

Harassment Prevention

General Policies

Marriott has well-defined and long-standing policies and practices designed to ensure that our associates are treated with dignity and respect. A central part of those policies is Marriott's commitment that associates will work in an environment free from sexual harassment by any associate, supervisor, manager, guest, vendor, client, or customer.

Marriott's Global Equal Opportunity Statement and Harassment and Unprofessional Conduct Policy ("Harassment Prevention Policy") strictly prohibits sexual harassment, as well as other forms of harassment, discrimination, and retaliation. These policies are accessible to Marriott associates through Marriott Global Source ("MGS"), Marriott's intranet, Marriott's associate handbook, or by requesting a copy from a Human Resources professional. At new hire orientation, associates are asked to read and acknowledge both the associate handbook and Harassment Prevention Policy. Marriott's Business Conduct Guide, referenced in the handbooks, also reinforces the Company's commitment to harassment prevention and non-retaliation for raising harassment complaints.

Recognizing that leadership and accountability are critical, Marriott periodically reinforces these policies and commitment to harassment prevention through leadership messages. For example, on May 30, 2018, Arne Sorenson, President & Chief Executive Officer, and David Rodriguez, Global Chief Human Resources Officer, highlighted the Company's commitment to harassment prevention in a message to all associates. The message—No Room for Harassment—emphasizes the Company's strict prohibition against sexual harassment and the harms harassment can cause. The message also reminds associates of the importance of and avenues for reporting sexual harassment.

Harassment Prevention Training

Marriott's policy is to train non-management and management employees in harassment prevention and the Company offers online and classroom training courses. Marriott new hires take harassment prevention training within 90 days of hire. Non-management associates who move into a management role complete the management training within 90 days of transfer.

Non-management training covers basic areas of interpersonal behavior and discrimination and harassment law. This training allows Marriott associates to understand their roles and responsibilities when it comes to harassment prevention in the workplace. After completing the training, participants are equipped with information and tools they need to identify and prevent sexual and other forms of harassment.

Marriott recognizes that well-trained, front line managers can be our Company's most valuable resource in preventing and stopping harassment. Management training covers the kinds of behaviors that can contribute to a harassing environment at work. The training examines the illegality of harassment, discrimination, and retaliation, and explores a manager's role in helping the Company to identify, prevent, and eliminate harassment. After completing the training,

participants have the tools to recognize prohibited conduct and the rights of employees relative to harassment in the workplace and to identify the actions that managers and supervisors should take to prevent and address harassment.

In addition, Marriott has developed a “Respect for All” video training series, launching in early 2019, that assures associates that even though Marriott’s brands are service-oriented, the guest is not always right. The videos provide associates with tools to respectfully and professionally refuse guest behaviors or requests that require doing something illegal or unethical, threaten someone’s safety or dignity, or violate Company policy. The series includes a manager module that encourages managers to champion Marriott’s “Respect for All” culture, support associates who raise complaints about guest behaviors, and utilize the many resources available through Marriott to address situations that may arise.

Further signaling our ongoing commitment to safety, Marriott has publicly announced our plan to make associate alert devices a new standard across our portfolio of more than 5,000 managed and franchised hotels in the United States and Canada, and further explore similar technology solutions to meet the needs of our global hotel portfolio and workforce. The associate alert technology rollout is projected to continue through 2020 as Marriott and our franchisees fine-tune and tailor technology installations at individual sites ranging from high-rise city properties to sprawling resorts to suburban hotels. The associate alert device puts another tool in the hands of Marriott’s tens of thousands of associates and complements the Company’s regular harassment and safety and security training and protocols.

Complaints and Investigations

The Harassment Prevention Policy gives associates multiple avenues to report sexual harassment. The options include any manager, Human Resources representative, or corporate Associate Relations representative. The policy highlights that when the sexual harassment involves a manager or supervisor to whom the associate directly or indirectly reports, alternative reporting options are available. Associates may also report sexual harassment confidentially and anonymously through Marriott’s 24-hour toll-free Business Integrity Line (“BIL”), accessible by phone, by email, or online; the BIL phone number and web address are included in the associate handbook.

Marriott policy requires a prompt and thorough investigation of all sexual harassment complaints. Sexual harassment complaints and investigations are, to the extent possible, strictly confidential. Information concerning sexual harassment complaints and investigations is shared internally or externally only with persons who have a legitimate need to know.

Company policy provides that in all cases, management must communicate with the reporting associate when the investigation is complete, confirm that appropriate action was taken and encourage the associate to report any further complaints of harassment or retaliation. Company policy also provides that management should follow-up periodically with the individual who reported the behavior to confirm that the offending conduct has stopped.

A violation of Marriott's Harassment Prevention policy is grounds for disciplinary action up to and including termination. Hotels may remove and ban a guest for conduct that is offensive or abusive to or poses risk to the safety of associates, including sexual harassment. In addition, managers who fail to promptly address complaints of harassment from their associates are subject to discipline.

As demonstrated by Marriott's Harassment Prevention Policy, the BIL system, and the No Room for Harassment message, Marriott strongly encourages all associates to immediately report any harassment, discrimination, or retaliation they may experience or observe. This applies equally to sexual harassment by an associate, supervisor, manager, guest, vendor, client, or customer.

Results

Marriott has found that maintaining robust harassment policies, procedures, and training coupled with effective complaint investigation creates an environment where associates feel comfortable coming forward without fear of retaliation. As a result of Marriott's "Respect for All" culture, most harassment complaints that the Company receives are promptly and effectively investigated and resolved at a very early stage. In all cases, Marriott's objective is to promptly remedy the harassing behavior, and address the complaint in a manner that is intended to ensure that the reported harassment does not happen again. By actively investigating, remediating and supporting individuals who come forward and report harassment, Marriott strives to address problematic behaviors before they become severe and disruptive to the workplace.

Among Marriott's managed workforce, very few sexual harassment complaints escalate to the filing of a formal legal complaint. For purposes of this discussion, Marriott defines formal legal complaints as attorney demand letters, equal employment opportunity administrative charges (federal or state) and lawsuits.

Over the past five years (1/1/2014 to 12/31/2018), globally Marriott has received only forty-four (44) formal legal complaints of sexual harassment, almost all of which involved alleged harassment by associates. That is an average of 8.8 formal complaints per year. To provide some sense of context, Marriott's global headcount of managed associates during that same time frame ranged from 123,500 to 177,000 associates. To date, 23 of the 44 formal legal complaints have been resolved through settlements, the majority of which include non-disclosure agreements. Like other hospitality companies of its size, Marriott maintains insurance that generally covers formal complaints of sexual harassment.