

# HYATT HOTELS CORPORATION

## COMPLAINT AND INVESTIGATION PROCEDURES FOR ACCOUNTING, INTERNAL ACCOUNTING CONTROLS, FRAUD, AUDITING MATTERS OR SECURITIES LAW MATTERS

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### I. PURPOSE

The following procedures have been adopted by the Audit Committee of the Board of Directors of Hyatt Hotels Corporation (together with its subsidiaries, the “*Company*”) to govern the receipt, retention, and treatment of complaints regarding the Company’s accounting, internal accounting controls, fraud, auditing matters or securities law matters, and to protect the confidential, anonymous reporting of employees’ concerns regarding any such matters.

### II. POLICY

It is the policy of the Company to treat complaints about accounting, internal accounting controls, fraud, auditing matters, securities law matters or questionable financial practices (collectively, “*Complaints*”) seriously and expeditiously.

Employees and other stakeholders are given the opportunity to submit for review by the Company confidential and anonymous Complaints, including without limitation, the following:

<b><i>Auditing and Accounting</i></b>	<ul style="list-style-type: none"> <li>Intentional error or fraud in the preparation, review or audit of any financial statement of the Company or significant deficiencies resulting from fraud or intentional noncompliance with the Company’s internal accounting controls and auditing matters;</li> </ul>
<b><i>Financial Issues</i></b>	<ul style="list-style-type: none"> <li>Fraud against investors, securities fraud, mail fraud, or fraudulent statements to the United States Securities and Exchange Commission (“<i>SEC</i>”) or members of the investing public; violations of SEC rules and regulations applicable to the Company;</li> </ul>
<b><i>Banking</i></b>	<ul style="list-style-type: none"> <li>Bank fraud, wire fraud or any concerns regarding questionable or unethical banking, such as money laundering, embezzlement, falsifying or forging any banking document;</li> </ul>
<b><i>Anti-Bribery</i></b>	<ul style="list-style-type: none"> <li>The act of influencing the official or political action of another by corrupt inducements which may include giving items that could be reasonably interpreted as an effort to improperly influence a business relationship or decision; and</li> </ul>
<b><i>Code of Business Conduct and Ethics</i></b>	<ul style="list-style-type: none"> <li>Violations of the Company’s Code of Business Conduct and Ethics.</li> </ul>

The Company encourages employees to report Complaints and to provide as much information as possible about their concerns. Anonymous Complaints by an employee will be investigated. If the employee has identified himself/herself, but has requested that he/she remain anonymous, the Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent

with the need to conduct an adequate review and comply with applicable laws and related legal processes. Beyond employees, other stakeholders, including vendors, customers, business partners and other parties external to the Company will also be given the opportunity to submit Complaints; however, the Company is not obligated to keep Complaints from non-employees confidential or to maintain the anonymity of non-employees.

Complaints will be reviewed under Audit Committee direction and oversight by the Company's General Counsel, Vice President of Internal Audit and/or such other persons as the Audit Committee or General Counsel determines to be appropriate.

The Company prohibits retaliation against a person who:

- Files a Complaint with the Company based on a reasonable belief that the information provided relates to a possible violation of securities law;
- Seeks help or files a Complaint with the Company in good faith regarding violations noted in this Policy;
- Cooperates with the Company, government agency or law enforcement investigation associated with a Complaint; or
- Files a Complaint other than with the Company as permitted by applicable law.

Any reprisal or retaliation by an employee against a person covered by this Policy because such person, in good faith, sought help or filed a Complaint will subject such employee to disciplinary action, which may include suspension or termination of association with the Company.

If the Company contracts with a third party to handle Complaints or any part of the Complaint process, the third party will comply with the policies and procedures in this Policy. In addition to the protections under this Policy, the person filing a Complaint may have other rights provided by applicable law.

