satisfied with the outcome of the initial investigation or the remedial action taken with respect thereto, if any, may submit their written complaint, together with a written explanation of why the Reporting Person believes the investigation or remedial action was inadequate (a "Revised Complaint"), to the Chairperson of the Audit Committee requesting him or her to forward the Revised Complaint directly to the Audit Committee for its review. The Reporting Person should forward the Revised Complaint consistent with the reporting procedure described above.

The Audit Committee will review the Revised Complaint, together with documentation of the initial investigation, and determine in its sole discretion if the Revised Complaint merits further investigation. To the extent it deems necessary, the Audit Committee will conduct a subsequent investigation to the extent and in the manner it deems appropriate, including, but not limited to, enlisting the appropriate Company personnel or external advisors to further investigate the Revised Complaint and report back to the Audit

Committee within a specified period of time. Any named Reporting Person submitting a Revised Complaint must be available to assist in the subsequent investigation, if any, as requested by the Audit Committee. The Audit Committee or its designated representative will timely inform the Reporting Person of any remedial action taken in response to a Revised Complaint, unless such Reporting Person submitted the complaint on an anonymous basis.

### **RETENTION OF COMPLAINTS**

The Chairperson of the Audit Committee, or his or her designated representative, will maintain all complaints, tracking their receipt, investigation and resolution. All complaints and reports will be maintained in accordance with the Company's document retention policy.

### **UNSUBSTANTIATED ALLEGATIONS**

If a Reporting Person makes a complaint in good faith pursuant to this policy and any facts alleged therein are not confirmed by a subsequent investigation, no action will be taken against the Reporting Person. In submitting complaints, Reporting Persons should exercise due care to ensure the accuracy of the information reported. If, after an investigation, a complaint is found to have been made for malicious or frivolous reasons or otherwise submitted in bad faith, the Reporting Person making the complaint could be subject to disciplinary action, up to and including termination. Where alleged facts reported pursuant to this policy are found to be without merit or unsubstantiated, (1) the conclusions of the investigation will be made known to the Reporting Person, unless such Reporting Person submitted the complaint on an anonymous basis, and (2) the allegations will be dismissed and all documentation and information related thereto will be removed from the Company's records.

### **AMENDMENTS**

The Audit Committee shall review and reassess this policy periodically and submit any recommended amendments to the Board of Trustees for its consideration, provided, however, that any immaterial amendments, including changes to the whistleblower hotline or email address, or other methods by which complaints may be submitted, may be approved solely by the Chairperson of the Audit Committee.

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WHISTLEBLOWER POLICY**

**Recommended Form of Complaint**

**Part I** (see General Instructions before completing)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

E-Mail: \_\_\_\_\_

\_\_\_\_\_ I am an employee of the Company or its subsidiaries.

\_\_\_\_\_ I am not an employee of the Company or its subsidiaries.

\_\_\_\_\_ I hereby authorize the disclosure of my identity if the Chairperson of the Audit Committee or his or her designee reasonably believes it is necessary or appropriate.

**Part II**

Type of Violation:

\_\_\_\_\_ Legal Accounting/Auditing Retaliation

\_\_\_\_\_ Securities Law

\_\_\_\_\_ Commodities Law

\_\_\_\_\_ Code of Ethics or other policies and procedures

\_\_\_\_\_ Other

Existence of Violation:

\_\_\_\_\_ Violation is ongoing or completed

\_\_\_\_\_ Unclear whether ongoing or completed

Department(s) suspected of violation: \_\_\_\_\_

Individual(s) suspected of violation:

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Describe all relevant facts of the suspected violation:

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Describe how you became aware of the suspected violation:

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Describe any steps taken to remedy the violation prior to submitting this Complaint:

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Who, if anyone, may be harmed or affected by this violation:

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Please be advised that federal law and company policy prohibits the Company, as well as its officers, employees or agents, from discharging, demoting, suspending, threatening, harassing or otherwise discriminating against anyone who makes good faith reports concerning actual or suspected illegal activities of the Company.

**GENERAL INSTRUCTIONS:**

Employees of the Company or its subsidiaries who are reporting questionable accounting or auditing matters of the Company are not required to include in its complaint the information contained Part I of this form. For all other individuals, Part I should be completed. The complaint may not be reviewed if the reporting person is a non-employee and does not submit a complaint containing the information in Part I.

The Company's policy and the related procedures offer protection from retaliation to individuals who make any complaint with respect to, or that could give rise to Violations (as defined in this policy) (a "Reporting Person"), provided the complaint is made:

- in good faith;
- in the reasonable belief of the individual making the complaint that the conduct or matter covered by the complaint could give rise to a Violation; and
- pursuant to the procedures outlined in this policy.

"Good faith" means that the Reporting Person has a reasonably held belief that the complaint made is true, even if the facts reported subsequently prove to be incorrect or do not give rise to any action.

If not filed anonymously,

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date