



FOUR SEASONS

FOUR SEASONS SUPPLIER CODE OF CONDUCT

Updated 18 March 2022

INTRODUCTION

As of year-end 2021, Four Seasons Hotels and Resorts (“**Four Seasons**” or the “**Company**”) manages 122 hotels and resorts and 48 residential properties in major city centres and resort locations in 47 countries, with more than 50 projects under planning or development. The hotels and residences managed by Four Seasons engage over 43,500 individuals globally (“**Field Colleagues**”). Field Colleagues are employed by the owners of the hotels and residences, rather than Four Seasons. Four Seasons employs around 600 own staff across our corporate offices, hotels, and residences (“**Corporate Colleagues**”).

The purpose of the *Supplier Code of Conduct* is to set out principles and expectations as to how organizations who supply goods and services to Four Seasons (“**Suppliers**”), are to conduct business. This *Supplier Code of Conduct* may be amended from time to time.

Our *Code of Business Conduct and Ethics* establishes clear ethical standards for how Four Seasons does business, including the expectation that our Four Seasons Corporate Colleagues and Field Colleagues behave responsibly and ethically, and comply with all applicable laws and regulations.

Four Seasons expects Suppliers and their subcontractors to comply with this *Supplier Code of Conduct* and operate in accordance with our organizational values, and in a manner which is consistent with prudent business practices.

Suppliers shall have their own appropriate management systems in place and are expected to take all reasonable measures to ensure they respect, uphold, and communicate the principles contained in this *Supplier Code of Conduct* across their entire business enterprise and within their own supply chains. If the nature of a Supplier’s business activities extends beyond this policy, the same level of ethical behaviour and integrity are expected by the Supplier. Four Seasons shall not mandate nor provide advice on the manner or method in which our Suppliers should comply with this *Supplier Code of Conduct*.

Four Seasons may undertake supply chain audits as necessary to ensure the integrity of our supply chain across all areas covered by this *Supplier Code of Conduct*. Suppliers who are found to be in violation of this policy and fail to amend their practices will be subject to appropriate sanctions.

LEGAL COMPLIANCE AND BUSINESS INTEGRITY

Four Seasons expects Suppliers to maintain the highest standards of corporate ethics and integrity and to comply with all applicable laws

Compliance with laws

Suppliers are expected to conduct business in compliance with all applicable laws. In the absence of applicable laws, Suppliers must follow generally accepted international standards related to health and safety, environment, human rights, ethics, and labour practices, as defined by the International Labour Organization (ILO). Suppliers are encouraged to go beyond legal compliance to advance social and environmental responsibilities. When applicable laws and international standards address the same issues, we expect the highest standards to be applied. This could be in the form of adherence to the *UN Guiding Principles on Business and Human Rights* as well as other internationally recognized frameworks such as the *UN's Sustainable Development Goals*.

Conflict of interest

Suppliers must not try to gain improper advantage or preferential treatment, or inappropriately influence Four Seasons Corporate Colleagues or Field Colleagues. Suppliers must disclose actual, potential, or perceived conflicts of interest to Four Seasons prior to entering into any business relationships and immediately upon discovery of a perceived or actual conflict.

Suppliers should avoid putting their businesses or their employees in a situation of potential conflict.

Gifts and entertainment

The nature of any gifts or entertainment must not be, by their quality, quantity, or timing, used by Suppliers to gain improper advantage or preferential treatment from Four Seasons Corporate Colleagues or Field Colleagues.

As a result, gifts may only be offered where they are reasonable, proportionate and given in good faith, and where the purpose of the gift is to improve the image of Four Seasons, to promote Four Seasons products or services in an ethical manner, or to enhance relations with the recipient in the normal course of business.

No gift should ever be offered, given, provided, authorized or accepted by Corporate Colleagues, Field Colleagues and Suppliers or their family members unless it is not a cash gift, is consistent with customary business practices, is not excessive in value, cannot be construed as a bribe or payoff, and does not violate any laws.

Bribery, corruption, and money laundering

Suppliers must not engage directly or indirectly in any activities that would violate applicable anti-bribery, anti-corruption, and anti-money laundering laws, including but not limited to the U.S. *Foreign Corrupt Practices Act*, the U.K. *Criminal Finances Act*, the U.K. *Bribery Act*, the *Criminal Code* of Canada, the *Canadian Corruption of Foreign Public Officials Act*, *Conflicts of Interest Act*, *Canada Elections Act*, and the *Anti-Corruption Act* (Quebec).

This prohibition includes but is not limited to giving anything of value, directly or indirectly, to governments officials to obtain or retain business. Four Seasons is committed to doing business with integrity, expects Suppliers to abide by the highest standards and will avoid even the perception of impropriety or a conflict of interest in all business interactions worldwide.

Taxation

Suppliers must comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. Suppliers must not participate in tax evasion or facilitate tax evasion by others. Specifically, Suppliers are expected to have contracts, policies, systems, and/or procedures in place to ensure that all who act for them or on their behalf, also comply with such obligations.

Non-public information and information barriers

If Suppliers have access to confidential information in their dealings with Four Seasons, they are expected to have their own policies and procedures in place (e.g., information barriers) for the proper handling, use, and destruction of that information. These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of non-public information.

