

Modern Slavery Statement

Pursuant to the United Kingdom Modern Slavery Act 2015
and Australia Modern Slavery Act 2018

JANUARY – DECEMBER 2025



SERVE360
DOING GOOD IN EVERY DIRECTION



Introduction

Marriott is publishing this Modern Slavery Statement (Statement) in connection with the company's human rights and community impact goals and in compliance with the United Kingdom Modern Slavery Act 2015 and Australia Modern Slavery Act 2018 (Commonwealth).

This Statement has been prepared in consultation with and details the steps taken by Elegant Hotels Group Limited, GH Hotel Operating Company Limited, Marriott European Hotel Operating Company Limited, Marriott Hotels International Limited, Marriott Hotels Limited, Marriott International Management Company B.V. (Australian Branch), Sheraton Hotels (England) Limited, Sheraton Hotels (U.K.) Limited, Sheraton on the Park Pty Ltd, Starwood Australia Hotels Pty Ltd, Starwood Pacific Hotels Pty Ltd, and their ultimate parent company, Marriott International, Inc., to aid in the prevention of human trafficking during the calendar year ending 31 December 2025.

For purposes of this Statement, the companies owned and operated by Marriott that conduct business within the United Kingdom (U.K.) and/or Australia, including the entities mentioned above, are collectively referred to as "Marriott," "we," "us," "our," or the "company." This report was prepared for the above group as a whole, and the entities listed above may engage in the described activities themselves or on behalf of other members of the group.

2025: A Milestone Year for Marriott's Serve 360 Platform

2025 represented a milestone year for Marriott International's **Serve 360: Doing Good in Every Direction** sustainability and community impact platform, as we concluded Serve 360's original set of goals and launched next generation objectives. From 2016 – 2025, Marriott International (Marriott) aimed to provide human trafficking awareness training to all on-property associates and successfully trained more than 1.7 million associates at managed and franchised properties worldwide. While Marriott plans to continue training and other preventative and awareness-raising efforts, we have also introduced a new target to support 1,000 survivors of human trafficking, from 2026 – 2030, through Marriott-developed programs, including the Future in Training (FiT) Curriculum and HotelHelp.

Marriott is proud to take an integrated approach to addressing human trafficking in the industry and was honored to be recognized for the company's efforts. In 2025, Hospitality ON highlighted Marriott at the 25th edition of the Hospitality Awards for the Best Innovative Social Responsibility Initiative for the company's efforts to combat human trafficking. The U.S. Chamber of Commerce and A21 also celebrated Marriott with the Anti-Human Trafficking Business Award for Survivor Empowerment at their first-ever Counter-Trafficking Freedom Summit and Awards Ceremony.

Organizational Structure, Business, and Supply Chains

Marriott is a worldwide operator, franchisor, and licensor of hotel, residential, timeshare, and other lodging properties under numerous brand names at different price and service points. Consistent with the company's focus on management, franchising, and licensing, Marriott owns or leases very few of its lodging properties.

Marriott maintains a large global supply chain to support its managed hotels and corporate offices. We use a hybrid procurement structure, where goods and services are both centrally contracted and locally sourced by hotels to make them available at the best combination of price, quality, and service, and with opportunities to source goods and services from a variety of suppliers. Enterprise Procurement establishes the enterprise-wide framework for how Marriott engages suppliers, purchases goods and services, manages contracts, across brands, regions, and disciplines. Corporate – level procurement generally includes corporate enabling functions (e.g., marketing information technology, global design, facilities management, and human resources). Hotel-level procurement generally includes the goods and services required for hotel operations, such as energy, hotel amenities, food and beverage, supplies (e.g., linens, cleaning products), and labor services.

For a more detailed description of Marriott's business, see Marriott's 2025 Annual Report on Form 10-K.

