



## SUPPLIER CODE OF CONDUCT

The products, services and activities of our Suppliers may impact the reputation of Radisson Hotel Group, affecting our level of trust with other stakeholders. Suppliers shall comply with the standards listed here, and with all applicable laws and regulations – requesting the same from their supply chain, including third-party labor agencies. Failure to follow the Supplier Code of Conduct could result in termination as a Radisson Hotel Group Supplier.

Radisson Hotel Group is not a joint or co-employer with any of its Suppliers, each of whom is the sole employer of its employees, making it fully and completely responsible for any of its employment-related decisions as well as compliance with all applicable laws, rules and regulations in the operation of its business.

### INTRODUCTION TO RADISSON HOTEL GROUP PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

Radisson Hotel Group believes in, and is committed to, advancing the [United Nations Global Compact's](#) ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption; as well as the 17 [Sustainable Development Goals](#).

Radisson Hotel Group supports the articles contained in the [Universal Declaration of Human Rights](#).

Radisson Hotel Group is committed to combatting modern slavery, educating employees and encouraging its partners as part the broader business community to take a stand against human trafficking.

Radisson Hotel Group promotes water stewardship and, therefore, has signed the United Nations Global Compact's [CEO Water Mandate](#) for its operations in Europe, the Middle East and Africa. All Radisson Hotel Group Suppliers shall work with honesty and integrity as valued standards.

In addition, Suppliers are expected to comply with the terms and conditions of their supplier agreements with Radisson Hotel Group – as well as all applicable laws and regulations in the countries and jurisdictions where they conduct business or deliver goods and/or services.

The above principles are the foundation for the Supplier Code of Conduct, which outlines the minimum standards that Suppliers to Radisson Hotel Group are expected to achieve.

Radisson Hotel Group's Responsible Business program includes an objective to work with Suppliers that demonstrate social, ethical and environmental responsibility. In order to achieve this objective, all our Suppliers should comply with the criteria listed on the following pages as a condition of doing business with Radisson Hotel Group.



These criteria comprise Radisson Hotel Group's Responsible Business pillars:

- Think People
- Think Community
- Think Planet

## **1. THINK PEOPLE**

### **1.1 HUMAN RIGHTS**

Radisson Hotel Group acknowledges and respects the principles contained in the [United Nations Declaration of Human Rights](#). Radisson Hotel Group Suppliers shall not violate these principles.

### **1.2 NO CHILD LABOR**

Suppliers shall not use any form of child labor, as defined by [Principle Five](#) of the UN Global Compact, in any of their facilities. Further clarification on the term 'child labor' can be found under <https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-5>

Children should be protected from any type of labor that may be hazardous to their health or that interferes with their education.

Suppliers shall adhere to minimum age provisions as applicable by local laws and regulations, and should not use workers under the legal age for employment for the type of work being performed in any facility.

### **1.3 COMBATING HUMAN TRAFFICKING AND SLAVERY**

Suppliers should not allow any form of modern slavery, human trafficking, exploitation of children, or forced or compulsory labor.

All work must be voluntary, and in no case should workers be mandated to relinquish government-issued identification, passports or work permits.

Suppliers should ensure that the [Employer Pays Principle](#) is applied and that workers are not required to pay any recruitment fees or expenses as a condition of receiving work.

In cases where modern slavery, human trafficking, exploitation of children, or forced and compulsory labor is discovered in the supply chain, it must be reported to Radisson Hotel Group without delay.

### **1.4 WORK HOURS AND CONDITIONS**

Suppliers should ensure and document that workers have reasonable daily and weekly work schedules, regulated by local laws.

Workers should not be required to work more than the number of hours legally allowed for regular and overtime work periods.

Suppliers shall comply with local laws and industry standards regarding payment, working hours (including overtime), rest days and public holidays.

Suppliers shall compensate workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers will not permit

deductions from wages as a disciplinary measure. Suppliers should be able to provide relevant documentation.

