starwood
Hotels and
Resorts

GLOBAL CITIZENSHIP AT STARWOOD

2014 UPDATE AND GLOBAL REPORTING INITIATIVE (GRI) INDEX

For Starwood Hotels & Resorts Worldwide, Global Citizenship is a natural extension of who we are as a business and as people. As such, our company is well positioned within our industry for the future. As more consumers and investors expect companies to make decisions that are environmentally and socially responsible, Starwood is ready to meet and exceed those increasing demands throughout our global portfolio, adding value for our guests and shareholders. Starwood's Board of Directors proudly supports and encourages Global Citizenship at Starwood.

Bruce Duncan
Chairman of the Board of Directors
Starwood Hotels & Resorts Worldwide, Inc.

Our Global Citizenship efforts are some of the most important work we can do as a business; they are also the part of my job that I'm the most proud of at Starwood Hotels & Resorts Worldwide. Sustainability and social responsibility touch every aspect of the company and help us execute a global growth strategy while mitigating our business risk, protecting our environment, promoting community vitality, supporting our associates, and enhancing the guest experience. It's through Global Citizenship that we belong to something bigger. We made great strides in 2014, and I'm pleased to share our most recent progress as we continue to make a better world to experience.

Ken Siegel
Chief Administrative Officer and General Counsel
Starwood Hotels & Resorts Worldwide, Inc.

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This report covers Starwood's Global Citizenship metrics, data, and GRI content as of December 31, 2014, unless otherwise noted. This report was compiled using the Global Reporting Initiative's (GRI) G4 framework as a guide and contains Standard Disclosures from the GRI Sustainability Reporting Guidelines. We welcome your feedback. Please send any comments or questions to global.citizenship@starwoodhotels.com.

GENERAL STANDARD DISCLOSURES

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
Strategy and Analysis			
G4-1	Statement from most senior decision maker.	Please refer to page 2 of this document for statements from Starwood's Chief Administrative Officer and General Counsel, Ken Siegel and the Chairman of Starwood's Board of Directors, Bruce Duncan.	Fully
G4-2	Key impacts, risks, and opportunities.	Identifying and mitigating risks is essential to safeguarding our license to operate in communities that include some of the world's most beautiful, remote, and ecologically sensitive destinations. At properties in approximately 100 countries, we are developing resources, programs, and opportunities to empower our associates to make choices that promote sustainability, support communities, and protect potentially vulnerable populations. We launched our 30/20 by 20 environmental goals in 2009, using a 2008 baseline year, and aim to reduce our energy consumption by 30 percent and water consumption by 20 percent by 2020. In 2013, we added a carbon emissions reduction goal of 30 percent for the same timeframe. We work with associates, owners, general managers, suppliers, and partners to achieve greater efficiencies in energy and water use and reduce our greenhouse gas (GHG) emissions and waste production. We also have efforts within other critical areas of focus including food and beverage, indoor environmental quality, supply chain, and waste management. In addition to addressing our environmental impact, we recognize our responsibility to focus on the opportunities and risks related to social impacts from our operations. By targeting local community needs, human rights, disaster response, and associate engagement, we identify and mitigate vulnerabilities in our business. Please visit our **Global Citizenship** webpage for additional information.	Fully
Organizational Profile			
G4-3	Name of the organization.	Starwood Hotels & Resorts Worldwide, Inc.	Fully
G4-4	Primary brands, products, and services.	Starwood Hotels and Resorts' brands are some of the most recognized in the world, and as of December 31, 2014, included: St. Regis®, The Luxury Collection®, W®, Westin®, Sheraton®, Le Méridien®, Four Points® by Sheraton, Aloft®, and Element®.	Fully
G4-5	Location of the organization's headquarters.	One StarPoint, Stamford, Connecticut 06902	Fully
G4-6	Number of countries where the organization operates and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	At December 31, 2014, our hotel business included 1,207 owned, managed or franchised hotels with approximately 346,600 rooms, comprising 36 hotels that we own or lease or in which we have a majority equity interest, 583 hotels managed by us on behalf of third-party owners (including entities in which we have a minority equity interest) and 588 hotels for which we receive franchise fees. Additionally, our vacation ownership and residential business included 15 stand-alone vacation ownership resorts and residential properties at December 31, 2014. There are 685 properties in the Americas, including the Caribbean, 249 properties in Europe, Africa and the Middle East, and 288 in Asia Pacific. For an up-to-date, detailed list of our properties by country, please visit the **Starwood Hotel Directory**.	Fully
G4-7	Nature of ownership and legal form.	Publicly traded on the New York Stock Exchange under the stock symbol, HOT.	Fully

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-8	Markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).	Starwood serves the travel and tourism markets with a global footprint. Beneficiaries include travel and tourism customers and hotel owners, as well as the communities and economies in which Starwood operates. The number of properties by division as of December 31, 2014, was 587 in North America (601 with 14 Starwood Vacation Ownership); 83 in Latin America (84 with one Starwood Vacation Ownership); 249 in Europe, Africa, and the Middle East; and 288 in Asia Pacific.	Fully
G4-9	Scale of organization.	**2014 Form 10-K, pp. 1-2**.	Fully
G4-10	Total workforce by employment contract and gender.	Starwood employs 180,400 associates at our owned and managed properties, vacation ownership resorts, and corporate offices.	Partially
G4-11	Percentage of total employees covered by collective bargaining agreements.	Starwood supports the collective bargaining rights of all of our associates and acts in accordance with local requirements governing collective bargaining. In North America, including Hawaii and Canada, 39 percent of our hourly workforce is unionized. Starwood supports our employees' rights to join a U.S. union through the secret ballot election process of the National Labor Relations Board. Across our properties in the European Union, 25–30 percent of our associates are unionized. In Latin America, 42 percent of our associates are unionized. In Asia Pacific, union regulations differ by country. Collective bargaining agreements in these three regions are made at country, city, or hotel levels, and nearly all cover workplace health and safety issues.	Fully
G4-12	Describe the organization's supply chain.	Our hotels and resorts use goods and services from more than 100,000 vendors. There are four major categories: Operating Supplies and Equipment; Food and Beverage; Information Technology; and Furniture, Fixtures, and Equipment. The Supply Chain Group manages procurement and is led by our Chief Supply Chain Officer. Starwood outlines supplier performance expectations and uses a variety of policies and procedures to verify that our suppliers uphold our company's ethical standards. Starwood does not have standard global procurement practices; however, the Company published a Supplier Code of Conduct in December 2014. In 2014, 9.9 percent of our spend in the United States went to diverse vendors. Please refer to our **Supplier Code of Conduct** for the minimum standards we expect suppliers to meet and exceed wherever practical and our **CDP Supply Chain response** for additional information.	Fully
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain.	Starwood reached a milestone as we opened our 1,200th hotel in 2014. That year, we signed 175 new hotel management and franchise contracts with approximately 34,700 rooms. We also opened 74 new managed and franchised hotels with approximately 15,000 rooms. In 2014, we sold eight wholly owned hotels and one unconsolidated joint venture.	Fully

