

## SUPPLIER CODE OF CONDUCT

The products, services and activities of our Suppliers may impact Carlson Rezidor Hotel Group's (Carlson Rezidor") reputation, affecting our level of trust with other stakeholders. Suppliers shall comply with the standards listed here within and with all applicable laws and regulations and request the same from their supply chain, including third-party labor agencies. Failure to follow the Supplier Code of Conduct could result in termination as Carlson Rezidor Supplier.

Carlson Rezidor is not a joint or co-employer with any of its Suppliers, each of whom is the sole employer of its employees and fully and completely responsible for any of its employment related decisions as well as compliance with all applicable laws, rules and regulations in the operation of its business.

### INTRODUCTION TO CARLSON REZIDOR PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

Carlson Rezidor believes in, and is committed to, advancing the [United Nations Global Compact's](#) ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption; as well as the seventeen [Sustainable Development Goals](#).

Carlson Rezidor supports the articles contained in the [Universal Declaration of Human Rights](#).

Carlson Rezidor is committed to combatting modern slavery, educating employees and encouraging its partners and the broader business community to take a stand against human trafficking.

Carlson Rezidor promotes water stewardship and therefore has signed the United Nations Global Compact's [CEO Water Mandate](#) for its operations in Europe, Middle East and Africa.

All Carlson Rezidor Suppliers shall work with honesty and integrity as valued standards. In addition, we expect our Suppliers to comply with terms and conditions of its supplier agreements with Carlson Rezidor as well as all applicable laws and regulations in the countries and jurisdictions where they conduct business, or deliver goods and/or services.

The above principles are the foundation for the Supplier Code of Conduct which outlines the minimum standards that Suppliers to Carlson Rezidor are expected to achieve.

Carlson Rezidor's Responsible Business program includes an objective to work with Suppliers that demonstrate social, ethical and environmental responsibility. In order to achieve this objective, all of our Suppliers should comply with the criteria listed on the following pages as a condition of doing business with Carlson Rezidor.

These criteria comprise Carlson Rezidor's Responsible Business pillars:

- Think People
- Think Community
- Think Planet

## **1. THINK PEOPLE**

### **1.1 Human Rights**

- Carlson Rezidor acknowledges and respects the principles contained in the [United Nations Declaration of Human Rights](#). Carlson Rezidor Suppliers shall not violate these principles.

### **1.2 No Child Labor**

- Suppliers shall not use any form of child labor, as defined by [Principle Five](#) of the UN Global Compact, in any of their facilities. Further clarification on the term “child labor” can be found under <https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-5>
- Children should be protected from any type of labor that may be hazardous to their health or interferes with their education.
- Suppliers shall adhere to minimum age provisions as applicable by local laws and regulations and should not use workers under the legal age for employment for the type of work being performed in any facility.

### **1.3 Combating Human Trafficking and Slavery**

- Suppliers should not allow any form of modern slavery, human trafficking, exploitation of children, forced or compulsory labor.
- All work must be voluntary and in no case should workers be mandated to relinquish government issued identification, passports or work permits.
- Suppliers should ensure that the [Employer Pays Principle](#) is applied and workers are not required to pay any recruitment fees or expenses as a condition of receiving work.
- In cases where modern slavery, human trafficking, exploitation of children, or forced and compulsory labor is discovered in the supply chain, it must be reported to Carlson Rezidor without delay.

### **1.4 Work Hours and conditions**

- Suppliers should ensure and document that workers have reasonable daily and weekly work schedules, regulated by local laws.
- Workers should not be required to work more than the number of hours legally allowed for regular and overtime work periods.
- Suppliers shall comply with local laws and industry standards regarding payment, working hours (including overtime), rest days and public holidays.

- Suppliers shall compensate workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers will not permit deductions from wages as a disciplinary measure. Suppliers should be able to provide relevant documentation.

### **1.5 Freedom of Association**

- Suppliers should allow employees the right to freely associate, organize and to bargain collectively in accordance with applicable law.

### **1.6 No Harassment, Harsh or Inhumane Treatment**

- Carlson Rezidor Suppliers must treat all workers, including temporary, migrant, student, contract, direct employees and any other type of worker with dignity, and respect; and ensure that no threats of violence, physical punishment, confinement, or other forms of physical, sexual, psychological, or verbal harassment or abuse are used as a method of discipline or control. Supplier will clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements.

### **1.7 Non-discrimination**

- There shall be no positive or negative discrimination in the Supplier's workplace or hiring policy due to race, gender, age, disability, marital status, sexual orientation, pregnancy, nationality, caste, affiliation with a political organization, national origin, veteran status, religious or union organization, minority group or any other characteristic protected by law.

### **1.8 Health and Safety**

- Suppliers' production and associated services shall comply with workers' health and safety regulations, human rights guidelines, per the [International Labor Organization](#), and environmental protection laws in the country of production.
- Facilities where goods are produced for Carlson Rezidor should provide a safe work environment and healthy working conditions for all workers. This includes access to drinkable water, sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, safeguarding against occupational injury and illness and subject to regular health and safety reviews, with corrective action being taken where necessary.
- When the Supplier provides housing, it must also adhere to the above requirements.

## **2. THINK COMMUNITY**

### **2.1 Principles and Community Support**

- Suppliers should be promoting the Think People principles in all contact with their local community.
- Suppliers are expected to create shared value in the community.
- Suppliers should assess the potential impact of their activities on the local community and take steps to mitigate and/or avoid any negative impacts.

### **2.2 Fair Competition**

- Suppliers shall comply with legal requirements regarding fair competition and accurate marketing. They shall act confidentially, lawfully, and with integrity when handling competitive and proprietary information.

