

Pebblebrook Hotel Trust

Human Rights Policy

At Pebblebrook Hotel Trust, we have a deep commitment to upholding the human rights of our employees, guests, suppliers and vendors, and external partners. This human rights policy reflects the principles set forth by the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

We recognize that there are human rights risks associated with our business activities, hotel operations and elsewhere along our supply chain, regardless of geographic location. These risks challenge our core values of conducting ourselves with the highest degree of honesty and integrity and treating everyone with respect. Therefore, we are committed to understanding, addressing, and mitigating the human rights issues that face our stakeholders throughout our business activities. Our ESG Committee has been formulated to regularly address ESG issues, which includes those related to human rights.

We have identified seven risk areas pertinent to our business, which may be further clarified or updated in our annual sustainability report. These include Diversity and Inclusion, Forced or Compulsory Labor, Human Trafficking, Health and Safety, Non-Harassment, Community Wellbeing, and Data Protection and Privacy.

1. Diversity and Inclusion

At Pebblebrook, we view diversity as a strength. Inclusion, representation and diversity matter to us both corporately and at our hotels. We recognize that a diversified workforce is essential since our hotels provide hospitality to a diverse population, and we have a duty to honor and participate in the communities we serve.

We are committed to creating an environment of inclusion and equal opportunity for all people regardless of their race, ancestry, place of origin, color, ethnic origin, disability, creed, sex, sexual orientation, gender identity, same-sex partnership, age, immigrant status, political affiliation, religious affiliation, and socioeconomic status. Furthermore, we commit to non-discrimination and fairness in all labor practices, including but not limited to, employee remuneration, recruitment, and promotions.

At Pebblebrook, we have a workplace where communication is open, and problems and concerns can be discussed and resolved in a mutually respectful atmosphere. Members of management are always available for discussion on matters related to diversity and inclusion, and equal employment opportunity.

2. Forced or Compulsory Labor

We are committed to ensuring that forced labor in all its forms is prevented from occurring as a result of Pebblebrook's business activities. As outlined by the International Labour Organization, this includes eliminating slavery, debt bondage, trafficking in persons, prison labor, compulsory labor, military work, and abuse of homeworkers in our business activities. We also recognize that women, racial and ethnic minorities, migrants, children, and the poor are some of the groups which are most vulnerable to forced, compulsory, or child labor. In line with this, we explicitly prohibit the use of child labor at Pebblebrook.

We are in full support of the International Tourism Partnership's Principles on Forced Labor, and we share these values with our employees, hotel operating partners, suppliers and vendors, and external partners.

- Every worker should have freedom of movement
- No worker should pay for a job
- No worker should be indebted or coerced to work

3. Human Trafficking

We believe hotel operators are best placed to ensure that human trafficking is prevented wholly and in all its forms in the lodging sector. We are committed to helping our hotel operating partners train and prepare hotel frontline staff to identify potential warning signs and carry out the protocol for reporting suspicious activity. To mitigate instances of human trafficking, and as part of our commitment to employee and guest safety, Pebblebrook has pledged support to the American Hotel & Lodging Association's (AHLA) 5-Star promise and will continue to engage with our hotel operators to provide the resources to further assist them in ensuring the safety of our hotel employees and guests. We intend to maintain this commitment by regularly identifying, assessing, and designing solutions to eliminate instances of human trafficking in our business activities, through our ESG Committee.

4. Health and Safety

Creating a safe environment for our guests, employees, and contractors is a top priority at Pebblebrook. At our corporate office, employees are provided with generous health and wellness benefits. We provide employees with standing desks, ergonomic desk chairs, a desk wellness series, and complimentary fitness center memberships, among other things.

