



FOUR SEASONS

FOUR SEASONS SUPPLIER CODE OF CONDUCT

Updated 7 November 2023

INTRODUCTION

Four Seasons Hotels Limited and its affiliates (“**Four Seasons**” or the “**Company**”) is committed to operating responsibly. Through our Environmental, Social and Governance (ESG) program, [*Four Seasons for Good*](#), we seek to create positive impact for people and for our planet.

Four Seasons recognizes that our supply chain plays a significant role in our commitment to responsible and ethical operations. This Code sets out our principles and requirements as to how organizations who supply goods and services to Four Seasons (“**Suppliers**”) and their employees, suppliers and business partners are to conduct business. Our expectations are informed by the principles contained in the *Universal Declaration of Human Rights*, the *International Labour Organisation (ILO) Standards*, the *UN Guiding Principles on Business and Human Rights*, the *UN Global Compact*, and the *Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)*.

OUR EXPECTATIONS

Four Seasons Suppliers are expected to meet the following expectations and are expected to ensure that their employees, suppliers, sub-contractors, and business partners also comply.

- 1. Compliance with laws:** Suppliers are expected to conduct business in compliance with all applicable laws. In the absence of applicable laws, Suppliers are expected to follow generally accepted international standards related to health and safety, the environment, human rights, ethics, and labour practices, as defined by the ILO. Suppliers are encouraged to exceed legal compliance to advance social and environmental objectives. When applicable laws and international standards address the same issues, Four Seasons expects the highest of the laws and standards to be applied.
- 2. Conflict of interest** Suppliers must not try to gain improper advantage or preferential treatment, or inappropriately influence Four Seasons Colleagues.¹ 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.
- 3. Confidentiality and data protection:** If Suppliers have access to confidential information in their dealings with Four Seasons (including proprietary Four Seasons information, intellectual property, and personal data of guests, employees, or others), Suppliers are expected to have their own policies and procedures in place for the proper processing, collection, storage, use, disclosure, transfer and disposal of confidential information. Such policies and procedures must be designed to prevent inappropriate

¹ Four Seasons employs individuals in our Company’s offices and at the hotels and residences we manage (“Corporate Colleagues”). The hotels and residences managed by Four Seasons also employ individuals (“Field Colleagues”). Field Colleagues are not employees of Four Seasons. For the purposes of this Policy, Corporate Colleagues and Field Colleagues are collectively referred to as “Colleagues.”

access to or disclosure of confidential information, and further protect confidential information from fraud, theft, and destruction. Suppliers must process, store, and dispose of Four Seasons confidential information only for authorized Four Seasons business, as agreed with Four Seasons, and in compliance with applicable privacy and data protection laws. Suppliers must not use Four Seasons confidential information for personal use. Suppliers must notify Four Seasons immediately of any actual or suspected data security breaches involving Four Seasons confidential information.

4. **Gifts and entertainment:** Any gifts and entertainment provided by the Supplier must not be, by their quality, quantity, or timing, used by Suppliers to gain, or attempt to gain, improper advantage or preferential treatment from Four Seasons. Suppliers are to maintain appropriate records of exchanges of gifts and/or entertainment.
5. **Business integrity and anti-bribery:** Suppliers must not engage directly or indirectly in any activities that violate applicable anti-bribery, anti-corruption, and anti-money laundering laws. 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 and expects Suppliers to abide by the highest standards and have appropriate procedures in place to safeguard against bribery and corruption to avoid even the perception of impropriety or a conflict of interest in all business interactions worldwide.
6. **Taxes and Recordkeeping:** 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. Suppliers must keep accurate records of all matters related to their business with Four Seasons in accordance with applicable standard accounting practices.
7. **Business relations with Four Seasons:** Suppliers must have written permission from Four Seasons before disclosing or publishing any information with respect to their business relations with Four Seasons, or speaking as a Four Seasons Supplier in any public forum. Suppliers must not use their association with Four Seasons for any improper purposes.
8. **Outsourcing and subcontracting:** Suppliers must not subcontract services that Suppliers perform for Four Seasons or outsource services that directly impact the delivery of goods and services to Four Seasons, without Four Seasons prior written approval. Suppliers must monitor the outsourcing and subcontracting of services to ensure compliance with Suppliers' contractual obligations to Four Seasons and under this Code.
9. **Competition and fair dealing:** Suppliers and their employees, suppliers and business partners must not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other intentional unfair dealing practice. Suppliers must not act in an anti-competitive manner that contravenes applicable anti-trust or competition laws.
10. **International trade laws:** Suppliers must comply with all applicable economic and trade sanctions laws, including economic sanctions, export, and import laws and regulations. Sanctions include but are not limited to sanctions lists, country-wide sanctions, and embargoes implemented, administered or enforced by Canada, the United States, the European Union, the United Kingdom and the United Nations.
11. **Use of assets:** Suppliers must protect Four Seasons assets, including confidential and proprietary Four Seasons information, intellectual property and data, from fraud, theft,

and destruction (e.g., by vandalism or neglect). Suppliers must use such assets only for authorized Four Seasons business, as directed by Four Seasons. Suppliers must not use Four Seasons assets for personal use.