### **2.3 Business Ethics and Anti-Corruption**

- Suppliers will perform all business dealings with integrity and transparency, and these dealings will be reflected accurately in the Supplier's annual reports and record-keeping.
- Carlson Rezidor is committed to ethical business practices and compliance with all applicable anti-bribery/anti-corruption laws worldwide ("ABAC Laws"). Carlson Rezidor prohibits the offering or providing of money or anything else of value, directly or indirectly, to any person for the purpose of influencing the exercise of his or her official duties in a manner that would benefit Carlson Rezidor.
- Carlson Rezidor also expects its Suppliers to adhere to this same commitment to ethical practices and compliance with ABAC Laws in the conduct of their respective businesses, particularly (but not limited to) when providing goods or services to Carlson Rezidor.
- Carlson Rezidor Suppliers must also adhere to the highest standard of moral and ethical conduct, respect all local laws, and not engage in any other form of illegal or improper practices such as extortion, fraud, or any other act which could enable corruption in any manner.
- Suppliers will not make illegal payments themselves or through a third party (or agent). Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

### **2.4 Gifts and Gratuities**

- Suppliers should ensure that acceptance of any business courtesies, gifts, entertainment, merchandise, services, travel, donations or anything of value to or from Carlson Rezidor employees is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment or as a means of obtaining an improper business advantage.

- Suppliers are advised that employees of Carlson Rezidor cannot engage in any behavior that could impact their judgement regarding the best interest of the company or their ability to give full attention to Carlson Rezidor business. This includes but is not limited to accepting personal gifts or entertainment that has a substantial monetary value or includes any personal kickback arrangement. Employees may not accept gifts of money under any circumstances nor may they solicit non-monetary gifts or any other personal benefit or favor of any kind from Suppliers.

### **3. THINK PLANET**

#### **3.1 Environmental Sustainability**

- Suppliers shall have a program in place to continuously minimize negative environmental impacts of their full product/service lifecycle and minimize their product/service carbon footprint as a result. They are expected to comply with existing legislation and regulations regarding the protection of the environment and to be environmentally proactive.

#### **3.2 Carbon Management and Emissions**

- Suppliers should monitor and take efforts to reduce the carbon footprint of their products and services.
- Suppliers should monitor and control the discharge of air emissions from volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated by their operations.

#### **3.3 Water Stewardship**

- Suppliers shall demonstrate knowledge of their company's water resource management and drive action towards sustainable, efficient and equitable water use.
- Suppliers are expected to promote responsible use of freshwater that is socially and economically beneficial in order to reduce their water footprint.
- Suppliers should monitor, control and treat as required, prior to the discharge of wastewater generated from operations, industrial processes and sanitation facilities.

#### **3.4 Waste Reduction**

- Waste of all kinds should be reduced or eliminated at the source through production modifications, operational processes, materials substitution, conservation, recycling and re-use of materials.
- Suppliers should monitor, control and treat as required, prior to the disposal of solid waste generated from operations, industrial processes and sanitation facilities.

### 3.5 Hazardous Materials and Restricted Substances

- Suppliers should adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal of such substances.
- Suppliers should identify and manage hazardous materials to ensure their safe handling, storage, recycling, reuse or disposal in such a way as not to harm the environment.
- Suppliers should avoid the use any materials listed on the [SIN](#) list or any relevant local legislation (i.e. prohibiting asbestos, arsenic, cadmium, chromium compounds, CFCs, cyanides, DDT, halons, PCBs, lead, AZO dyes, DMF, PAHs, Phthalates, PFOS, the nickel release) and should strive to use chemicals listed on the EPA [Safer Chemical Ingredients](#) list and alternative chemicals with low toxicity and high biodegradability.
- Suppliers should not use materials from endangered wood & varieties of animals, and plants listed by [CITES](#) and all wood used should be sustainable.

### 4. REPORTING VIOLATIONS

Suppliers agree to notify their employees and any sub-contractors that they may report serious or sensitive concerns or possible breach of the Supplier Code of Conduct.

Any stakeholder with concerns about the Supplier Code of Conduct and its implementation is encouraged to work directly with the Supplier or their primary Carlson Rezidor contact to resolve those concerns.

If that is not possible or appropriate, please contact Carlson Rezidor through the following methods per region:

#### Americas and Asia Pacific

**Phone: Business Conduct and Ethics Hotline:** The Company's Business Conduct and Ethics Hotline is available to report ethical problems or questionable practices. There is no need to identify yourself, except where local law restricts the Company from accepting anonymous reports.

- Toll Free (U.S.A. and Canada): +1 (800) 377-3729
- Worldwide Direct Line: +1 (763) 212-3056
- China—South China Telcom: 10800-130-1712
- China—North China Netcom: 10800-713-1755
- Hong Kong: 800-696669
- India: 000-800-100-4133



- Mexico: 001-855-285-8762
- Singapore: 800-1301-958
- Taiwan: 00801-14-7059
- UK: 0800-210-0975

### **Europe, Middle East and Africa**

Internet: Rezidor Ethics Hotline: Carlson Rezidor employees, suppliers and others with a concern regarding business ethics at one of our properties that they feel a need to report anonymously, may anonymously report on the following website: [www.rezidorethics.com](http://www.rezidorethics.com)

Email: Rezidor Supplier Hotline: All other issues with this Code of Conduct may report via [responsible.supplychain@carlsonrezidor.com](mailto:responsible.supplychain@carlsonrezidor.com)

If Carlson Rezidor receives such a report, the Supplier will be asked to comment and if necessary Carlson Rezidor may request an improvement plan to correct the issue. If the Supplier does not act or respond to the report or concern and is not willing to work on correcting the issue, the Supplier can be subjected to disciplinary actions, including termination as a Carlson Rezidor Supplier and/or review by local authorities.

Carlson Rezidor will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Supplier Code of Conduct.