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-14	Whether and how the precautionary approach or principle is addressed by the organization.	While Starwood does not formally follow the precautionary principle, we have robust risk assessment and management processes intended to ensure we take a long-term view of Global Citizenship. To assess risks in future franchise, management, and development projects, Starwood applies several different internally developed checklists that correspond to each project. During the development process, a checklist is utilized to assess a project's potential for violation of Starwood's polices and codes, and business risk due to terrorism and corruption. The results of the checklist inform decisions on moving forward with projects and mitigating associated risks. In addition, the Global Citizenship team has developed two checklists; the first aims to minimize the environmental impact of new construction, development projects, and the second aims to minimize the environmental and social risk of the furniture and fixtures specified by our Brand Design team. We also rely on employee grievance mechanisms, our Code of Conduct, and our Supplier Code of Conduct to help assess and manage risk. These codes and additional policies cover corruption and bribery, discrimination, money laundering, insider trading or dealing, health and safety, and whistle blowing. We carefully evaluate and take seriously instances of possible harm to our guests, associates, business partners, and communities where we operate.	Fully
G4-15	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.	Our unwavering commitment to provide a respectful and safe work environment for all our associates is evident by our Human Rights Policy, issued in 2007. Our policy follows the principles of the United Nations (UN) Universal Declaration of Human Rights and applies to all of our owned, managed, and franchised hotels. In 2012, in line with UN doctrine, we began adding a clause into our suppliers' contracts to ensure that the contracts also comply with our Human Rights Policy. Please refer to our **Human Rights Policy Statement** and **Human Trafficking Position Statement for additional information.** Starwood is committed to transparency in our environmental reporting. Since 2007, we have reported our GHG emissions to CDP Investor (formerly the Carbon Disclosure Project). We also voluntarily report to CDP's water disclosure and supply chain questionnaires. Our full CDP responses are available online, **here**. In 2012, Starwood published a **Sustainable Food & Beverage Policy**. We updated the policy in 2014 to expand the global ban on all sales of whale and sea turtle to include an elimination of shark fin consumption in restaurants and throughout food and beverage. In addition, in 2014 we updated and expanded our **Environmental Sustainability Policy** to reflect our critical areas of focus.	Fully

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-16	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	The vitality of our business is directly linked to the vitality of our communities. Our commitment to Global Citizenship is aimed at making a lasting difference in the places where we live and work. Starwood is a member of these associations that help achieve our Global Citizenship goals: • American Hotel & Lodging Association • Clinton Global Initiative • Conservation International's Business & Sustainability Council • Human Rights Campaign • International Tourism Partnership • National Oceanic and Atmospheric Administration (NOAA) Sanctuary System Business Advisory Council • U.S. Green Building Council • Urban Land Institute	Fully
Identified Material Aspects and Boundaries			
G4-17	All entities included in the organization's consolidated financial statements or equivalent documents and whether any of these entities is not covered by the report.	Starwood Hotels & Resorts Worldwide, Inc. Starwood Vacation Ownership, Inc.	Fully
G4-18	Explain the process for defining the report content and the Aspect Boundaries and how the organization has implemented the Reporting Principles for Defining Report Content.	Over the past five years, Starwood has made steady progress on developing our Global Citizenship approach. In 2013, we launched a comprehensive stakeholder-engagement process and conducted a materiality assessment. We considered Aspect Boundaries within and outside of the organization. Our stakeholder-engagement process focuses on understanding how external stakeholders view our Global Citizenship performance. The results are informative, revealing stakeholders' need for additional metrics and communication about our Global Citizenship efforts. Please refer to our **2012 Global Citizenship At Starwood Report, pp. 8–13,** for additional information.	Fully

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-19	All the material Aspects identified in the process for defining report content.	In 2014, we participated in the International Tourism Partnership (ITP) Stakeholder Dialogue to continue our support of the materiality-assessment process. Starwood, along with other companies in the hospitality industry, provided names of partners, suppliers, and owners to ITP for stakeholder interviews. The results of interviews and assessments are a materiality matrix and the focus areas listed below. The focus areas continue the material Aspects identified by our internal materiality assessment in 2013 and now include resiliency. • Adaptation • Climate change • Data privacy • Emissions • Energy • Food waste • Human rights overall • Labor standards • Preservation of local heritage • Renewable energy and materials • Security • Social and human rights of goods and services • Solid waste • Sourcing of local products and services • Supply chain • Sustainable construction • Water	Fully
G4-20	The Aspect Boundary within the organization for each material Aspect.	The following table summarizes the Aspect Boundary within Starwood for each material Aspect.	Fully

G4-20 table

Issue	GRI G4 (Aspects)	Aspect Boundary
Carbon and Emissions	Energy	Hotel Operations
Climate Change	Emissions	Hotel Operations
Disaster Preparedness	No GRI-Specific Aspects	Business Operations, Hotel Operations, and Associates
Energy Efficiency and Diversification	Energy	Hotel Operations
Indoor Environmental Quality	No GRI-Specific Aspects	Hotel Operations
Resiliency	No GRI-Specific Aspects	Business Operations
Supply Chain	Supplier Environmental Assessment	Business Operations
Sustainable Development	Governance, Environmental Management	Business Operations
Sustainable Food and Beverage	Supplier Environmental Assessment	Hotel Operations
Waste Reduction and Diversion	Materials	Hotel Operations
Water Efficiency and Risk	Water	Hotel Operations
Workforce Development	Indirect Economic Impacts, Labor Practices and Decent Work	Associates

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-21	The Aspect Boundary outside the organization for each material Aspect.	The following table summarizes the Aspect boundary outside Starwood for each material Aspect.	Fully

