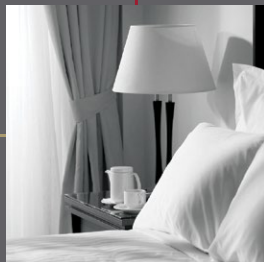
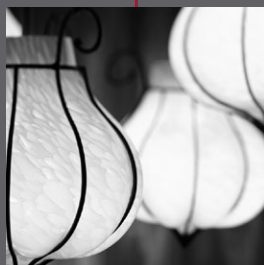


Business Conduct Guide

Our Tradition of Integrity



Marriott
INTERNATIONAL

ethics+
compliance
Marriott International

“How we do
business is
as important
as the business
that we do.”

– J.W. “Bill” Marriott, Jr.





Dear Marriott International Associate,

Marriott International's reputation and continued success as a global hospitality leader are grounded in our steadfast commitment to service and business integrity and in our application of consistently high standards to everything we do.

From our very humble beginnings as a root beer stand, a fundamental commitment to hard work, fair business practices, and respect for others has shaped our decision making and guided our relationships with our valued stakeholders: associates, guests, hotel owners and franchisees, investors, suppliers, and the communities in which we operate.

Our commitment to being a responsible member of the communities where we do business has not changed since our founding in 1927. Decisions that do not reflect our fundamental values of integrity, honesty, and fairness can pose risks to our business, compromise our competitiveness, and negatively impact our associates and our reputation.

This Business Conduct Guide and related company policies were developed to provide clear guidance on not only what is legal but also what is right. It supports our pledge to uphold uncompromising business standards and maintain a fair and ethical workplace.

Thank you in advance for reading and embracing this Guide in the spirit of one of our core values that has stood the test of time – Act with Integrity.

Sincerely,

A handwritten signature in black ink that reads "Anthony Capuano". The signature is written in a cursive, flowing style.

Anthony G. Capuano
President and Chief Executive Officer

Introduction..... 1

- Expectations and Responsibilities..... 1
- Special Responsibilities of Managers 2
- Seeking Advice and Speaking Up..... 3
- Where to Go for Help..... 4

Acting with Honesty and Integrity..... 5

- Accurate Books, Records, and Reports..... 6
- Dealing Fairly with Customers..... 8
- Antitrust and Competition Law 9
- Dealing Fairly with Competitors..... 11
- Commercial Bribery and Improper Gifts..... 12

Interacting Honestly with the Government 14

- Bribery, Illegal Gratuities, and Gifts..... 15
- Political Contributions and Activities..... 18
- Lobbying..... 19
- Providing Information to the Government..... 19
- Anti-Money Laundering and Anti-Terrorism Financing 19
- Global Trade Sanctions, Restrictions, and Boycotts..... 20

Protecting Marriott’s Assets and Reputation..... 21

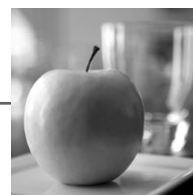
- Proper Use of Marriott’s Assets..... 22
- Protecting Personal Data and Confidential Information 23
- Insider Trading..... 25
- Protecting Marriott’s Reputation 26
- Conflicts of Interest..... 28
- Corporate Opportunities..... 29
- Use of Associate Time and Pay Practices..... 29

Respecting Customers and Associates 30

- Fair and Harassment-Free Workplace..... 31
- Privacy and Personal Data 32
- Health, Safety, and Security..... 32

Promoting the Greater Good..... 33

- Giving Back to the Community 34
- Supporting Human Rights and Human Dignity..... 34
- Human Trafficking..... 35
- Environmental Responsibility 35



Expectations and Responsibilities

One of our core values is Acting with Integrity. This means we hold ourselves to uncompromising ethics and compliance standards. This Business Conduct Guide was created for associates to help all of us live up to these standards – every day, everywhere in the world we do business.

As you read these pages, please understand that misconduct by just one of us hurts all of us.

And remember – it is ok if you do not always know the right thing to do – as long as you raise your hand and ask for help.

More Information

Consult [MIP-01 \(Ethical Conduct\)](#) for more information about our high ethics and compliance standards.

Waiver and Certification

Any waiver of any provisions of the Business Conduct Guide applicable to executive officers or directors may be made only with the prior approval of the Board of Directors or its designated committee after disclosure of all material facts. Any such waivers will only be granted in exigent circumstances and will be promptly disclosed to stockholders.

You may be required to certify that you understand and will follow this Guide.

Who Does This Apply To?

This Business Conduct Guide applies to Marriott International, Inc. and its consolidated subsidiaries (“Marriott”), associates, officers, directors, and other persons acting on behalf of Marriott (collectively “associates”).

This Business Conduct Guide does not apply to our franchisees, licensees, and their respective employees. They must comply with our agreements and the law and are encouraged to have their own policies that reflect our shared commitment to integrity. Marriott’s **Responsible Business Principles for Franchisees** further amplify our expectations of franchisees for ethical conduct.

What is Expected?

You are expected to know and work within the standards of conduct detailed in this Guide and obey the law at all times. While we do not expect everyone to be subject matter experts in all subjects, each associate is responsible for being familiar with the policies and laws governing their areas of responsibility.

Each of us has a duty to report potential violations of the law, this Guide, or the policies discussed here. Failing to do so in a timely manner may enable the misconduct to continue, increasing the harm it may cause. See [Seeking Advice and Speaking Up](#).

Special Responsibilities of Managers

Managers are expected to set the right tone and lead by example.

Managers who are responsible for supervising other associates have a special responsibility to help their team members understand the expectations contained in this Business Conduct Guide and model desired conduct.

Know the Business Conduct Guide and its supporting policies. Talk to your team members about integrity and encourage them to apply these policies every day.

“Our business relies upon integrity and good judgment.”

– J.W. “Bill” Marriott, Jr.

Creating the Right Environment

- Communicate what is expected of associates.
- Set the right example. Others are likely to follow your lead.
- Do not set unrealistic goals that place pressure on associates to compromise our ethics standards.
- Recognize associates for acting with integrity.
- Report known or suspected violations of policy or law.
- Encourage associates to speak up and report Business Conduct Guide and policy concerns.
- Adopt “open door” processes for the benefit of associate communications.
- Safeguard the confidentiality of those who report violations in good faith and protect them from retaliation.

Marriott's Ethics + Compliance Program

Since our founding in 1927, we have taken care of our associates and served guests with integrity. To help all of us maintain this core value of Integrity and help you conduct business the right way, Marriott maintains an **Ethics + Compliance Program**. The program is implemented by a multidisciplinary team, including associates from Human Resources, Law, Finance, Internal Audit, Internal Investigations and Government Affairs.

Our Ethics + Compliance Program is overseen by the Ethics and Compliance Governance Board, which is made up of senior Marriott leaders led by Marriott's Chief Financial Officer and Marriott's General Counsel. The Governance Board reports on the state of the Ethics + Compliance Program to the Audit Committee of the Board of Directors at least once each year.

Seeking Advice and Speaking Up

This Business Conduct Guide provides information you need to identify potential ethics and compliance issues, get advice, and speak up about a potential issue within Marriott.

When to Seek Advice

If you are unsure of what to do in a given situation, stop to ask yourself:

- Is the action legal?
- Is it consistent with Marriott's business values and policies?
- How would you feel about your decision if your friends and community learned about it in the media?