Business relations

Suppliers must have written permission from Four Seasons before releasing publication of any information with respect to business relations with Four Seasons or speaking as a Four Seasons supplier in any public forum, including presentations to industry, community, or business groups and/or including media/social media forum or with a media representative.

Suppliers must not use their association with Four Seasons for any improper purposes.

Outsourcing and subcontracting

Suppliers are not to subcontract services that they perform for Four Seasons or outsource activities that directly impact the delivery of goods and services to Four Seasons, without prior written approval. This includes the sub-contracting of recruitment or human resources services. In situations where approval is given, it is important to inform Four Seasons of the locations of where the work will be performed, the possibility of cross-border movement of any Four Seasons data, and the identity of parties involved in the provision of the services.

In addition, where Suppliers are outsourcing certain activities in connection with Four Seasons, Suppliers must monitor the outsourcing or subcontracting engagement to ensure compliance with the Suppliers' contractual obligations with this Code.

Competition and fair dealing

No Supplier or partner should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice. Suppliers should not act in an anti-competitive manner than contravenes applicable local anti-trust or competition laws.

Financial integrity

Suppliers must keep accurate records of all matters related to their business with Four Seasons in accordance with standard accounting practices such as Generally Accepted Accounting Principles (GAAP) or International Financial Reporting Standards (IFRS), as applicable.

Use of assets

Suppliers must protect Four Seasons assets, including and not limited to confidential and proprietary Four Seasons information and data, and use them only for authorized Four Seasons business, as directed by Four Seasons. Suppliers must protect Four Seasons assets from fraud, theft, and destruction (e.g., by vandalism or neglect). Suppliers must not use Four Seasons assets for personal use.

Business resumption and contingency planning

Suppliers must develop, maintain, and test their own business continuity and disaster recovery plans in accordance with applicable regulatory and service level requirements.

PRIVACY AND INFORMATION SECURITY

Suppliers must use data obtained through their relationship with Four Seasons only to provide services to Four Seasons and in accordance with Four Seasons instructions. Suppliers must only process Four Seasons data for Four Seasons benefit, and strictly for the purpose(s) for which the data was provided or collected. Suppliers are required to meet their privacy, confidentiality, and security obligations with respect to everyone with whom they do business in accordance with local laws.

Suppliers must process, store, and dispose of Four Seasons data as agreed with Four Seasons and in compliance with applicable local privacy and data protection laws. Suppliers must notify Four Seasons immediately of any actual or suspected data security breaches involving Four Seasons data.

Suppliers must protect Four Seasons intellectual property such as copyrighted information, trademarks and logos, patents, and trade secrets against loss or infringement, and use them only as permitted in writing by Four Seasons in order to provide services to Four Seasons. These Privacy and Information Security obligations apply even after the Supplier's contract is complete.

ENVIRONMENTAL PROTECTION

We are committed to promoting environmental sustainability and reducing the environmental impact of our operations. Four Seasons will support Suppliers who conduct their business using progressive environmental practices and take active steps to preserve and protect the environment. At a minimum, Suppliers must:

- Ensure compliance with all relevant laws related to the protection and conservation of the environment, including the use, handling, storage, transportation, and disposal of regulated hazardous substances.
- Have their own appropriate management policies and procedures in place to minimize environmental impacts and comply with applicable environmental laws.
- Obtain, maintain, and report on all relevant environmental permits, approvals, licenses, and registration as required under applicable environmental legislation.
- Have their own environmental policy in place which sets out the proactive steps they take to measure and reduce material environmental impacts, including carbon emissions, energy, water, waste (including single use plastics and/or food waste, as relevant), and impacts on biodiversity.
- Source all materials from responsible and legal sources, and exercise due diligence on materials used in their supply chain.
- Give preference to recycled and certified sustainable products.
- Be prepared to provide Four Seasons with information on their efforts to monitor and minimize the environmental impacts of their operations.

ANIMAL WELFARE

Four Seasons supports the humane treatment of animals and expects our Suppliers to do the same. Our approach to animal welfare is informed by the “Five Freedoms” of care endorsed by the World Organisation for Animal Health, including: 1) freedom from thirst, hunger, and malnutrition; 2) freedom from fear and distress; 3) freedom from heat stress or physical discomfort; 4) freedom from pain, injury, and disease; and 5) freedom to express normal behaviour. We expect our Suppliers to implement their own processes that prevent the suffering or mistreatment of animals at every stage, from birth, as it is raised, transported, and processed, and to comply with all local animal welfare laws.

RESPECT FOR HUMAN RIGHTS

Four Seasons supports and protects human rights, as described in our *Human Rights Policy*. We adhere to the principles established in the *Universal Declaration of Human Rights*, *International Labour Organisation (ILO) Standards*, the *UN Global Compact*, and the *Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)* and the *UN Guiding Principles on Business and Human Rights*, and we expect our Suppliers to do the same. Suppliers are expected to:

- Provide employees with a safe and healthy working environment that meets applicable legal and industry workplace standards in all jurisdictions where the Suppliers operate, including those concerning hours, compensation, opportunity and working conditions.

