

Policy Effective Date: June 1, 2019

1. PURPOSE AND SCOPE

The Company employs this Policy to define the fundamental principles for its commitment to the well-being of its Users, communities and the environment, uphold the Company's Core Values and comply with Applicable Law.

This Policy applies to anyone accessing, participating in or impacting the Program including, but not limited to, employees, consultants, contractors, temporary employees, property managers, owners, franchisees and vendor personnel ("Users").

2. INTRODUCTION

The Company is committed to being the leader in environmental sustainability ("Sustainability") and protecting the Earth's natural resources through education, innovation, and the efficient use of land, energy, water and green products/services in all its operations. It is committed to mitigating climate change and to meeting global policies and legislation to reduce carbon emissions.

Environmental sustainability is one of four focus areas of the Wyndham Hotels & Resorts ("WHR") Social Responsibility Program ("SR"). The WHRSR Program focused pillars include: championing diversity and inclusion, protecting human rights, supporting our communities (philanthropy), and leadership in sustainability.

The Company takes reasonable steps to manage its Environmental Footprint and develop programs to reduce energy and water consumption and increase waste diversion as well as increase our usage of green products and services. The Company tracks and measures its sustainability performance, manages risks and delivers triple bottom line benefits by focusing on People (Human Capital/Community), Planet (Natural Capital) and Profit (Economy). The Company has established baselines and will report performance results annually to externally recognized third party reporting mechanisms and rating agencies including but not limited to: Global Reporting Initiative, CDP and Dow Jones Sustainability Index. Performance reporting enables investors to gauge social responsibility efforts (also called Environment, Social and Governance ("ESG")) in conjunction with financial reporting to evaluate overall company performance. The Company also works with governments, nonprofit organizations and academic institutions to develop solutions to climate change.

To that end, the Company has developed the Wyndham Green Program or the Program. The Program is designed to not only benefit its customers, associates and shareholders but also the communities in which it operates. The Program enhances the Company's reputation, delivers positive economic and environmental benefits and helps the Company attract and retain talent. The Program enables the Company to optimize its risk management efforts and measure its results both quantitatively and qualitatively to drive competitive advantage by achieving short and long term Sustainability goals.

3. POLICY

3.1 Sustainability. All Users are responsible for supporting the Company's Sustainability goals.

3.2 The Wyndham Green Program. Senior Executive Leadership ("EC") endorses the mission, authority and structure of the Program and is committed to taking appropriate steps to comply with Applicable Law. The EC has charged the Social Responsibility Department in conjunction with the Social Responsibility Council with developing, maintaining and communicating Sustainability policies. The Social Responsibility Department, subject to the oversight of the Social Responsibility Council, is responsible for the overall administration and management of the Program. The Social Responsibility Department in conjunction with the Social Responsibility Council is responsible for implementing processes and controls that identify, respond to and remediate issues with regards to environmental or Sustainability issues and/or information regarding the Company's facilities, products, services, and supporting processes.

3.3 Wyndham Green Toolbox.

- The Social Responsibility Department in conjunction with the Social Responsibility Council is responsible for developing the Program's strategies, processes and procedures that support the Program's objectives, including the implementation of the Wyndham Green Toolbox including related funding and resources.
- Facility Administrators or Operators are responsible for monitoring, tracking, and for using the Wyndham Green Toolbox and/or applicable resources as specified by the Social Responsibility Department in conjunction with the Social Responsibility Council.
- The Social Responsibility Department is responsible for granting Facility Administrators or Operators the appropriate level of access to the Wyndham Green Toolbox and its resources.
- The Social Responsibility Department will coordinate with Information Technology when any technology tools and/or technology support is required for Sustainability initiatives.

3.4 Environmental Management.

- **3.4.1 Minimize Environmental Footprint.** Facility Administrators must take reasonable and appropriate steps to minimize the Environmental Footprint of Facilities, including purchasing and procuring environmentally responsible products and services used in Facilities and taking steps to reduce waste to landfill. Waste includes, but is not limited to, electronic devices, paper, glass, plastic, and metal plus food products. When disposing of waste, Users must comply

with Applicable Law, including the Company's policies regarding Information Security, Privacy and Information Management.

- **3.4.2 Environmental Incident Response.** The Social Responsibility Department will partner with other areas of the organization as well as serve as a member of the Executive Incident Response team to assess the potential impact to the company's assets and associates in regard to any environmental incident. In addition, the Social Responsibility Department will be responsible for assisting those associates impacted at any of our corporate, owned or managed properties

3.5 Reporting and Monitoring Environmental Risk.

- The Social Responsibility Department in conjunction with the Social Responsibility Council, is responsible for: (1) tracking, measuring and reporting on the Company's environmental performance to be utilized by investors and rating agencies; (2) obtaining credible third-party verification and financial review of data and metrics, including the Company's Environmental Footprint; and (3) maintaining oversight of existing and new Sustainability products/services. The Social Responsibility Department will lead the data validation process through independent third-party verification providers.
- Appropriate tracking of Sustainability regulations and environmental controls must be built into the Company's business practices. Such tracking must be commensurate with the level of risk and comply with Applicable Law.
- The Social Responsibility Department in conjunction with the Social Responsibility Council, shall monitor and track Facilities and the Company's related Environmental Footprint and activities to comply with Applicable Law and/or reporting requirements that meet the WHR's Sustainability goals. The Facility Administrators are responsible for understating and applying applicable legislation/regulation at the property level.