If you are still unsure if an action is a violation, discuss your questions and concerns with a resource listed in [Where to Go for Help](#).

Speaking Up - No Retaliation

You have a duty to speak up about suspected violations of the law, this Business Conduct Guide, and Marriott policies.

Marriott respects the confidentiality of associates who report concerns or potential violations of the law, this Business Conduct Guide, and policies. Marriott has a No Retaliation policy for associates who raise a concern honestly and in good faith.

When reporting a suspected violation, you do not have to give your name, but you are encouraged to remain in contact in case there are follow-up questions. Marriott makes every reasonable effort to safeguard the confidentiality of associates who raise a concern, provide information, or participate in an investigation.

No Retaliation means that associates who report a concern in good faith cannot be subjected to any adverse employment action, including separation, demotion, suspension, or loss of benefits because of the report.

If you believe someone has retaliated against you for your role in reporting a concern or participating in an investigation, report the matter using the **Business Integrity Line** or other [Where to Go for Help](#) resources.

Enforcement of Business Conduct Violations

Violations of the Business Conduct Guide will be addressed promptly, consistently, and effectively. Consequences may include prosecution, involuntary separation from employment, or other appropriate discipline or performance management measures. A final update may be provided, if appropriate, to the person who reported the violation, if the report was not made anonymously.

Associates who conceal misconduct, falsify records, knowingly make a false report, or fail to cooperate with an investigation or comply with Marriott policies may be subject to disciplinary action, up to and including termination.

Managers may be subject to disciplinary action if they do not adequately supervise associates.

Where to Go for Help

Use the following resources to ask questions, raise concerns, or speak up about potential violations.

Discuss your concerns with your manager or someone more senior at Marriott.

Use the “open door” process.

Contact the Business Integrity Line.

- Website and telephone numbers: visit [Business Ethics Site](#)
- United States, U.S. territories and Canada: 1 (888) 888-9188

Contact Internal Audit.

- Email: Business.Ethics@Marriott.com
- MGS: Associates can reach [Internal Audit here](#)

Contact the Marriott Law Department.

- Mail: Marriott International, Inc.
General Counsel
7750 Wisconsin Ave.
Bethesda, MD 20814

Ethics & Compliance resources can also be found on the [Business Ethics site](#) on MGS.

The Business Integrity Line is available 24 hours a day, seven days a week, and has anonymous reporting options. Marriott adheres to a policy of [No Retaliation](#).





Acting with Honesty and Integrity



Always act with honesty and integrity. This applies to recordkeeping – especially with financial records – and to your business interactions with customers, competitors, vendors, and others.

Additionally, obey all laws that govern these relationships and activities.

- Accurate Books, Records, and Reports..... 6
- Dealing Fairly with Customers.....8
- Antitrust and Competition Law.....9
- Dealing Fairly with Competitors11
- Commercial Bribery and Improper Gifts.....12

Accurate Books, Records, and Reports

Be honest and act with integrity in all communications, every record created, and all data entered, from financial information and personal resumes to quality and safety reports. Our books, records, and reports are only as accurate as the data they contain.

Who is Responsible?

We all contribute to the accuracy of information maintained by Marriott or submitted to regulators.

You should never falsify or distort any information or documents related to your work for Marriott. The duty to ensure the accuracy of records encompasses:

- Expense reports
- Benefits claims
- Payroll records
- Invoices
- Entries in financial books and records
- Numerous other business-related documents

Managers are responsible for helping their subordinates understand and adhere to this principle.

Accurate Financial Records are Critically Important

Inaccuracies in our financial information may undermine the confidence of our customers, investors, and hotel owners and franchisees, or harm our reputation.

Further, inaccurate financial records could result in Marriott failing to satisfy legal, regulatory, or fiduciary obligations and cast doubt on Marriott's integrity and honesty.

Marriott does not tolerate fraud of any kind. Allegations of suspected fraud will be

investigated. Remediation may include associate discipline.

Requirements:

- Accurately document the purpose of transactions, the provider or recipient of funds, the accounts to and from which funds are transferred, and the entities and departments responsible for particular transactions.
- Respond truthfully to all appropriate questions from auditors.
- Make certain that all information and reports supplied to government authorities, self-regulatory organizations (such as Nasdaq), stockholders, securities analysts, and the general public are fair, accurate, timely, and supported by necessary documentation.
- Ensure that all travel and entertainment expenses are supported by required receipts, details, and explanations and have a valid business purpose. Expenses must be reasonable and within guidelines described by [MIP-44 \(Travel & Business Expense Reimbursement\)](#).
- Do not inappropriately delay or accelerate the recognition of revenues or expenses or overstate or understate assets or liabilities.
- Do not distort the true nature of any transaction, no matter what the reason and no matter how insignificant the result may seem.
- Do not discard, destroy, or improperly alter records that are required to be preserved by law, by policy, or by specific "hold directives."

Seek Advice

When something about a record does not seem right, speak up. Remember, Marriott adheres to a policy of [No Retaliation](#).

Accurate Books, Records, and Reports

Accuracy of Information Submitted by Others

We all must pay attention to the accuracy of information submitted by others, including:

- Hotel owners and franchisees
- Joint venture parties
- Customers
- Contractors
- Vendors
- Other third parties such as licensees

“Take care of the little things every day....”

- J. Willard Marriott

This philosophy of our founder is behind all Marriott policies, procedures, and systems.

Examples

Accurately Assigning Project Budgets

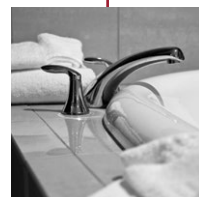
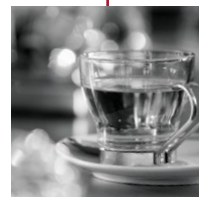
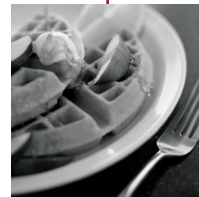
A manager is working on two projects—Project A, which is under budget, and Project B, which is over budget by a small amount. So that the manager can report that Project B was within budget, the manager recorded a very small amount of the expenses incurred on Project B to Project A.

Is this Acceptable? No. The manager may not distort the purpose of expenses, no matter how insignificant the amount.

Expense Report Accuracy

An associate submits an expense report to their manager for approval. A meal expense on the report does not include an explanation of its business purpose, and the receipt amount and date do not match those stated on the expense report. The manager does not carefully review the report and approves it for reimbursement.

Who is Responsible? The associate and manager are both responsible for the report's inaccuracy. When approving transactions, managers have a duty to confirm expenses are valid, are properly supported, and have a bona fide business purpose.



Dealing Fairly With Customers

As a leading worldwide hospitality company, Marriott is dedicated to providing exceptional customer service. Customers should always be treated fairly and with respect.

Customers should be given what is promised and at the promised price. A false claim, a small untruth, or even a perception of dishonesty can jeopardize the loyalty and satisfaction of our customers.

When communicating with customers and the public:

- Be truthful, without embellishment or omission, when representing the nature and quality of Marriott's products, services, prices, contractual terms, and other information.
- Avoid even inadvertently misleading customers.
- Only make claims about Marriott's products and services that you know to be true or have adequate information to support.

