

SUNSTONE HOTEL INVESTORS, INC.

Human Rights & Labor Rights Policy

Sunstone Hotel Investors, Inc. (“Sunstone” or “Company”) believes that companies have a responsibility to respect and uphold fundamental human rights. We aim to adhere to the principles defined in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We are committed to complying with all applicable human rights and labor rights laws, including International Labour Organization (“ILO”). Likewise, we expect our vendors, business partners and hotel operators to adhere to these principles and laws.

We endeavor to engage with our business stakeholders to ensure the implementation and adherence of this policy throughout our Company’s operations and our portfolio of hotels, regardless of geographic location. We engage with the hotel brands and operators on how they are identifying potential human rights risks throughout our portfolio’s operations. In doing so, we aim to ensure that our corporate operations and portfolio of hotels abide by the guiding principles below and support training efforts to achieve compliance.

1. Labor Rights

- In line with the ILO Minimum Age Convention, child labor is not employed or exploited, including individuals below the ILO-defined minimum age or the minimum lawful employment age (whichever is higher) for the respective country or region in which we operate.
- Compliance with all applicable wage and compensation requirements as defined by the respective country or region in which they operate. This includes fair wages for all employees.
- Maximum number of working hours, as defined by applicable law, are not exceeded and where appropriate overtime is compensated.
- Respect and support of employees’ freedom of association, peaceful assembly, and right to choose a collective bargaining representative, if desired.
- Employee funded recruitment fees, if any, are eliminated.

2. Adherence to the American Hotel & Lodging Association Five-Star Promise

We fully support as a Company and encourage our operators to adopt and abide by the principles of the Five-Star Promise, which includes a commitment to:

- Provide industry-wide training and materials on safety and security, and retain expert guidance to work with the industry on diversity and safety matters;
- Ensure mandatory anti-sexual harassment policies are in place in multiple languages;
- Provide ongoing training and education for employees on identifying and reporting sexual harassment;
- Provide U.S. hotel employees with employee safety devices to help them feel safe on the job; and,
- Broaden vital partnerships with wide-ranging national organizations that target sexual violence and assault and trafficking and promote workplace safety.

3. Diversity & Inclusion

As a signatory to the CEO Action for Diversity & Inclusion™, Sunstone is committed to their four goals for driving diversity, equity and inclusion in corporate America. Sunstone aims to create an environment of inclusion and equal opportunity for all people regardless of gender, race, disability, ethnicity, nationality, religion, sexual orientation, gender expression, or gender identity. Diversity, equity, and inclusion are fundamental to our core values and strategic business goals. We aim to advance diversity and inclusion at and for:

- All corporate workforce levels, including senior management and board of directors;
- Hotel operators, including management teams and hotel associates; and
- Vendors, suppliers, and other business partners by identifying and offering opportunities for diverse-owned enterprises, including economic and minority inclusion.

4. Harassment & Non-discrimination

- Harassment or discrimination based on gender, race, disability, ethnicity, nationality, religion, sexual orientation or gender expression or identity is not tolerated.
- Protection of rights for minorities including visible minorities, women, persons with disabilities and the LGBTQ+ community.
- Encouragement to report all incidents of harassment, including sexual and verbal, and promptly investigate every such complaint.

5. Prohibition against Forced Labor, Modern Slavery and Human Trafficking

- Elimination of all forms of forced, bonded or compulsory labor.
- Protection of employees from all forms of abuse and exploitation.
- Encouragement of human trafficking awareness and prevention training at properties.
- Prohibition against all forced labor, modern slavery and human trafficking.

6. Freedom of Expression

- Respect and support of employees' right of freedom of opinion and expression, provided it does not affect work performance and does not violate any Sunstone corporate policies.

7. Ethical Recruitment

- Compliance with all applicable laws and regulations during the hiring process.

8. Occupational Health, Well-being and Safety

- Compliance with all applicable safety and health legal regulations and guidelines throughout all of our operations, including hotel properties and our corporate headquarters.
- Compliance with all cleaning and disease prevention guidelines and protocols established by state and federal regulatory authorities, as well as the policies and protocols of our hotel operators.
- Prompt identification and response to health, safety and security concerns.
- Safe working environment for all employees.

9. Community, Supplier and Tenant Health & Safety

- Promotion of health and safety of the communities where our corporate headquarters and portfolio of properties hotels are located.
- Encouragement of suppliers, tenants and business partners to comply with all applicable safety and health regulations and guidelines.

10. Local Communities

- Engagement with local groups and organizations through corporate charitable giving and volunteer work.
- Encouragement for hotel properties to engage with local communities and promote local businesses.

11. Stakeholder Engagement

- Engagement with stakeholders, including employees and business partners to ensure implementation and adherence of this policy and the above principles.
- Engagement with organizations that have similar social objectives, as well as, encouraging our portfolio of hotels to engage with these types of organizations.

Additionally, Sunstone maintains its Ethics Hot-Line in order to enhance communication and promote ethical behavior. Reported violations will be investigated by the Nominating and Corporate Governance Committee and the Code of Ethics Contact Person.

We expect our stakeholders, including our business partners and vendors, to operate in a manner that adheres to the above standards. This policy should be read in conjunction with our Code of Business Conduct and Ethics and our Vendor and Business Partner Code of Conduct. Our Code of Business Conduct and Ethics hotline covers the broad principles of legal and ethical conduct embraced by Sunstone and specifies our reporting and accountability mechanisms, including the identification and monitoring of potential issues that could result in non-compliance with this human rights and labor policy. Our Vendor and Business Partner Code of Conduct details the policies and standards that we hold our suppliers, vendors and all business partners accountable to with regard to environmental sustainability, social responsibility and governance.

Sunstone's Human Rights & Labor Rights Policy is approved by the Board of Directors. Sunstone reserves the right to amend or modify our Human Rights and Labor Rights Policy.