

Pebblebrook Hotel Trust
Whistleblower Policy

**Procedures for the Submission of Complaints or Concerns
Regarding Financial Statement or other Disclosures, Accounting,
Internal Accounting or Disclosure Controls, Auditing Matters or Violations
of the Pebblebrook Hotel Trust Code of Business Conduct and Ethics**

Section 301 of the Sarbanes-Oxley Act requires the Audit Committee of the Board of Trustees of Pebblebrook Hotel Trust (the “Company”) to establish procedures for: (a) the receipt, retention, and treatment of complaints received regarding all illegal activities including problems associated with accounting, internal accounting controls, or auditing matters associated with the Company; and (b) the submission by employees of the Company and others, on a confidential and anonymous basis, of good faith concerns regarding questionable accounting or auditing matters.

In accordance with Section 301, the Audit Committee has adopted the following procedures:

1. The Company will promptly forward to the Audit Committee any complaints that it has received regarding financial statement disclosures, accounting, internal accounting or disclosure controls or auditing matters, disclosure violations or violations of our Code of Business Conduct and Ethics.
2. Any employee of the Company may submit, on a confidential, anonymous basis if the employee so desires, any good faith concerns regarding financial statement or other disclosure, accounting, internal accounting or disclosure controls, auditing matters or violations of the Company’s Code of Business Conduct and Ethics. All concerns may be reported to the Chairperson of the Audit Committee of the Board of Trustees via Hunton Andrews Kurth LLP, counsel for the Company, as follows:

Mr. Mark W. Wickersham, Esq.
Hunton Andrews Kurth LLP
951 E Byrd Street, Suite 200
Richmond, Virginia 23219

3. Following the receipt of any complaints disclosed hereunder, the Audit Committee will investigate each matter so reported and take corrective and disciplinary actions, if appropriate, which may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit increase, bonus or stock options, suspension without pay or termination of employment.
4. The Audit Committee may enlist committee members, employees of the Company and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial statement disclosures, disclosure concerns or violations, accounting, internal accounting controls, auditing matters or violations of the Company’s Code of Business Conduct and

Ethics. In conducting any investigation, the Audit Committee will use reasonable efforts to protect the confidentiality and anonymity of the complainant.

5. The Company does not permit retaliation of any kind against employees for complaints submitted hereunder that are made in good faith. Additionally, no employee will be adversely affected because the employee refuses to carry out a directive, which, in fact, constitutes corporate fraud, or is a violation of state or federal law or the Company's Code of Business Conduct and Ethics.

6. The Audit Committee will retain as a part of the records of the Audit Committee any complaints or concerns for a period of no less than seven (7) years.

The Audit Committee will keep a written record of all reports or inquiries. If the contact is in the nature of an alleged violation of the Company's Code of Business Conduct and Ethics or an impropriety with regard to the Company's financial statements or other disclosures, accounting, internal or disclosure controls, or auditing matters, the Chairperson of the Audit Committee will immediately notify the complainant that the complaint has been received (if the complaint was not made anonymously) and begin the procedures outlined above.

As approved by the Board of Trustees, February 17, 2023.