Seek Advice

If in doubt, consult with your manager or another leader at Marriott.

Examples

Clarifying Services with a Customer

Q. You met with a customer about providing catering services for an event. The contract and discussions with the customer correctly represented the products and services to be provided. However, you suspect that the customer has an incorrect understanding about the meal being provided. What should you do?

A. Although you acted honestly, you should clarify and resolve any confusion before providing the services, so as not to risk having a dissatisfied customer.

Colleague Misrepresents Services to a Customer

Q. During a customer meeting, you hear a colleague make a representation about Marriott's services, which you believe to be in error. What is the appropriate response or action?

A. You should take prompt steps to clarify and correct the misstatement. The response depends upon the circumstances and relationships of the people involved.

- If the error appears to be inadvertent, either correct the misstatement during the meeting or talk with the colleague after the meeting.
- If an intentional misrepresentation is suspected, consult with your manager or another leader at Marriott.

Antitrust and Competition Law

We believe in fair competition and our policy is to comply with all applicable competition and antitrust laws and regulations.

These laws affect almost every aspect of our global business, including our international activities, which may be subject to U.S. antitrust laws, the laws of the European Union, or of other countries where we do business.

Penalties for violating – or even appearing to violate – competition laws may be severe for both Marriott and Marriott associates.

Examples of the most common potential violations relevant to us are described in [MIP-10 \(Global Antitrust & Competition Law\)](#).

Do Not Make Unlawful Agreements with Competitors

Any agreement or understanding with competitors to limit competition or collaborate can be unlawful even if the firms involved did not act on the agreement or if the firms' actions did not actually harm competition.

In some locations certain agreements are automatic violations of antitrust laws, including actual or implied agreements to:

- Raise, lower, or stabilize prices (e.g., room rates)
- Reduce output (e.g., keeping inventory off-line)
- Allocate customers, products, or geographic territories (e.g., refraining from development in certain areas)
- Boycott or refuse to deal with certain customers or suppliers
- Coordinate employment terms or conditions including wages, benefits, or other compensation for associates, independent contractors, or vendors, except as permitted by specific labor laws

Competition laws are designed to stop anticompetitive practices, particularly those that unfairly affect prices or allocate business.



Antitrust and Competition Law

What Other Practices Might Violate Competition Laws?

The following business practices are typically not appropriate, depending upon the circumstances and applicable laws:

- **Predatory or below-cost pricing** or other exclusionary practices that are designed to maintain or create a monopoly by impairing a competitor's ability to compete or that are designed to drive out or deter competition
- **Exclusivity arrangements** that deny a competitor access to customers, distribution channels, or raw materials, particularly if they result in higher prices for consumers
- **"Tying" or "conditional" arrangements**, which require a customer who wants to buy or lease one product to also buy or lease a second product

Seek Advice

Seek guidance from the Marriott Law Department in these situations or when in doubt about any competitive strategy.

Is Below-Cost Pricing Ever Acceptable?

There are limited circumstances where below-cost pricing may be acceptable, such as introductory offers. If in doubt, consult the Marriott Law Department.

Example

Conversations with Competitors

Marriott and a competitor are planning to build hotels in an emerging market. At an industry meeting, the competitor's employee casually suggests to a Marriott associate that the two hotel chains should coordinate the sites of their new hotels to avoid "crowding."

Correct Action: Associates should be on heightened alert when interacting with competitors. The conversation above could violate competition laws. The Marriott associate should exit the conversation then contact the Marriott Law Department as soon as possible for guidance.



“Good food and good service at a fair price...”

A premise of the Marriott culture since 1927, when J. Willard and Alice Marriott opened a root beer stand, and the future Marriott International was born.

Dealing Fairly With Competitors

Marriott competes on the merits of our products and services. Use caution in discussing a competitor's products and services.

You should not make false claims or remarks that unfairly disparage competitors or that improperly interfere with a competitor's business relationships. However, you may point out legitimate weaknesses in a competitor's products or operations.

Use information concerning competitors in a manner that is lawful, fair, and consistent with Marriott policy.

Respect the trade secrets and non-public information of others, and avoid unauthorized use of patented, copyrighted, or confidential information belonging to competitors.

Examples

New Hire with Competitor Insights

Marriott recently hired a former employee of a competitor who had access to the competitor's confidential and proprietary information.

Correct Action: Marriott associates, including the new hire, should respect competitor's confidential and proprietary information. Associates should not ask the new associate for the competitor's confidential information. Nor should the new associate share or use any of this confidential information at Marriott.

Improper Access to Competitor Information

A Marriott manager receives a competitor's confidential document showing it plans to increase restaurant prices. This is not information that has been released to the public.

Correct Action: Contact the Law Department for guidance. Associates may not use the information competitively unless it is determined that it was obtained properly and using the information would not be illegal or unethical.

Request to Improve on Competitor Proposal

A customer offers a Marriott associate a copy of a written proposal from a competitor and asks if Marriott can improve on the competitor's terms.

Correct Action: The associate may not review the competitor's proposal without first determining whether its disclosure to Marriott is in violation of a confidentiality agreement or other duty that the customer owed to the competitor. If in doubt, the associate may not share or use the information without consulting with the Marriott Law Department.

Commercial Bribery and Improper Gifts

Never compromise ethics standards to gain a competitive advantage or to meet a business objective. This includes making or receiving improper payments or gifts.

Commercial Bribery

Payments made on behalf of Marriott and in connection with Marriott's business must be made solely for lawful and legitimate business purposes.

You may not request, receive, give, or offer anything of value in the form of a bribe or kickback. This unethical practice is not acceptable simply because "everyone is doing it" or because it is "necessary to compete" in a particular market.

Taking bribes or kickbacks is dishonest and prevents fair and honest negotiations.

Giving bribes or kickbacks to employees or persons associated with parties with whom we may do business may harm that other party, too.

Promoting business through bribery is unethical and may subject Marriott to civil lawsuits and criminal prosecution.

Bribery in commercial transactions is illegal in the U.S. and in many other countries where Marriott does business.

Associates involved in commercial bribery could be subject to serious consequences, including involuntary separation from employment or even criminal prosecution.

Improper Gifts

Marriott has established clear policies regarding the acceptance and giving of gifts between associates and parties with whom we do business. You are expected to follow these policies, as detailed in [MIP-75 \(Gift & Entertainment Policy\)](#). A few highlights from the gift policy include:

- Marriott forbids the acceptance of cash other than an ordinary gratuity for those associates who routinely receive tips as part of their jobs.
- You may not request gifts for your personal benefit in connection with your work for Marriott.
- Marriott places specific annual aggregate limits on the value of gifts that you may give or receive.
- Personal acceptance of discounts or free services from vendors may also be prohibited if you are responsible for procuring for Marriott those same types of products or services. These could be considered kickbacks.
- Avoid frequent acceptance of gifts, even if the gifts are not lavish and are individually within the value limits established by Marriott.
- Decline gifts otherwise permitted by Marriott if you know or suspect that the gift would violate the policies of the giver's employer.

Know Policy; Use Common Sense

In addition to following our policies, use common sense in giving and accepting gifts in the context of business relationships.

Do not accept any gift that could compromise your objectivity in making decisions for Marriott, that creates the appearance of impropriety, or that violates the law.

