



**Marriott International**

# MODERN SLAVERY STATEMENT

January – December 2021



**SERVE360**  
DOING GOOD IN EVERY DIRECTION



## INTRODUCTION

The Los Angeles Airport Marriott

In March 2021, a young woman grabbed a food and beverage associate and pulled him into the lobby restroom at the Los Angeles Airport Marriott and told him that she needed help. She had visible bruising around her eye and said that she had been kidnapped and was being held at the hotel against her will. Seeing and hearing these snippets of her story, the associate quickly realized that she was likely a victim of human trafficking and alerted the hotel's management team. The situation was a harrowing reminder that human trafficking can happen anywhere, from locally owned budget properties to well-known brands moments away from one of the world's busiest airports.

This incident also showed us first-hand the profound impact of training and awareness. In 2016, Marriott introduced a human trafficking awareness training program that educates and empowers associates to report suspicious situations and made it mandatory for all on-property associates around the world. Armed with the knowledge and skills from the training, the associate in Los Angeles aptly identified the situation and the management team swiftly responded. With support from the hotel's Security team, specialized law enforcement arrested the trafficker, identified four other victims, and helped them access emergency services and start their journeys to recovery. For more information on the incident and the Los Angeles Airport Marriott team's response, watch this brief [video](#), produced by the American Hotel and Lodging Association (AHLA) Foundation.



The Los Angeles Airport Marriott team was recognized by the industry and awarded the inaugural Shining Star Award for advancing the AHLA Foundation's mission to improve lives and strengthen the industry at AHLA's annual Night of a Thousand Stars Gala.

The response at the Los Angeles Airport Marriott reinforced Marriott's commitment to combat human trafficking, raise awareness of the importance of training, and share our training and resources. Most notably, we launched an enhanced version of our human trafficking awareness training that builds upon the foundation of the original training by featuring scenario-based modules, a mobile-friendly design, and increased guidance on how to respond to potential situations of human trafficking. We shared the enhanced training through internal meetings, external webinars, a [press release](#), a LinkedIn [blog](#) by our Chief Executive Officer (CEO), and a launch event in recognition of World Day Against Trafficking in Persons. At year-end 2021, more than 900,000 associates at Marriott's managed and franchised properties had completed human trafficking awareness training. Marriott's key global actions implemented in 2021 include:

- 1 **Launched an enhanced version of our human trafficking awareness training** to build on the foundation of the original training by providing additional context around the potential indicators of human trafficking and further guidance on reporting potential situations of human trafficking;
- 2 **Developed new human trafficking awareness posters** to accompany the enhanced human trafficking awareness training and share potential indicators of human trafficking that associates may observe in particular areas of the hotel, including the lobby, guest rooms, bars, restaurants, and other public areas;
- 3 **Participated in ethical recruitment training and resource development**, in collaboration with the Sustainable Hospitality Alliance (the Alliance) and International Organization for Migration (IOM), to promote ethical recruitment practices in the hotel and tourism industry; and
- 4 **Expanded hospitality training and resources for survivors**, in partnership with the Global Fund to End Modern Slavery (GFEMS) and the Alliance, to support survivors and at-risk youth interested in pursuing careers in the hospitality industry.

Marriott International is publishing these highlights in accordance with our human rights and social impact goals and in compliance with the *United Kingdom Modern Slavery Act 2015*. It details the steps taken by Marriott Hotels Limited, Marriott European Hotel Operating Company Limited, Marriott Hotels International Limited, Sheraton Hotels (England) Limited, Sheraton Hotels (U.K.) Limited, GH Hotel Operating Company Limited, Elegant Hotels Group Limited, and their ultimate parent company, Marriott International, Inc., to aid in the prevention of human trafficking during the fiscal year ending 31 December 2021. For the purposes of this statement, the companies carrying on business within the United Kingdom, including the entities mentioned above, are collectively referred to as "Marriott," "we," "us," or the "Company."

*"As we work to stop this horrific exploitation, I am proud that at our hotels around the world, all of us will be prepared – ever watchful and ready to do our part to help rid the world of the scourge of human trafficking."*

– **ANTHONY CAPUANO**, Chief Executive Officer



# ORGANIZATIONAL STRUCTURE, BUSINESS, AND SUPPLY CHAINS

## Business Model

Marriott International is the world's largest hospitality company with a portfolio of 30 brands comprising nearly 8,000 properties and roughly 1.48 million rooms in 139 countries and territories, as of year-end 2021. Marriott's operations are supported by our associates, who take care of the company, our guests and each other, working with passion and commitment every day. At year-end 2021, Marriott employed approximately 120,000 associates at properties, customer care centers, and above-property operations. In addition, Marriott manages approximately 205,000 associates who are employed by hotel owners.



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With a focus on management, franchising, and licensing, Marriott owns very few of our lodging properties. Under various agreements, we use our systems, services, and marks in connection with the operation of hotels globally and work closely with independent third-party hotel owners. As a result, many hotel personnel in Marriott-branded hotels are employed by third-party hotel owners, rather than by Marriott directly. Depending on operational needs, hotels may also outsource certain roles, such as security, housekeeping, valet, and event staff, to third-party labor suppliers.

## Managed

At managed properties, Marriott is responsible for: hiring, training, and supervising the associates needed to operate the facilities; purchasing supplies; providing centralized reservation services and advertising, marketing, and promotional services; and supplying accounting and data processing services. While the terms of management agreements vary, owners are generally required to reimburse Marriott for operations costs and pay a management fee based on revenues and profits. At year-end 2021, Marriott had 2,007 managed properties with 568,864 rooms.



## Franchised and Licensed

Marriott has franchising and licensing arrangements that permit hotel owners and operators to use many of our lodging brand names and systems and help them succeed in their business. Marriott generally receives an initial application fee and continuing royalty fees for the right to use our lodging brand names and systems, and owners make independent decisions regarding their hotel operations, including employment, procurement, and other systems and services. At year-end 2021, Marriott had 5,880 franchised and licensed properties with 900,437 rooms.



## Residential

Marriott also uses or licenses our trademarks for the sale of residential real estate, often in conjunction with hotel development, and receives fees for sales of this branded residential real estate by others. These residences are typically constructed and sold by third-party owners and allow their new owners, tenants, or other residents to wake up every day to the same experiences that they have come to love in Marriott hotels. At year-end 2021, Marriott had 102 branded residential communities with 9,878 rooms.



For a more detailed description of our business, see our [Annual Report](#).