Issue	GRI G4 (Aspects)	Aspect Boundary
Biodiversity and Ecosystem Health	Biodiversity	Local Communities
Community Development	Indirect Economic Impacts	Local Communities
Culture and Community Preservation	Local Communities	Local Communities
Disaster Preparedness	No GRI-Specific Aspects	Local Communities, Supply Chain
Human Rights	Nondiscrimination, Freedom of Association and Collective Bargaining, Child Labor, Forced or Compulsory Labor	Local Communities, Supply Chain
Strategic Philanthropy	Indirect Economics Impacts	Local Communities
Supply Chain	Supplier Environmental Assessment, Supplier Assessment for Labor Practices, Supplier Human Rights, Supplier Assessment for Impact on Society	Supply Chain
Sustainable Development	Indirect Economic Impacts	Local Communities
Workforce Development	Indirect Economic Impacts, Labor Practices and Decent Work	Local Communities

Indicator	Description	Response	Reported
G4-22	The effect of any restatements of information provided in previous reports, and the reasons for such restatements.	There are no restatements of information from previous reports. Please refer to our **2012 Global Citizenship at Starwood Report** for more information.	Fully
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries.	There are no significant changes in Scope and Aspect Boundaries from previous reports. Please refer to our **2012 Global Citizenship at Starwood Report** for more information.	Fully

Stakeholder Engagement

Indicator	Description	Response	Reported
G4-24	A list of stakeholder groups engaged by the organization.	The stakeholder groups we engaged with include investors, governments, guests and customers, nongovernmental organizations (NGOs) and advocacy groups, owners, associates, industry associations, and corporate and nonprofit partners.	Partially
G4-25	The basis for identification and selection of stakeholders with whom to engage.	Engaging stakeholder groups is key to understanding our current impact and planning for the future. Surveys, interviews, and questionnaires are used to gather insight from stakeholders and to provide feedback on our operations. Based on the feedback received and our material issues, we select stakeholders with whom to engage. We aim to involve stakeholders with different perspectives that will improve our Global Citizenship program.	Fully

GENERAL STANDARD DISCLOSURES

Indicator	Description	Response	Reported
G4-26	The organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	At the company level, outreach and collaboration with business partners, advocacy groups, and nonprofits happen on an ongoing basis. Our engagement with guests and associates happens continually throughout the year. For example, in 2014, guests received a survey post-stay where we inquired about their experience. That survey included information about sustainability. To bring Starwood Preferred Guest (SPG®) and associates' voices into the development of new programs and services, Starwood partnered with C Space (formerly Communispace) to build and operate private online communities. C Space helps brands build direct connections to their customers to improve performance and drive growth. Our goal is to build a better guest experience through this program. In 2014, Starwood participated in the inaugural International Tourism Partnership (ITP) Stakeholder Dialogue, and we will continue to be involved in this biannual process. Please refer to our response to G4-19 for additional information.	Fully
G4-27	Key topics and concerns that have been raised through stakeholder engagement and how the organization has responded to those key topics and concerns, including through its reporting. The stakeholder groups that raised each of the key topics and concerns.	We engage with our stakeholders through different events like meetings, hotel and facility tours, newsletters, conferences, press releases, investor and board meetings, industry associations, investor surveys, and via social media. Key topics and concerns that have been raised include: • Carbon footprint • Energy, water, and waste management • Human trafficking • Labor rights • Management of marine and coastal environments • Sustainable food and beverage • Water risk and scarcity	Fully
Report Profile			
G4-28	Reporting period for information provided.	January 1, 2014–December 31, 2014	Fully
G4-29	Date of most recent previous report (if any).	In January 2015, we published a Data Update and GRI Index covering the 2013 calendar year.	Fully
G4-30	Reporting cycle.	Annual.	Fully
G4-31	The contact point for questions regarding the report or its contents.	**global.citizenship@starwoodhotels.com**	Fully
G4-32	Report the "in accordance" option the organization has chosen; the GRI Content Index for the chosen option and the reference to the External Assurance Report, if the report has been externally assured.	This index contains standard disclosures from the GRI Sustainability Reporting Guidelines.	Fully
G4-33	The organization's policy and current practice with regard to seeking external assurance for the report.	Annually, Starwood obtains independent third-party verification of our 30/20 by 20 data from YR&G Consulting. Lloyd's Register Quality Assurance audits our process for obtaining emissions and water data each year.	Fully

GENERAL STANDARD DISCLOSURES:
GOVERNANCE

GENERAL STANDARD DISCLOSURES: GOVERNANCE

Indicator	Description	Response	Reported
Governance			
G4-34	The governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision making on economic, environmental, and social impacts.	Strong disclosure and checks and balances across our organization are integral to how we do business. Starwood's Board of Directors (the "Board") is responsible for the global conduct of the company and sets the tone and standard for our properties and associates. Key committees include the Audit Committee, Compensation and Option Committee, Corporate Governance and Nominating Committee, and Capital Committee. The high-level Global Citizenship Steering Committee represents our geographic operating divisions (The Americas - North America and Latin America, Europe, Middle East and Africa, and Asia Pacific), as well as several functions centralized at our corporate headquarters. For detailed information on our governance structure and committees, please refer to our **2015 Proxy Statement, pp. 11–13**.	Fully
G4-35	The process for delegating authority for economic, environmental, and social topics from the highest governance body to senior executives and other employees.	The Global Citizenship team is led by Chief Administrative Officer and General Counsel Ken Siegel. The team regularly monitors and reports on progress to senior leadership, the Starwood Board of Directors, and internal and external stakeholders. The Vice Presidents of Global Citizenship include Michelle Naggar, VP of Social Responsibillity, and Andrea Pinabell, VP of Sustainability. They report to Ken Siegel, and in 2014, he reported to CEO Frits van Paasschen, who reported to the Board of Directors. The Global Citizenship Steering Committee members consist of divisional and global sustainability and social responsibility champions. These champions have hotel operations, human resources, and engineering backgrounds. The committee convenes monthly with the Global Citizenship team to discuss ongoing efforts, goals, challenges, and best practices. The steering committee ensures the regional relevance and feasibility of all Global Citizenship initiatives and facilitates the development, execution, and communication of these programs. The Global Citizenship team also works with our global Sales, Operations, and Brand teams to create effective processes that enable implementation of global projects across the entire hotel portfolio.	Fully
G4-36	Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental, and social topics, and whether post holders report directly to the highest governance body.	Starwood's Global Citizenship team is responsible for establishing and implementing Starwood's sustainability and social responsibility strategies worldwide and is led by Chief Administrative Officer and General Counsel Ken Siegel. Mr. Siegel reports to the CEO. Charlene Barshefsky serves as the point person on the Board of Directors for Global Citizenship issues. The Global Citizenship team regularly monitors and reports on progress to the Board of Directors and Senior Leadership Team.	Fully
G4-37	Processes for consultation between stakeholders and the highest governance body on economic, environmental, and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.	In 2014, our Global Citizenship team was led by Chief Administrative Officer and General Counsel Ken Siegel and championed from the top by CEO Frits van Paasschen. The Senior Leadership Team, which consisted of the 10 most senior officers and included Mr. Siegel and Mr. van Paasschen, reported to the Board of Directors, who acts in the best interest of the company for its shareholders.	Fully

