

## Anti-Harassment Policy

*It is suggested that this policy be read in its entirety.*

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### What

Choice Hotels International, Inc. and its U.S. subsidiaries (Choice) prohibit and will not tolerate unlawful discriminatory practices, including harassment by or against any associates or applicants by anyone in the workplace, including without limitation supervisors, co-workers, vendors, clients, independent contractors or other associates, on the basis of Protected Characteristics (see definition below).

### Why

Choice believes that all associates should work in an environment free from any type of unlawful discrimination or harassment.

### Who This Policy Applies To

All associates from date of hire, vendors, clients, independent contractors or any other person who conducts business on Choice property or in Choice's work environments.

For associates based in California: The California Fair Employment and Housing Act prohibits co-workers and third parties, as well as supervisors and managers, with whom the associate comes into contact from engaging in unlawful discrimination or harassment.

### Protection of Confidentiality

Choice strives to create an open and productive work environment in which associates are not afraid to discuss concerns or complaints about unlawful discrimination or harassment. Choice will protect associate confidentiality to the fullest extent it deems appropriate when responding to inquiries, discussing complaints, and/or investigating allegations. Any associate found to be in breach of confidentiality will be subject to disciplinary action up to and including termination to the extent permitted by law.

### Definitions

**Harassment** — generally defined as unwelcome verbal, physical or visual conduct that denigrates or shows hostility or aversion to a person because of a person's protected characteristic and which results in a work environment that a reasonable person would find offensive (commonly referred to as a "hostile work environment"). Harassment may include,

without limitation, any combination of the following conduct: epithets, slurs, negative stereotyping, threats, intimidation, hostile acts, denigrating or hostile written or graphic material posted or circulated in the workplace, or any other act that interferes with another associate's work performance, creates a hostile, intimidating or offensive work environment, disrupts the work environment, affects productivity, disparages others, or harms another's reputation.

Examples of Conduct that may constitute harassment are:

- Verbal — Comments which are not flattering regarding a person's protected class.
- Non-verbal/Visual — Distribution or display of any written or graphic material that ridicules, denigrates, insults, belittles, or shows hostility or aversion toward an individual, or group because of a protected class.

**Sexual Harassment** — Sexual harassment has a special legal definition. It generally consists of unwelcome sexual advances, requests for sexual acts or favors, or other physical or verbal conduct or visual displays of a sexual nature when:

1. Submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual (e.g. treating an associate favorably for engaging in such conduct or unfavorably for refusing to engage in the conduct) or;
3. Conduct that has the purpose or effect of unreasonably interfering with an associate's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may include, without limitation, unwanted sexual advances; subtle or overt pressure for sexual favors; sexual jokes, innuendoes, advances or propositions; verbal abuse of a sexual nature; graphic commentary about an individual's body, sexual prowess or sexual deficiencies; leering; whistling; touching; brushing against another; pinching; assault; coerced sexual acts; or suggestive, insulting or obscene comments or gestures; displays in the workplace of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature.

Examples of Conduct that may constitute sexual harassment are:

- Verbal — Sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, threats. Requests for any type of sexual favor (this includes repeated, unwelcome requests for dates). Verbal abuse or "kidding" that is oriented towards a prohibited form of harassment, including that which is sexually oriented and considered unwelcome.
- Visual — The distribution or display of any written or graphic material, including calendars, posters, and cartoons that are sexually suggestive, or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, that is sexual in nature.
- Physical — Unwelcome physical contact, including but not limited to, touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and/or fondling.

If an associate would like additional clarification as to what constitutes harassment in the workplace or has been a witness to, or involved in, an incident that he or she thinks might be harassment but is not sure; the associate should immediately contact Human Resources.

