

Pebblebrook Hotel Trust Supplier Code of Conduct

Pebblebrook's Code of Business Conduct and Ethics sets out our business standards for employees and third-party hotel operators. We also expect our direct suppliers to respect and align with these business standards. Our goal is also to work with our suppliers to enhance their own performance in environmental sustainability and social responsibility. This Supplier Code of Conduct therefore outlines the expectations we place on our suppliers.

Pebblebrook expects, at a minimum, that suppliers respect the following: compliance with regulation, communication of conflicts of interests, fair dealing in competition, equal employment opportunities, respecting human rights and environmental health, preventing bribery and corruption, and reporting incidents of unethical behaviour. If the nature of a supplier's business activities extends beyond this policy, the same level of ethical behavior and integrity are expected by the supplier.

Compliance with Laws, Rules, and Regulations

The Company expects all suppliers and partners to respect and obey federal laws and all applicable international, regional, and local laws and regulations concerning its activities. Suppliers shall also adhere to and support the protection of human rights in accordance with the UN Declaration of Human Rights.

Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Company. Where a Conflict of Interest exists, suppliers of the Company must declare actual or potential conflicts immediately. Suppliers may communicate actual or potential conflicts to the Company's Legal Counsel.

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.

Please discuss with the Chief Financial Officer who is responsible for oversight of anti-bribery and anti-corruption within the Company, any gifts, or proposed gifts which you are not certain are appropriate.

Diversity, Equal Opportunity, Discrimination and Harassment

The Company is firmly committed to providing equal opportunity in all aspects of employment. Discrimination or harassment is not tolerated, in any form, on the grounds of gender, race, age, disability, ethnicity, nationality, religion, sexual orientation, or gender expression. The Company also strives to enhance gender diversity at all levels and is working towards a gender-balanced workforce. The same is expected of the Company's suppliers and partners.

The Company is also fully committed to providing a fair and living wage for all employees to ensure a sustainable livelihood is secured. Suppliers are urged to corroborate the Company's efforts to provide fair compensation regardless of an employee's demography.

Human Rights

While human rights abuses have not been identified as a significant risk within the Company, suppliers, and partners are expected to take action to prevent the risk of such occurrence and remedy any such instance that may occur. First and foremost, the Company prohibits any instance of child labor, forced labor, modern slavery, and human trafficking. This stance is evident in the Company's full support of the American Hotel & Lodging Association's (AHLA) No Room for Trafficking campaign and the 5-Star Promise on Sexual Harassment. As such, suppliers should be entirely committed to values around human rights, and to take necessary action. Input and feedback are welcomed from suppliers, and in turn, may be considered in the training and updating of the Company's related policies.

Human and Environmental Health and Safety

The Company recognizes the importance of the health and safety of hotel guests, operations employees, management, and the local community and environment. The level of commitment by suppliers is expected to be aligned with the

Company's environmental sustainability and social responsibility commitments, which extends to environmental health, employee wellbeing, and respecting local communities.

1. **Environmental Health:** At a minimum, suppliers should possess an environmental policy outlining a commitment to reduce the adverse impacts of their business activities on the environment, including but not limited to climate change, biodiversity and natural ecosystems, and efficiencies in Energy, Water, Waste, and Carbon Emissions. More specifically, suppliers are urged to opt for recycled or reusable products where applicable given the Company's commitments around single-use plastics. The Company encourages suppliers, particularly General Contractors, to commit to making a sincere effort to minimize the adverse environmental effects of their business activities. As such, suppliers are encouraged to source materials responsibly, and opt for eco-friendly items and sustainably packaged items where applicable, including but not limited to low- or no-VOC paints, finishes, and other items specified for renovations or additions.
2. **Employee Wellbeing:** Promoting human health is integral to the Company. One key commitment, which all suppliers are expected to commit to, is ensuring all employees are given at least one day of rest every seven days. Furthermore, the Company's suppliers are urged to effectively communicate occupational risks and potential injuries through employee training initiatives to all employees. Training should cover topics, including but not limited to, working at heights, proper use of equipment and machinery, and appropriate handling and disposal of hazardous materials, to safeguard employee safety from workplace-related injuries.
3. **Respecting Local Communities:** Suppliers and vendors are encouraged to engage local resident groups, city agencies and other relevant stakeholders to ensure that the local communities are being respected, and adverse impacts, particularly those resulting from repositioning projects, are reduced to an absolute minimum. Also, the Company recognizes water as a fundamental human right, and expects all suppliers to respect this commitment when working with, for or on behalf of the Company.

Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country. We expect our suppliers and partners to abide by this legislation.

Reporting any Illegal or Unethical Behavior

Suppliers are expected to encourage their employees to communicate to supervisors, managers, or other appropriate personnel about observed illegal or unethical behavior and when in doubt about the best course of action in a situation. Furthermore, the Company expects suppliers and partners not to allow retaliation for reports of misconduct by others made in good faith by their employees.

The Company maintains a Whistleblower Policy where any employee, supplier, or third-party may raise complaints or concerns regarding supplier violations of this Code. Suppliers are encouraged to communicate all concerns to the Chairperson of the Audit Committee of the Board of Trustees via Hunton Andrews Kurth LLP, counsel for the Company, as follows:

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