GENERAL STANDARD DISCLOSURES: GOVERNANCE

Indicator	Description	Response	Reported
G4-38	Report the composition of the highest governance body and its committees by: • Executive or nonexecutive • Independence • Tenure on the governance body • Number of each individual's other significant positions and commitments, and the nature of the commitments • Gender • Membership of underrepresented social groups • Competences relating to economic, environmental, and social impacts • Stakeholder representation	Please refer to our **2014 Form 10-K, pp. 56–58,** for information.	Fully
G4-39	Whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement).	Please refer to our **2015 Proxy Statement, p. 11,** for information.	Fully
G4-40	The nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members.	Please refer to our **2015 Proxy Statement, pp. 20–21,** for information.	Fully
G4-42	The highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value, or mission statements, strategies, policies, and goals related to economic, environmental, and social impacts.	We maintain strong ethical checks and balances throughout our global organization. Starwood's Board has adopted Corporate Governance Guidelines that address issues such as the Board's composition and committee structure, director responsibilities, qualifications and independence, senior executives' performance evaluations, and management-succession planning. The Board regularly reviews developments in corporate governance and updates Starwood's Corporate Governance Guidelines and related materials and standards as necessary.	Fully
G4-47	The frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities.	Starwood's Global Citizenship team reports to the Board of Directors at least once per year with a full update on company CSR activities. At quarterly earnings meetings, the Board of Directors reviews a dashboard with six Starwood goals. Our progress towards the Global Citizenship 30/20 by 20 goals is one of the six goals highlighted.	Fully
G4-48	The highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered.	Starwood's sustainability report is prepared by the Global Citizenship and Global Communications teams in collaboration with Starwood's global business units. Content is reviewed by global and divisional leadership and the Global Citizenship Steering Committee. Together, Starwood ensures that all material Aspects are covered in the report. The report is reviewed by the CEO, the Chief Administrative Officer and General Counsel, and the Chief Human Resources Officer.	Fully
G4-49	The process for communicating critical concerns to the highest governance body.	Please refer to our **2015 Proxy Statement, p. 15,** for information.	Fully

GENERAL STANDARD DISCLOSURES:
ETHICS AND INTEGRITY

GENERAL STANDARD DISCLOSURES: ETHICS AND INTEGRITY

Indicator	Description	Response	Reported
Ethics and Integrity			
G4-56	The organization's values, principles, standards, and norms of behavior such as codes of conduct and codes of ethics.	With properties in more than 100 countries, our reputation is dependent on daily decisions made across the organization. Our core values – do the right thing, go the extra step, and play as a team – guide our associates in how to interact with guests and other stakeholders. Please refer to our **Code of Business Conduct and Ethics**, **Finance Code of Ethics**, **Supplier Code of Conduct,** and **Corporate Opportunity Policy** for additional information.	Fully
G4-57	The internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines.	Our associates have four avenues to seek advice on ethical and lawful behavior and report ethical concerns. These avenues include: • Meet in person with a manager, Human Resources representative, the Office of the General Counsel, or the Internal Audit office • Post a message on the 24/7 website, www.HOTEthics.com, anonymously if preferred • Call Starwood's 24/7 toll-free helpline from anywhere in the world, anonymously if preferred • Write to the Audit Committee of the Board of Directors.	Fully
G4-58	The internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms, or hotlines.	Please refer to our response to G4-57.	Fully

SPECIFIC STANDARD DISCLOSURES:
ECONOMICS

SPECIFIC STANDARD DISCLOSURES: ECONOMICS

Indicator	Description	Response	Reported
Specific Standard Disclosures: Indicators by Aspects			
CATEGORY: ECONOMIC			
DMA-EC	Disclosure on Management Approach EC (Economic Aspects)	Starwood is an owner, operator, and franchisor of hotels, resorts, and residences across the globe with annual revenues close to USD $6 billion. We set ourselves apart as a company through our people, distinctive brands, the guest experience, and our strong, locally led focus on communities. For information on our management approaches, please refer to our **2014 Form 10-K, pp. 1–4**.	Fully
Economic Performance			
G4-EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations, and other community investments, retained earnings, and payments to capital providers and governments.	For information on our revenues, operating costs, employee compensation, retained earnings, and payments to capital providers and governments, please refer to our financial statements in our **2014 Form 10-K, pp. 3–9, 25–37**. Our philanthropic giving enables us to contribute in a way that goes beyond our direct operations. Our approach is aimed at generating positive change on a global scale. We contribute to our communities across 100 countries through targeted philanthropic programs designed to address local priorities. We carry our philanthropic actions through multiple channels including corporate giving, the Starwood Foundation, the Starwood Associate Relief Fund (SARF), and property giving. We donated more than USD $5.85 million to support local and global projects in 2014. The breakdown of giving is as follows: Corporate giving — $1,036,799 Starwood Associate Relief Fund (to 311 associates) — $643,907 Starwood Foundation (to 22 global and local NGOs) — $1,141,121 Giving from properties — $3,035,140 Total (USD) — $5,856,967	Fully