Policies and Other Documents

As part of Marriott's longstanding commitment to responsible business practices, Marriott has four key policies in place to guide the company's efforts to uphold human rights and combat human trafficking. These policies include:

- ▶ **Human Rights Policy Statement*** – This policy statement reflects the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. It outlines Marriott's commitment to a safe, healthy, and respectful workplace and sets expectations for preventing human trafficking, forced labor, child labor, unethical recruitment, and other human rights risks.
- ▶ **Business Conduct Guide*** – Marriott's Business Conduct Guide sets expectations for ethical conduct and respect for human rights, including lawful use of Marriott properties and services, collaboration to prevent trafficking and exploitation, and guidance for reporting concerns. It is updated periodically to reflect ongoing human rights efforts and links directly to Marriott's annual Modern Slavery Statement.
- ▶ **Responsible Business Principles for Franchisees** – Published in 2023, this document outlines shared values and expectations for franchisees to uphold brand trust globally, including preventing human trafficking and forced labor, providing anonymous complaint mechanisms, following ethical recruitment principles, and being transparent in recruitment activities.
- ▶ **Global Procurement Supplier Conduct Guidelines** – The guidelines set the standards Marriott expects suppliers, vendors, and contractors to meet, and encourage them to apply the same standards across their supply chains. They cover ethics and business conduct, labor and human rights, environmental responsibility, animal welfare, responsible sourcing, and risk management and mitigation.

*These policies apply to all associates at Marriott's managed, owned, and leased hotels and the company's corporate offices. They are shared through the associate handbook, internal intranet, and public website. Violations of these policies are addressed through Marriott's progressive discipline approach and may lead to significant consequences including potential termination of contract, separation from employment, other appropriate disciplinary or performance management measures, or referral for prosecution. These policies are also made available to the company's franchisees, suppliers, and other stakeholders so they can educate themselves on Marriott's business principles and to encourage them to develop similar policies for their own operations. In addition, the policies are also publicly available.

Human Rights Governance

Marriott's ongoing work on human rights, including the company's human trafficking awareness and survivor empowerment efforts, is managed by Marriott's Community Impact team in the company's Global Communications and Public Affairs organization. The team is responsible for corporate responsibility, volunteerism, external stakeholder engagement, and a portfolio of programs and partnerships that aim to connect Marriott's business with communities to drive positive community outcomes and business value.

Marriott's human rights strategy is overseen by an internal Human Rights Council that convenes key global and regional leaders whose responsibilities intersect with human rights, including Global Communications and Public Affairs, Finance, Internal Audit, Global Operations, Global Safety and Security, Human Resources, Information Technology, Legal, Owner and Franchise Services, Procurement, and Sustainability. It meets biannually and is co-chaired by senior executive leaders. The Council aims to:

- Inform, support, and drive execution and accountability for Marriott's human rights strategy;
- Identify emerging issues, risks, and trends in various disciplines and regions, bringing an operational and local perspective;
- Review status of human rights goals and identify opportunities to accelerate progress; and
- Communicate outcomes to raise awareness and inspire action internally and externally.

Marriott's Board has established a dedicated committee, the Inclusion and Social Impact Committee, that assists the Board in providing oversight of the company's strategy and efforts to advance the company's business through the company's culture and core values, including providing access to opportunity for its various stakeholders and supporting the communities in which the company operates.

Due Diligence

► **Supply Chain** – Marriott's policies set expectations related to the responsible sourcing of products, materials, and labor. For most products and services sourced through Marriott's central procurement groups, supplier due diligence generally focuses on the supplier's reputation, financial background, organizational structure, proposed brands and products, insurance, and environmental and human rights impacts. The procurement groups may also use third-party certifications, third-party audit reports, and traceability processes in evaluating whether forced or child labor may be involved. Active and existing centrally managed procurement contracts are subject to Marriott's Supplier Conduct Guidelines.

► **Third-Party Owners** – It is Marriott's policy to conduct reasonable, risk-based due diligence on prospective counterparties to determine whether they are a suitable business partner for the company. These counterparties include prospective owners, franchisees, and other significant business associates. Due diligence consists of sanctions screening and an open-source background check conducted by a third party on one or more key members of the ownership group, as well as other checks including consulting internal resources and local market sources. If the company determines that an enhanced due diligence review is appropriate, Marriott engages additional resources to conduct more targeted or extensive research.

► **Operations and Compliance** – Marriott's Internal Audit team provides assurance and advisory services designed to maintain an effective system of internal controls, while Marriott's Compliance Office assists the company in managing risk in key regulatory areas. Each year, the company's Internal Audit team and Compliance Office together administer various surveys and assessments that help identify and understand the risks of the company. The Compliance Office manages the Business Ethics mailbox and Business Integrity Line, where reports of unethical conduct can be made.