Are There Any Exceptions?

When the value of a gift exceeds the annual value limits established by Marriott, your manager may make a limited exception in appropriate circumstances. Key considerations include whether the gift serves a business purpose and otherwise does not violate Marriott's gift policies or legal or ethics standards. A written record of the exception must be maintained.

Stricter Rules Relating to Government Officials

Marriott's permissible gift rules are not applicable when the intended recipient of the gift is a government official. It is rarely appropriate to give anything of value to national, state, or local government officials or entities (whether U.S. or non-U.S.), including meals and travel expenses. Refer to [MIP-07](#) for non-U.S. government officials and [MIP-80](#) for U.S. government officials.

More Information

Consult [MIP-75](#) for more information regarding Marriott's gift policies.

Examples

Costly Gift from a Vendor

A Marriott associate responsible for purchasing decisions receives a watch worth \$750, as a gift from a vendor who has done recurring business with the associate's department. May the manager approve acceptance of the watch?

Correct Action: The manager should consider the value of the gift, the ongoing nature and recurring award of the business, the associate's role in the procurement process, and appearances. Weighing these factors, the manager must direct the associate to return the gift.

Tickets to a Sporting Event

A vendor offers a Marriott associate floor-level seats to a popular sporting event. The vendor explains that they cannot attend the event and does not want the seats to be wasted. The value of the tickets, however, exceeds the value limits established by Marriott.

Correct Action: Even if the gift was not offered to gain any improper advantage, the associate must politely decline the tickets which exceed the value limit in [MIP-75](#). Approval is needed for events above this limit and co-attendance of the gift giver is generally required.

A Business Dinner

A vendor invites a Marriott associate to discuss business over dinner and insists on paying the entire bill.

Correct Action: Assuming the meal is not inappropriately lavish, the associate may accept the meal.

Paid Trip to a Trade Show

A vendor offers an associate an all-expenses-paid trip to attend a trade show. Attendance would assist the associate's work for Marriott, but exceeds the value limit in [MIP-75](#).

Correct Action: The associate must obtain prior approval from their supervisor. The supervisor may approve the travel if it furthers Marriott's business and does not create the appearance of impropriety.

Interacting Honestly with the Government



Wherever you live or work, there are very specific rules to guide your interactions with the government and government officials. These rules may concern political contributions, lobbying, gifts, illegal gratuities, or providing anything of value to officials.

Be responsive when supplying information to regulatory agencies or other government entities, and understand Marriott’s policies on anti-money laundering, trade sanctions, restrictions, and boycotts.

Bribery, Illegal Gratuities, and Gifts.....	15
Political Contributions and Activities.....	18
Lobbying.....	19
Providing Information to the Government.....	19
Anti-Money Laundering and Anti-Terrorism Financing	19
Global Trade Sanctions, Restrictions, and Boycotts.....	20

Bribery, Illegal Gratuities, and Gifts

Marriott does not believe in bribing anyone, anywhere, for any reason. You may not give or promise anything of value to a government official or employee, to influence their official duties or to encourage unlawful conduct.

In addition, you may not give things of value to a government official or employee because of any official act performed or to be performed by that person. Even a “thank you” gift for the performance of official duties is not appropriate.

Such practices may be considered bribery and are illegal in many parts of the world, including the U.S., and may seriously damage our reputation. Associates involved in any form of bribery could be subject to serious consequences, including involuntary separation from employment, or even criminal prosecution.

International Bribery

The United States Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act apply to our business conducted around the world. The FCPA, the U.K. Bribery Act and the laws of many countries forbid giving or promising anything of value, directly or indirectly, to government officials to obtain or retain business. These laws apply to anything given for the personal benefit of a government official. The U.K. Bribery Act further prohibits the bribery of any person and holds companies, such as Marriott, strictly responsible for failing to prevent a bribe from being paid to obtain or retain business or to gain a business advantage.

What is Considered Bribery?

Bribery could include the giving or promising of anything of value with a corrupt intent, including but not limited to:

- Money
- Favorable loans
- Free or discounted goods or services
- Free upgrades
- Rebates
- Gifts
- Meals
- Entertainment
- Travel
- Job offers
- Donations to a charity suggested by an official
- Campaign contributions
- Intangibles, such as valuable information

Who is Considered a “Government Official”?

- Officials and employees of state-owned enterprises (SOE) and state-owned universities
- Elected or appointed government officials and their family members, including those waiting to assume office
- Employees of national, state, and local governments, including embassies and consulates
- Members of ruling royal families
- Political party officials and employees; political candidates
- Employees of public international organizations like the World Health Organization

Involvement of Third Parties

Using a third party to make a corrupt or forbidden payment is just as wrong as making it directly. Take care in selecting contractors, vendors, and suppliers who, in their work on our behalf, may interact with government officials and government employees. Perform appropriate due diligence and make sure third parties agree to follow Marriott's prohibition against corrupt payments.

Further Investigation

If there is reason to question the purpose or amount of a payment or the integrity of another person working with us or on our behalf, further investigation may be required. We could be held liable for intentionally avoiding knowledge about the corrupt conduct of others.

Information & Advice

U.S. Government Officials: see [MIP-80 \(Interaction with Government, Political Activity, and Political Contributions in the United States\)](#) or contact Marriott's Office of Government Affairs.

Non-U.S. Government Officials: see [MIP-07 \(Global Anti-Bribery & Anti-Corruption\) and FAQs](#) or direct any questions to the Marriott Law Department.

Gifts and Entertainment

Even if done with honest intentions, giving things of value to government officials and employees may create the appearance of improper influence.

You must consider applicable rules and laws before providing even inexpensive items of value that, if given in other circumstances, might be considered common courtesies (e.g., paying for taxi fare or a meal).

Examples

Excessive Hospitality

A local government official eats dinner at the hotel restaurant each Friday night. The Director of F&B gives the official a free \$100 bottle of wine each meal to encourage return visits.

Correct Action: A \$100 bottle of wine is much too lavish of a gift for a government official. Even a less expensive gift given frequently would violate Marriott policies. The GM or Director of F&B could instead arrange a tour of the kitchen, or some other modest way of showing appreciation for the regular visits.

Marriott Bonvoy® Loyalty Membership

While on vacation, a government employee and his family are checking in for a one-week stay at a Marriott hotel. The reservations agent offers the government employee membership in the Marriott Bonvoy loyalty program.

Correct Action: The agent was correct to make the offer. Membership in the Marriott Bonvoy loyalty program is offered to all guests of Marriott hotels in the ordinary course of business and is not based upon status as a government employee.

Bribery, Illegal Gratuities, and Gifts

Examples

Cash in Exchange for Permit Approval

A Marriott associate is responsible for obtaining a permit for a Marriott hotel. All of the legal conditions for the permit have been satisfied but the government official responsible for reviewing Marriott's application asks for \$50 in cash to approve the permit.

Correct Action: Associates may not pay a bribe no matter how small.

Questionable Third-Party Negotiation

Marriott is negotiating a contract to provide meeting space and lodging for a large meeting. A local company wants to act as Marriott's agent in the negotiations in exchange for a commission that seems excessive and inappropriate for the service. The company has told Marriott officials "off the record" that it has the inside edge for the meeting space and lodging contract.