SPECIFIC STANDARD DISCLOSURES: ECONOMICS

Indicator	Description	Response	Reported
G4-EC2	Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure.	Global climate change presents new risks — both known and unknown — for our operations in communities all over the world. Changes in average air and water temperatures (and the risks associated with these changes) may increase operational costs or lead to changes in guest demand in areas where many of our properties are located. As climate change models predict, rising sea levels and more frequent extreme weather events may cause damage to Starwood hotels in vulnerable locations. We owe it to our guests, associates, owners, and the communities we serve to account for climate change in our business strategy. Climate change risks and opportunities are assessed annually and prioritized in terms of potential materiality and the financial impact on our business as a whole, as well as the likelihood and frequency of occurrence based on each hotel's climate zone. This assessment by the Global Citizenship team determines the urgency to react to these risks and opportunities and is executed in partnership with the Operations team. Please refer to our **2014 Form 10-K, p. 18,** and **CDP Climate Change 2015** response for additional information.	Fully
G4-EC3	Coverage of the organization's defined benefit plan obligations.	Our goal is to ensure that our associates have everything they need to thrive every day. Through our signature Starwood wellness program, Total Rewards, our associates in eligible positions have access to health and life insurance, retirement savings, continuing education, and tuition reimbursement. Please refer to our **2014 Form 10-K, pp. 160, 186–190, 196–197,** for additional information.	Fully
Indirect Economic Impacts			
G4-EC7	Development and impact of infrastructure and services supported.	Starwood has a direct impact on our global stakeholders, including associates, owners, developers, partners throughout our supply chain, and every community where we have a presence. We pride ourselves on the many ways we share the success of our business. These include the contributions our hotels and resorts make as engines of local economic growth and development, in addition to enhancing tourism, and the impacts we make globally through employment, workforce training, paying taxes, and supporting diverse suppliers and small businesses. The hospitality industry is responsible, directly and indirectly, for approximately 9.5 percent of the global economy. This impact has a ripple effect in local communities through taxes, support for small businesses, protection of local natural resources, training, and employment. Through our franchise model, local property owners and entrepreneurs leverage Starwood's world-class brands to start successful businesses and drive economic growth in their home countries and communities.	Partially

SPECIFIC STANDARD DISCLOSURES: ECONOMICS

Indicator	Description	Response	Reported
G4-EC8	Significant indirect economic impacts, including the extent of impacts.	Delivering a socially and environmentally responsible experience to our guests requires a vast network of suppliers around the world – from local farmers to multinational corporations. When we make small changes to the ways we procure goods and services, the effects are magnified across the 100,000 partners that make up our supply chain. Our properties around the world engage community organizations in programs and partnerships to preserve culture and enhance and protect ecosystems and biodiversity. As a result of this engagement, business is driven to communities for eco-tourism, diving, fishing, and other activities. Our associates embrace the chance to make a difference in the communities where they live and work. Through our volunteer programs, we create value for society and our company while giving associates new experiences and deeper connections to their communities. In 2014, 13,828 associates reported volunteering in their local communities, collectively giving about 57,000 hours of their time.	Fully
Procurement Practices			
G4-EC9	Proportion of spending on local suppliers at significant locations of operation.	With the exception of some global partners and contacts, most of our procurement takes place at the individual property level. We enrich local economies by working with diverse suppliers, including artisan vendors. We believe this helps us source a better range of goods to create unique experiences for guests. It also allows us to make informal decisions on a local level about sustainability for that market. We implemented diversity spending goals in 10 of our top markets to grow our base of diverse suppliers.	Partially

SPECIFIC STANDARD
DISCLOSURES:
ENVIRONMENTAL

SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Indicator	Description	Response	Reported
CATEGORY: ENVIRONMENTAL			
DMA-EN	Disclosure on Management Approach EN (Environmental Aspects)	Our guests value the natural beauty of our properties, making it vital to our business to be good stewards of the environment that surrounds us. We seamlessly integrate sustainability into our business in ways that enhance the Starwood experience while improving the efficiency of our operations and addressing local community needs. By reducing our environmental footprint, we aim to play an important part in conserving natural resources and habitats and maintaining biodiversity in the communities where we operate. Initiated in 2009, our **Environmental Sustainability Policy** is based on the following objectives: • Conserve natural resources • Drive sustainable development • Establish and report on key environmental performance indicators • Minimize waste and pollution • Protect ecosystem biodiversity • Raise environmental awareness among our associates, guests, and communities To achieve our energy, emissions, and water objectives, we established a goal that aims to reduce energy consumption and greenhouse gas (GHG) emissions per built hotel room by 30 percent and water consumption by 20 percent by 2020, from a 2008 baseline. By December 2014, we reduced energy use by 12.08 percent, carbon emissions by 16.07 percent, and water use by 17.26 percent per built hotel room across all owned, managed, and franchised properties since 2008. We recognize that the built environment contributes to climate change through energy and resource use. Starwood properties are required to have an energy audit, and we are developing global energy conservation measurement guidance and renewable energy strategies for all owned, managed, franchised, and vacation ownership properties. Element hotels are required to be LEED certified, a globally recognized standard for building efficiency. As of December 31, 2014, eight Element hotels were LEED certified and six were pursuing LEED certification. We fully support our properties that choose to pursue other third-party certifications, including Green Key, where, at the end of 2014, we had 68 certified properties. The Global Citizenship team works closely with the Architecture and Construction team to update standards and specifications to ensure renovated and new construction properties meet our efficiency and development standards. We are also making adjustments to our fuel mix by selecting fuels with lower emission factors and utilizing more efficient building systems like combined heat and power (CHP) systems. Starwood was the first hotel company to require franchise properties to report GHG emissions, improving our capacity to address Scope 3 emissions. Starwood is minimizing waste in more ways than traditional recycling. Some of our properties are growing food onsite to use in restaurants, composting remaining food waste, and powering shuttle vehicles with biodiesel fuel made from waste kitchen oil.	Fully

SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Indicator	Description	Response	Reported
		We measure progress against our 30/20 by 20 goals at all properties through our Environmental Impact Assessment System (EIAS+) and an Annual Environmental Impact Survey. We set targets of 100 percent participation from owned and managed hotels and 75 percent from franchise hotels for the Annual Environmental Impact Survey. In 2014, 94.74 percent of owned, 96.85 percent of managed, and 78.65 percent of franchise properties completed the survey. Measuring progress towards our goals also depends on all hotels participating in data collection. In 2014, 93 percent of owned properties, 95 percent of managed hotels, and 60 percent of franchised hotels responded to the Annual Environmental Impact Survey and data-collection process. Overall, 78 percent of global properties completed the survey and participated in data collection.	
Energy			
G4-EN3	Energy consumption within the organization.	In 2014, Starwood's absolute energy consumption was 5,964,497.59 MWh. This number includes data extrapolated for properties that did not report or are unqualified.	Fully
G4-EN5	Energy intensity.	In 2014, Starwood's energy use intensity (EUI) was 114,498 Kbtu per built hotel room. Our 2014 EUI was calculated using validated data from 766 properties.	Fully
G4-EN6	Reduction of energy consumption.	In 2014, Starwood's global energy use per built hotel room declined 4.03 percent from 2013 (YOY). Energy use per built hotel room declined across all global regions by the following amounts: • Asia Pacific: 4.30 percent decrease • Europe, Africa, and the Middle East: 9.55 percent decrease • Latin America: 3.02 percent decrease • North America: 3.27 percent decrease	Fully
G4-EN7	Reduction in energy requirements of products and services.	As of December 2014, Starwood's global energy use declined 12.08 percent compared to 2008. Energy use declined across all of Starwood's global divisions between 2008 and 2014 by the following amounts: • Asia Pacific: 12.03 percent decrease • Europe, Africa, and the Middle East: 14.15 percent decrease • Latin America: 15.80 percent decrease • North America: 15.09 percent decrease	Fully

SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Indicator	Description	Response	Reported
Water			
G4-EN8	Total water withdrawal by source.	Our properties use water from both municipal water supplies and a variety of nonmetered sources, including surface water, wells, and water delivered from other locations or collected from rainwater harvesting. In 2014, 66 percent of Starwood hotels reporting their water consumption were validated for data correctness. For the remaining properties, water use was extrapolated using the metric cubic meters by guest room. As of December 2014, Starwood's global water consumption declined 17.26 percent per built room compared to 2008. Water consumption declined across all of Starwood's global divisions between 2008 and 2014 by the following amounts: • Asia Pacific: 15.06 percent decrease • Europe, Africa, and the Middle East: 22.03 decrease • Latin America: 18.70 decrease • North America: 23.42 decrease In 2014, Starwood's global water consumption declined 0.17 percent since 2013 (YOY). Water consumption by global division changed by the following amounts: • Asia Pacific: 3.50 percent increase • Europe, Africa, and the Middle East: 0.51 percent increase • Latin America: 7.35 percent decrease • North America: 3.27 percent decrease Please refer to our **CDP Water response** for additional information.	Fully
G4-EN9	Water sources significantly affected by withdrawal of water.	Our properties use water from both municipal water supplies and a variety of nonmetered sources, including surface water, wells, and water delivered from other locations or collected from rainwater harvesting. To better understand our water risk globally, we utilize the World Resources Institute's Aqueduct global mapping tool. The results showed that about 42 percent of our properties are located in areas of high or extremely high water risk. We are also developing water conservation measure guidance for all owned, managed, franchised, and vacation ownership properties globally.	Fully
Biodiversity			
G4-EN11	Operational sites owned, leased, managed in, or adjacent to protected areas and areas of high biodiversity value outside protected areas.	At the present, Starwood does not have an explicit biodiversity policy at the corporate level, but we included biodiversity as a critical area of focus when we updated our environmental sustainability policy at the end of 2014.	Partially
G4-EN12	Significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Starwood hotels are located in some of the world's most beautiful and species-rich places. Protecting species and maintaining biodiversity in the communities where we operate is increasingly important, as economic development and the resultant climate change threaten more species each year. By reducing our environmental footprint, we aim to play an important part in conserving natural habitats in our backyard.	Partially

SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Indicator	Description	Response	Reported
G4-EN13	Habitats protected or restored.	Many of our properties work to promote and protect biodiversity. Examples include: • Le Méridien Bora Bora manages a sea turtle breeding program that protects and rehabilitates endangered green sea turtles. The program also helps 200 Bora Bora school children participate in marine wildlife-protection workshops. • The St. Regis Bahia Beach in Puerto Rico has a prosperous nature program that provides on-site protection of endangered leatherback sea turtles and Caribbean manatees. • The Andaman Langkawi in Malaysia is involved in coral reef conservation. The property has an artificial reef module system that enables conservationists to transplant live coral.	Partially
Emissions			
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1).	Scope 1: 476,083.63 metric tons CO_2e.	Fully
G4-EN16	Energy indirect greenhouse gas (GHG) emissions (Scope 2).	Scope 2: 2,450,197.03 metric tons CO_2e.	Fully
G4-EN17	Other indirect greenhouse gas (GHG) emissions (Scope 3).	Scope 3: 1,331,351.68 metric tons CO_2e from franchises and Starwood business travel.	Fully
G4-EN19	Reduction of greenhouse gas (GHG) emissions.	As of December 2014, Starwood's global GHG emissions declined 16.07 percent from a 2008 baseline. GHG emissions declined across all of Starwood's global divisions between 2008 and 2014 by the following amounts: • Asia Pacific: 10.61 percent decrease • Europe, Africa, and the Middle East: 17.44 percent decrease • Latin America: 4.54 percent decrease • North America: 27.11 percent decrease In 2014, Starwood's global GHG emissions per built hotel room declined by 8.09 percent at owned, managed, and franchised properties compared to 2013 (YOY). By global division, GHG emissions per built hotel room changed by the following amounts: • Asia Pacific: 4.30 percent decrease • Europe, Africa, and the Middle East: 12.81 percent decrease • Latin America: 11.84 percent increase • North America: 14.28 percent decrease	Fully
Transport			
G4-EN30	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations and transporting members of the workforce.	Starwood has a diverse and expansive supply chain. Engaging with our suppliers to aggregate emissions data from the goods and services we purchase is a challenge that we are working on. Through our work with CDP Supply Chain, we are hoping to begin using the prescribed best practices for working with some of our largest suppliers on this issue. We track emissions data related to our associates' business travels and report them with Scope 3 emissions in our CDP response. In 2014, five companies to which Starwood is a supplier requested that we submit GHG emissions for their related business with Starwood to CDP Supply Chain. Please refer to our **CDP Supply Chain response** for additional information.	Fully

SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Indicator	Description	Response	Reported
Overall			
G4-EN31	Total environmental protection expenditures and investments by type.	In 2014, Starwood committed USD $147,900 total to fund environmental protection initiatives through global and regional partnerships. The breakdown of funding is as follows: Water risk, ocean health, and seafood — $55,000 Waste management including diversion and amenity recycling — $62,900 General environmental sustainability partnerships — $30,000 Total (USD) — $147,900	Fully
Supplier Environmental Assessment			
G4-EN32	Percentage of new suppliers that were screened using environmental criteria.	In 2014, 100 percent of Starwood's new supplier contracts included our corporate social responsibility clause, which states that vendors must commit to the highest ethical, human rights, and environmental standards throughout their organization and in their selection of subcontractors. New suppliers in high-risk categories like linens and amenities are also audited by third-party vendors, including Bureau Veritas (BV), for social criteria. BV's social compliance audit criteria are based on an audit checklist of 14 key areas for review that are consistent with industry standards.	Fully
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken.	Our materiality process identified potentially negative environmental impacts in our supply chain including GHGs, water consumption, and food and beverage sourcing. In 2014, Starwood partnered with CDP to gather information on our top 215 suppliers' emissions and environmental and climate change strategies using a standardized disclosure process. Our voluntary participation in CDP Supply Chain reporting helped us to understand our overall environmental footprint as we pursue improvements. Please refer to our **CDP Supply Chain response** for additional information.	Fully