## Supply Chain

Marriott's commitment to responsible business and human rights extends to our large global supply chain. We engage with vendors and suppliers that are dedicated to similar principles and hold their own suppliers and subcontractors to the same standards and practices. Our supply chain consists of the many goods and services necessary to support our hotels and corporate offices, including: furniture, fixtures, and equipment; operating supplies and equipment; food and beverage; hotel amenities; and corporate services. Generally, Marriott uses a hybrid procurement structure, where goods and services are centrally contracted and locally sourced by hotels, to make goods and services available at the best combination of price, quality, and service and work with diverse and local vendors.

Marriott's central procurement structure includes five distinct groups that cover operations, information technology, global design, human resources, and facilities management. Marriott Global Procurement (MGP), which focuses on operations, is comprised of seven global Marriott International Procurement (MIP) offices, 50 Clusters, and 50 associates who provide managed hotels, corporate offices and departments with the tools and resources needed to purchase quality products and services from approved suppliers. MGP also provides support to help hotels and Marriott associates comply with our sustainability, social impact, and human rights goals.

Procurement at the hotel-level generally includes the goods and services required for operating a hotel, including energy, hotel amenities, supplies (e.g., linens, bathroom amenities, cleaning products), and labor services. Globally, hotels procure from thousands of suppliers. Hotels, whether managed or franchised, and their respective third-party owners are responsible for managing these supply chains.

## COVID-19 Recovery Efforts

While the COVID-19 pandemic has transformed our industry and our world in ways we could never have anticipated, there are signs all around us that people are adapting to a "new normal," and the return of travel is one of the best indicators. As borders open and travel restrictions are lifted, we have seen an immediate surge in demand, and all regions experienced significant occupancy gains during the 2021 calendar year. However, as travel accelerates, the hospitality industry is now facing new challenges. We have seen industry-wide labor shortages causing challenges in hiring or re-hiring for certain positions, primarily in high-demand markets. We have also seen disrupted supply chains and rising costs, which could continue or worsen in the future. Marriott recognizes that these challenges may pose additional human rights risks as unscrupulous actors exploit these unprecedented demands for labor and goods, and we will continue to monitor and assess the impact on our business and industry.





## → POLICIES

Founded by J. Willard and Alice S. Marriott and guided by family leadership since 1927, our founding principles remain embedded in the Company's culture and in everything we do today. As we change and grow, the beliefs that are most important to us stay the same – putting people first, pursuing excellence, embracing change, acting with integrity, and serving our world. As part of this thriving culture and proud history of responsible business, Marriott has policies in place that help us uphold human rights and combat human trafficking. These policies include:

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### **Human Rights Policy Statement**

Enacted in 2006, this policy acknowledges and reflects the principles contained in the United Nations Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights. It describes Marriott's goal to provide a safe and healthy working environment for all associates, including commitments on harassment and discrimination prevention, child labor, freedom of association, and human trafficking and forced labor. In 2017, we enhanced our Human Rights Policy to address unethical recruitment, highlighting our "no fees" recruitment policy and stating that the Company will not ask for any money or fees as part of the application process.

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### **Principles of Responsible Business**

This document, updated in 2012, details Marriott's commitment to demonstrating our core values and a company culture that represents the highest standards of ethics, integrity, guest and associate experience, and corporate citizenship. It includes a section on human rights principles that establishes a foundation for managing Marriott's business around the world in accordance with all applicable laws and our own high human rights standards. It also expressly states Marriott's support for the elimination of all forms of forced, bonded, or compulsory labor and all forms of human trafficking, including the exploitation of children.

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### **Business Conduct Guide**

Available in 15 languages, Marriott's Business Conduct Guide describes our pledge to conduct business in an ethical and responsible manner. It expresses our support for human rights around the world, including: ensuring our properties are appropriately used by others; aligning with industry and other stakeholders on human rights issues, including preventing human trafficking and child exploitation; and providing reporting guidance for associates who suspect their property is being used for illegal purposes or in a manner that does not respect human rights.

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### **Global Procurement Supplier Conduct Guidelines**

As previously mentioned, the Supplier Guidelines set forth the principles, standards, and guidelines that we expect our suppliers, vendors, and contractors to uphold, and we encourage business partners to hold their own suppliers to the same standards and practices. In 2019, we updated the Supplier Guidelines to include expectations that suppliers prevent unethical recruitment, child labor, forced labor, and human trafficking, including respecting a worker's freedom of movement and not retaining a worker's identity or immigration documents.

These policies apply to all associates at our managed and leased hotels and our corporate offices and are shared through our associate handbook, internal intranet, and public website. Violations of these policies are addressed promptly and consistently, and punishment may include referral for prosecution, termination of contract, separation from employment, or other appropriate disciplinary or performance management measures. These policies are also made available to our franchisees, business partners, other stakeholders, and the general public to educate them on Marriott's business principles and encourage them to develop similar policies for their own operations.



*Marriott's New York City Business Council took to the city's streets in a midnight TakeCare Glow Run to help raise awareness of human trafficking and support local nonprofit organizations.*

**In 2018**, the Sustainable Hospitality Alliance launched the Principle of Forced Labor to address the primary drivers of forced labor within the hotel industry. As a founding member of the Alliance and active participant in its Human Rights Working Group, Marriott collaborates with other global hospitality companies to mitigate human rights issues that affect the industry. Marriott supports these principles, which have helped prioritize action within the hospitality industry and address unethical practices in global supply chains that serve multiple industries.



**Every worker should have freedom of movement –**

The ability of workers to move freely should not be restricted by their employer through abuse, threats, and practices, such as unlawful retention of a passport/travel documents or valuable possessions.



**No worker should pay for a job –**

Fees and costs associated with recruitment and obtaining employment should not be paid by workers.



**No worker should be indebted or coerced to work –**

Workers should work voluntarily, be informed of their employment terms and conditions in advance without misrepresentation, and be paid regularly as agreed and in accordance with any applicable laws and regulations.







## GOVERNANCE

Cascading from our Board of Directors and executive team to associates working at hotels across our 30 brands, a series of complementary committees, councils and teams provide structure and oversight to support our human rights goals and anti-trafficking efforts. At the Board level, a dedicated Inclusion and Social Impact Committee oversees, encourages, and evaluates efforts undertaken by the company to address environmental, social, and governance (ESG) issues, including efforts to: promote associate wellbeing and inclusion; promote and leverage a diverse ownership, customer, associate, and vendor base; reduce our environmental impact; and promote positive social impact in the communities we serve. As part of this mandate, new and completed human rights initiatives and progress towards our Serve 360 goals are reported to the Inclusion and Social Impact Committee. As of year-end 2021, the Committee included 13 company officer/associate members and Marriott's CEO, and is supported by three subcommittees: Inclusive Opportunity, Environmental and Social Impact, and Governance.