Correct Action: Immediately raise this high-risk issue with the Marriott Law Department, which will assist in determining how the situation should be handled.

Government Official's Preferred Contractor

The GM of a Marriott hotel was told by a government official in charge of health inspections that a cleaning service company run by the official's cousin provides excellent service. The inspector informs the GM that other hotels using the cousin's service have never been charged with a local health violation.

Correct Action: The health inspector's suggestion contains many "red flags" that require analysis by the Marriott Law Department. Even if competitive bid procedures were followed, the propriety of the relationship is questionable.

Suspected Corrupt Conduct of Agent

Marriott plans to build new hotels in a country where bribery is common. A Marriott associate is planning to hire an agent and interpreter to explain Marriott's plans to government officials in order to obtain necessary permits. The agent insists upon meeting alone with government officials and recommends that fees be documented as "a public relations campaign" or "introduction services." The associate suspects that the agent may engage in corrupt conduct.

Correct Action: Given the country's reputation for condoning corruption, the associate should raise the issue with the Marriott Law Department.

"Thank You" Gift for Retired Government Official

A respected government official recently retired. They had been instrumental in passing legislation of importance to Marriott and even met with a Marriott associate to discuss Marriott's views on the legislation. Now that the government official has retired, the associate considers sending a gift basket to them in recognition of their retirement and as thanks for the hard work on the legislation.

Correct Action: The associate may not provide the gift basket because it might appear to be a gratuity given because of an official action.

Political Contributions and Activities

There are strict rules that govern political contributions and personal political activities of Marriott associates.

Political Contributions

Corporate campaign contributions and expenditures given to political parties and candidates for federal office are prohibited under U.S. law.

We lawfully participate in U.S. federal elections through our Political Action Committee (PAC).

Although other countries and some U.S. states and localities may permit political contributions from corporate funds, our guidelines are clear:

- You may not make political contributions and expenditures on behalf of Marriott or involve Marriott in political activities without prior approval from Marriott’s Office of Government Affairs.
- Managers may not require political contributions or contributions to the PAC as a condition of employment or any other job-related benefit.
- Marriott may not reimburse you by any method (including direct payment, increased bonuses, or inflated expense allowances) for political contributions.

Be Aware of Laws Related to Government Contracts

Managers must be mindful of state and local “pay-to-play” laws. Such laws vary, but, in general, they prohibit companies from receiving certain government contracts if the company made contributions to the campaigns of that jurisdiction’s government officials.

Some laws even prevent companies from being awarded government contracts if the

company’s directors, officers, and certain other associates personally contribute money to certain campaigns.

Seek Advice

When in doubt about “pay-to-play” laws, consult with Marriott’s Office of Government Affairs and refer to [MIP-80](#).

Personal Political Activities

Marriott encourages your personal participation in elections and government processes. However, you must conduct your personal political activities on your own time and without use of Marriott’s resources (e.g., stationery, email, copying machines, or office supplies).

You also must refrain from conducting personal political activities in a manner that might suggest sponsorship or approval by Marriott.

Examples

Improper Use of Marriott Resources for Political Activities

An associate has their assistant organize a fundraising event for a friend’s political campaign, send out invitations, and ask for donations.

Right or Wrong? Engaging in personal political activity at work, and using corporate resources to do so, are both violations. Using Marriott email also gives the impression that we are sponsoring or subsidizing the personal contributions when it is not.

Lobbying

Marriott seeks to impact legislation and government decision-making solely through legal means and on the merits of our proposals.

Associates who interact with government officials must be familiar with and obey all applicable lobbying laws and lobbying disclosure requirements.

You should avoid even the appearance of improper influence. For example, a promise of financial support from Marriott's PAC should never be made to an official in exchange for their endorsement of government policies favorable to Marriott.

Similarly, never give a gift or other benefit to a government official for the purpose of gaining an improper advantage.

Providing Information to the Government

Always be truthful in providing information to the government on behalf of Marriott.

You may interact with various government agencies in many ways. Examples include:

- Filing routine information with government agencies
- Participating in legal actions before agencies and courts
- Providing information in connection with special government inquiries and investigations

Making false statements in these circumstances may harm Marriott's reputation and may result in severe penalties for both Marriott and the responsible associate.

Never attempt to obstruct a government inquiry or the administration of justice, and immediately report any such activities by others. Tell a manager or use any of the other methods listed in [Where to Go for Help](#).

Remember, Marriott adheres to a policy of **No Retaliation**.

Anti-Money Laundering and Anti-Terrorism Financing

Money laundering involves disguising illegal sources of funds and using those funds in legal businesses. Marriott takes anti-money laundering and anti-terrorism financing laws seriously and is committed to complying with applicable laws and regulations around the world, including but not limited to the U.S. Bank Secrecy Act and related U.S. anti-money laundering laws and the U.K. Criminal Finances Act.

We maintain an anti-money laundering and anti-terrorism financing policy and related procedures that provide for the timely filing of reports required by the U.S. Department of Treasury and the USA Patriot Act, and strict limits on cash, currency, check-cashing, and gift card transactions, among other controls. We also maintain a separate policy and related procedures that apply to our casino operations.

Information & Advice

For more information see [MIP-57 \(Compliance with Anti-Money Laundering and Anti-Terrorism Financing Requirements\)](#) and [MIP-14 \(Casinos and Casino Oversight Committee\)](#).

Global Trade Sanctions, Restrictions, and Boycotts

It is our policy to comply with all applicable economic trade sanctions laws and embargoes, including trade sanctions laws of jurisdictions such as the U.K. and E.U.

These laws control business and commercial activities and target certain countries or territories, individuals, and entities that are deemed a threat to security, human dignity, or human rights.

You must be familiar with the applicable restrictions so that Marriott does not do business with any prohibited countries or territories, individuals and entities, or hire prohibited individuals.

Ensure sufficient due diligence is conducted on parties like prospective hotel owners and franchisees, to confirm they are not subject to applicable sanctions. Be mindful of the travel restrictions placed on residents of prohibited countries or territories as there is business that Marriott cannot accept.

Sanctions also impact procurement and food and beverage operations. We cannot purchase or sell products that originate in certain prohibited countries or territories, such as Cuban cigars or Iranian saffron. See [MIP-85](#) for a current list of prohibited countries.

In addition, export control laws may restrict certain business activities in a country or territory, including the transmission of data, purchase of technology and software, submission of proposals, or solicitation of business.

Examples

Personal Stays

A resident of a prohibited country would like to book a room for personal use at a hotel in London.

Right or Wrong? While there are strict rules about dealings with residents of prohibited countries, personal travel like this is permitted under the “Travel Exemption.” See [MIP-85 and its FAQs](#) for more details.

Events

A resident of a prohibited country would like to book event space to hold a family reunion in Singapore.

Right or Wrong? We cannot book events including weddings or business meetings for residents of prohibited countries. However, these bookings are acceptable if the guest is a citizen of a prohibited country but no longer resides there. See [MIP-85 and its FAQs](#) for more guidance.

Information & Advice

For more information about trade sanctions and restrictions consult [MIP-85 \(Global Trade Sanctions - Prohibited Countries, Entities and Individuals\) and its FAQs](#).

Direct questions to the Marriott Law Department.

