



XENIA HOTELS & RESORTS, INC. Human Rights & Labor Rights Policy

Xenia Hotels & Resorts, Inc. (“Xenia”) believes that companies such as ours have a responsibility to respect and uphold fundamental human rights. We aim to adhere to the principles defined in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights and comply with all applicable human rights and labor rights laws. We adhere to these principles as it relates to our employees and we expect and encourage the operators who manage our portfolio of properties to also adhere to these principles and laws, as well as adhere to the following standards, regardless of geographic location:

Harassment & Non-discrimination

- Adopt and abide by the American Hotel & Lodging Association 5-Star Promise
- Do not tolerate any form of harassment or discrimination based on gender, race, disability, ethnicity, nationality, religion, or gender expression or identity, or any other protected class
- Protect all the rights of all individuals, including minority’s and women’s rights
- Promote diversity and inclusion within their organizations
- Encourage reporting of all incidents of alleged harassment and promptly investigate any and all complaints in a confidential manner, free from any retaliation
- Facilitate and conduct effective training and awareness programs to prevent harassment or discrimination
- Continuously review and implement policies, protocols, trainings and new and emerging technologies to enhance employee and guest safety

Ethical Recruitment and Prohibition against Forced Labor, Modern Slavery and Human Trafficking

- Eliminate any forms of forced, bonded, or compulsory labor
- Eliminate recruitment fees payable by job applicants, if any
- Protect employees from all forms of abuse and exploitation
- Provide awareness and prevention training to combat human trafficking at our properties
- Aim to prevent all forced labor, modern slavery and human trafficking in their operations

Labor Rights

- Do not employ or exploit child labor and individuals below the minimum lawful employment age for the respective jurisdiction in which they operate
- Comply with all applicable wage and compensation requirements as defined by the respective jurisdiction in which they operate
- Do not exceed the maximum number of working hours as defined by applicable law and ensure appropriate overtime compensation is paid
- Respect employees’ freedom of association, to peaceful assembly, and right to choose a collective bargaining representative through an agency-administered process

Freedom of Expression

- Respect and support our employees' right of freedom of opinion and expression, provided it does not affect work performance during working hours

Occupational Health and Safety

- Comply with all applicable safety and health legal regulations and guidelines at all properties and at our corporate office
- Actively identify and promptly respond to health, safety and security concerns

We expect and encourage our stakeholders, including our hotel operators and suppliers, to operate in a manner that adheres to the above standards. This policy document should be read in conjunction with our Code of Business Conduct and Ethics and our Supplier/Vendor Code of Conduct. Our Code of Business Conduct and Ethics outlines the broad principles of legal and ethical conduct embraced by Xenia and specifies our reporting and accountability mechanisms. Our Supplier/Vendor Code of Conduct details our expectations of our vendors and suppliers and their respective policies and standards on environmental sustainability, social responsibility and governance to which we hold them accountable.