Marriott's human rights strategy is overseen by an internal Human Rights Council that brings together key representatives from multiple business disciplines, including Social Impact, Global Communications and Public Affairs, Human Resources, Legal, Global Operations, Procurement, Sustainability, Global Safety and Security, and Owner Franchise Services. It meets biannually and is cochaired by corporate leadership. The purpose of the Council is to lead successful execution of the Company's human rights strategy, including:

- > **Driving accountability** for the strategy regionally and within business operations;
- > **Supporting** human rights-related awareness, education, and monitoring programs;
- > **Providing** direction to regional and functional teams on execution of strategy; and
- > **Investigating** cross-functionally and reporting results.

In 2021, the Human Rights Council resumed regular operations after being unable to meet amid the pandemic. The Co-Chairs conducted a review of the membership to ensure that the Council has the representatives best positioned to advise on the Company's human rights strategy, identify human rights risks within their disciplines, support internal pull-through of our human rights programs to address human rights risks across our supply chain and operations, and align with our Serve 360 platform and goals. The Human Rights Council met twice in 2021 to reorient members to the mission and objectives, revise priorities in the wake of the pandemic, and implement human rights and anti-trafficking programming that is pertinent and responsive to our current operating environment, including supporting the launch of the enhanced human trafficking awareness training.

Marriott's ongoing work on human rights, including our anti-trafficking efforts, is managed by the Social Impact team in the Global Communications and Public Affairs department at Marriott's Corporate Headquarters. In close collaboration with Human Resources, Legal, and Global Operations, the team is responsible for global public policy advocacy, social responsibility, external stakeholder engagement, and a portfolio of initiatives and partnerships that advance human rights and drive positive social outcomes.

*"If you have ever talked to anyone who works at Marriott, you have probably heard them say 'how we do business is as important as the business we do.'"*

**– APOORVA GANDHI,**

Senior Vice President, Multicultural Affairs, Social Impact and Business Councils





Our human rights work is closely aligned with Marriott's sustainability and social impact platform, Serve 360: Doing Good in Every Direction. The platform, launched in 2017, deepens our commitment to the environment and our communities and establishes a targeted set of sustainability and social impact goals, which includes our human rights goals. The Serve 360 platform is guided by the various governing bodies, which each maintain their own priorities and objectives to make progress toward our companywide goals and are integral in executing on our strategy globally, including:

- **Serve 360 Executive Leadership Council** is comprised of Continent Presidents and C-level executives representing each discipline and global division and typically meets biannually to review progress toward the Serve 360 goals and discuss Serve 360-related investment decisions and recommendations.
- **Serve 360 Advisory Council** consists of direct reports of C-level executive leaders and one level below, representing each discipline and global division, and typically meets quarterly to assess Serve 360 goal performance, provide updates on regional and discipline initiatives, and develop recommendations for the Serve 360 Executive Leadership Council.
- **Owner Advisory Councils or Committees** represent the voice of the ownership, franchise, and management company community and provide input, feedback, and advice. Each continent determines the most appropriate way to discuss owner-relevant initiatives, collaboration opportunities, and overall progress and learnings around sustainability and social impact.
- **Regional Serve 360 Councils and Leaders** assist in pulling through the Company's sustainability and social impact strategy at the regional level in order to better address the Company's risks and opportunities locally and drive progress toward their respective Serve 360 regional goals.
- **Serve 360 Champions** are passionate individuals or teams volunteering to be the face and energy of Serve 360 on and above property, including rallying fellow associates by organizing events, educating, and collaborating with on-property departments and reporting and sharing best practices to achieve the Serve 360 goals.

For more information on Serve 360, please see our [Serve 360 website](#).



The Courtyard by Marriott Bangkok supported Serve 360 by donating linens to a local children's hospital.



## → DUE DILIGENCE

### Supply Chain

Marriott is committed to the legal and responsible sourcing of its products and services and will not knowingly purchase products made with illegally harvested, produced and/or traded materials or forced labor. Marriott expects suppliers to source raw and other materials from responsible and legal sources and exercise due diligence on the materials in their own supply chains. Marriott's Supplier Guidelines convey these expectations and help us promote the highest standards for human rights.

Marriott's central procurement groups play a key role in performing due diligence checks on suppliers. When selecting suppliers, they look at the company's reputation, financial background, organizational structure and diversity, proposed brands and products, insurance, and environmental and human rights impacts. They also use third-party certifications, third-party audit reports, and traceability processes, when available, to ensure that no forced or child labor is involved. For all newly negotiated contracts, our central procurement groups review our Supplier Guidelines with the supplier and attach them to the contract. In 2021, we attached the Supplier Guidelines to 127 new contracts negotiated by Marriott Global Procurement at Corporate Headquarters. We review and renew our contracts every two or three years, and we reinforce our expectations, including those around human rights, during the review process.

As part of the Company's efforts to promote responsible sourcing and conduct due diligence throughout our supply chain, all associates with procurement and purchasing responsibilities are required to complete a digital training, "Procurement 101: An Introduction to the World of Marriott International." The training provides an overview of Marriott's procurement structure, ethics, and contracts. Associates are instructed to consider human rights criteria when selecting vendors and ensure that our commitment to human rights is reflected in every contract. At year-end 2021, more than 5,000 associates completed the training.



### Third-Party Owners

Marriott carries out due diligence and compliance checks on prospective owners, franchisees, joint venture partners, and other significant business partners before entering into hotel agreements, sales, transfers, or relicensing transactions. This process helps Marriott establish a reasonable basis to conclude that the prospective party is an acceptable business partner for the Company and will uphold our commitment to human rights. These checks include research using internal resources to gather background information, automated screening and monitoring tools, and the provision of guidance for our Development, Legal, Owner and Franchise Services, and Global Safety and Security teams. In some instances, the risk factors determine that more comprehensive due diligence review is necessary, including allegations related to human rights abuses, human trafficking, or forced or child labor. In these instances, Marriott engages additional investigative resources, such as third-party investigative firms and comprehensive in-market research. The responsible Executive Vice President or Chief Development Officer reviews all findings.

