

SUPPLIER CODE OF CONDUCT **FOR SUPPLIERS TO CARLSON REZIDOR HOTEL GROUP**

PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

As a supporting member of the [United Nations Global Compact](#), Carlson Rezidor Hotel Group believes in, and is committed to, advancing the Compact's ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption.

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

The company 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 contracted Carlson Rezidor parties shall work within the ethical framework of Carlson Rezidor which places honesty and integrity as valued standards. In addition, we expect our Suppliers to comply with the laws and regulations as well as its supplier agreements applicable to operations 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 are structured on Carlson Rezidor's Responsible Business pillars:

- Think People
- Think Community
- Think Planet

The products, services and activities of our Suppliers may impact Carlson Rezidor's reputation, affecting our level of trust with other stakeholders. It is therefore important that Carlson Rezidor Suppliers follow the Supplier Code of Conduct and request the same from their supply chain, including third-party labor agencies.

CODE OF BUSINESS ETHICS

The Company's internal Code of Business Ethics contains rules and guidelines, and serves as a reminder of its policies and commitment to do what is right and ethical for all Carlson Rezidor employees. This Supplier Code of Conduct supplements the Code of Business Ethics.

SUPPLIER CODE OF CONDUCT CRITERIA

THINK PEOPLE – HUMAN RIGHTS, HEALTH AND SAFETY OF GUESTS AND EMPLOYEES

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.

No child labor

- Suppliers shall not use any form of child labor or forced labor, as defined in the [UN Convention on Human Rights and Child Labor](#), in any of their facilities.
- The Supplier 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.
- Children should be protected from any type of labor that may be hazardous to their health or interferes with their education.

Slavery and combating human trafficking

- 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 employees be mandated to relinquish government issued identification, passports or work permits.
- The Supplier should ensure that the 'employer pays principle' is applied and employees are not required to pay any fees 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 needs to be reported to Carlson Rezidor without delay.

Working hours and conditions

- Suppliers should ensure that their employees have reasonable daily and weekly work schedules, regulated by local laws.
- Employees 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.
- All employees should receive at least the stipulated minimum wage.

No harassment, harsh or inhumane treatment

- Carlson Rezidor Suppliers must treat all employees 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.

No discrimination

- There shall be no positive or negative discrimination in the Supplier's workplace or hiring policy due to union membership or on account of gender, race, color, sexual orientation, origin, religion, physical ability, nationality, age, pregnancy, political affiliation or any other basis prohibited by law.
- Employees shall be treated with respect and in accordance with local legislation.
- Suppliers should provide their employees with the right to freely associate, organize and to bargain collectively in accordance with applicable law.

Health and safety

- Suppliers' production and associated services shall comply with workers' health and safety regulations, human rights guidelines, according to 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 employees. 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 these requirements.

THINK COMMUNITY – COMMUNITY ACTION AND BUSINESS ETHICS

Principles and community

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

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.

Business integrity and ethics

- Suppliers shall conduct their business without engaging in fraudulent activities or extortion and shall neither offer, pay, request nor accept any bribes. They shall maintain integrity, transparency and accuracy in annual reports and record-keeping.

Corruption and bribery

- Carlson Rezidor Suppliers must adhere to the highest standard of moral and ethical conduct, specific to the UK / US bribery act, respect all local laws, and not engage in any form of corrupt practices such as extortion, fraud, bribery or any act which would enable corruption of government or governmental officials.

Limitations on 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.

THINK PLANET – MINIMIZE ENVIRONMENTAL FOOTPRINT

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.

Carbon management and emissions

- Suppliers should monitor and take efforts to reduce their products and services carbon footprint.
- 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 from their operations.

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 discharge, wastewater generated from operations, industrial processes and sanitation facilities.

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 disposal, solid waste generated from operations, industrial processes and sanitation facilities.

Hazardous materials and restricted 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, nickel release) and should strive to use chemicals listed on the [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.

REPORTING VIOLATIONS OF OUR SUPPLIER CODE OF CONDUCT

Suppliers shall comply with the standards listed here within and with all applicable laws and regulations. Failure to follow the Supplier Code of Conduct could result in termination as Carlson Rezidor Supplier.

Carlson Rezidor encourages any stakeholder with concerns about the Supplier Code of Conduct and its implementation to discuss this directly with the Supplier.

Suppliers agree to notify their employees and any sub-contractors related to work for Carlson Rezidor that they may report serious or sensitive concerns or a possible breach of the Supplier Code of Conduct by sending an e-mail with their concerns to responsible.supplychain@carlsonrezidor.com. If Carlson Rezidor receives such a report, we will ask the Supplier to comment and if necessary we 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.

Please contact responsible.supplychain@carlsonrezidor.com if you have any questions about the Supplier Code of Conduct.