Human Rights Risk Assessment and Management

Marriott implements an ongoing and multi-disciplinary process that seeks to identify, mitigate, and prevent human rights risks in the company's operations and supply chains. Property-level risk assessments are designed to help Marriott examine the nature and extent of particular threats, and related potential consequences for the business. Marriott also works collaboratively with peers, industry associations, nonprofit organizations, and other external experts to help combat human trafficking as follows:

- ▶ **Human Trafficking** – Marriott requires all on-property associates to complete human trafficking awareness training to help them recognize and respond to potential situations of human trafficking they may observe. The company also provides human trafficking awareness posters and other resources to reinforce the training and raise further awareness that hotels may be unwilling venues for both sex and labor trafficking.
- ▶ **Development and Construction** – While Marriott typically has no role in the construction of hotels and construction workers are generally employed by owner-selected contractors, the company has worked with the hospitality industry to provide information on human rights risks in the hotel construction phase.
- ▶ **Orphanage Tourism** – Marriott is a member of The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism, which incorporates a Voluntourism Policy, supports efforts to promote responsible and safe forms of volunteer tourism, and seeks to protect children in orphanages and residential care facilities who are at risk of abuse and exploitation.
- ▶ **Online Child Sexual Exploitation** – In 2023, through engagement with the Internet Watch Foundation (IWF) and Cisco, Marriott launched the first-of-its-kind initiative in the hospitality industry to block illegal websites with child sexual abuse material from guest internet network access across nearly 5,000 managed and franchised properties in the U.S. and Canada. Marriott has since expanded this program to its hotels globally and continues to maintain it.

- ▶ **Large-Scale Global Events** – Major sporting, conventions, and other events are a potential human trafficking awareness-raising opportunity. Around these events, Marriott works with hotels to reinforce training and industry peers to amplify these efforts.

With support from a third-party human rights consultancy, Marriott conducted a human rights mapping exercise to identify potential human rights risks across the hospitality industry's value chain. In 2025, Marriott leveraged the exercise to inform its 2026 – 2030 Serve 360 goals and strategy, and the Human Rights Council continued to use its findings for awareness and consideration of potential future steps.

Marriott recognizes that grievance mechanisms help identify and address human rights risks, provide pathways to remedy, and build trust. Associates, contractors, and guests can report concerns through multiple channels, including anonymous third-party options. These mechanisms are communicated through orientation and training, included in the associate handbook, and posted in associate areas. Reporting channels are listed below.

- ▶ **Guarantee of Fair Treatment Policy:** Marriott's "open-door" policy encourages associates at managed hotels and corporate offices to discuss fair treatment concerns directly with their manager. Other reporting options include any manager, Human Resources representatives, or corporate and Continent based Associate Relations representatives.
- ▶ **Business Integrity Line:** This 24-hour hotline is accessible by phone 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 proactively communicated to associates at managed hotels and corporate offices but is also available to the general public, including former associates, third-party workers, vendors, and guests. In addition, the Business Ethics email mailbox, managed by Marriott's Compliance Office, also accepts reports of legal, ethical, or integrity concerns.

- ▶ **Crisis Hotline:** Managed by independent third parties, this 24-hour hotline is available to managed and franchised properties for reports of urgent incidents, including human trafficking.
- ▶ **Marriott Incident Reporting Application:** This online database program manages accidents, security incidents, and other allegations at managed properties outside of the U.S. and Canada. Although it primarily functions as a management tool, critical incidents, including human trafficking, are flagged for immediate follow-up and are reported to and investigated by regional Global Safety and Security representatives.
- ▶ **Global Safety and Security Investigations:** Marriott managed properties are assigned above-property Global Safety and Security representatives who may be contacted directly to report potential safety and security matters, including human trafficking incidents. Global Safety and Security may conduct investigations, liaise with law enforcement, and provide additional resources that the property may need to effectively respond to incidents.
- ▶ **Customer Care:** Guests around the world can contact Marriott's Customer Care via phone or email to report any concern, including those pertaining to human rights and human trafficking. Loyalty members can also contact us through the Marriott Bonvoy® mobile app.

Marriott conducts a prompt and thorough investigation of complaints of unethical behavior, harassment, and other human rights concerns. The company's policies encourage management to communicate with the reporting associate to confirm appropriate action was taken and suggest periodic follow-up to monitor the cessation of the offending conduct. Violation of Marriott's policies constitutes grounds for disciplinary action up to and including termination. In addition, hotels may remove and/or ban a guest for conduct that is offensive, abusive, illegal, or poses risk to the safety of associates or other guests.