- Support the right of employees to freedom of association and collective bargaining, if they so wish.
- Support the elimination of forced labour and human trafficking by complying with the Sustainable Hospitality Alliance's Principles of Forced Labour:
 - 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 passport and valuable possessions.
- Ensure that no worker pays for a job. Fees and costs associated with recruitment and obtaining employment must not be paid by workers,¹ and the recruitment and hiring of workers, including workers provided by temporary help agencies, must comply with applicable local laws. 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.
- Condemn all forms of exploitation of children and not use child labour directly or indirectly in their supply chain, in accordance with the International Labour Organization (ILO) standards. Suppliers must cooperate fully with law enforcement authorities to address any such instances of exploitation of which the Supplier becomes aware.
- Have their own appropriate mechanisms for reporting labour and human rights violations, including appropriate whistleblowing mechanisms.
- Be prepared to demonstrate adherence with the above principles to Four Seasons.

DIVERSITY, INCLUSION AND BELONGING

Four Seasons promotes and embraces diversity in all aspects of our business operations. Suppliers are expected to maintain workplaces characterized by professionalism and respect for the dignity of every individual with whom their employees interact, including respect for differences such as gender, gender identity, gender expression, race, colour, age, disability, sexual orientation, ethnic origin, and religion including without limitation any prohibited grounds of discrimination as defined by local laws.

ANTI-HARASSMENT & NON-DISCRIMINATION

Four Seasons will not tolerate any harassment of any kind, as set out in the Company's *Workplace Violence, Workplace Harassment and Discrimination Policy*. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful or inappropriate behaviour in the workplace. Suppliers are expected to treat their workers with respect and dignity. No worker may be subject to any inhumane or degrading treatment, bullying, or to physical, sexual, psychological, or verbal harassment or abuse including the use of physical punishment. In addition, the docking of and deductions from wages or fines should not be deployed as retribution or a disciplinary measure, and should only be carried out when permitted and in accordance with local laws.

Suppliers must abide by applicable employment standards, labour, non-discrimination, occupational health and safety, and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, Four Seasons expects Suppliers to

¹ [ILO definition of recruitment fees and costs](#)

be committed to non-discrimination principles and not to operate in a way that unfairly differentiates between individuals.

HEALTH AND SAFETY

Four Seasons is committed to the health and safety of our guests, employees, and business partners. We expect Suppliers to comply with all international, national, regional, and local health and safety standards, regulations, and legislation applicable to the Suppliers' business activities. Suppliers must take proactive measures to prevent workplace hazards and perform all services in a diligent manner.

REPORTING CONCERNS AND CONSEQUENCES

Breaches of the *Supplier Code of Conduct* are taken seriously by Four Seasons. A failure to comply with the Four Seasons *Supplier Code of Conduct* may result in suspension or termination, in whole or in part, of the supplier's agreement(s) with Four Seasons and may include legal claims. In the event of a conflict between the *Supplier Code of Conduct* and an applicable agreement, the agreement will govern.

Reporting of Grievances

Suppliers are expected to encourage their employees to communicate to supervisors, managers, or other appropriate personnel any observed illegal or unethical behaviour and when in doubt about the best course of action in a situation. Suppliers should provide an Ethics Hotline or similar whistle blower mechanism and/or comply with any other internal complaint and external reporting obligations required by local laws. Furthermore, Four Seasons expects Suppliers and partners not to allow retaliation for reports of misconduct by others made in good faith by their employees.

Monitoring and Reporting of *Supplier Code of Conduct* Violations

Suppliers must maintain accurate records to demonstrate compliance with applicable laws and the Four Seasons *Supplier Code of Conduct*. Suppliers must not destroy any records that may be relevant to any legal or regulatory proceeding. Suppliers shall have in place their own systems for ensuring compliance with this *Supplier Code of Conduct* and undertaking self-audit exercises and have in place procedures for self-disclosure in instances of actual or potential breaches of this *Supplier Code of Conduct*.

Four Seasons reserves the right to appoint independent third parties or itself to conduct unannounced assessments, audits, and inspections of Suppliers to ensure appropriate efforts are being taken by our Suppliers to operate in a manner consistent with the *Supplier Code of Conduct*. Suppliers must cooperate with any such assessment, audit, and inspection. Suppliers must equally cooperate with any investigation into a violation or suspected violation of the *Supplier Code of Conduct*.

GOVERNANCE

The Four Seasons *Supplier Code of Conduct* is a part of our company's commitment to Environmental, Social and Governance (ESG). The ESG Committee of our Board of Directors advises and guides the company on our ESG programs. The ESG program is overseen by the ESG Steering Committee, which is comprised of members of the company's Executive Leadership Team.

This *Supplier Code of Conduct* is reviewed and, if necessary, updated annually. It should be read in conjunction with the following Four Seasons policies:

- *Human Rights Policy*
- *Code of Business Conduct and Ethics*
- *Workplace Violence, Workplace Harassment and Discrimination Policy*
- *Environmental Policy*

The Four Seasons Board ESG Committee approved this statement on 18 March 2022.