



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, including the International Labor Organization. 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. We also support training efforts to achieve compliance.

Our Board of Directors, whom the Nominating and Corporate Governance Committee and senior executive team inform via input from our internal Enterprise Risk Management and Corporate Responsibility Committees, have oversight of the significant social risk factors facing our Company, such as those covered in this Human Rights & Labor Rights Policy, including:

- bribery and corruption;
- harassment and discrimination;
- diversity, equity and inclusion;
- ethical recruitment, forced labor and human trafficking;
- labor rights and fair employment;
- freedom of expression; and
- occupational health and safety.

Anti-Bribery and Anti-Corruption

- Prohibit corruption in all its forms, such as bribery, improper or lavish gifts, and extortion
- Our policy on gifts is more fully detailed in our Code of Ethics and Business Conduct

Anti-Harassment & Non-discrimination

- Adopt and abide by the American Hotel & Lodging Association (AHLA) 5-Star Promise on Sexual Harassment and support and encourage our third-party operators to adopt relevant measures.
- 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
- Ensure equal opportunity
- Protect all the rights of all individuals, including minorities and women
- 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, training, and new and emerging

technologies to enhance employee and guest safety

Diversity, Equity, and Inclusion

- Promote diversity, equity, and inclusion across our organization
- Encourage diversity, equity, and inclusion among our operators, suppliers, and vendors

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 and Fair Employment

- 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 our corporate office
- Actively identify and promptly respond to health, safety, and security concerns
- Encourage operators to adopt and abide by the AHHA's Safe Stay® Enhanced Industry-wide Hotel Cleaning Guidelines in response to COVID-19 in order to protect their workers and our guests
- Implement health and wellness initiatives appropriate for our office environment
- Engage contractors, suppliers and vendors who are focused on health and safety

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, including the identification and monitoring of potential issues that could result in non-compliance with this policy. 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. This policy was approved by the Nominating and Corporate Governance Committee pursuant to its charter as delegated and approved by the Board of Directors.