

IHG Supplier Code of Conduct

OUR COMMITMENT

Our commitment to operating our business responsibly underpins our entire strategy and the reputation of IHG and our brands. At IHG, we understand how important it is to operate with honesty, integrity and the highest ethical standards, and to grow our business in a way that respects human rights and positively impacts on the environment and local communities.

OUR EXPECTATIONS OF OUR SUPPLIERS

As part of our commitment to operating responsibly, and to ensure we work with suppliers who share this commitment, we place requirements on our suppliers as set out in this Supplier Code of Conduct (Supplier Code). These are informed by the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic Social and Cultural Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development, the Ten Principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights.

We expect our suppliers to adhere to these standards across their own business and to apply these standards across their own supply chains.

IHG reserves the right to conduct unannounced assessments and on-site audits to ensure compliance with the Supplier Code. Whilst it is our intention to work with suppliers to resolve any issues identified, material breaches of the Supplier Code may lead to termination of contract.

OUR STANDARDS

IHG suppliers must comply with the following standards:

1. Compliance with Laws and Regulations

Comply with the laws and regulations in the countries in which they source, operate and supply. All other applicable international laws and regulations related to the conduct of business must also be complied with, including trade sanctions, competition/antitrust and data privacy/protection laws. In cases where national law may offer a lower standard, we expect our suppliers to uphold the higher standard set by the Supplier Code. Where national law conflicts with the Supplier Code, we expect our suppliers to comply with legal requirements while seeking to uphold the spirit of the Supplier Code wherever possible.

2. Labour practices

Comply with applicable laws and regulations including those concerning hours, compensation, opportunity and working conditions.

3. Forced labour & Human Trafficking

IHG has a zero-tolerance approach to forced labour and human trafficking. Suppliers must comply with the following:

- Every worker should have freedom of movement. The ability of workers to move freely should not be restricted by their employer through abuse, threats and practices such as unlawful retention of passports and valuable possessions.
- No worker should pay for a job. Fees and costs associated with recruitment and obtaining employment should not be paid by workers.

- No worker should be indebted or coerced to work. Workers should work voluntarily, be informed of their employment terms and conditions in advance without misrepresentation and paid regularly as agreed and in accordance with any applicable laws and regulations.

4. Child Labour

Comply with all applicable child labour laws in accordance with applicable national legislation and International Labour Organisation (ILO) standards as set out in ILO Conventions No. 138 and 182.

5. Freedom of Association

Respect employees' rights to voluntary freedom of association, under the law. Employees should have the right to organise or join associations, and bargain collectively, if they so choose.

6. Diversity and Inclusion

Provide equality of opportunity without discrimination, including recruiting and promoting individuals based on their suitability for the job and not discriminate based on race, colour, ethnic or national origin, gender, sexual orientation, gender identity or expression, age, religion, marital status, disability, or any other characteristic protected by national, state or local legal requirements. In addition, demonstrate respect in the workplace by not tolerating any form of harassment.

7. Safe Working Environment: Provide a safe, secure and healthy working environment in compliance with all applicable health, safety and security laws.

8. Environment

Respect the environment including complying with environmental regulations and in making business decisions suppliers are expected to endeavour to:

- preserve and protect the environment and reduce environmental impact;
- undertake initiatives that promote greater environmental responsibility in the design, development and operation of their business;
- consider the development and integration of sustainable technologies in order to reduce the use of energy and water, and re-use/recycle the resources consumed by their business; and
- monitor, record and benchmark their environmental performance on a regular basis

9. Land Rights

Ensure any land acquisition respects the rights of individuals and communities impacted.

10. Business Integrity and Anti-Bribery

Suppliers are expected to act with integrity. Bribery and any form of financial crime, including improper payments, money laundering and tax evasion or the facilitation of tax evasion, are not permitted under any circumstances. This also applies to any agents, consultants and other service providers who do work on a supplier's behalf in providing goods to, or performing services for, IHG.

11. Gifts and Entertainment

Ensure any gifts or entertainment to IHG are not used to improperly influence business transactions or decisions related to awards of future business. Gifts and entertainment to IHG

are prohibited if the supplier is engaged in negotiations for the award or renewal of business/contracts.

12. Conflicts of Interest

Suppliers are expected to compete on the merits of their products and services. Suppliers are required to implement appropriate mitigations against and disclose to IHG any real or perceived conflict of interest.

13. Confidentiality and Data Protection

Respect IHG's confidential and proprietary information as well as its employee and customer privacy and personal information.

14. Accurate Financial Records

Accurately record and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws, regulations and good industry practices.

15. Grievance Mechanisms

Establish grievance mechanisms for workers to report concerns, including processes for anonymous complaints to be raised, communicate these mechanisms to workers and respond to concerns raised in a fair and timely manner.

REPORTING CONCERNS

We expect our Suppliers to raise concerns about any potential breach of our Supplier Code or concerns regarding our business conduct. Concerns can be raised directly with your IHG contact or alternatively can be reported through our confidential reporting service. This channel enables IHG colleagues to report any ethical concerns or breaches of the IHG Code of Conduct and is also accessible to external parties, including IHG Suppliers and their workers. Online reports can be filed at www.ihgethics.com. Telephone reports can be made using the toll-free number for your country. This number can be found online at www.ihgethics.com.

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