

SONESTA INTERNATIONAL HOTELS CORPORATION SUPPLIER CODE OF CONDUCT

INTRODUCTION

Sonesta is a global hospitality company that owns, operates, franchises, and manages a diverse portfolio of hotels and resorts. The company was founded in 1937 and is headquartered in Newton, Massachusetts, USA.

Sonesta's portfolio includes over 280 owned and operated hotels with an additional 900+ franchised properties in seven countries, with a strong presence in the United States, Latin America, and Egypt. The brand offers a range of accommodations, from luxury hotels and resorts to extended-stay hotels and boutique properties. Sonesta's hotels are known for their personalized service, modern amenities, and unique local experiences.

Sonesta's supplier code of conduct is a set of principles that outlines the expectations and standards that Sonesta has for its suppliers. These principles cover a range of issues, including ethical conduct, labor practices, environmental sustainability, and business practices.

LEGAL COMPLIANCE AND BUSINESS INTEGRITY

Business Practices and Ethical Conduct

Suppliers are expected to conduct their business in an ethical and honest manner, and to avoid any practices that are illegal or unethical. This includes compliance with laws and regulations, as well as adherence to industry standards and best practices. Suppliers are expected to maintain high standards of business conduct, including transparency in financial reporting, avoiding conflicts of interest, and prohibiting bribery or corruption in any form.

Compliance with Laws

Sonesta is committed to conducting business in compliance with all applicable laws, regulations, and standards in the jurisdictions where we operate. We expect our suppliers to share this commitment and to comply with all applicable laws and regulations in their operations, including those related to labor, health and safety, environmental protection, and other areas relevant to the products or services being supplied.

Suppliers must also monitor and report any legal or regulatory compliance issues that arise in the course of their operations and take appropriate corrective action as necessary. This could include implementing new policies

or procedures, conducting employee training, or making changes to products or services to comply with legal requirements.

Overall, compliance with laws is a fundamental requirement for our suppliers, and we expect all suppliers to operate in a legal and ethical manner. Failure to comply with applicable laws and regulations or to adhere to the requirements set out in this code of conduct may result in termination of the supplier relationship.

Conflicts of Interest

Sonesta is committed to ensuring that all business decisions are made in the best interests of our company and customers and are free from any actual or perceived conflicts of interest. As a supplier to our company, you are expected to share this commitment and to conduct your business in a manner that is free from conflicts of interest.

A conflict of interest arises when personal or financial interests or relationships interfere, or appear to interfere, with an individual’s ability to act in the best interests of the company.

If a conflict of interest arises or is perceived to arise, suppliers must disclose the conflict of interest to our company promptly, in writing. Suppliers should also take steps to eliminate the conflict of interest or to mitigate its effects, potentially including recusal from relevant business decisions, termination of conflicting relationships or interests, or other appropriate measures.

Failure to disclose a conflict of interest or to take appropriate steps to address it may result in termination of the supplier relationship. Suppliers are also expected to cooperate fully with our company in investigating any potential conflicts of interest and in taking appropriate steps to address them.

Gifts and Entertainment

Sonesta is committed to conducting business in a transparent and ethical manner, and to avoiding any actions or relationships that could compromise the integrity of our operations. Suppliers are required to adhere to Sonesta’s Code of Business and Ethics.

Sonesta prohibits employees and suppliers from accepting gifts, favors, or other items of value that could influence, or appear to influence, business decisions or create a conflict of interest. This includes gifts of cash, stock, or other securities, as well as gifts of goods or services. However, we recognize that certain gifts of nominal value, such as promotional items or holiday gifts, may be acceptable.

Labor Practices

Suppliers are expected and highly encouraged to uphold the highest standards safe and healthy work environment for their employees, and to comply with all applicable labor laws and regulations as guided by the Universal Declaration of Human Rights and International Labor Organization’s Fundamental Conventions. This includes prohibiting child labor and forced labor, providing fair wages and benefits, and allowing workers to organize and bargain collectively in accordance with United Nations Guiding Principles on Business and Human Rights and Sustainable Hospitality Alliance – Principles on Forced Labor.

ENVIRONMENTAL SUSTAINABILITY

Suppliers are expected to minimize the environmental impact of their operations, and to comply with all applicable environmental laws and regulations. Here are some of the key environmental sustainability requirements that suppliers might be expected to meet:

Environmental management system

Suppliers may be expected to have an environmental management system (EMS) in place to help them identify, manage, and reduce their environmental impact. This could include measures such as energy and water conservation, waste reduction and recycling, and reducing greenhouse gas emissions.

Sustainable sourcing

Suppliers are expected to source their products and materials in a sustainable way, such as using certified sustainable wood products or organic cotton. They also expected to source products locally to reduce the environmental impact of transportation.

Chemical management

Suppliers are expected to manage their use of chemicals and hazardous materials in a responsible way, such as by using non-toxic cleaning products or minimizing the use of harmful pesticides.

Packaging

Suppliers are expected to use packaging that is reusable, recyclable, or made from sustainable materials. They may also be expected to minimize the amount of packaging used, and to use packaging that is the appropriate size and weight for the product being shipped.

Energy and water efficiency

Suppliers are expected to take measures to reduce their energy and water use, such as by using energy-efficient equipment or installing low-flow water fixtures.