SPECIFIC STANDARD
DISCLOSURES:
LABOR PRACTICES
AND DECENT WORK

SPECIFIC STANDARD DISCLOSURES: LABOR PRACTICES AND DECENT WORK

Indicator	Description	Response	Reported
CATEGORY: SOCIAL			
Labor Practices and Decent Work			
DMA-LA	Disclosure on Management Approach LA (Labor Practices and Decent Work Aspects)	Our standard operating procedures facilitate uniform adoption and application of policies on safety, security, the environment, and health. These policies cover topics such as workplace violence protection, crisis management, and fire protection, and create fundamental standards across our global properties. Starwood policies, resources, and training materials are easily accessible to our associates on StarwoodOne, our global intranet site. Our policies include: • The Be Safe Associate Program, to ensure our associates are safe and aware of safety procedures • Our Equal Employment Opportunity, to promote diversity and inclusion in our workforce • We also provide benefits to associates in eligible positions through our Total Rewards program (see GA-LA2 for additional details). We collect feedback from employees worldwide through our Annual StarVoice Survey. We reached a response rate of 96 percent in 2014, with 93 percent of our associates saying they were satisfied with Starwood as a place to work.	Fully
Employment			
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operations.	Starwood is committed to offering benefits programs designed to attract, retain, motivate, and reward associates worldwide. We offer competitive wages, health care, and incentive plans linked to strong performance. Offerings vary from country to country, with associates receiving locally competitive packages. In the United States, programs include Health Savings and Flexible Spending Accounts, wellness plans, disability benefits, and basic life insurance. U.S. associates can also join a retirement program and/or an employee stock purchase plan.	Fully
Training and Education			
G4-LA9	Average hours of training per year per employee by gender and by employee category.	We provide various professional development opportunities for associates and managers including eLearning and instructor-led training (ILT). Globally, we had 2,700 eLearning and ILT offerings in 2014. Managers averaged 16 ILT hours and nearly five eLearning hours. Associates averaged nearly 11 ILT hours and four eLearning hours. Starwood does not track employee training by gender.	Fully

SPECIFIC STANDARD DISCLOSURES: LABOR PRACTICES AND DECENT WORK

Indicator	Description	Response	Reported
G4-LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	We support our associates to follow unique career paths through individualized learning and development. From online and classroom experiences to conferences and on-the-job training, we provide opportunities strategically aligned to help associates grow. Our global training programs include: • Brand awareness • Compliance training • Functional skills training • General manager orientation • Leadership skills • New hire company orientation • Service culture We also help our associates build their careers by providing associate-development feedback through the 360-degree feedback process.	Fully
G4-LA11	Percentage of employees receiving regular performance and career-development reviews, by gender and by employment category.	At Starwood, we utilize a variety of talent management tools to support the ongoing learning and development of our associates and leaders, such as regular performance reviews, succession planning, and talent review meetings, as well as a variety of assessments such as 360-degree feedback.	Partially

SPECIFIC STANDARD DISCLOSURES:
HUMAN RIGHTS

SPECIFIC STANDARD DISCLOSURES: HUMAN RIGHTS

Indicator	Description	Response	Reported
Human Rights			
DMA-HR	Disclosure on Management Approach HR (Human Rights Aspects)	Starwood's Human Rights Policy, issued in 2007, commits the company to conduct our business in line with the principles of the United Nations Universal Declaration of Human Rights. In 2012, we added a clause into our supplier contracts to ensure compliance with our Human Rights Policy. In 2014, we launched our Human Trafficking Awareness Training (see additional details in G4-HR6). By the end of the year, 87 percent of all owned and managed properties had at least one manager on property complete the new training. Starwood also conducted a Human Rights Impact Assessment in 2014. Using the results of the assessment, we developed a five-year strategy to address human rights risks and opportunities in our value chain. Starwood properties are often in close proximity to global sports and entertainment venues. These events provide an opportunity to raise awareness on human trafficking risks. We work with industry peers and other partners to eliminate human trafficking by encouraging our guests and associates to report suspicious behaviors.	Fully
Investment			
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.	Since 2013, Starwood vendor contracts originating from the corporate office contain a corporate social responsibility (CSR) clause, which states that vendors must commit to the highest ethical, human rights, and environmental standards throughout their organization and in their selection of subcontractors. We also require vendors to agree to conduct business in compliance with all applicable laws with respect to labor and human rights, including but not limited to, all laws that support the elimination of exploitative or forced labor. Contracts executed prior to 2013 may have included an earlier version of our CSR clause. The CSR clause is also shared with our divisional teams for use in divisional and/or regional contracts as appropriate.	Fully
G4-HR2	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Engaging associates on human rights issues is critical for every region of our business. Starwood provides human rights training for associates and managers. Globally, in 2014, associates and managers completed 19,730 training hours on Starwood's Code of Conduct, which incorporates our Human Rights Policy and Human Trafficking Awareness. Associate participation rates range from 87–100 percent depending on the training module.	Fully
Freedom of Association and Collective Bargaining			
G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	In 2013, we began including a corporate social responsibility clause in vendor contracts, and we finalized a Supplier Code of Conduct in 2014. We expect our suppliers to maintain these minimum standards, including permitting employees' rights to freedom of association. In 2014, we also initiated Human Rights and Good Manufacturing Practices audits of a small number of suppliers in higher risk categories. For more information, please refer to our **Supplier Code of Conduct**.	Fully