Marriott's policies strictly prohibit 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. Any associate who brings a complaint in good faith to Marriott's attention will not be adversely affected as a result of reporting, provided they did not participate in the offending conduct. Managers who fail to promptly address complaints from their associates may also be subject to discipline.

In 2025, there were reports of human trafficking relating to third parties using hotel facilities (except for one, not by, or in respect of, Marriott) made through formal reporting channels for Marriott's managed hotel portfolio. For example, six potential human trafficking incidents were reported through the Business Integrity Line (BIL). They were investigated in line with Marriott's internal policies; four were found to be unsubstantiated, one was referred to local law enforcement, and one resulted in one individual being terminated.

Training and Awareness

Marriott’s human trafficking awareness training is the foundation of the company’s anti-trafficking efforts as it is designed to empower associates to recognize and respond to potential indicators of trafficking they may observe on property.

Developed in 2016 in consultation with PACT (previously ECPAT-USA) and Polaris, training was mandated globally for all on-property associates at managed and franchised hotels in 2017. In 2021, Marriott introduced an enhanced version, developed with Polaris and consultants with lived experience, featuring separate learning paths for associates and managers, expanded guidance on responding to potential trafficking situations, and authentic scenarios to practice decision-making in context. As of year-end 2025, more than 1.7 million associates have completed human trafficking awareness training since 2016.

With support from the American Hotel and Lodging Association Foundation, Marriott donated both its original and enhanced versions of the training to make them available to the entire industry at no cost. As of year-end 2025, the trainings have been completed more than 2.5 million times by hotel workers and community members outside of Marriott, since the original donation in 2020.

Marriott continues to drive human trafficking awareness by identifying opportunities to reinforce trainings, such as providing ongoing follow-up questions to associates through the company’s Digital Learning Zone and working with properties to display back-of-house signage. In 2026, Marriott plans to continue to reinforce training and enhance offerings to be more regionally and culturally relevant.



Global Communications and Public Affairs recognizes World Day Against Trafficking in Persons at Marriott’s global corporate headquarters.

Survivor Support

Marriott has taken steps beyond training and leveraged other resources to contribute to the fight against human trafficking. Marriott's efforts have expanded to include awareness-raising initiatives, survivor empowerment programs, and other innovations in an effort to confront this crime.

Survivor Employment

Survivors often face barriers to meaningful education and job opportunities. Marriott and the Global Fund to End Modern Slavery (GFEMS) recognized the need for dedicated employment support and developed the FIT Curriculum to provide trauma-informed training and resources for survivors exploring hospitality careers. The curriculum provides essential information about the hospitality industry, builds market-relevant skills, and equips care providers with practical tools for targeted employment assistance.

The curriculum includes seven job-readiness modules. Some focus on hospitality; others cover transferable skills, such as presentations, teamwork, time management, and interviewing. Local care providers select participants and choose the delivery format and timeline. Pre- and post-curriculum and module surveys gather feedback and measure results.

The FIT Curriculum was piloted in 2022 by four U.S. care providers and supported 64 survivors. Post-program surveys showed increased knowledge and confidence, and a 98% satisfaction rate with pace and content. In 2024 and 2025, Marriott partnered with Survivor Alliance to adapt the curriculum to the Southeast Asia region and train 12 survivors in Thailand. Since its inception, more than 700 survivors have completed the FIT Curriculum across 15 markets.

Marriott continues to support the FIT Curriculum through hotel tours of local properties, mock interviews with associate volunteers, and job-placement support at managed hotels. To protect associate privacy, Marriott does not track resulting placements. In 2026, Marriott plans to expand the FIT Curriculum in the U.S., Canada, and Thailand and assess its longer-term impact.

Rooms Donations

While there have been improvements in shelter systems over the last decade, dedicated beds for survivors of human trafficking remain scarce and difficult to access, and hotels are often used when other immediate shelter options are not available. To make hotel stays more accessible, Marriott created HotelHelp to connect survivors in need of short-term emergency accommodation with hotels that are willing to donate stays.

HotelHelp operates through an external website, www.hotel-help.org, where Marriott-branded hotels can donate unused rooms and trusted care providers can book them on behalf of the survivors they serve. The website and its supporting technology is managed by HotelSwaps.

