



XENIA HOTELS & RESORTS, INC. Supplier / Vendor Code of Conduct

Xenia Hotels & Resorts, Inc., (“Xenia”) strives to operate in an ethical, environmentally sustainable, and socially responsible manner. We believe this is the basis of strong lasting relationships with business partners and the duty of a responsible corporate citizen. We expect and encourage our suppliers and vendors to operate in a manner to reduce environmental and social risks and the impacts of their products and services through the following standards:

Compliance

We expect every supplier to adhere to all relevant laws and regulations, including those related to the environment, labor and employment, and corporate governance. We also expect to be informed in the event of a violation of a law or regulation should the activity relate to products or services provided to Xenia.

Environmental Standards

- Acquire environmental permits and registrations where required and adhere to all environmental laws and regulations
- Monitor environmental performance and make continual efforts to maximize efficiency, reduce energy and water consumption and carbon emissions
- Handle all materials, including chemicals and hazardous materials, safely and properly in accordance with best practices throughout their life cycle, including recycling, reuse, or disposal
- Prohibit the use of illegal substances
- Restrict the use of hazardous substances in products in accordance with applicable laws and regulations, such as recycling and disposal regulations
- Incorporate sustainably sourced materials when available
- Monitor, control, and treat air emissions prior to discharge where required
- Prevent environmental pollution and reduce resource consumption, including the minimization of waste
- Advance environmental sustainability best practices related to operations, products, and services

Labor Rights and Human Rights Standards

- Adhere to applicable labor laws and regulations, including laws related to child labor, minimum age requirements, compensation, and working hours
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- Adopt and abide by the American Hotel & Lodging Association 5-Star Promise
- Provide a safe and healthy working environment free of discrimination, harassment and retaliation
- Facilitate and conduct effective training and awareness programs to prevent harassment or discrimination

- Provide employees the right to freedom of association and the right to choose a collective bargaining representative through an agency-administered process, if desired
- Promote a diverse and inclusive environment for all stakeholders, including employees, suppliers, and customers
- Identify and eliminate any forms of forced, bonded or compulsory labor
- Protect employees from all forms of abuse and exploitation
- Eliminate recruitment fees payable by job applicants, if any
- Identify and prevent all forced labor, modern slavery, or human trafficking in operations
- Promote supplier diversity by identifying and offering opportunities for diverse-owned enterprises

Governance Standards

- Comply fully with all applicable laws and regulations
- Maintain an honest and ethical business conduct environment and culture
- Have zero tolerance towards corruption, bribery, extortion, or embezzlement
- Document all financial transactions accurately with transparency
- Respect and safeguard business and personal information and data to ensure privacy among stakeholders, including employees and customers

Xenia expects its suppliers and vendors to strive to conduct business in a manner aligned with the standards outlined in our Code of Business Conduct and Ethics, located on our Investor Relations webpage. Xenia reserves the right to request a third-party audit of its suppliers and vendors (including site inspections and/or documentation requests to ensure compliance) and to terminate its relationship with any supplier or vendor who fails to comply with the above outlined standards. Xenia also reserves the right to amend or modify our Supplier/Vendor Code of Conduct from time to time. This policy was approved by the Nominating and Corporate Governance Committee pursuant to its charter as delegated and approved by the Board of Directors.