Protecting Marriott's Assets and Reputation



All of our actions reflect who we are as individuals and as representatives of Marriott. We must be responsible in the way we use and handle Marriott's assets and information – never using them for personal gain – and in the way we spend our time on the job.

Additionally, unauthorized communication and the disclosure or misuse of information may be damaging to our customers, associates, and stockholders, as well as to Marriott's reputation – one of our most important assets.

Proper Use of Marriott's Assets	22
Protecting Personal Data and Confidential Information ...	23
Insider Trading.....	25
Protecting Marriott's Reputation	26
Conflicts of Interest	28
Corporate Opportunities.....	29
Use of Associate Time and Pay Practices	29

Proper Use of Marriott's Assets

Associates have a duty to protect Marriott assets, which include assets managed for hotel owners. Marriott's assets should be used only in the manner intended and only for legitimate business purposes.

You may not take or use for your personal benefit Marriott products and services for which you have not paid, unless proper authority has been granted by Marriott.

Complimentary guest rooms for associates are not permitted for personal travel. Associates may only accept, or offer to other associates, complimentary guest rooms for narrow, business-related purposes. For more details and approval requirements see **MIP-97 (Associate Use of Complimentary Rooms)**.

Marriott's records, including information stored electronically on computers, personal digital devices, and other media are Marriott assets. Safeguard all Marriott information and follow all records retention policies as described in **MIP-15 (Enterprise Records Management)**.

Exercise caution when using third-party communication applications and instant messaging programs—always follow Marriott policy, including when they can be used, what can be shared over them, and how to separately preserve important messages.

What Is an Asset?

Marriott's assets include: 1) tangible assets, both large and small, such as electronic equipment and office supplies; 2) intangible assets, such as Marriott's proprietary information; and 3) other assets under Marriott's control, including assets of hotel owners.

Examples of Assets

Tangible Assets

- Money
- Products
- Vehicles
- Meeting rooms
- Guestrooms
- Software/computer systems
- Equipment
- Associate-generated assets and works for hire

Intangible Assets

- Confidential or proprietary information
- Trademarks
- Trade secrets
- Copyrighted or patented information
- Associate time
- Marriott's reputation
- Corporate opportunities

Example

Business Rate vs. Explore Rate

While traveling on business for Marriott, a cost-conscious associate notices that she can save a considerable amount for Marriott by booking her hotel stay using the Marriott Associate Explore Rate.

Correct Action: The associate cannot utilize the Explore Rate for a business-related stay. This would misrepresent the purpose of the trip and constitute improper use of the discount rate. It impacts the profitability of the hotel and the operating results for the hotel owner. All reimbursable stays (including weekends) at Marriott's lodging properties should be at the Marriott Associate Business Rate.

Examples

Complimentary Room for a Friend

An associate encounters a longtime friend checking into a Marriott hotel for a one-night stay. It is late in the evening, and the hotel has vacancies. The associate would like to offer his friend a complimentary room.

Correct Action: Unless the associate has special authorization, the giving of a complimentary room would be a misappropriation of a Marriott asset.

Loan from the Cash Bank

An associate who has access to a Marriott cash bank needs a short-term loan. Without anyone

else's knowledge, he takes \$50 from the cash bank and pays the money back the next day.

Right or Wrong? Although the associate returned the money, the unauthorized "loan" is a theft of Marriott's property.

Tickets for Personal Use

As a marketing promotion, Marriott is offering complimentary tickets to an amusement park for guests at the hotel. A hotel associate considers taking tickets for their family's use.

Right or Wrong? The unauthorized personal use of the tickets is a violation of Marriott's policies.

Protecting Personal Data and Confidential Information

Everyone is responsible for protecting Marriott's confidential information, which includes the Personal Data of our guests, associates and parties with whom we do business, except when disclosure is authorized or legally mandated.

This duty applies to all associates, including when using third-party communication and instant messaging applications. It applies during both working and nonworking hours and extends beyond your employment with Marriott.

Do not share Personal Data or Marriott's confidential information with: 1) individuals who are not authorized to receive it or do not have a business need for the information; or 2) persons outside Marriott, unless there is a legitimate and authorized business purpose for the disclosure, or unless disclosure is required or permitted by law.

Be mindful when using generative AI. Do not include or insert any Marriott confidential or proprietary information or Personal Data when using public generative AI models or tools such as ChatGPT. This includes any text, imagery, or content used in Marriott social media, marketing materials, Marriott channels, and external presentations.

Information & Advice

If you suspect that Personal Data or other confidential information has been lost or misused, contact your manager or report the concern to Privacy@Marriott.com.

Remember, Marriott adheres to a policy of [No Retaliation](#).

Consult [MIP-25 \(Public Information for News Media and Other Parties\)](#) for guidance related to communications with news media and other outside parties.

Consult [MIP-29 \(Global Information Security Policy\)](#).

Consult [MIP-91 \(Global Privacy Policy\)](#).

Protecting Personal Data and Confidential Information

Confidential Information Includes:

- Personal Data of Marriott's guests, associates and parties with whom we do business
- Information that derives value from not being known to the public
- Undisclosed or commercially sensitive information that might be of use to Marriott's competitors
- Information that might harm Marriott, our stockholders, our customers, or our associates, if disclosed
- Non-public financial or performance information about Marriott or our hotels
- Personnel matters
- Associate usernames and passwords
- Sales, marketing, and pricing strategies
- Financial or other performance data
- Policies and Standards
- Trade secrets
- Business plans or new products
- Information about major transactions
- Changes in Marriott's management

Defer to Designated Persons

To protect Marriott and to comply with applicable laws, decisions related to disclosing Personal Data and commercially sensitive business information should be made only by designated persons.

Never share information about Marriott with government agencies, regulators, investors, or stockholders without authorization from the Law Department and Investor Relations. Similarly, never share Marriott information with the news media, other interested persons, or the public without authorization by Global Communications and Public Affairs.

These guidelines concerning the protection of confidential information should not be interpreted as prohibiting associates from discussing the terms and conditions of their employment in accordance with applicable laws.

Insider Trading

It is illegal to use material non-public information (“inside information”) to buy, sell, or trade in securities such as stocks, bonds, and options.

This is considered insider trading and applies to associates, officers, directors, and their family members who are aware of inside information about Marriott or other companies.

The prohibition on insider trading includes using inside information to recommend investment decisions or to provide or “tip” such information to others.

[MIP-11 \(Securities Trading\)](#) details examples of inside information.

If you suspect that inside information has been disclosed, immediately consult the Marriott Law Department.

Example

Sharing Non-Public Information

An associate's mother is considering buying stock. The associate learned at work that there are non-public plans, which mean the company will increase in value, and confirms mom's decision.

Right or Wrong? This conduct was illegal and a violation of our policy because the associate confirmed their mother's decision using material non-public information.

Trading in Securities

Marriott has certain restrictions for associates trading in Marriott securities or the securities of entities with which we do business or are likely to do business. These restrictions are described in [MIP-11](#), including the following:

- All associates, even those not designated as Restricted Associates, are prohibited from engaging in insider trading.
- Marriott directors, officers, and associates who are designated as Restricted Associates, may trade in Marriott securities only during permitted open “trading window” periods.
- Even at times when the trading window is open, directors and certain officers must pre-clear transactions in Marriott securities.
- You may not engage in derivative transactions (such as “short” sales or call or put options) in Marriott securities.