Cleanliness is central to Pebblebrook and our hotel operating partners. While the highest cleaning standards have always been standard at Pebblebrook, the impact of COVID-19 has reinforced our commitments to ensure that our guests and employees are safe at our hotels. In turn, Pebblebrook is in full support of the AHLA's Safe Stay guidelines, including the enhanced industry-wide hotel cleaning guidelines in response to COVID-19. To safeguard employee and guest health, we commit to the below practices at a minimum:

- All employees have access to soap and water for handwashing
- All presumed cases of COVID-19 are responded to swiftly
- All high-traffic areas have health and hygiene reminders
- All employees will be reminded of the proper ways to wear, handle and dispose of face coverings, use gloves, wash hands, sneeze, and to avoid touching their face
- All confirmed cases of COVID-19 are immediately reported to local health authorities

We work closely with our third-party operators to ensure their hotel employees are working in a safe and healthy environment. We do so by trying to create a high-quality indoor work environment. Additionally, we work with our operating partners to eliminate identified or potential indoor air pollutants as part of any project we undertake. We prioritize on-the-job safety; workers on major renovation and new construction projects must undergo a project orientation, which educates them on the rules, regulations, and standard operating procedures about site safety as well as the steps to take during an emergency.

5. Non-Harassment

It is our priority to assure that in the workplace, no employee harasses another for any reason. We prohibit harassment of one employee by another employee, supervisor, or third party for any reason. Sexual harassment, in all its forms, is against company policy and is unlawful under state and federal law.

As previously mentioned, we strongly support the AHLA 5-Star Promise. Our pledge to AHLA complements the practices and policies in-place by our company and our hotel operating partners. These practices aim to ensure that hotel employees, at our hotels across the United States, abide by the law, respect individual's rights, and do not tolerate sexual harassment of any type at our properties. We have dedicated a significant amount of resources to assist our hotel operators with sexual harassment awareness training, and avoidance programs, in addition to training and resources to prevent human trafficking. We will continue to engage with our hotel operators to provide the resources to further assist them in ensuring the safety of our hotel employees and our guests. Pebblebrook has committed to funding the purchase of hotel employee safety devices for use at all our owned hotels by the end of 2020. Also, we provide funding for additional training and education programs on sexual harassment and human trafficking at our corporate level and our hotel properties. Through our pledge to the 5-Star Promise, Pebblebrook intends to contribute to positive, industry-wide improvements to continue to make hotels a safe place for all our employees and guests. Finally, we instituted a non-fraternization policy in light of the #MeToo movement to help further eliminate any instances of sexual harassment in the workplace.

We will investigate all reported matters as confidentially as possible. Adverse action will not be taken against an employee who, in good faith, reports, or participates in the investigation of a violation of this policy. Violations of this policy are not permitted and may result in disciplinary action, up to and including discharge.

6. Community Wellbeing

As indicated by our community engagements, Pebblebrook is dedicated to the health and wellbeing of the communities in which we operate. Furthermore, we are committed to continuously improving the positive impact of our properties on the local community. We also engage the local community through public consultation to identify, discuss, and mitigate potential impacts a major development project might have on the local community. We also recognize that water is a fundamental human right and are committed to promoting water efficiency among our properties, ensuring this fundamental right is not threatened for the communities where our properties operate.

7. Data Protection and Privacy

As we are committed to protecting the data and privacy of our guests and employees, we continuously work with our corporate employees and hotel operating partners to adopt actionable controls to ensure that data and sensitive information of guests, employees, suppliers and vendors, and partners are kept private and protected, improving overall cybersecurity.

Whistleblower Policy

Employees are encouraged to talk to supervisors, managers, or other appropriate personnel about observed illegal or unethical behavior. And it is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees. Employees are expected to cooperate in internal investigations of misconduct.

Any employee of Pebblebrook may submit, on a confidential, anonymous basis if the employee so desires, any good faith concerns regarding financial statement or other disclosure, accounting, internal accounting or disclosure controls, auditing matters or violations of the Code of Business Conduct and Ethics. All concerns may be reported to the Chairperson of the Audit Committee of the Board of Trustees via Hunton Andrews Kurth LLP, counsel, as follows:

Mr. Mark Wickersham
Hunton Andrews Kurth LLP
951 E Byrd Street
Richmond, Virginia 23219