

## **LADDER CAPITAL CORP**

### **WHISTLEBLOWING AND WHISTLEBLOWER PROTECTION POLICY**

**As of: October 31, 2023**

All Employees have a responsibility to guard against and report unethical business practices and actions (including questionable accounting and auditing matters) that can subject the Company or its Employees to civil or criminal liability.

In addition to the General Code, the Senior Financial Officer Code, and LCAM's Code of Ethics, the Company has also adopted a policy regarding financial matters, briefly summarized below, and incorporated by reference herein.

#### **Policy and Procedures for Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters**

Ladder Capital Corp has adopted a policy, incorporated herein by reference, describing the:

- Procedures for the receipt and retention of complaints regarding certain financial matters, including accounting, financial reporting, internal accounting controls and auditing; and
- Rights of Employees who make these complaints.

The Audit Committee of the Board of Directors is ultimately responsible for addressing any such complaints.

#### **Reporting Violations**

##### ***Whistleblower Hotline***

Ladder has installed an anonymous phone line and web-based reporting system (the "Whistleblower Hotline") that permits Employees to report any potential unethical business practice or misconduct they reasonably believe violates the law or that poses a substantial and specific danger to the public health or safety, including questionable accounting or audit matters.

**The telephone hotline number is: 855-726-6896**

**The website is: [laddercapital.ethicspoint.com](http://laddercapital.ethicspoint.com)**

The Company has partnered with EthicsPoint to manage the Whistleblower Hotline. Employees can report any potential unethical business practice or misconduct (including questionable accounting or audit matters) confidentially and without fear of retaliation. All reports will be reviewed and responded to appropriately.

Employees can also report violations to their Department Manager and others as described below.

### ***Violations by Others***

If an Employee knows of, observes, suspects or becomes aware of a violation of applicable laws, regulations, or business ethics standards including, but not limited to, questionable accounting or auditing matter, the Employee should make a good faith effort to either report that information immediately to the Employee's Department Manager, CCO or CAO, or report the information through the Whistleblower Hotline. If appropriate or necessary in the opinion of the Employee, the Employee may also contact a member of the Disclosure Committee or Audit Committee of the Board of Directors in connection with any suspected or known violations relating to the financial reporting of the Company.

### ***Violations by Oneself***

If an Employee believes that the Employee may have violated the law or business ethics standards, or engaged in questionable accounting or auditing practices, the Employee must report this behavior to the Employee's Department Manager immediately, or in the case of public financial disclosures, to a member of the Disclosure Committee or Audit Committee of the Board of Directors. The fact that the Employee reported the violation, together with the degree of cooperation the Employee displays, and whether the violation is intentional or unintentional, the Employee will be given consideration in an investigation and any resulting disciplinary action.

### ***Necessity of Reporting***

Unless Company management learns of a problem, the Company cannot deal with it appropriately. Concealing improper conduct often compounds the problem and may delay or hamper responses that could prevent or mitigate actual damage. Therefore, an Employee is encouraged to contact the CCO or CAO with any questions about legal, regulatory or ethical issues.

### ***Alternative Avenues for Reporting***

An Employee should make an effort to first report internally, unless the Employee has good faith belief that there is a significant danger to public safety or telling management will interfere with the investigation. An Employee can also report any legal/regulatory concerns by contacting the SEC or any other appropriate regulatory agency.

**The SEC website is: <http://www.sec.gov/whistleblower>**

### **Investigating Violations**

All reported violations of applicable laws, regulations or business ethics standards, or violations relating to the financial reporting of the Company will be promptly investigated and treated confidentially to the extent practicable under the circumstances. Please be advised that neither the CCO, CAO nor Audit Committee member, as applicable, will be able to acknowledge to the sender of an anonymous complaint whether such complaint has been received or to report the resolution of such complaint.

## **Retaliation**

### ***Retaliation Is Prohibited***

The Company prohibits retaliation against any individual who, in good faith, reports or expresses concerns about a violation or suspected violation of applicable laws, regulations, or business ethics standards, or a violation or suspected violation relating to the financial reporting of the Company, or against any individual who participates in, or otherwise supports, an investigation of such reports. Anyone who retaliates against an individual under such circumstances will be subject to disciplinary action, up to, and including, termination of employment. Unlawful conduct may subject the offender to civil, and in some cases criminal, liability.

### ***Reporting Retaliation***

All Employees are strongly urged to report all incidents of possible retaliation, regardless of the offender's identity or position, so that an effective investigation and any appropriate remedial action can be undertaken.

If an Employee believes that the Employee has experienced or observed retaliatory conduct of any sort, the first and most effective resource may be to tell the individual who engaged in the conduct that the behavior was perceived as inappropriate. Often such open communication can clear up or avoid misunderstandings. Of course, Employees may at any time report the matter to their Department Manager, the CCO, CAO or Audit Committee (for financial matters) or through the Whistleblower Hotline.

### ***Investigation of Retaliation***

Any reported allegations of retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, when necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigation process to the extent possible consistent with adequate investigation and appropriate corrective action. The Company will take every action to protect Employees from any retaliation for reporting violations or suspected violations of applicable laws, regulations, business ethics standards, or violations or suspected violations relating to the financial reporting of the Company.

### ***Defend Trade Secrets Act***

18 U.S.C. § 1833(b) provides: "An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that (A) is made - (i) in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal." Accordingly, Employees have the right to disclose in confidence trade secrets to Federal, State, and local government officials, or to an attorney, for the sole purpose of reporting or investigating a suspected violation of law. Employees also have the right to disclose trade secrets in a document filed in a lawsuit or other proceeding, but only if the filing is made under seal and protected from public disclosure. Nothing in this Employee Manual is intended to conflict with 18 U.S.C. § 1833(b) or create liability for disclosures of trade secrets that are expressly permitted by 18 U.S.C. § 1833(b).