## Operations

The Internal Audit team provides independent, objective assurance and consulting services designed to ensure maintenance of an adequate and effective system of internal controls and improve the effectiveness and efficiency of the Company's operations. Each year, the Internal Audit team administers two key surveys and analyzes the results to help identify human rights risks in our operations:

### Ethical Conduct Survey

In partnership with Ethisphere, a research firm, a broad cross section of associates participate in an ethics survey to: make sure there is a clear understanding of our Company's firm commitment to high ethical standards, including the Principles of Responsible Business and Business Conduct Guide; uncover any potential areas of concern; and monitor compliance with our Human Rights Policy. The survey results allow for a better assessment of business ethics at Marriott, guide global compliance efforts, and ensure we uphold our commitment to responsible business practices and human rights.

### Enterprise Risk Assessment

Senior leadership participates in this process to identify the top business and emerging risks facing the Company, including human rights risks. The results are reported to the Board of Directors and reviewed annually by key executives across the Company. All the risks evaluated may be considered to have the potential for substantive impact, and as a part of the annual review, the risks are prioritized and data is gathered about current and long-term mitigation efforts, challenges, and performance tracking mechanisms.







## RISK ASSESSMENT

Marriott implements an ongoing risk assessment process to identify, mitigate, and prevent relevant human rights risks. Our due diligence processes help us identify and assess human rights risks in our operations and supply chains. Similarly, risk assessments at the property-level, which can be conducted on human trafficking or other human rights risks, help us examine the nature of a particular threat, the level of risk that it will occur, and the consequence for the business if it does. Our internal Risk Assessment Tool provides a step-by-step guide for this self-assessment process.

Given the complexity of human rights issues, Marriott also works collaboratively with our peers, industry associations, nonprofit organizations, and other external experts to identify and assess human rights risks that affect our industry. Marriott actively participates in the Alliance's Human Rights Working Group, World Travel and Tourism Council's Human Trafficking Taskforce, and U.S. Chamber of Commerce Human Trafficking Task Force. Through this collaboration, Marriott gains insights and addresses potential risks related to human rights and forced labor in the hospitality industry.

### Supplier Assessments

#### The Americas

Through Avendra, Marriott's procurement services provider, our suppliers and their products are screened on environmental and social attributes. Avendra contracts outline the requirements for suppliers to follow our Supplier Guidelines and require suppliers to submit a policy that is relevant to their industry impacts, including labor and human rights practices. In 2021, we continued to assess the environmental and social business aspects of our existing Americas suppliers, within our top 10 priority product categories (animal proteins, bottled water, cleaning supplies, cocoa, coffee, guest room amenities, paper products, seafood, sugar, textiles), via the EcoVadis sustainability assessment platform. Through this platform, Avendra engaged 89% of contracted spend with manufacturers and 80% of contracted spend with distributors within Marriott's top 10 categories in the U.S., Canada, Caribbean, and Latin America. As of year-end 2021, 52% of manufacturers and 32% of distributors have completed the EcoVadis assessment. Through 2023, Marriott will continue to evaluate our remaining global suppliers through the EcoVadis platform and use the information to develop improvement plans for suppliers that have not yet met our responsible sourcing requirements.



#### Asia Pacific

In 2021, the Asia Pacific (excluding Greater China) region introduced a digital auditing system for hotel suppliers to replace the previous manual system. Taking advantage of the digital functions, the regional MIP Office is extracting information from Slavery & Trafficking Risk Template (STRT), an open-source template that collects and standardizes human trafficking risk and compliance-related data across supply chains, to include in the system. This process allows system users to access the same information, track and report human trafficking and related incidents, and validate information against a supplier's disclosures. While the program is in its early phases, the Asia Pacific MIP Office aims to expand the program in 2022 and scale it globally to improve supply chain visibility, assess and mitigate risk, and ensure compliance with our Human Rights Policy.



Through these risk assessment processes, we have identified several human rights risks, including human trafficking, that affect our operations and supply chains.

### Human Trafficking

The hospitality industry is particularly vulnerable to human trafficking, and hotels can be unwilling venues for both sex and labor trafficking. Victims may be sexually exploited within hotels, and individuals working at hotels, often hired through recruitment agencies or employed by third-party labor providers, may be in situations of forced labor. Marriott requires all on-property associates at both managed and franchised hotels to complete human trafficking awareness training, which teaches associates to recognize potential indicators of human trafficking they may observe throughout a hotel. Marriott also provided human trafficking awareness posters and other resources to reinforce the training and raise further awareness. For more information about our training and awareness efforts, see page 17.



### Labor Exploitation

Labor exploitation may occur at any point in a product's lifecycle, from harvesting raw materials to manufacturing and transporting them to the hotels where they are used or consumed. Recognizing that individuals working throughout all of our supply chains may also be at risk of trafficking and exploitation, Marriott is enhancing responsible sourcing efforts for our priority product categories, including animal proteins (inclusive of beef, eggs, lamb, pork, and poultry), bottled water, cleaning supplies, cocoa, coffee, guest room amenities, paper products, seafood, sugar, and textiles.



### Development and Construction

The construction industry is particularly vulnerable to labor trafficking due to the demand for labor, limited government and law enforcement oversight and intervention, and complicated nature of the labor supply chain, which often involves recruiters, direct employers, and subcontractors and leaves many victims unable to identify who is responsible for their exploitation. While Marriott typically has no role in the construction of hotels and construction workers are generally employed by owner-appointed contractors, we carry out due diligence on third-party owners and have established a goal to work with the industry to address human rights risks in the hotel construction phase by 2025.



### Unethical Recruitment

Workers, particularly migrant workers, are often exploited during the recruitment process by unscrupulous labor brokers or recruiters that charge excessive fees, provide misleading information about the job offer, and exploit aspiring migrant workers through false promises and coercion. Because of the complex recruitment and employment model, which uses recruitment agencies, employment agencies, and third-party labor providers, the hospitality industry is susceptible to unethical recruitment. Marriott is collaborating with the Alliance and IOM to enhance ethical recruitment practices in the industry. For more information on our ethical recruitment efforts, see page 20.



### Orphanage Tourism

Children in orphanages or residential care facilities are at high risk of abuse and exploitation and are exposed to further risk of harm due to volunteer tourism or “voluntourism.” These visits may drive institutionalism and may allow unvetted access to children, putting them at risk of abuse, exploitation, or trafficking. As a member of The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (“The Code”), Marriott abides by The Code’s Voluntourism Policy and works to ensure that only responsible and safe forms of voluntourism are undertaken, excluding visits to orphanages from tourism packages.



