

# WYNDHAM



## WORLDWIDE

### SUPPLIER CODE OF CONDUCT

As one of the world's largest hospitality companies, Wyndham Worldwide Corporation demands the highest level of law-abiding and ethical behavior, and we expect the same of our suppliers, worldwide.

In all instances we expect adherence to our Core Values, which are to:

- Act with Integrity
- Respect everyone, everywhere
- Provide individual opportunity and accountability
- Improve our customers' lives
- Support our communities

Accordingly, we require all suppliers to comply with this Wyndham Worldwide Supplier Code of Conduct ("Code") and all applicable laws and regulations in all locations where they conduct business.

For purposes of this Code, "supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services, to or through Wyndham Worldwide, including the supplier's employees, subcontractors, agents, and other representatives.

### **ETHICAL STANDARDS**

Wyndham Worldwide expects its suppliers to conduct business with ethical standards consistent with our own.

- Obey all relevant laws
- Treat each other fairly, with dignity and respect
- Prepare all records of financial transactions carefully and accurately
- Report financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, suppliers, and financial partners
- Avoid actual and potential conflicts of interest
- Avoid the improper giving and receiving of gifts
- Safeguard Wyndham Worldwide's assets
- Properly handle competitive data, intellectual property, and other proprietary and/or sensitive information, including Wyndham Worldwide client, customer, guest and/or employee information, and protect against unauthorized disclosures
- Protect Wyndham Worldwide's reputation
- Separate personal political activities from Wyndham Worldwide business
- Report observed violations of legal and ethical standards

## **CHILD LABOR**

Suppliers shall not use workers under the legal age of employment in any country or local jurisdiction where work is performed. If the minimum age of employment is not defined, the minimum age of employment shall be 15 years of age. In cases where minors are authorized to work, we expect our suppliers to observe all legal requirements, particularly those pertaining to hours of work, wages, minimum education and working conditions.

## **FORCED LABOR**

No supplier shall permit nor tolerate the use of indentured, slave, bonded or other forced involuntary labor by its suppliers.

## **WAGES AND BENEFITS**

Suppliers shall not pay less than the minimum wage in accordance with local laws or the prevailing market wages, whichever is higher.

## **WORKING HOURS**

Suppliers shall maintain reasonable employee work hours in compliance with local standards and applicable national laws of the countries and regions in which the supplier does business. Wyndham Worldwide requires suppliers to comply with the statutory requirements for working hours for employees. Wyndham Worldwide will not use suppliers that, on a regularly scheduled basis, require employees to work in excess of the statutory requirements, unless those employees are properly compensated as required by applicable law.

## **HEALTH AND SAFETY GUIDELINES**

Suppliers must share Wyndham Worldwide's commitment to providing a safe and healthy workplace and to treating employees fairly and in compliance with local laws. Health, safety and other workplace standards must meet all local laws and safety regulations. Worker housing, where provided, must meet the same standards for health and safety as those that apply in the workplace.

## **FREEDOM OF ASSOCIATION**

Employees of suppliers shall be free to join organizations of their own choice. Suppliers shall respect and recognize the right of employees to join and organize associations of their own choosing, and to bargain collectively. Employees shall not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

## **NON-DISCRIMINATION**

Wyndham Worldwide believes that all terms of employment should be based solely on an individual's ability to do the job. Wyndham Worldwide requires its suppliers to uphold a commitment to basic principles of human rights. This means that suppliers should not discriminate against employees in hiring, promotion, salary, performance evaluation or any other term or condition of work, on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, disability, or any other basis prohibited by law in the applicable jurisdiction.

## **RESPECT AND DIGNITY**

Wyndham Worldwide firmly believes that everyone should be treated with dignity and respect. Suppliers shall treat each of its employees with respect and dignity, and shall not subject or threaten to subject any employee to physical, sexual, psychological or verbal harassment or abuse.

## **ENVIRONMENTAL GUIDELINES**

Wyndham Worldwide actively seeks suppliers who share our commitment to protecting the environment. Suppliers shall abide by all federal, state and local environmental laws. Wyndham Worldwide favors suppliers that work to sustain, protect and restore the environment, by means such as energy conservation, recycling and proper disposal of waste, as well as by environmental restoration.

## **COMMUNITY INVOLVEMENT**

Wyndham Worldwide seeks to work with suppliers that partner with local governments and communities to improve the educational, cultural, economic and social well-being of the communities in which they live and serve.

## **ANTI-CORRUPTION AND CONFLICTS OF INTEREST**

Suppliers will conduct their businesses without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers may not give or receive a bribe, or engage in any activity that could be construed as a bribe, to or from any non-U.S. government official, those in a position to influence government officials or any other party. Suppliers may not give Wyndham Worldwide employees any gift of value or offer of service which could, or could be considered to, improperly or materially influence the Company's business relationship with that supplier.

## **COMMUNICATION**

Suppliers should take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. Suppliers should also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, agents and contractors to the extent applicable.

## **COMPLIANCE WITH THIS CODE**

Wyndham Worldwide holds each of its suppliers accountable for ensuring compliance with this Code, and may request that a supplier demonstrate such compliance to the satisfaction of Wyndham Worldwide.

## **WYNTEGRITY LINE**

Any concerns regarding the ethics of a supplier's relationship with Wyndham Worldwide or this Code may be reported through the Wyntegrity Line. The toll-free number for the U.S. and Canada is 866-949-9963.