**Protected Characteristics** include:

- Age (40 and over)
- Ancestry
- Color
- Religious Creed (including religious dress and grooming practices)
- Denial of Family and Medical Care Leave
- Disability (mental and physical) including HIV and AIDS
- Marital Status
- Medical Condition (cancer and genetic characteristics)
- Genetic Information
- Military and Veteran Status
- National Origin (including language use restrictions)
- Race
- Sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding)
- Gender, Gender Identity, and Gender Expression
- Sexual Orientation
- Any other characteristic protected by applicable law

## **Reporting an Incident**

Choice recognizes that reporting alleged incidents of harassment may be difficult; however such activities in the workplace cannot be tolerated. For that reason, associates are strongly urged to first speak with the individual who responsible for the inappropriate behavior. However, if an associate does not feel comfortable with this or if an associate has done this and the inappropriate behavior continues, the associate should utilize one of the following procedures to address complaints regarding violations of this policy:

- File a complaint with his or her manager/supervisor; or,
  - Contact Human Resources.
- OR

Report it anonymously to the Compliance Hotline:

- Online: [choicehotels.ethicspoint.com](https://choicehotels.ethicspoint.com); or
- Phone: 855.313.3421

If the incident involved the associate's immediate manager/supervisor or if the associate does not feel comfortable involving his or her manager/supervisor, the associate should utilize one of the other means listed above to report the incident.

Supervisors must report any know allegations of discrimination or harassment.

## Complaint Procedure

Business days are defined for the purpose of this policy as Monday-Friday; excluding Choice recognized holidays.

For every complaint received Human Resources will have a discussion with the associate, when possible, and/or supervisor/manager to determine the best course of action. If it is determined that an investigation should be initiated the following will occur:

1. Human Resources will notify the Vice President of Human Resources and legal counsel if appropriate.
2. Generally within five (5) business days of receiving the complaint, Human Resources will:
  1. Inform the person(s) charged (hereafter referred to as "respondent(s)");
  2. Initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this Policy occurred.
  3. Choice reserves the right to place associates on paid or unpaid administrative leave pending an investigation.
3. During the investigation, Human Resources will interview the complainant, the respondent, and any witnesses, and with legal counsel determine whether there is sufficient evidence to conclude that the alleged violation occurred. The investigation will be fair and thorough and parties will be provided appropriate due process. Any conclusions will be reasonable based on the evidence presented.
4. Generally within fifteen (15) business days of the complaint being filed the Human Resources representative conducting the investigation will conclude the investigation and report his or her findings to the Vice President of Human Resources and Legal Counsel.
5. Human Resources will meet with the complainant and the respondent separately, in order to communicate the Report of Findings and any action to be taken in response to the findings. If the complaint was received anonymously, Human Resources will meet with individuals as it deems appropriate.
6. If it is determined that a violation of policy has occurred, Choice will take appropriate action to remedy the situation and stop the conduct that violates this policy. Thus, violations of this policy by employees will result in disciplinary action up to and including immediate termination.

## Appeal of Report of Findings

To appeal the Report of Findings the associate should refer to Choice's [Dispute Resolution Policy](#) and follow the outlined procedure within 5 business days after the report has been communicated to him or her. Business days are defined for the purpose of this policy as Monday-Friday; excluding Choice recognized holidays.

## Retaliation

As discussed above, retaliation in any form against any associate because he or she made a good faith complaint under this policy or for opposing a violation of this policy or for participation in an investigation or legal proceeding involving an alleged violation of this policy

is expressly prohibited by this policy. Therefore, anyone who does so will be subject to disciplinary action up to and including immediate termination.

Any person who believes that he or she has been improperly retaliated against in violation of this policy should report it immediately by:

- Contacting Human Resources or the Chief Compliance Officer  
OR  
Report it to the Compliance Hotline:
- Phone: 855.313.3421
- Online: [choicehotels.ethicspoint.com](http://choicehotels.ethicspoint.com); or

## **Associates' Responsibility**

Associates must comply with this policy and if they believe the policy has been violated, they should follow the complaint procedure described above.

Associates are reminded of the seriousness of this policy and therefore should not make knowingly false allegations in bad faith. Such actions would be subject to disciplinary action up to and including termination.

## **Management Best Practice**

Best Practices would include:

- Know this policy.
- Avoid compromising situations: management sets the standard.
- If an associate discloses a potential violation, or if management hears of a potential violation, follow the procedures as outlined in this policy and contact Human Resources as soon as possible. Failure to do so may result in disciplinary action up to and including termination.
- Do not speak to the accused harasser about the complaint before speaking to Human Resources.
- Ensure that the associate making the allegation is not retaliated against (whether by the accused harasser or anyone else in the company).
- If Human Resources deem that additional monitoring is required, you will be coached on how to accomplish this and will be required to report to Human Resources as deemed appropriate.