### III. PROCEDURES

#### Receipt of Complaints

<b>Telephone Hotline</b>	<ul style="list-style-type: none"><li>• Any person with a Complaint in the United States can call the Company's anonymous, confidential hotline at <b>1-866-294-3528</b> to submit his or her Complaint.</li><li>• International toll-free numbers may be found on the following website: <a href="http://www.hyattethics.com">www.hyattethics.com</a>. In the event an international toll-free number is not available, a person may call us collect at <b>503-726-2412</b>.</li><li>• Employees who call one of these numbers need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from any employee call in a manner that protects the confidentiality and anonymity of the employee making the call. The intake phone call will be received by a third-party contractor specifically engaged to provide the hotline services, or an internal person specifically designated to receive hotline calls.</li></ul>
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	<ul style="list-style-type: none"> <li>• Among other things, the following information may be requested by the person receiving the call: <ul style="list-style-type: none"> <li>○ If an employee, the division of the Company in which the caller works and, if a non-employee, where such person is employed or such person’s relationship to the Company;</li> <li>○ Any relevant information concerning the allegations; and</li> <li>○ Name of the caller (unless an employee elects to remain anonymous).</li> </ul> </li> <li>• The information from the call will be documented in a format acceptable to the Company and shall include at a minimum a written description of the information received concerning the Complaint allegations.</li> </ul>
<b>Company Website</b>	<ul style="list-style-type: none"> <li>• Any person may submit a Complaint on the Company’s external website at <a href="http://www.hyatt.com">www.hyatt.com</a> at “Investor Relations/Corporate Governance/Ethics Reporting” or at <a href="http://www.hyattethics.com">www.hyattethics.com</a>. Employees submitting this information need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from a Complaint from an employee in a manner that protects the confidentiality and anonymity of the employee submitting the Complaint.</li> </ul>

**Treatment of Complaints Reported to the Company**

1. A Complaint made pursuant to this Policy shall be directed to the Company’s General Counsel or the General Counsel’s designated Associate General Counsel of the Company’s Legal Department (in each case, “**Company Counsel**”) and the Vice President of Internal Audit, both of whom shall report directly to the Audit Committee on such matters, as requested by the Audit Committee.
2. Company Counsel shall review the Complaint, and may investigate it himself or herself or may assign another employee, outside counsel, advisor, expert or third-party service provider to investigate, or assist in investigating, the Complaint. Company Counsel may direct that any individual assigned to investigate a Complaint work at the direction of or in conjunction with Company Counsel or any other attorney in the course of the investigation.
3. Unless otherwise directed by Company Counsel, the person assigned to investigate will conduct an investigation of the Complaint and report his or her findings or recommendations to Company Counsel. If the investigator is in a position to recommend appropriate disciplinary or corrective action, the investigator also may recommend disciplinary or corrective action.
4. If determined to be necessary by Company Counsel or the Audit Committee, the Company shall provide for appropriate funding, as determined by Company Counsel or the Audit Committee, to obtain and pay for additional resources that may be necessary to conduct the investigation, including without limitation, retaining outside counsel and/or expert witnesses.
5. At any time with regard to any Complaint, Company Counsel may specify a different procedure for investigating and addressing such Complaint, such as when the Complaint concerns pending litigation.

## **Complaints to External Government Agencies**

Please note that while the Company encourages employees to make reports internally to the Company in the manner set forth above, nothing in this Policy prohibits any employee from: (1) reporting possible violations of federal law or regulations, including any possible securities laws violations, to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Congress, or any agency Inspector General; (2) making any other disclosures that are protected under the whistleblower provisions of federal law or regulations; or (3) otherwise fully participating in any federal whistleblower programs, including but not limited to any such programs managed by the U.S. Securities and Exchange Commission and/or the Occupational Safety and Health Administration. Moreover, nothing in this Policy or any other policy of the Company prohibits or prevents employees from receiving individual monetary awards or other individual relief by virtue of participating in such federal whistleblower programs.

## **Access to Reports and Records by the Company and Disclosure of Investigation Results**

All reports and records associated with Complaints are considered confidential information and access will be restricted to members of the Audit Committee, the Company's Legal Department, the Company's Human Resources Department, the Vice President of Internal Audit, and selected Company personnel or outside counsel involved in investigating/monitoring a Complaint as contemplated by this Policy. Access to reports and records may be granted to other parties at the discretion of the Audit Committee or restricted based on the allegations in the Complaint.

Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any applicable legal requirements or regulations or by any corporate policy in place at the time. The person who filed the Complaint may be provided a summary of the conclusions of the investigation, as appropriate under the circumstances.

## **Retention of Records**

All Complaints and documents relating to Complaints made through the procedures outlined above shall be retained by the Company for at least five years from the date of the Complaint or such later date as is noted on the Company's Records Retention Schedule under (Corporate-US/Human Resources/Compliance/Regulatory Compliance), after which the information may be destroyed unless Company Counsel determines that the information may be relevant to any pending or potential litigation, inquiry, or investigation; in such event, the information will not be destroyed unless and until permitted under the Company's Document Hold Process.

*Approved by the Board of Directors to be effective November 4, 2009;  
Amended and Approved as of December 9, 2021.*