

MVW SUPPLIER CODE OF CONDUCT GUIDELINES

Marriott Vacations Worldwide (“MVW”, “Company”, “We”, “Us” or “Our”) is committed to responsible business practices and operations, including engaging with suppliers that are dedicated to similar principles and holding their own suppliers and subcontractors to the same standards and practices. Our suppliers play a vital role in upholding MVW’s reputation for excellence with owners, members, guests, associates, business partners, investors, contractors, and other important stakeholders. We want to do business with companies that share our values and identify and build relationships with suppliers that follow all applicable laws as well as the spirit and intent of our principles.

MVW’s Supplier Code of Conduct Guidelines (“Supplier Guidelines”) set forth the principles, standards, and guidelines that we expect our suppliers to uphold and that are applicable to all MVW officers, managers and associates in MVW’s global operations. As an MVW supplier it is expected that you and your employees will strive to stay within comparable standards of conduct and will respect the obligations of MVW associates to adhere to MVW policies and applicable standards.

MVW may take steps to assess a supplier’s adherence to these principles, standards and guidelines. Failure to uphold these guidelines could jeopardize the business relationship.

HUMAN RIGHTS

We expect our suppliers to acknowledge and respect the principles contained in the United Nations’ Universal Declaration of Human Rights and related international covenants. We expect our suppliers to match our commitment to conduct business in all locations in a manner consistent with these principles and to protect human rights within the conduct of their business.

We expect our suppliers to be engaged in responsible workplace practices and to conduct their business in a manner that is free from complicity in human rights abuses in all forms. We expect our suppliers to embody a commitment to ethical business practices and good corporate citizenship.

ENVIRONMENTAL IMPACT & SUSTAINABILITY

We expect our suppliers to take responsibility for the environmental impact of their business operations. We expect our suppliers to support the United Nations’ Sustainable Development Goals (SDGs) through environmental and social initiatives.

INCLUSION AND DIVERSITY

We expect our suppliers to promote and embrace diversity and seek to provide an inclusive environment in all aspects of their business operations. We expect our suppliers to not tolerate discrimination in the workplace.

PROTECTION OF THE RIGHTS OF CHILDREN

MVW condemns all forms of exploitation of children. We expect our suppliers to only recruit, employ and do business with individuals who are of lawful age to work in the applicable geographical location. Our suppliers should support laws enacted to prevent and punish the crime of exploitation of children.

FORCED LABOR & HUMAN TRAFFICKING

We expect our suppliers to prohibit the use of forced, bonded, or compulsory labor. We expect our suppliers to commit to ensuring that forced labor in all its forms are prevented from occurring as a result of business activities. This includes the elimination of modern slavery, debt bondage, trafficking in persons, prison labor, compulsory labor, military work, and abuse of homeworkers, as defined by the International Labor Organization. We expect our suppliers to fully support the following principles from the Sustainable Hospitality Alliance's Principles on Forced Labor:

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

We expect our suppliers to be committed to being vigilant in identifying, reporting, and assisting in preventing human trafficking in all forms. We expect our suppliers to have a comprehensive human trafficking awareness program, which includes mandatory company-wide associate training, in an effort to help employees identify possible situations of human trafficking. The human trafficking awareness program should align with all applicable jurisdictional requirements, as well as guidance and recommendations issued by local organizations and law enforcement agencies.

FAIR TREATMENT

We expect our suppliers to not tolerate any form of disparate treatment in the workplace.

- Our suppliers should treat all of their employees with dignity and respect and should not subject them to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment.
- Our suppliers should clearly define disciplinary policies and procedures in support of these requirements and communicate them to all of their employees.

HEALTH AND SAFETY

We expect our suppliers to provide their employees with a safe and healthy working environment.

- Suppliers should strive to ensure their business operations do not impact basic human needs, such as access to food, water, sanitation, or healthcare in local communities.
- Suppliers' employees should have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title or responsibility.
- Suppliers' employees should be trained on the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures, prior to employment and then on a regular basis in the primary language(s) of their workers. Workers should be provided appropriate protective equipment and instructed on appropriate use.

ETHICAL BUSINESS CONDUCT

We expect our suppliers to conduct business with honesty and integrity and in full compliance with applicable laws. Our suppliers' policies should establish clear ethical standards and guidelines for how they conduct business and establish accountability. All of our suppliers' employees should be required to obey the law and comply with specific standards relating to legal obligations, ethics, and business conduct. Our suppliers should have clear accountability mechanisms in place to monitor and report on compliance with those directives.

GRIEVANCE MECHANISMS

To report questionable behavior or a possible violation of these Supplier Guidelines, suppliers are encouraged to work with their primary MVW business contact in resolving their concern. If that is not possible or appropriate, please contact MVW through any of the following methods:

- Mail: Marriott Vacations Worldwide
Attention: Internal Audit
7812 Palm Parkway
Orlando, FL 32836
- Email: business.ethics@mwwc.com
- Tel: +1 407-206-6375

AUDITING AND COMPLIANCE

Our suppliers should ensure that adequate and effective policies, procedures, audits, systems and training are in place to ensure ongoing compliance with these Supplier Guidelines. We reserve the right to request from our suppliers information about the management of relevant issues outlined in the Supplier Guidelines.

MVW may request to verify a supplier's compliance with these Supplier Guidelines through internal and external assessment mechanisms, including on-site independent third-party audits. A supplier's non-compliance and/or failure to take recommended corrective actions may negatively impact, or result in termination of, MVW's ongoing business relationship with the supplier.

We may request that suppliers disclose information that may pertain to geographical location of facilities that produce any item supplied to MVW.

Management of these Supplier Guidelines is the responsibility of MVW's Corporate Procurement Team, which is a participating member of the MVW Environmental, Social and Governance (ESG) Task Force that manages MVW's interaction with the environment, our impact on society, and how our company is governed. Ultimate oversight for the ESG Task Force resides with our Board of Directors and our Executive Committee.