### Online Child Sexual Exploitation

Initial studies suggest that the COVID-19 pandemic has increased cases of online child sexual exploitation. In many cases, children transitioned to virtual learning and spent more time online, often unsupervised, becoming increasingly exposed to offenders. Many offenders take advantage of hotels and other tourism facilities to commit these crimes. While Marriott’s human trafficking awareness training provides information on and indicators of child sexual exploitation, Marriott’s Information Technology and Global Safety and Security teams participate in working groups to explore technology-based solutions to online exploitation and human trafficking, and Marriott added representatives from the Information Technology team to the Human Rights Council in 2021.



### Large-Scale Global Events

Major sporting events, like the Super Bowl and World Cup, are often accompanied by discussions about the potential for increased trafficking and exploitation. These large-scale gatherings bring many visitors to a particular area, which may increase the potential for human trafficking. While we recognize that some advocates suggest that data has not shown a significant increase in human trafficking at these events, Marriott still feels they are an important awareness-raising opportunity. Marriott deploys an easy-to-activate framework and toolkit for hotels in the vicinity of major events that helps managers reinforce the human trafficking awareness training for associates and provide guests with access to information on human trafficking.



*Apoorva Gandhi joined It's a Penalty, AHLA, and other industry leaders to discuss how hotels are tackling human trafficking in advance of Super Bowl LVI.*





## → RISK MANAGEMENT

### Reporting Mechanisms

Marriott understands that grievance mechanisms are an important way to identify risks, gather information for due diligence processes, resolve issues, provide a pathway to remedy, and build trust with the workforce and the community. Therefore, we provide associates, properties, and guests with a variety of means, including anonymous and third-party managed channels, to report unethical behavior, harassment, and other human rights concerns, including human trafficking. We strive to ensure that these channels are legitimate, accessible, predictable, equitable, transparent, and rights-compatible. Associates are made aware of these reporting mechanisms through new hire orientation and mandatory training, and some of the reporting channels are included in the associate handbook and openly displayed in associate areas. These reporting channels include:

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#### Open-Door Policy

Marriott's "open-door" policy encourages associates at managed properties to discuss concerns directly with their manager. Other reporting options include any manager, Human Resources representatives, or corporate Associate Relations representatives.

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#### Business Integrity Line

This 24-hour hotline is accessible by phone, by email, or online and allows associates to report any legal, ethical or integrity concerns or violations of the Business Conduct Guide, including human trafficking. This reporting channel is available to all our leased and managed hotels and corporate offices.

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#### Crisis Hotline

Managed by independent third parties, this 24-hour hotline is available to managed properties for reports of urgent incidents, including human trafficking.

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#### Marriott Incident Reporting Application (MIRA)

This online database program manages accidents and security incidents at managed properties outside of the US. Critical incidents, including human trafficking, are flagged for immediate follow-up and are investigated by regional Global Safety and Security Directors.

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#### Global Safety and Security

Marriott managed properties are assigned above-property Global Safety and Security representatives who may be contacted directly to report a potential human trafficking incident. Global Safety and Security can manage and conduct investigations, liaise with law enforcement, and provide additional resources the property may need to effectively respond to the incident.

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#### Customer Care

Guests can contact Marriott's Customer Care via phone or email to report any concern, including those pertaining to and human trafficking. Loyalty members can also contact us through the Marriott Bonvoy App.

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#### External Channels

Marriott recognizes that an effective grievance mechanism should also allow associates or community members to access other reporting channels or pathways to assistance. Our reporting channels do not prohibit or restrict reporting to any external grievance mechanisms, including those run by state-based mechanisms, civil society organizations, or labor recruiters, employment agencies, or suppliers.

### Response Planning

Marriott requires a prompt and thorough investigation of all complaints of unethical behavior, harassment, and other human rights concerns. Company policy requires that management communicate with the reporting associate when the investigation is complete, confirm that appropriate action was taken, and encourage the associate to report any further complaints or retaliation. A violation of Marriott's Business Conduct Guide, Harassment Prevention Policy, and other policies is grounds for disciplinary action up to and including termination, and hotels may remove and/or ban a guest for conduct that is offensive or abusive to or poses risk to the safety of associates. Company policy also provides that management should follow-up periodically with the individual who reported the issue to confirm that the offending conduct has stopped. Managers who fail to promptly address complaints from their associates may also be subject to discipline.

Marriott policy strictly prohibits retaliation against associates who report unethical behavior or harassment or who file, testify, assist, or participate in any manner in any investigation, proceeding or hearing. An associate who brings a complaint in good faith to the attention of the company will not be adversely affected as a result of reporting. These policies apply to all associates at our leased and managed hotels and our corporate offices.



*“Marriott International was one of the first hospitality companies to proactively address this issue, but it’s not just a corporate or industry responsibility. We can all help.”*

– **CRAIG SMITH**, Group President, International Division

## TRAINING AND AWARENESS

### Human Trafficking Awareness Training

Marriott's human trafficking awareness training has long been the critical foundation for the Company's efforts to prevent human trafficking and protect human rights. In 2016, Marriott introduced a comprehensive human trafficking awareness training program, "Your Role in Preventing Human Trafficking: Recognize the Signs," which became the first nonservice-oriented training to be required for all on-property associates at both managed and franchised properties. The training is intended to raise awareness of all forms of human trafficking, highlight the unique role the hospitality industry can play in combatting human trafficking and teach associates how to recognize potential indicators based on their role and how to react to a suspected incidence of human trafficking at their property.

*"The updated training empowers a global workforce that stands ready to recognize and respond to human trafficking and allows our company to live up to our core values."*