Information & Advice

When in doubt, seek advice from the Marriott Law Department before trading.

Restricted Activities

Review [MIP-11](#) to confirm if you are a “Restricted Associate”. It includes a list of activities that are prohibited during “closed trading windows.”

All associates are prohibited from engaging in insider trading.

Protecting Marriott's Reputation

Our reputation for ethical business is one of our most important assets.

Application of Marriott's Ethics Standards to Others

Who we do business with matters. Be mindful of Marriott's ethics standards when selecting and doing business with third parties. Make sure they share our values and commitment to doing business the right way. The following resources provide guidance for dealing with third parties, like hotel owners, franchises, and suppliers, to help ensure that our reputation for integrity remains strong.

Third Party Due Diligence

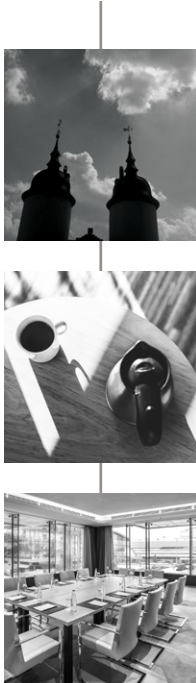
The proper level of due diligence is important at the outset of a business relationship and ongoing monitoring is important for long-term relationships. [MIP-71 \(Third Party Due Diligence\)](#) details guidance and requirements for new and existing business relationships, such as hotel owners and franchisees, joint venture parties, and equity or venture capital investments.

Expectations for Third Parties

Third parties that we have key business relationships with play a vital role in upholding Marriott's reputation. Our expectations for them are described in several resources, including Marriott's [Global Procurement Supplier Conduct Guidelines](#) and [Marriott's Responsible Business Principles for Franchisees](#). Remember, it is just as wrong for a third party to engage in illegal or unethical conduct as it is to engage in that conduct yourself.

Communications

Our communications help define public perceptions about Marriott. You must avoid any communication, disclosure, or interaction that might disparage, defame, or damage Marriott's brands, services, or



other legitimate business interests, associates, customers, vendors, or other business partners. Public statements made on behalf of Marriott should present a consistent viewpoint and must not divulge confidential information.

Official and Unofficial Communications

These guidelines apply to communications and disclosures about Marriott in both official and unofficial contexts, such as:

- With friends and family
- On social media
- In the news media
- During outside activities and speaking engagements

Marriott has no desire to interfere with your private lives or your activities outside of work, including social networking. However, where such activities adversely affect your job performance, the job performance of other associates or Marriott's legitimate business interests. Marriott may take appropriate disciplinary action to protect Marriott's reputation and interests. Refer to [MIP-90 \(Social Media\)](#) and the [Social Media Rules of Conduct for Associates](#) for further details.

The Role of Public Relations

Public statements from and concerning Marriott must be coordinated with, approved by, and released through appropriate Marriott public relations sources. The objective is to ensure that what we communicate publicly is factual, serves our stakeholders and our interests, is not misleading or confusing, and meets all legal and regulatory requirements.

In general, all communications must comply with Marriott's [Social Media Rules of Conduct for Associates](#) and Marriott's other communications policies. If an emergency situation could lead to publicity or media inquiries, you should promptly alert Global Communication and Public Affairs.

Consider the Implications

Consider whether items you are sharing with others might result in inappropriate disclosure to third parties, be subject to misinterpretation, or result in harm, including reputational damage, to Marriott.

Information & Advice

For additional information, consult [MIP-25 \(Public Information for News Media and Other Parties\)](#) and [MIP-90 \(Social Media\)](#) and the [Social Media Rules of Conduct for Associates](#).

Conflicts of Interest

Avoid activities that might result in, or give the appearance of, a conflict between your personal interests and Marriott's legitimate business interests.

Marriott requires the disclosure and approval of outside business activities before you engage in these activities. These requirements are explained in [MIP-59 \(Outside Business Activities\)](#) and [MIP-60 \(Investing in Business Partners\)](#).

A conflict of interest arises when personal interests interfere with an associate's ability to make objective business decisions, work effectively on behalf of Marriott, or adversely affect Marriott's relationship with suppliers, customers, hotel owners, franchisees or other third parties.

Some of the rules designed to prevent conflicts of interest include:

- Avoid selecting, on behalf of Marriott, contractors and suppliers owned or operated by personal friends or family members.
- Avoid personal investment decisions and outside business ventures that might compromise your ability to make decisions in the best interest of Marriott. For example, personal investments in a business partner, customer, supplier, or other entity with which Marriott may do business, might give the appearance that your decisions for Marriott may be affected by favoritism.
- Avoid outside employment or business ventures that may interfere with your ability to perform your duties for Marriott in an objective, effective, and timely manner.
- Do not promote your employment with Marriott in connection with any outside business activity, speech, presentation, or publication without authorization.
- Do not create the appearance that Marriott

is sponsoring or supporting personal outside activities without proper approvals.

- Serving on the Board of Directors of another company or boards of charitable and nonprofit organizations must conform with the standards of [MIP-59](#) and, for directors, the [Board of Directors Governance Principles](#).
- Direct or indirect supervisory roles between relatives or those in close personal or intimate relationships could be inappropriate and must conform with the standards of [MIP-95 \(Personal & Social Relationships in the Workplace\)](#), including all disclosure requirements.

Example

Hiring a Relative's Business

An associate is hiring a landscaper for a new Marriott resort. In response to an open request for bids, he receives a proposal from a landscaping business in which his cousin has a significant but passive interest. The cousin's business has a good reputation, has offered a fair price, and satisfies all requirements.

Correct Action: The associate should not select a landscaper until he informs a manager of the potential conflict of interest in selecting the landscaper. The manager may decide to transfer this decision to another associate or take other measures to mitigate the appearance of a conflict.

More Information

Consult [MIP-59 \(Outside Business Activities\)](#) for more information.

See [MIP-95 \(Personal & Social Relationships in the Workplace\)](#) for more information.

Corporate Opportunities

You have a duty to act in the best interests of Marriott and to advance our legitimate business interests.

Thus, you should not compete with Marriott. Do not accept opportunities for yourself that rightfully belong to Marriott or that might advance Marriott's interests.

You must disclose corporate opportunities to Marriott and obtain approval before pursuing any such opportunity for yourself. This includes opportunities such as those:

- Offered because of your position with Marriott
- Offered by an entity with which Marriott does business
- Discovered through the use of Marriott resources or information, or through your position with Marriott
- Offered by a competitor
- That, if pursued by Marriott, would likely advance Marriott's business objectives

This list of examples is not exhaustive. It can be difficult to determine whether an opportunity is one that may belong to Marriott, so seek guidance from the Marriott Law Department.

Example

Five Percent Stake in Contractor's Business

An associate has a business relationship with a contractor who performs work for Marriott. The contractor offers the associate a personal opportunity to obtain a five percent interest in the contractor's company.

Right or Wrong? Investment in the contractor's company could result in a conflict of interest. The Marriott associate may not take an investment opportunity without first disclosing it to Marriott and seeking approval.