3.6 Training and Communication.

- The Company will provide appropriate Sustainability training to Users and Facility Administrators. It is the Facility Administrators and User's responsibility to attend required training sessions.
- The Social Responsibility Department in conjunction with the Social Responsibility Council, and Communications department, shall develop ongoing communications with key stakeholders both internally and externally about the Program, including but not limited to, ESG reporting, requests for proposals, third-party reviews and the Company's Sustainability performance.

3.7 Management of Third-Party Vendors.

- The Strategic Sourcing Department, with the assistance of the Social Responsibility Department, is responsible for oversight of third-party vendors who supply and develop Sustainability products and services to the Company.
- The Social Responsibility Department, together with the Strategic Sourcing Department, is responsible for administering all surveys related to corporate social responsibility performance of vendors and their products. Administered surveys are intended to track third-party vendor performance and other products, services and information aligned with the Program.

4. RESPONSIBILITIES

It is the responsibility of all Users to understand and comply with this Policy. Upon discovery of a violation or perceived violation of this Policy, the User will immediately notify the Social Responsibility Department or a member of the Senior Leadership of the Social Responsibility Council as soon as possible. It is the responsibility of the Senior Leadership of the Social Responsibility Council to review this Policy on an annual basis.

5. DEFINITIONS

"Applicable Law" means any applicable regulation, statute, rule, industry standard, contractual requirements, Company policies, standards (including privacy notices) and procedures.

"Facility Administrators or Operators" are individuals or groups of individuals designated by the Sustainability Department with responsibility for monitoring, tracking, implementing and/or maintaining Wyndham facilities and also the Environmental Footprint of our facilities and related activities. If an individual or group not designated by the Sustainability Department the responsibility will be that of the property general manager.

"Company" means Wyndham Hotels & Resorts, Inc., and its subsidiaries.

"Environmental Footprint" means the measurement of natural resources or sources (e.g., oil, coal, gas, water, plants and wood) used by the Company through business activities such as working, printing, traveling and meetings. These activities are translated into common sets of measurements and then can be defined as a footprint of a business, building, person or activity.

"Environmental Incident" is an environmental activity (e.g., unplanned event, natural disaster, etc.) that impacts Facilities and requires review, intervention, and/or remediation by the Company.

"Environmental, Social and Corporate Governance" or "ESG" refers to the three the central factors in measuring the Sustainability and ethical impact of an investment in a business.

"Facilities" means any physical location where the Company conducts business.

"Information Resources" means information and related resources, such as computers, cell phones, or other electronic devices.

"People (Human Capital)" means treating our associates and communities fairly, as well as saving the environment and improving health with clean air and water.

"Planet (Natural Capital)" means conserving the earth's resources and our natural environment by recycling, reusing and reducing the consumption of resources.

"Profit" means providing an economic benefit either through an increase in revenues or a reduction of expenses.

“Senior Executive Leadership” or “EC” consists of WHR’s Chief Executive Officer and his or her direct reports.

“Senior Leadership of the Social Responsibility Council” is an officer of the Company and member of the Social Responsibility Council who has been appointed by the CEO or designated sponsor of the Program.

“Sustainability” means meeting the needs and resources of the present generation without compromising the ability of future generations to meet their own needs.

“Sustainability Leadership Council” consists of executive officers, senior leadership members, key leaders with representation from areas including Operations, Legal, Finance, Communications, Human Resources and Information Technology. This council meets quarterly to develop and implement the Program strategies and initiatives, as well as track program progress for each business.

“Wyndham Green Program” or “Program” means the Sustainability Program for the Company.

“Wyndham Green Program Charter” means a document that outlines the philosophy, motivation, scope and objective of the Program. It also outlines the governance structure and defines the key functional areas of responsibility.

“Wyndham Green Toolbox” means an online computer software tool that tracks the Company’s Environmental Footprint. It captures the resource usage of the Company’s buildings and activities in its Facilities. This software not only captures energy usage such as electricity, gas, water and waste but also tracks projects and legislation that require- buildings to report their Environmental Footprint and other related activities.

6. VIOLATIONS

Any violation of this Policy may result in disciplinary action, up to and including termination of employment. This document shall not be construed to represent a contract of employment between Company and any User or third party.

Any User who is requested to undertake an activity which he or she believes is in violation of this Policy must report his or her concerns to his or her manager, any other manager or the Human Resources Department, and/or the Integrity Line as soon as possible.

7. OWNER

EVP, Global Learning & Development and Chief SR Officer

8. QUESTIONS & CONCERNS

Questions and concerns may be directed to the EVP, Global Learning & Development and Chief SR Officer (Patricia Lee) at Patricia.Lee@wyndham.com.

9. REVISIONS

Revision	Date	Modified By	Reason for Change
1.0	06.01.2018	Cheryl Rosario	Initial Version
1.1	06.01.2019	Pete Hernandez	Formatting; technical clarifications.