– **ANTHONY CAPUANO**, Chief Executive Officer

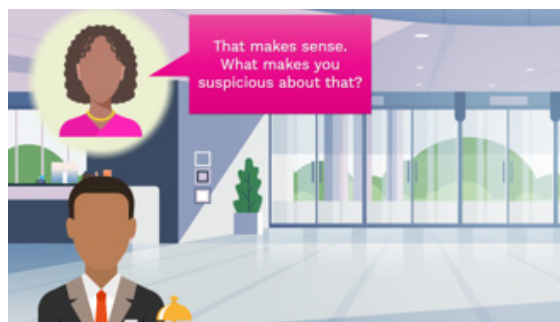
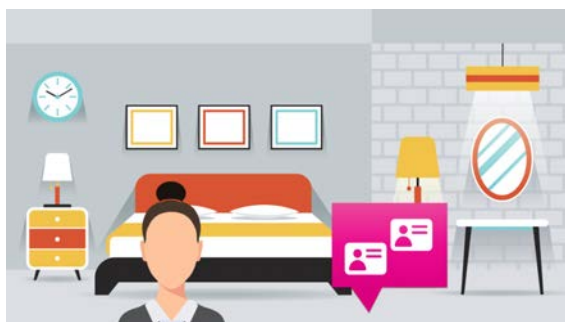
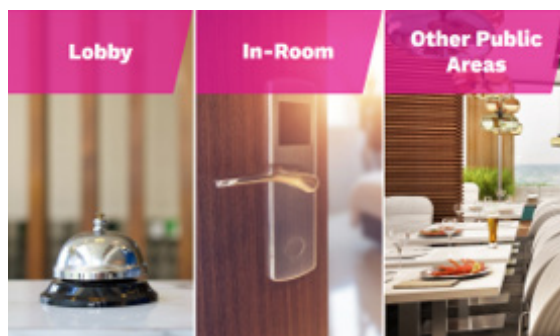
The world has changed significantly since we launched the original human trafficking awareness training. The COVID-19 pandemic has ushered in more contactless and mobile hotel experiences, which have been invaluable for minimizing the spread of the virus, but make it more difficult to spot potential indicators of trafficking. At the same time, we, along with our nonprofit partners, have also learned a lot about the most effective ways to teach associates to recognize human trafficking and convey the nuance needed to understand the indicators. Marriott convened a series of hotel-level focus groups and learned that associates wanted more context on the potential indicators of human trafficking and managers needed more guidance on reporting potential trafficking situations. As a result, we initiated the development of a new and enhanced version of our human trafficking awareness training.

In July 2021, Marriott launched "Recognize and Respond: Addressing Human Trafficking in the Hospitality Industry." Building upon the foundation of the original training, Marriott partnered with Polaris, survivor consultants, and more than 100 hotel-level and corporate associates to develop a multi-module resource that implements these new best practices in human trafficking awareness training. It embraces new ways of working amidst the pandemic by incorporating aspects of the higher-tech and lower-touch operating environment and explaining how associates can still recognize human trafficking in mobile check-in interactions and amid evolving room cleaning protocols. It also includes other critical enhancements, using the focus group feedback, to better inform associates and empower them to take action. Key updates include:





Manager Responsibilities			
Signs	Support	Contacts	Reporting
<p>Become familiar with signs of human trafficking.</p> <p>No single sign should be the sole basis for reporting a situation.</p>	<p>Emphasize support of associates reporting suspicions.</p>	<p>Establish law enforcement contacts trained in human trafficking.</p>	<p>Work with the General Manager (GM) or other manager on duty to gather as much information as possible and follow suggested reporting procedures.</p>



### Associate and Manager Modules

Recognizing that associates and managers have different roles in addressing human trafficking, the new training provides separate learning paths for non-management associates and managers. Non-management associates are instructed to report potential trafficking situations to their managers, and managers are provided with additional guidance to interact with potential victims and assess and report the situations.

### Additional Content

Based on hotel-level feedback, the new training contains additional information to help associates understand human trafficking and contextualize the potential indicators they may observe. As a result, the new training is approximately 60 minutes for non-management associates and 80 minutes for managers, which represents a significant increase from the previous 30-minute training.

### Mobile-Friendly Design

While the previous training could be delivered both online or in a classroom, the new training can also be taken on a mobile device, increasing ease and flexibility of access to this important resource.

### Scenarios

The new training incorporates four scenarios that are based on calls to the U.S. National Human Trafficking Hotline and incidents reported to Marriott's Global Safety and Security team. The same scenarios are used in both the non-management associate and manager learning paths, but the perspective shifts; the associates see potential indicators of human trafficking first-hand, while the manager gathers information based on reports from various associates. The scenarios are a critical tool that helps associates navigate authentic situations, practice decision-making skills, and enhance overall learning.

### Survivor-Informed

The training was developed with meaningful input from survivors of trafficking and reflects their expertise. Survivor consultants helped select scenarios and develop initial storyboards, and members of ECPAT-USA's Survivors' Council reviewed the built training and provided feedback. Their perspectives help ensure that our response is survivor-centered and our resources are trauma-informed, and we know that the training is appropriate for any survivors who may work at Marriott.

## Survivor Empowerment

Marriott is also addressing human trafficking by empowering survivors and removing some of the barriers they face in securing meaningful employment. We recognize that access to quality educational and employment opportunities is often limited for survivors of human trafficking, so Marriott and GFEMS developed the “Future in Training (FIT) Hospitality” Survivor Employability Curriculum to provide training and resources for survivors seeking careers in the hospitality sector. Marriott and GFEMS are piloting the curriculum with the University of Maryland’s Support, Advocacy, Freedom, and Empower (SAFE) Center for Human Trafficking Survivors to test the program to inform further enhancements. Two groups of survivors completed the program in 2021 and reported that they developed new skills, felt confident in their abilities to obtain employment, and planned to pursue careers in the hospitality industry. In 2022, Marriott and GFEMS will expand the pilot to include additional victim service providers and continue to refine the curriculum based on survivor feedback.

In 2021, the Alliance also partnered with GFEMS to better understand how its youth employment program could be adapted to support survivors of human trafficking in gaining access to employment opportunities in the hospitality industry. The Alliance’s youth employment program, founded in 2004, helps young people from restrictive backgrounds to access training and practical experience in hospitality. The program provides: classroom training using the Alliance’s hospitality and life skills curriculum; three months of hands-on training provided by member companies, including Marriott; and support to find employment. Marriott hotels in India also participated in the pilot for survivors and youth, ages 18 – 24, at-risk of human trafficking; 21 trainees were inducted and graduated, with 17 now employed across various companies, including Marriott.

*“Marriott International has been a crucial ally in ECPAT-USA’s child protection work for years, including developing critical training that gives hotel associates the tools and resources to be able to identify and respond to human trafficking.”*

– **LORI L. COHEN**, Chief Executive Officer, ECPAT-USA

## Industry Efforts

Marriott donated our original human trafficking awareness training, “Your Role in Preventing Human Trafficking: Recognize the Signs,” to ECPAT-USA in 2020. With support from the AHLA Foundation, the training is available to all members of the hospitality industry at no cost. ECPAT-USA works with 18 major hotel companies to provide licensing for them to host the training through their own learning management systems and provides access to countless through ECPAT-USA’s website. At year-end 2021, nearly 620,000 hotel workers – outside of Marriott – had completed the training. As we launched our new human trafficking awareness training, we shared our plans to donate the training and work with ECPAT-USA and the AHLA Foundation to make it widely available, as we did with the original training.