### **1.5 FREEDOM OF ASSOCIATION**

Suppliers should allow employees the right to freely associate, organize and to bargain collectively in accordance with applicable law.

### **1.6 NO HARASSMENT, HARSH OR INHUMANE TREATMENT**

Radisson Hotel Group Suppliers must treat all workers – including temporary, migrant, student, contract, direct employees and any other type of worker – with dignity and respect. They must ensure that no threats of violence, physical punishment, confinement, or other forms of physical, sexual, psychological, or verbal harassment or abuse are used as a method of discipline or control. Suppliers will clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements.

### **1.7 NON-DISCRIMINATION**

There shall be no positive or negative discrimination in the Supplier's workplace or hiring policy due to race, gender, age, disability, marital status, sexual orientation, pregnancy, nationality, caste, national origin, veteran status, minority group, affiliation with a political, religious or union organization or any other characteristic protected by law.

### **1.8 HEALTH AND SAFETY**

Suppliers' production and associated services shall comply with workers' health and safety regulations, human rights guidelines (per the [International Labor Organization](#)), and environmental protection laws in the country of production.

Facilities where goods are produced for Radisson Hotel Group should provide a safe work environment and healthy working conditions for all workers. This includes access to drinkable water, sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, and safeguarding against occupational injury and illness. Facilities should be subject to regular health and safety reviews, with corrective action being taken where necessary.

When the Supplier provides housing, it must also adhere to the above requirements.

## **2. THINK COMMUNITY**

### **2.1 PRINCIPLES AND COMMUNITY SUPPORT**

Suppliers should be promoting the Think People principles in all contact with their local community.

Suppliers are expected to create shared value in the community.

Suppliers should assess the potential impact of their activities on the local community and take steps to mitigate and/or avoid any negative impacts.

### **2.2 FAIR COMPETITION**

Suppliers shall comply with legal requirements regarding fair competition and accurate marketing.

They shall act confidentially, lawfully, and with integrity when handling competitive and proprietary information.

## **2.3 BUSINESS ETHICS AND ANTI-CORRUPTION**

Suppliers will perform all business dealings with integrity and transparency, and these dealings will be reflected accurately in the Suppliers' annual reports and record-keeping.

Radisson Hotel Group is committed to ethical business practices and compliance with all applicable anti-bribery/anti-corruption laws (ABAC Laws) worldwide. Radisson Hotel Group prohibits the offering or provision of money or anything else of value, directly or indirectly, to any person for the purpose of influencing the exercise of his or her official duties in a manner that would benefit Radisson Hotel Group.

Radisson Hotel Group also expects its Suppliers to adhere to this same commitment to ethical practices and compliance with ABAC Laws in the conduct of their respective businesses – particularly (but not limited to) when providing goods or services to Radisson Hotel Group.

Radisson Hotel Group Suppliers must also adhere to the highest standard of moral and ethical conduct, respect all local laws, and not engage in any other form of illegal or improper practices (such as extortion, fraud, or any other act which could enable corruption in any manner).

Suppliers will not make illegal payments themselves or through a third party (or agent). Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

## **2.4 GIFTS AND GRATUITIES**

Suppliers should ensure that acceptance of any business courtesies, gifts, entertainment, merchandise, services, travel, donations or anything of value to or from Radisson Hotel Group employees is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment, or as a means of obtaining, an improper business advantage.

Suppliers are advised that employees of Radisson Hotel Group cannot engage in any behavior that could impact their judgement regarding the best interest of the company or their ability to give full attention to Radisson Hotel Group business. This includes, but is not limited to, accepting personal gifts or entertainment that have a substantial monetary value or include any personal kickback arrangement. Employees may not accept gifts of money under any circumstances, nor may they solicit non-monetary gifts or any other personal benefit or favor of any kind from Suppliers.

## **3. THINK PLANET**

### **3.1 ENVIRONMENTAL SUSTAINABILITY**

Suppliers shall have a program in place to continuously minimize any negative environmental impacts of their full product/service lifecycle and minimize their product/service carbon footprint as a result. They are expected to comply with existing legislation and regulations regarding the protection of the environment and should be environmentally proactive.

