

SUNSTONE HOTEL INVESTORS, INC.

Vendor and Business Partner Code of Conduct

Sunstone Hotel Investors, Inc. (“Sunstone” or “Company”) strives to operate in a fair and ethical, environmentally sustainable and socially responsible manner, and encourages our suppliers, vendors, tenants, hotel operators and all other business partners to do so as well. Our Vendor and Business Partner Code of Conduct outlines our expectations and minimum standards for suppliers, vendors, and business partners. This includes minimizing climate change, human trafficking, and labor rights related risks, and ensuring their products, services and operations adhere to the standards below.

1. Environmental, Social, Governance Laws, Regulations and Standards

- Acquire environmental permits and registrations where required and adhere to all environmental laws and regulations.
- Prohibit or restrict the use of hazardous or illegal substances in products according to applicable laws and regulations, such as recycling and disposal regulations.
- Prohibit the use of child labor below the minimum lawful age of employment for the respective country or region of operation.
- Comply with applicable labor law and regulations, minimum age requirements, fair compensation and working hours.
- Comply with all applicable safety and health legal regulations and guidelines.
- Comply fully with all applicable governance-related laws and regulations.
- Aim to comply with all applicable human rights and labor rights laws, including all applicable standards established by the International Labour Organisation (“ILO”).

2. Environmental Performance and Monitoring Standards

- Continuously monitor energy, water and waste performance, maximize efficiency throughout operations, and aim to reduce energy and water consumption and carbon emissions.
- Safely manage all materials, including chemicals and hazardous materials throughout product life cycle, including recycling, reuse, or disposal.
- Monitor, control, and treat air emissions prior to discharge where required.
- Prevent environmental pollution and reduce resource consumption.
- Protect biodiversity and environments impacted by operations.

3. Responsible Sourcing Standards

- Incorporate sustainably sourced materials, including materials that have sustainability certifications and/or are locally sourced, when available.
- Ensure materials and products are ethically sourced or procured and manufactured in fair, safe and legal working conditions.
- Consider human health related aspects when sourcing materials which includes avoiding harmful chemicals, packaging, and products, when possible.

4. Labor Rights Standards

- Ensure a working environment free of discrimination, harassment, and retaliation.
- Encourage reporting of all incidents of harassment, including sexual and verbal, and investigate every such complaint.

- Provide employees the right to freedom of association and the right to choose a collective bargaining representative, if desired.
- Eliminate recruitment fees payable by job applicants, if any.

5. Diversity & Inclusion Standards

- Promote diversity and inclusion for all stakeholders, including employees and customers.
- Promote supplier diversity by identifying and offering opportunities for diverse-owned enterprises.
- Promote a working environment that protects the rights of minorities including visible minorities, women, persons with disabilities, and the LGBTQ+ community.

6. Health and Safety Standards

- Ensure a safe and healthy working environment.
- Comply with all applicable health and safety legal regulations and guidelines.
- Support the safety initiatives implemented by the American Hotel & Lodging Association, which specifically includes our commitment: to uphold the 5-Star Promise, to provide hotel employees with employee safety devices, and to enhanced anti-sexual harassment policies, trainings and resources that together are aimed at enhancing hotel safety, including prevention of and response to reports of sexual harassment and assault.

7. Human Rights Standards

- Eliminate all forms of forced, bonded or compulsory labor.
- Protect employees from all forms of abuse and exploitation.
- Identify and prevent modern slavery and human trafficking in operations.

8. Governance Standards

- Maintain an honest and ethical business conduct.
- Have zero tolerance towards corruption, bribery, extortion, or embezzlement.
- Document all financial transactions accurately and honestly.
- Respect and safeguard all data and business and personal information to ensure privacy among stakeholders, including employees and customers.

Sunstone endeavors to work with our hotel brands and operators to promote the above standards with their respective procurement partners. Sunstone encourages the hotels' procurement partners to conduct supplier screening to advance these initiatives across all categories of services and purchasing. Sunstone encourages application of this Vendor and Business Partner Code of Conduct to all subcontractors engaging in business relationships relating to the Company.

Sunstone also expects its suppliers, vendors, and business partners to strive to conduct business in a manner aligned with our standards outlined in our Code of Business Conduct and Ethics, as well as, our Human Rights & Labor Rights Policy which can be viewed in the Investor Relations section of our website at www.sunstonehotels.com.

Sunstone publishes these documents as a resource to suppliers, vendors, and business partners with the aim of assisting these stakeholders with continuous improvement in the areas of environmental and social performance, including human rights and responsible procurement. All suppliers, vendors, or business partners may also report any grievances to the Company by directly writing to the Company's Legal Department: Sunstone Hotel Investors, Inc.; Attn: General Counsel, 15 Enterprise, Suite 200, Aliso Viejo, CA 92656. Any grievance may be communicated anonymously if desired. Sunstone reserves the right to audit or terminate its

relationship with any supplier or vendor who fails to comply with the above outlined standards. This includes evaluating suppliers' performance in areas including sustainability, labor, human rights and/or additional standards outlined above.

This Vendor and Business Partner Code of Conduct is approved by the Sunstone Board of Directors. Sunstone reserves the right to amend or modify our Vendor and Business Partner Code of Conduct.