In recognition of World Day Against Trafficking in Persons, Marriott collaborated with the AHLA Foundation to host a virtual training and awareness [event](#). The event promoted the AHLA Foundation’s No Room for Trafficking campaign, which seeks to unite the hotel industry around a single, comprehensive approach to fight human trafficking and build on the industry’s long-standing commitment to combat human trafficking. It featured a fireside discussion on leveraging partnerships to combat trafficking, a 30-minute human trafficking training tailored for hotel workers, and the official announcement that Marriott will work with ECPAT-USA and the AHLA Foundation to make the enhanced training widely available to the hotel industry in 2022. More than 200 people, namely General Managers and Human Resources directors, participated in the event, from independent properties, management companies, and global brands.



Tricia Primrose, Melissa Froehlich Flood, and Abbe Horswill join Chip Rogers, CEO of AHLA, and Lori Cohen, CEO of ECPAT-USA, at the AHLA Foundation’s World Day Against Trafficking in Persons Awareness Event.

## Innovative Resources

Marriott hotels display public signs that highlight common indicators of human trafficking and provide reporting guidance should guests encounter suspicious situations. We work with our nonprofit partners, including A21, ECPAT-USA, and Polaris, who collaborated on the development of these posters, to make these posters widely available. We also host them on our internal intranet so that hotels can easily download, print, and display them throughout their properties. In 2021, we launched four new posters in five languages. Like the enhanced human trafficking awareness training, the posters provide information by area, rather than by role, so associates can learn about the potential indicators of human trafficking they may observe throughout the hotel, which is increasingly important as hotels are cross-utilizing staff amid current labor shortages.

Marriott also works to combat human trafficking around major events, including sporting and entertainment events and conferences. Marriott's Social Impact team collaborates with hotels, Business Councils, and other market leaders where an event is taking place to reinforce the human trafficking awareness training and engage associates and the community in trafficking prevention efforts. Hotels incorporate reminders of trafficking indicators and hypothetical scenarios into meetings and use guest-facing posters and materials. To prepare for the 2021 Super Bowl in Tampa Bay, Florida, managers facilitated discussions at all pre-shift meetings during the week leading up to the event, and Marriott's corporate Social Impact team joined virtual events, hosted by the Tampa Bay Police Department, to discuss Marriott's anti-trafficking efforts.

In 2021, Marriott revamped its internal intranet page on human rights and anti-trafficking initiatives to provide additional resources and make it easier for properties and associates to find them. We created sub-pages for our human trafficking awareness training, human trafficking awareness posters, ethical recruitment, and other resources, including The Code, the Principles on Forced Labor for the Hospitality Industry, and the Global Business Coalition Against Human Trafficking trauma-informed company training resources to support our efforts to pilot hospitality training for survivors of human trafficking. We actively promote these resources through our 107 worldwide Business Councils.

## Ethical Recruitment

In 2021, Marriott collaborated with the Alliance and IOM on the project "Promoting Ethical Recruitment in the Hotel and Tourism Industry" to develop relevant training resources for the hospitality industry. As part of the project, IOM and the Alliance developed training for key internal stakeholders to help establish ethical recruitment standards in cross-border labor migration and make international recruitment fair for everyone involved. Marriott piloted four, two-hour pilot training sessions with internal representatives from the Continent Operations, Global Operations, Human Resources, Legal, and Social Impact teams, providing feedback and input to complete resource development. Training content delivered included policies, procedures, and action plans for ethical recruitment and grievance mechanisms. In 2022, the next phase of the project will look to implement learnings from the training as well as make them available to the industry at large.

Using the information gleaned from the training, Marriott began to review our ethical recruitment policies and programs. While our Human Rights Policy already includes a "no fees" recruitment policy, and our Supplier Guidelines include expectations that suppliers prevent unethical recruitment and not charge recruitment fees or use fraudulent recruitment practices, we explored opportunities to amplify these policies. We reviewed and reissued our internal guidance on recruitment scams to provide Human Resources associates with up-to-date information on recruitment scams and warning signs, and we shared this guidance with our peers and the Alliance to raise further awareness and help protect job seekers. In 2022, we will expand our efforts on ethical recruitment.



David Marriott, Anthony Capuano, and members of his executive team met with Marriott's East Italy Business Council in Rome and participated in a human trafficking awareness event. Attendees signed a pledge to stop human trafficking, and the Council donated household items for a home the charity runs for survivors, who were also gifted with 11 hotel vouchers for a one-night dream experience.



## Hotel Efforts

Our human trafficking awareness training and company-wide commitment to combat human trafficking has impassioned many properties and associates to volunteer and engage in local efforts. In 2021, more than 850 associates at over 40 properties around the world contributed volunteer hours and donations towards human rights and anti-trafficking efforts. Hotels have hosted awareness-raising events and fundraisers, provided cash donations and in-kind support to local anti-trafficking organizations, and invited guest speakers to help associates learn more about this important issue. Several 2021 highlights are listed below, and Marriott is proud of these exciting programs and the meaningful impacts they have made in their communities.



### 1 CANADA

The Delta Hotels by Marriott Saskatoon Downtown and the Prairie Business Council collaborated with the Canadian Museum of Human Rights to produce a three-part educational series on the history and rights of local Indigenous communities.

### 2 U.S. ▶

The GE Healthcare Institute RiversEdge Condos, Fairfield by Marriott Inn & Suites Cape Coral/North Fort Myers, and Ritz-Carlton, Naples donated clothing, toiletries, and other items to support survivors of human trafficking in their communities. The Fairfield Inn & Suites San Diego North/San Marcos worked with law enforcement to provide emergency housing for survivors of human trafficking.

At Marriott's Corporate Headquarters, Marriott's Legal team worked with Jenner & Block LLP and anti-trafficking organizations in the Washington, DC area to provide legal services to victims and survivors of human trafficking. The legal services range from civil litigation in federal courts to assistance with T-visa applications. Marriott's Vice President and Senior Counsel worked with a trafficking survivor for nearly six months to review her case file, gather information, and prepare and file the documents necessary to support her visa application.



Marriott's Houston Business Council launched a new initiative to support survivors of human trafficking in their community. They collected toiletry donations and packed more than 150 bags to donate to local survivors.

### 3 MEXICO

The Delta Hotels by Marriott Riviera Nayarit displayed a human trafficking awareness poster and shared it with visiting executives, including Board Chairman David Marriott, Executive Vice President and Chief Human Resources Officer Ty Breland, and Group President Craig Smith, placed their painted hands on the poster to represent their support in the fight against human trafficking.