HotelHelp was piloted in 2024 by hotels and care providers in five U.S. markets: Atlanta, Detroit, Phoenix, Seattle, and Washington, D.C. Through year-end 2025, HotelHelp supported 115 survivors with 419 donated room nights at 53 hotels in 12 markets in the U.S. and Canada.

Marriott continues to support HotelHelp with direct operational assistance and ongoing outreach to hotels and care providers that may want to participate. In 2026, Marriott plans to continue to expand HotelHelp by adding hotels and care providers in existing markets, expanding to include franchised properties, and growing to new markets in the U.S., Canada, and other countries.

Volunteerism

Marriott’s human trafficking awareness training and survivor support initiatives mobilized associates and properties to volunteer locally. In 2025, more than 40,000 associates volunteered more than 80,000 hours in support of Marriott’s efforts to welcome all and advance human rights as part of the Serve 360 platform. Activities included awareness events and fundraisers that generated cash and in-kind donations, as well as guest speakers and training sessions. Examples include:

- ▶ **Australia** – In 2025, Marriott participated in the International Centre for Missing and Exploited Children (ICMEC) Australia Monthly Brown Bag “Leading with care: How travel companies are protecting children.” In addition, the Sydney Harbour Marriott hosted the ICMEC Australia Symposium 2025 that brought together leaders from sectors, including financial services, technology, and law enforcement, to focus on detecting, disrupting, and preventing child sexual exploitation and abuse.
- ▶ **United Kingdom** – In recognition of World Day Against Trafficking in Persons, the JW Marriott Grosvenor House London and Sheraton Grand London Park Lane held seminars, facilitated by local law enforcement, to raise awareness of human trafficking and reinforce the knowledge and skills taught in Marriott’s human trafficking awareness training.
- ▶ **Canada** – Marriott collaborated with the Hotel Association Canada (HAC) to promote access to its enhanced human trafficking awareness training, “Recognize and Respond: Addressing Human Trafficking in the Hospitality Industry.” In recognition of National Human Trafficking Awareness Day in Canada, one of Marriott’s General Managers co-presented with HAC on a webinar to discuss tips for successfully implementing training on property.
- ▶ **Chicago, Illinois, U.S.** – The Sheraton Grand Chicago Riverwalk supported a local care provider, Salt & Light Coalition, that participates in the FiT Curriculum. Associates hosted recent FiT participants for a property showcase and tour, and later volunteered to pack wellness kits for the survivors that the organization serves.
- ▶ **Bethesda, Maryland, U.S.** – Associates at Marriott’s global corporate headquarters volunteered to support local anti-trafficking organizations, including serving dinner at a local residential facility, assembling journal kits and snack bags for survivors, donating professional clothing, and engaging with nonprofit leaders through a panel discussion.

Key Performance Indicators

Marriott plans to continue to enhance efforts to identify and address human rights issues in the company’s operations and supply chains, and to assess the effectiveness of any responsive actions. The Human Rights Council and other internal governance groups have responsibility for overseeing, reviewing, and providing guidance to management on the company’s human rights work. In addition, the Community Impact team develops new initiatives and programs in an effort to continue to advance the company’s efforts in this area.

Ongoing Efforts

Marriott's purpose and global reach give us opportunities to make a difference in communities around the world. Throughout 2026, we plan to continue to enhance Marriott's human trafficking awareness and survivor empowerment efforts by updating training, expanding the FiT Curriculum and HotelHelp, and reviewing company policies. We aim to collaborate with peers, industry associations, and nonprofit partners to identify innovative ways in which we can help combat human trafficking. We hope to encourage the broader hospitality industry and business community to join Marriott's anti-trafficking efforts and undertake their own human trafficking prevention initiatives.

This Statement is jointly submitted by Marriott International, Inc. and the U.K. and Australian entities it wholly or partly owns or controls. We have taken an integrated approach to addressing human trafficking and operate under a common set of governance policies and programs. There has been consultation and collaboration among associates to prepare this Statement, including within the Community Impact, Global Communications and Public Affairs, Human Resources, Legal, Global Operations, Procurement, Internal Audit, Sustainability, and Global Safety and Security teams. This Statement was approved by the Board of Directors of Marriott International, Inc.



Anthony G. Capuano
President and Chief Executive Officer