SPECIFIC STANDARD DISCLOSURES: HUMAN RIGHTS

Indicator	Description	Response	Reported
Child Labor			
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	Our Human Rights Policy and our Supplier Code of Conduct prohibit all forms of human trafficking, including the exploitation of children, and all forms of forced, bonded, or compulsory labor. In 2014, we also initiated Human Rights and Good Manufacturing Practices audits of a small number of suppliers in higher risk categories. For more information, please refer to our **Supplier Code of Conduct**.	Partially
Forced or Compulsory Labor			
G4-HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	As a member of the International Tourism Partnership (ITP), Starwood has committed to uphold ITP's antitrafficking policy, provide awareness training, and develop and share best practices. In 2014, we launched our global Human Trafficking Awareness training to all associates at the manager level and above. By the end of the year, 87 percent of all owned and managed properties had at least one manager on property complete the training. Our Supplier Code of Conduct also prohibits all forms of human trafficking. For more information, please refer to our **Supplier Code of Conduct**.	Fully

SPECIFIC STANDARD DISCLOSURES:
SOCIETY

SPECIFIC STANDARD DISCLOSURES: SOCIETY

Indicator	Description	Response	Reported
Society			
DMA-SO	Disclosure on Management Approach SO (Society Aspects)	The vitality of our business is directly linked to the vitality of our communities. Our commitment to Global Citizenship is aimed at making a lasting difference in the places where we live and work. Starwood and the Starwood Foundation focus on Workplace Readiness, Conservation, Disaster Relief, Human Rights, and Community Vitality. In February 2014, we launched the Starwood Cares for the Community Portal with the objective of providing our associates with access to real-time information for volunteering in their local communities. This new portal provides a way for associates to search for volunteer opportunities, sign up for events, track their success and participation, and share best practices. Once a year, we evaluate our associates' views of Starwood's community involvement programs through our associate engagement survey, StarVoice. The 2014 survey showed strong support from managers across the company for associates' participation in community events, which is consistent with the results from the prior year. Eighty-five percent of our associates agree that Starwood management supports participation in events and activities that benefit local communities.	Fully
Local Communities			
G4-SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	Starwood properties engage communities where we operate. Starwood Cares for the Community is an online portal that provides associates access to volunteer opportunities in the community. Associates can also track volunteer hours in the portal. In 2014, 79 percent of Starwood operations had at least one associate active in Starwood Cares for the Community portal.	Fully
G4-SO2	Operations with significant actual and potential negative impacts on local communities.	Starwood understands that our business can affect natural habitats and resources, local economies, and social infrastructure. We do not currently track the number of operations with potential negative impacts on local communities.	Fully
Anticorruption			
G4-SO3	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified.	Starwood assessed 100 percent of new property-development opportunities for risk of corruption.	Fully

SPECIFIC STANDARD DISCLOSURES: SOCIETY

Indicator	Description	Response	Reported
G4-SO4	Communication and training on anticorruption policies and procedures.	In 2014, we added capacity in a number of areas including the Global Compliance Office, Global Human Resources Ethics function, and Internal Audit teams. These resources focus on messaging and support of Starwood's policies, including the Code of Conduct, Anticorruption Policy, and Finance Code of Ethics. They also share responsibility for handling whistle-blower complaints and allegations of wrongdoing submitted through hotlines established and maintained under the Sarbanes-Oxley Act of 2002 and the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Starwood's Code of Conduct and Anticorruption Policies were refreshed and rolled out in 2014 for recertification by more than 52,000 associates. We achieved a 95-percent completion rate for associates and a 100-percent completion rate for associates titled Vice President and above on the Code of Conduct training.

Starwood's Finance Code of Ethics was also updated in 2014. A new training was provided globally to more than 11,000 finance associates. We achieved a 94-percent completion rate for the new finance code. The Finance Code of Conduct was distributed to more than 250 of our largest suppliers in North America and distributed by EAME and Asia Pacific Supply Chain leaders to our other suppliers, aligning them to our values.

Please refer to our **Supplier Code of Conduct** and **Finance Code of Ethics** for additional information. | Fully |
| **Public Policy** | | | |
| G4-SO6 | Total value of political contributions by country and recipient/beneficiary. | In 2014, the Starwood Political Action Committee donated USD $37,500 to various U.S. Congressional candidates, federal election committees, and federal political action committees. We contributed $5,000 total to five Congressional candidates. A $15,000 donation was made to the Democratic Congressional Campaign Committee, and a $10,000 donation was made to the Democratic Senatorial Campaign Committee. A $2,500 donation was made to the Rubio Victory Committee, a joint fundraising committee composed of Marco Rubio for Senate and Reclaim America Political Action Committee. We also made a $5,000 donation to the U.S. Travel Association Political Action Committee. A $2,500 donation to Blumenthal for Connecticut made in January 2014 was subsequently withdrawn.

Please refer to the **U.S. Federal Election Commission webpage** for additional information. | Fully |
Product Responsibility			
Product and Service Labeling			
G4-PR3	Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements.	Starwood has several mechanisms for gathering information on products and services used in our properties. Our global Supplier Code of Conduct applies to all suppliers, and a third-party audit is conducted in areas we identify as high-risk supply chain areas. Starwood's Furniture, Fixtures and Equipment (FF&E) group has a checklist used in all factories that addresses the safe use and disposal of FF&E items. The FF&E group has its own reporting chain for possible ethics issues and violations.	Partially
G4-PR5	Results of surveys measuring customer satisfaction.	Starwood gives guests an opportunity to provide feedback on every stay, whether they decide to do so through surveys or Ratings & Reviews on our branded websites. The results are used to improve our products and services, and ensure we are providing our guests with a positive and memorable experience. In addition, our hotels are audited by a third-party inspection firm. These inspections measure compliance with brand standards to ensure hotels are delivering against our brand-wide quality, conditional, and service requirements.	Partially

OUR COMPANY

NUMBER OF PROPERTIES BY DIVISION IN 2014

601
NORTH AMERICA

288
ASIA PACIFIC

249
EUROPE, AFRICA,
& THE MIDDLE EAST

84
LATIN AMERICA

180,400 ASSOCIATES

1,207 OWNED, MANAGED, OR FRANCHISED HOTELS

15 SVO PROPERTIES

NINE WORLD-CLASS BRANDS

ONE UNIFIED COMMITMENT TO GLOBAL CITIZENSHIP

ABOUT US

At Starwood, our commitment to our local communities and the environment is not only part of who we are, but it is also vital for our ongoing business success. We incorporate Global Citizenship work throughout our business, across our brands, and at each of our properties around the world.

Our goals, programs, and partnerships encourage every associate to be part of something bigger, doing what's right not only for our business but also for each other, our communities, the environment, and the world. By sharing our progress, we promise to continue to provide our guests, associates, customers, communities, and owners a better way to experience the world.

FOR MORE INFORMATION, VISIT SPG.COM/GLOBALCITIZENSHIP