

STARWOOD HOTELS & RESORTS WORLDWIDE INC.
SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct outlines certain standards of conduct expected of all Starwood suppliers. While not an exhaustive list, Starwood encourages suppliers to ensure they adhere to at least these minimum standards at all times, and wherever reasonably practicable, strive to exceed them. Starwood further selects and evaluates its partners by their commitment to uphold the Starwood promise to “Do the Right Thing,” to act with integrity in all dealings, to maintain high standards of professional conduct, and to use good judgment. As we define those minimum commitments and standards; all Starwood suppliers must:

Business Conduct and Ethics

1. Comply with all applicable laws and regulations in the countries in which you operate.
2. Compete fairly for business. Do not pay bribes or kickbacks, or provide anything of value to secure an improper advantage. Suppliers acting on Starwood’s behalf are prohibited from giving gifts or other things of value to government employees.
3. Maintain accurate books and records in accordance with locally accepted accounting principles (e.g., Generally Accepted Accounting Principles or International Financial Reporting Standards).
4. Deliver products and services manufactured in accordance with current Good Manufacturing Practice (cGMP) guidelines and meet applicable quality, health and safety standards.
5. Care for the environment in a responsible manner. Seek ways to reduce any negative impact your business operations may have on the environment.
6. Properly handle competitive data, intellectual property, and other proprietary data and/or sensitive information, including Starwood employee, customer, and guest information.
7. Ensure all tiers of the supply chain operate in accordance with Starwood’s Supplier Code of Conduct.

Human Rights and Labor

1. Encourage a diverse workforce and provide a workplace free from harassment, discrimination, or any other abuse.
2. Treat employees fairly with respect to wages, working hours, and benefits.
3. Prohibit all forms of human trafficking including the exploitation of children, and all forms of forced, bonded or compulsory labor. Respect employees’ rights to freedom of association(s), consistent with local law.
4. Provide safe and humane working conditions for all employees.

Animal Welfare

1. Comply with all local, regional and national laws and regulations regarding treatment of animals raised for food.
2. Follow best practices and humane procedures for sound animal husbandry as defined in the locale where animals are raised and grown to prevent the mistreatment of animals.
3. Recognize your responsibility for the ethical treatment of animals in your care and in the care of your suppliers, your employees and contractors.

Reference Materials you may wish to consider are: Social Certification (SA8000), Quality Management (ISO 9001), Environment (ISO 14001), and Social Responsibility (ISO 26000).

You may report any concerns or questions regarding these standards to the Office of the Chief Supply Chain Officer and/or the Office of the General Counsel, Starwood Hotels and Resorts, One StarPoint, Stamford, CT 06902. If you wish to report your concerns anonymously, you can contact Starwood’s confidential helpline at 800-254-4375 in the United States and Canada, or via the internet at www.HOTethics.com. You can also find toll free telephone numbers to call the hotline from around the world at www.HOTethics.com. Both the hotline and website are available 24 hours a day/ 7 days a week.