### 4 SPAIN

More than 10 hotels in Spain supported local anti-trafficking efforts. In Barcelona, associates participated in inter-hotel games to raise money to support a local anti-trafficking organization. Other hotels supported A21 by participating in their virtual training event for World Day Against Trafficking in Persons, joining their annual Walk for Freedom to raise awareness, and holding breakfast and coffee sales, raffles, and other activities to help raise funds to support the organization.



Ty Breland joined associates who placed their painted hands on the poster, representing their commitment to combat human trafficking.

### 5 FRANCE

The Riviera Marriott Hotel La Porte de Monaco donated a two-night voucher for an auction and gala held by a local organization that supports human rights and non-discrimination.

### 6 AUSTRIA AND ROMANIA

The Vienna Marriott Hotel and the Sheraton Bucharest Hotel collaborated with UNICEF to recognize World Children's Day by providing information about children's rights and lighting the hotel façades to symbolize a better future for every child.

### 7 GEORGIA

The Sheraton Grand Tbilisi Metechi Palace coordinated a Christmas-time charity event to support the Agency of State Care and assistance for Victims of Human Trafficking. Associates and their local partner companies collected clothes and toys to donate and organized a motorcycle ride in Tbilisi to help raise awareness.

### 8 SINGAPORE

The Ritz-Carlton, Millenia created a comprehensive human rights awareness program to reinforce Marriott's Human Rights Policy and commitment to fighting human trafficking and child exploitation and incorporated it into new hire orientation and dedicated learning days.

*"It's true we are a big, global company – but we never lose sight of the fact that each of our properties and the amazing people who execute our service culture are a part of their communities and each and every day they are doing their part to Serve our World."*

– TRICIA PRIMROSE,

Executive Vice President and Chief Global Communications and Public Affairs Officer



## KEY PERFORMANCE INDICATORS

Marriott is committed to continuously improving our operations and supply chains and enhancing our efforts to address human rights and forced labor issues. We understand the importance of assessing our efforts, so our Human Rights Council, Serve 360 governance groups, and Inclusion and Social Impact Committee regularly review the effectiveness of our work by evaluating our performance against our goals, reviewing our policies, and identifying opportunities for improvement. With support from the Social Impact team, we develop new initiatives to support continuous improvement in addressing human trafficking and upholding human rights in our operations and industry.

### 2025 Sustainability and Social Impact Goals



We recognize that business plays an increasingly critical role in taking on our world's most pressing social, environmental, and economic issues. With our size and scale, we have a global responsibility and a unique opportunity to be a force for good. Marriott's sustainability and social impact platform, Serve 360: Doing Good in Every Direction, guides our efforts in the meaningful role that we believe we can play to support the United Nations Sustainable Development Goals. Our 2025 sustainability and social impact goals related to human rights are:

- ✓ **Ensure** 100% of on-property associates have completed human rights training, including on human trafficking awareness, responsible sourcing, and recruitment policies and practices.
- ✓ **Enhance** or embed human rights criteria in our recruitment and sourcing policies and work with our industry to address human rights risks in the construction phase.
- ✓ **Responsibly source** 95%, by spend, of our top 10 priority categories (animal proteins, bottled water, cleaning supplies, cocoa, coffee, guest room amenities, paper products, seafood, sugar, textiles).



Associates at the Palm Beach Marriott Singer Island Beach Resort & Spa joined the U.S. Department of Homeland Security #WearBlueDay to recognize National Human Trafficking Awareness Day and raise awareness of human trafficking through social media.



Goal	Status	2021 Progress	Next Steps
Ensure 100% of on-property associates have completed human rights training, including on human trafficking, responsible sourcing, and recruitment.	On Track 	<ul style="list-style-type: none"> <li>Launched enhanced training.</li> <li>900,000 associates have completed the training since 2016.</li> <li>83,000 associates completed the training in 2021.</li> </ul>	<ul style="list-style-type: none"> <li>Develop next generation resources to complement enhanced training.</li> <li>Share training and resources developed by Marriott with the broader industry to create greater awareness.</li> </ul>
Enhance or embed human rights criteria in our recruitment and sourcing policies and work with our industry to address human rights risks in the construction phase.	On Track 	<ul style="list-style-type: none"> <li>127 contracts, negotiated and signed by MGP in 2021, included human rights criteria.</li> <li>5,000 associates worldwide have completed procurement training, which includes content on human rights.</li> </ul>	<ul style="list-style-type: none"> <li>Launch additional human rights-related training programs, including an updated Procurement 101 training with enhanced content around human rights.</li> </ul>
Responsibly source 95%, by spend, in our top 10 categories.	Behind Schedule 	<ul style="list-style-type: none"> <li>89% of contracted spend with manufacturers and 80% of contracted spend with distributors in the Americas engaged in the assessment process.</li> <li>52% of manufacturers and 32% of distributors in the Americas completed the assessment.</li> <li>Introduced new digital audit system and human trafficking risk assessment in Asia Pacific.</li> </ul>	<ul style="list-style-type: none"> <li>Review the results of the assessment and leverage them to improve environmental and social performance throughout our supply chains and shape future responsible sourcing efforts.</li> <li>Scale the assessments to suppliers in other parts of the world to develop global findings.</li> </ul>



## OUR ONGOING COMMITMENT

Our purpose and global reach give us real opportunities to make a difference in communities around the world. Sometimes our work benefits hundreds of people, and other times, like our human trafficking awareness program, it may save a life. The incident at the Los Angeles Airport Marriott showed us first-hand that training can make a real impact and the importance of equipping our industry with the tools to recognize and respond to this horrible crime. Now, more than ever, we know the risks of human trafficking in our operations and supply chains require constant attention, and we will strive to advance our training, resources, and awareness-raising efforts. We will continue to collaborate with our nonprofit partners to identify innovative ways our Company can combat human trafficking and with our peers to address human rights risks in the hospitality industry. Whether the actions of a single associate or property, like the associate at the Los Angeles Airport Marriott, or the collective efforts of our global workforce and industry, we are proud to be contributing to a more hopeful and compassionate world where everyone is free from exploitation.

This statement is jointly submitted by Marriott International and the entities it owns or controls (the Group). We have taken an integrated approach to addressing human trafficking risks and operate under a common set of governance policies and programs. There has been significant consultation and collaboration among our people to prepare this statement, including within the Social Impact, Global Communications, Public Affairs, Human Resources, Legal, Global Operations, Procurement, Sustainability, Global Safety and Security, and Owner Franchise Services teams. We have also explained our commitments and expectations regarding human rights and human trafficking more broadly within our business, and we intend to enhance that communication in the future as part of our ongoing commitment to serve our world.