12. Business continuity and contingency planning: Suppliers must develop, maintain, and test their own business continuity and disaster recovery plans in accordance with applicable regulatory and contractual service level requirements.

13. Human rights: Four Seasons supports and protects human rights. Four Seasons has a zero-tolerance approach to human rights abuses. Suppliers are expected to align their practices with those outlined in the Four Seasons [Human Rights Policy](#). Suppliers are expected to:

- a) Provide their employees with a safe and healthy working environment that meets applicable legal and industry workplace standards in all jurisdictions where the Suppliers operate.
- b) Support the right of their employees to freedom of association and collective bargaining.
- c) Support the elimination of forced labour and human trafficking by complying with the [Sustainable Hospitality Alliance's Principles of Forced Labour](#).
- d) Ensure that no worker pays for a job. Fees and costs associated with recruitment and obtaining employment must not be paid by workers.² The recruitment and hiring of workers, including workers provided by temporary help agencies, must comply with all applicable laws. No worker should be indebted or coerced to work.
- e) Condemn all forms of exploitation of children and not use child labour directly or indirectly in their supply chain, in accordance with the ILO standards.
- f) Provide appropriate training to their employees to ensure compliance with the Human Rights Policy, the Sustainable Hospitality Alliance's Principles of Forced Labour, the applicable ILO standards, and any other applicable laws and policies.
- g) Assess their own effectiveness in ensuring that forced labour and child labour are not being used in the Supplier's own business and supply chain.
- h) Collaborate with any human rights-related audits, investigations, or information requests by Four Seasons.

14. Diversity, inclusion and belonging and non-discrimination: Suppliers are expected to maintain workplaces characterized by professionalism and respect for the dignity of every individual with whom their employees interact. Suppliers must provide equality of opportunity for their employees without discrimination, including respect for differences such as race, ancestry, place of origin, ethnic origin, colour, disability, religion, sex, sexual orientation, gender identity, gender expression, and age and including any additional prohibited grounds of discrimination as defined by all applicable laws.

15. Harassment: Suppliers must treat their employees with respect and dignity. Suppliers must not tolerate violent conduct, threats of violence, workplace harassment, workplace sexual harassment, and any other form of legally prohibited form of harassment, retaliation and other disrespectful or inappropriate behaviour in the workplace.

16. Health and Safety: Suppliers must comply with all applicable occupational health and safety laws applicable to Supplier's employees and their suppliers and business partners.

² [ILO definition of recruitment fees and costs](#). Worker is a broad term that is meant to apply to all workers in the Suppliers' supply chain, not just the Suppliers' employees.

- 17. Environment:** Suppliers are expected to align their practices, and ensure those of their suppliers are aligned, with those outlined in the Four Seasons [Environmental Policy](#). Suppliers must conduct their business using progressive environmental practices and take active steps to protect and regenerate the environment. This includes:
- a) **Reduction of environmental impact:** Suppliers are expected to take steps to minimize their environmental footprint, including through reduction of carbon emissions, conservation of water, conservation and regeneration of biodiversity, and reduction of waste, including by reducing packaging and giving preference to recycled products.
 - b) **Protection of biodiversity and endangered species:** Suppliers must not offer products originating from endangered species, including those listed in the [CITES Appendices](#), [IUCN Red List of Threatened Species](#), or seafood from known Illegal, Unreported, and Unregulated (“IUU”) sources.
 - c) **Protection of animal welfare:** Suppliers must support the humane treatment of animals and implement their own processes that prevent the suffering or mistreatment of animals at every stage, from birth, as they are raised, transported, and processed, and must comply with all applicable animal welfare laws.

MAINTAINING COMPLIANCE AND REPORTING CONCERNS

Suppliers must have their own systems for maintaining records that demonstrate compliance with all applicable laws and this *Code*. Four Seasons reserves the right to appoint independent third parties or itself to conduct unannounced assessments, audits, and inspections of Suppliers to ensure that every reasonable effort is being taken by Suppliers to operate in a manner consistent with this *Code*. Suppliers must cooperate with any such assessment, audit, and inspection, and with any investigation into a violation or suspected violation of this *Code*.

Suppliers are expected to encourage their employees to report to their managers any illegal or unethical behaviour their employees observe. Suppliers should provide a whistle blower mechanism and/or comply with any other internal complaint and external reporting obligations required by all applicable laws. Suppliers must not allow retaliation for reports of misconduct made in good faith by their employees. Breaches of this Code will be taken seriously by Four Seasons. Suppliers that breach this Code will be sanctioned, subject to and in accordance with applicable supplier agreements.

GOVERNANCE

This *Code* is a key component of Four Seasons commitment to achieving the objectives of our ESG program. The ESG Committee of Four Seasons Board of Directors advises and guides Four Seasons 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 *Code* is reviewed and, if necessary, updated annually. It should be read in conjunction with the following Four Seasons policies:

- [Environmental Policy](#)
- [Human Rights Policy](#)

The ESG Committee of the Board of Directors of Four Seasons approved this Supplier Code of Conduct on 7 November 2023.