Seek Advice

Consult [MIP-60 \(Investing in Business Partners\)](#). When in doubt, seek guidance from the Marriott Law Department.

Use of Associate Time and Pay Practices

Treat your working time and the working time of other associates as corporate assets. Ensure that associates are paid for all hours worked.

You are expected to dedicate your full attention to your work while on work time. Avoid engaging in activities that detract from your duties during working time. Managers also should ensure that associates are paid for all hours worked. Overtime is paid in accordance with the law.

Example

Outside Business Ventures

After consulting with a manager and obtaining approval, a Marriott manager decides to pursue an outside business venture. A few times per week, the manager asks an assistant, a Marriott associate, to devote one or two hours to working on documents related to the outside venture. The manager reasons that the additional work will not interfere with the assistant's duties for Marriott, and the assistant does not mind assisting with the new venture.

Right or Wrong? The manager's new business is a personal activity. Therefore, the manager should not ask a Marriott associate to devote time to his venture. This is a misuse of an associate's time.



Respecting Customers and Associates



As a hospitality company with interests around the globe, Marriott strives to create a safe, fair, and harassment-free workplace for our associates and a safe, secure, and hospitable environment for our customers.

Our “Spirit to Serve” our customers, associates, and communities is an important part of our culture and is based on respect and care for individuals and a belief in basic human rights.

Fair and Harassment-Free Workplace.....	31
Privacy and Personal Data	32
Health, Safety, and Security.....	32

Fair and Harassment-Free Workplace

Marriott celebrates individual differences and strives to create an environment that welcomes all. Everyone who enters our doors should be treated with dignity and respect and feel that they belong. It's simply how we do business, and we believe it's good for business.

We believe that when people feel valued and respected, they are empowered to succeed. We actively promote a sense of belonging for our associates, customers, owners, and suppliers.

We are committed to providing access to opportunity to our associates. It is Marriott's policy to comply with all laws affording protection to employees based on race, color, religion, sex (including pregnancy), sexual orientation, gender identity or expression, national origin, age, disability, genetic information, veteran or military status, or other basis protected by applicable law. Inclusion is part of our legacy and the foundation of our core value to Put People First.

You are entitled to a professional work environment free from harassment, including sexual harassment, and retaliation. You are expected to avoid any conduct that may be perceived as harassment or create a hostile working environment for others. Treat one another with dignity and respect.

Information & Advice

We do not tolerate harassment. Consult [MIP-05 \(Harassment and Professional Conduct\)](#) for more information.

If you observe suspected workplace harassment or discrimination, you should report your concerns using any resource listed in [Where to Go for Help](#).

Remember, Marriott adheres to a policy of **No Retaliation**.

“Associates are at the heart of what makes Marriott an extraordinary company. Our rich blend of culture, talent, and experiences drives excellence and helps us connect the world through the power of travel.”

– David S. Marriott

Privacy and Personal Data

We value the privacy of our customers, associates, and business partners and have strict policies concerning the protection of their Personal Data.

There are only limited circumstances in which the Personal Data of associates or customers may be disclosed outside of Marriott.

You are responsible for reviewing and understanding [MIP-91](#) before you release information about Marriott customers and associates. Other than the exceptions expressly identified in Marriott policies, you may not disclose Personal Data of present or former customers, associates, or others with whom we do business.

Personal Data is any information that can be associated with or traced to an individual, such as:

Name, address, telephone number, email address, government issued identifications (e.g., Social Security number), health records, credit card information, or other financial information, a Marriott Bonvoy number, an IP address, or an online identifier.

Personal Data concerning customers, associates, and others with whom we do business can only be used only for legitimate business purposes. It should be safeguarded and should not be shared, even within Marriott, except on a need-to-know basis.

More Information

Consult [MIP-91 \(Global Privacy Policy\)](#) for more information about personal data protection.

Health, Safety, and Security

Marriott strives to protect the health, safety, and personal security of those who visit our properties and who work for us.

Providing a healthy, safe, and secure environment supports our mission to provide an excellent experience for our guests and to protect our associates from harm.

You are expected to comply with all health, safety, and security requirements and to immediately report health and safety hazards and security breaches.



These policies should not be interpreted as prohibiting associates from discussing the terms and conditions of their employment in accordance with applicable laws.

Marriott supports the freedom of association and the right to choose a collective bargaining representative, if desired.

Promoting the Greater Good



Marriott is well known for our commitment to social responsibility and community engagement.

We are committed to giving back to the communities in which we operate and to focus on sustainability in our operations.

Giving Back to the Community34
Supporting Human Rights and Human Dignity.....34
Human Trafficking35
Environmental Responsibility35

Giving Back to the Community

Marriott has a social responsibility to serve the greater community.

To have the most significant impact, our social responsibility and community commitment blends corporate financial contributions with in-kind giving and the volunteer service of Marriott associates around the world.

As Marriott associates, we should be guided by our core values to serve our world. We are all expected to be kind, generous, and charitable to others.

“We need to stand together to ensure that travel and tourism are always a positive force for good in the world.”

– J.W. “Bill” Marriott, Jr.

Supporting Human Rights and Human Dignity

Marriott supports human rights around the world and works to protect human rights.

Ensuring that our properties and services are appropriately used by others is an important element of our support of human rights.

Our [Human Rights Policy Statement](#) and [Modern Slavery Statement](#) reflect Marriott’s longstanding commitment to responsible business, including aligning with government, business, and public concerns about issues such as human trafficking and child exploitation.

If you suspect that our property is being used for illegal purposes or in a way that does not respect human dignity or human rights, or if you believe that an associate’s conduct is inconsistent with this Business Conduct Guide, report your concerns immediately, using any resource listed in [Where to Go for Help](#).

Remember, Marriott adheres to a policy of [No Retaliation](#).



Human Trafficking

Marriott condemns all forms of human trafficking and supports laws to prevent and punish such crimes.

If you suspect human trafficking or see potential indicators of human trafficking on your property, you should report them to your manager. Managers should assess the situation and report to established law enforcement contacts trained to address human trafficking. Managers should also contact their above-property Director of Global Safety and Security for sex trafficking concerns and their above-property Human Resources representative for labor trafficking concerns.

More Information

Consult [MIP-48 \(Human Rights\)](#), Marriott's Human Rights Policy Statement, Marriott's Modern Slavery Statement and our Serve360 Report for more information regarding our commitment to human rights and good corporate citizenship.

Environmental Responsibility

Marriott works to integrate sustainability in our hotel design, operations, and supply chain. We are focused on reducing environmental impacts and mitigating climate risks.

To execute on our goals, we collaborate with key stakeholders across the globe. These activities aim to support the resiliency of Marriott hotels and communities where we operate by implementing biodiversity and natural capital programs, driving improvements in energy and water use, and reducing waste and carbon emissions.

Our focus on environmental responsibility includes all associates and we encourage them to engage in innovative and creative thinking to help us do our part in protecting the environment.

You should immediately report potential violations of environmental laws and regulations, using any resource listed in [Where to Go for Help](#).

“We know that corporations must play a large role in protecting the Earth. We remain committed to doing our part to serve our world.”

– Anthony G. Capuano



“It is during the tough times that organizations are stress-tested and strong values become the life vests that help keep us afloat.”

– Anthony G. Capuano

