

**STARWOOD HOTELS & RESORTS WORLDWIDE, INC.**  
**HUMAN RIGHTS POLICY STATEMENT**  
**Policy Issued: December 2015**

Starwood Hotels & Resorts Worldwide, Inc. respects the human rights standards contained in the [Universal Declaration of Human Rights \(UDHR\)](#). Starwood's Human Rights Policy reflects our commitment to conduct our business in a manner consistent with these standards.

As part of this commitment, Starwood conducts ongoing human rights due diligence and is designing a formal approach to localized due diligence to be implemented at the regional or country level. Accountability for this due diligence lies with the Office of the General Counsel while implementation of this commitment is conducted via Starwood's Human Rights Council. Individuals seeking to report potential human rights infringements can do so through the Company's reporting hotline, Ethics Point.

Starwood's policies require that our business be conducted with honesty and integrity, and in compliance with all applicable laws. In cases where local laws may appear to conflict with international human rights standards, we seek to uphold the underlying human rights principle while complying with local law.

While we assess Starwood's ability to impact the broad universe of human rights through our direct operations and business relationships, our human rights impact assessment suggests that we have specific responsibilities related to:

- **Starwood Associates:** Starwood enforces a policy of non-discrimination with respect to employment, treats workers fairly with respect to wages, working hours and benefits, and promotes and embraces diversity in all aspects of our business operations. Starwood is further committed to freedom of association and has zero tolerance for all forms of forced, bonded or compulsory labor. Starwood condemns all forms of exploitation of children. The Company does not recruit unlawful child labor, and supports the elimination of exploitative child labor.
- **Franchise Associates:** Starwood expects our franchisees to respect the human rights of their associates, including any associates of third party managers engaged by the franchisee, and advise they conduct their business in an ethical manner consistent with all applicable laws related to human rights and ethical business conduct. We believe the UDHR is the international standard to follow, and we encourage our franchise owners to adopt these principles as a best practice. To assist franchisees in meeting the standards set forth in the UDHR, Starwood makes various resources available to its franchisees regarding human rights protocols.
- **Workers in Starwood's Supply Chain:** Starwood and its properties expect our primary and secondary suppliers, including those providing contract labor, working with Starwood, its affiliates and branded hotels, to respect human rights standards related to freedom from harassment and discrimination; treating workers fairly with respect to wages, working hours and benefits; prohibiting all forms of forced labor and unlawful child labor; respecting freedom of association; and providing safe and humane working conditions, as communicated through our [Supplier Code of Conduct](#).
- **Local Communities:** Starwood is committed to promoting the human rights of individuals in the communities in which we operate. This includes the promotion of human rights through economic development and job creation as well as proactive steps to recognize and respect cultural heritage and ensure the company respects the community's right to water.

- **Business Partners:** Starwood promotes adherence to international human rights principles amongst our business partners. We incorporate human rights into our decision making process related to business relationships, sponsorships and client engagements and will use our leverage to promote respect for human rights as appropriate.

In addition, Starwood recognizes the industry's risk of being linked to instances of human trafficking and has established a position statement to help raise awareness amongst our stakeholders. The company is committed to contributing to the prevention of human trafficking, through awareness training and engagement of our associates and guests and to developing and sharing best practices. Our Human Trafficking Awareness training, translated into 9 languages, is mandatory for management at our owned & managed properties and available to our franchisees.

As one of the world's leading hospitality companies with operations in over 100 countries, Starwood believes the company has the ability to positively impact the human rights of individuals within our sphere of influence. Starwood commits to continually engaging with these stakeholders as we continue our human rights journey and to reporting on the Company's human rights performance through our [Global Citizenship Report](#).

If you have questions related to our Human Rights Policy, please email us at [global.citizenship@starwoodhotels.com](mailto:global.citizenship@starwoodhotels.com).

If you believe this policy is not being implemented, please contact [EthicsPoint](#).



Tom Mangas  
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