Carbon footprint

Suppliers are expected to measure and may be asked report their carbon footprint, and to take steps to reduce their greenhouse gas emissions. This could include measures such as using renewable energy sources, reducing travel-related emissions, or investing in carbon offsets.

OUTSOURCING AND SUBCONTRACTING

Sonesta recognizes the value of outsourcing and subcontracting certain business functions to third-party providers in the hospitality industry. However, we also recognize the potential risks and challenges associated with these arrangements, including risks to our reputation, data security, and compliance with laws and regulations.

To ensure that outsourcing and subcontracting arrangements are managed effectively and in compliance with all applicable laws and regulations, our company has established the following Outsourcing and Subcontracting Policy:

Suppliers are not to subcontract services that they perform for Sonesta or outsource activities that directly impact the delivery of goods and services to Sonesta, without prior written approval.

Suppliers are required to conduct a thorough risk assessment to identify and evaluate potential risks, including risks to data security, regulatory compliance, and the quality of services provided. This assessment will be based on objective criteria, including the provider's experience, reputation, and financial stability.

All outsourcing and subcontracting arrangements will be formalized through written agreements that clearly define the scope of services, responsibilities, and obligations of parties. These agreements will also include provisions for data security, compliance with laws and regulations, and the protection of confidential information.

Our company will maintain ongoing oversight and monitoring of all outsourcing and subcontracting providers to ensure that they are meeting their contractual obligations, maintaining high standards of quality and service, and complying with all applicable laws and

regulations. This oversight may include regular audits, site visits, and performance reviews.

By adhering to this policy, we can maintain the trust and confidence of our customers and promote a fair and transparent business environment in the hospitality industry.

SUPPLIER FINANCIAL INTEGRITY

Sonesta is committed to maintaining the highest standards of financial integrity in all aspects of our operations, and we expect our suppliers to share this commitment. Suppliers must maintain sound financial practices and comply with all applicable financial laws and regulations. This includes accurately reporting financial information, maintaining appropriate accounting records, and ensuring that all financial transactions are properly authorized, recorded, and documented.

BUSINESS RESUMPTION AND CONTINGENCY PLANNING

Suppliers are required to create, update, and conduct regular testing of their own business continuity and disaster recovery plans, in compliance with relevant regulatory and service level guidelines.

PRIVACY AND INFORMATION SECURITY

Suppliers must safeguard all information provided by our company, including but not limited to customer data, employee data, and business information. Suppliers must comply with all applicable data privacy laws and regulations, as well as industry standards for information security as defined in section 2 and 3 of Sonesta's Code of Business and Ethics. Suppliers must implement appropriate technical and organizational measures to protect data from unauthorized access, disclosure, alteration, or destruction. Any suspected or actual security breaches must be immediately reported to our company, and suppliers must cooperate fully in any investigation or remediation efforts. Non-compliance with this policy may result in disciplinary action, up to and including termination of the supplier relationship.

ANIMAL WELFARE COMMITMENT

Sonesta is committed to promoting the highest standards of animal welfare in all aspects of our operations, and we expect our suppliers to share this commitment. Suppliers must treat animals humanely and with respect and must not engage in any cruel or inhumane practices. Suppliers must comply

with all applicable laws and regulations regarding the care and treatment of animals and must follow recognized best practices for animal welfare.

Suppliers must minimize the use of animal testing and must only use it when necessary and in compliance with applicable laws and regulations. Alternative testing methods should be explored and adopted whenever possible to reduce the number of animals used for testing.

DIVERSITY AND INCLUSION

Sonesta is committed to fostering a culture of diversity, inclusion, and belonging in all aspects of our operations, and we expect our suppliers to share this commitment. Suppliers must not discriminate on the basis of race, ethnicity, gender, sexual orientation, age, religion, national origin, or any other legally protected characteristic. Suppliers must demonstrate a commitment to diversity and inclusion by actively promoting a workplace culture that values and respects differences. Suppliers should strive to create an inclusive environment where everyone feels welcomed, respected, and valued.

ANTI-HARASSMENT & NON-DISCRIMINATION

Sonesta is committed to upholding a workplace that is free from harassment and discrimination, and we expect our suppliers to share this commitment. Suppliers must not engage in any form of harassment, including sexual harassment, verbal abuse, or other conduct that creates a hostile or intimidating work environment. Suppliers must promptly report any suspected or actual harassment or discrimination, or any violation of this policy or any applicable laws and regulations. Suppliers must provide training to their employees on this policy and on the importance of maintaining a workplace that is free from harassment and discrimination. The training should include examples of what constitutes harassment and discrimination, and how to report such behavior.

CONTACT US

We require anyone who knows of a violation of laws, rules, regulations, or this Code of Conduct to report that violation to a member of our board, our General Counsel/Chief Compliance Officer, or RMR LLC's Director of Internal Audit. You may report such violations as follows:

By written correspondence to:

Sonesta International Hotels Corporation

Chief Compliance Officer

400 Centre St, Newton, MA 02458

By toll-free telephone to: 833-946-0390.

By e-mail to: Compliance@sonesta.com

By use of Sonesta's web site at: <http://ethicspoint.com>

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