### **3.2 CARBON MANAGEMENT AND EMISSIONS**

Suppliers should monitor, and take efforts to reduce, the carbon footprint of their products and services.

Suppliers should monitor and control the discharge of air emissions from volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated by their operations.

### **3.3 WATER STEWARDSHIP**

Suppliers shall demonstrate knowledge of their company's water resource management and drive action towards sustainable, efficient and equitable water use.

Suppliers are expected to promote the responsible use of freshwater, taking socially and economically beneficial actions to reduce their water footprint.

Prior to discharge, Suppliers should monitor, control and treat as required any wastewater generated from operations, industrial processes and sanitation facilities.

### **3.4 WASTE REDUCTION**

Waste of all kinds should be reduced or eliminated at the source through production modifications, operational processes, materials substitution, conservation, recycling and re-use of materials.

Prior to disposal, Suppliers should monitor, control and treat as required any solid waste generated from operations, industrial processes and sanitation facilities.

### **3.5 HAZARDOUS MATERIALS AND RESTRICTED SUBSTANCES**

Suppliers should adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal of such substances.

Suppliers should identify and manage hazardous materials to ensure their safe handling, storage, recycling, reuse or disposal in such a way as not to harm the environment.

Suppliers should avoid the use any materials listed on the [SIN](#) list or any relevant local legislation (i.e. prohibiting asbestos, arsenic, cadmium, chromium compounds, CFCs, cyanides, DDT, halons, PCBs, lead, AZO dyes, DMF, PAHs, Phthalates, PFOS, or nickel release). They should strive to use chemicals listed on the EPA [Safer Chemical Ingredients](#) list as well as alternative chemicals with low toxicity and high biodegradability.

Suppliers should not use materials from endangered wood, animals or plants as listed by [CITES](#) – and all wood used should be sustainable.

## **4. REPORTING VIOLATIONS**

Suppliers agree to notify their employees and any sub-contractors that they may report serious or sensitive concerns or possible breach of the Supplier Code of Conduct.

Any stakeholder with concerns about the Supplier Code of Conduct and its implementation is encouraged to work directly with the Supplier or their primary Radisson Hotel Group contact to resolve those concerns.

If that is not possible or appropriate, please contact Radisson Hotel Group through the following methods per region:

## AMERICAS AND ASIA PACIFIC

**Phone: Business Conduct and Ethics Hotline:** The Company's Business Conduct and Ethics Hotline is available to report ethical problems or questionable practices. There is no need to identify yourself, except where local law restricts the Company from accepting anonymous reports.

- Toll Free (U.S.A. and Canada): +1 (800) 377-3729
- Worldwide Direct Line: +1 (763) 212-3056
- China—South China Telcom: 10800-130-1712
- China—North China Netcom: 10800-713-1755
- Hong Kong: 800-696669
- India: 000-800-100-4133
- Mexico: 001-855-285-8762
- Singapore: 800-1301-958
- Taiwan: 00801-14-7059
- UK: 0800-210-0975

## EUROPE, MIDDLE EAST AND AFRICA

**Internet: Ethics Hotline:** Radisson Hotel Group employees, Suppliers and others with a concern regarding business ethics at one of our properties, may anonymously report on the following website: [ethics.radissonhotels.com](https://ethics.radissonhotels.com)

**Email:** Radisson Hotel Group Supplier Hotline: All other issues with this Code of Conduct may be reported via [responsible.supplychain@radissonhotels.com](mailto:responsible.supplychain@radissonhotels.com)

If Radisson Hotel Group receives such a report, the Supplier will be asked to comment and, if necessary, Radisson Hotel Group may request an improvement plan to correct the issue. If the Supplier does not act or respond to the report or concern – and is not willing to work on correcting the issue – the Supplier can be subjected to disciplinary actions, including termination as a Radisson Hotel Group Supplier and/or review by local authorities.

Radisson Hotel Group will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Supplier Code of Conduct