

Our culture – how we operate responsibly continued

Speaking up

A core component of our people culture is respect in the workplace. IHG has zero tolerance to any form of discrimination, harassment or bullying, in line with our Respect in the Workplace Policy. While we uphold our responsibility to behave ethically and protect IHG’s reputation, it is possible that in limited instances, a colleague may act in a way that conflicts with the principles set out in the Code. Guidance is given to report concerns directly to line managers, supervisors or local HR representatives. A confidential reporting hotline and online reporting facility are available and globally advertised. Concerns can also be reported to the Head of Risk and Assurance or the General Counsel and Company Secretary. The Board routinely reviews summaries of reported concerns and ensures processes are in place for investigations and follow-up.

Safety and security

IHG is committed to providing a safe, secure and healthy environment for all colleagues, guests and visitors. All operations must comply with all applicable health, safety and security laws. Beyond compliance with the law, IHG works to identify further improvements to the way safety and security risks are managed, and has mandatory Brand Safety Standards in place for all hotels globally to drive consistency in this area. Initiatives to respond to safety and security risks are on page 48.

Bribery and corruption

IHG is committed to operating with integrity. Colleagues are not permitted to engage in bribery or any form of financial crime, including fraud, money laundering, violations or circumvention of economic and trade sanctions and tax evasion or the facilitation of tax evasion. This standard also applies to agents, consultants and other service providers who do work on our behalf.

Our Anti-Bribery Policy sets out our zero tolerance approach and is applicable to all Directors, Executive Committee members, employees and colleagues in managed, owned, leased and managed lease hotels. It is accompanied by anti-bribery content in our mandatory Code of Conduct e-learning module. Our Gifts and Entertainment Policy and guidance further support our approach in this area.

→ Initiatives to respond to legal, regulatory, ethical and compliance risks are more broadly discussed on page 47.

IHG is a member of Transparency International UK’s Business Integrity Forum and participates in its Corporate Anti-Corruption Benchmark. The results from this benchmark help to measure the effectiveness of our anti-bribery and corruption programme and identify areas for continuous improvement.

Handling information responsibly

We are committed to ensuring that guests, loyalty programme members, colleagues, shareholders, owners and other stakeholders trust the way we manage data. As part of our privacy and information security programmes, we have standards, policies and procedures in place to manage how personal data can be used and should be protected. Our e-learning training for employees on handling information responsibly is a mandatory annual requirement and covers topics such as password and email security, using personal data in accordance with our policies and privacy commitments, how to work with vendors and transferring data securely.

In addition to the cybersecurity awareness training mentioned on the previous page, this year we held tabletop exercises to practise our ability to detect and respond to potential security events, such as ransomware attacks. We continue to develop our privacy and security programmes to address evolving requirements and take account of developing best practice. The Board regards cybersecurity as a critical business discipline and it regularly receives updates on the Group’s cybersecurity risk management and control arrangements.

→ See page 46 for further detail on uncertainties relating to data and information usage, storage, security and transfer and cybersecurity on page 248.

Section 172 statement

Details of how the Directors have had regard to the matters set forth in Section 172(1)(a) to (f) of the Companies Act 2006 is provided in the Section 172 statement on pages 102 to 103.

Further details can be found throughout the Strategic and Governance Reports, including in our key stakeholder engagement disclosures on pages 36 and 37.

Non-financial and sustainability information statement

Non-financial and sustainability information, produced to comply with sections 414CA and 414CB of the Companies Act 2006, including a description of policies, due diligence processes, outcomes and risks and opportunities can be found as set out below. Internal verification and disclosure controls apply to all information covered in these areas.

- Impact of the Company’s activities on the environment on pages 33 to 35, 52 to 59, and 238 to 240.
- Social matters on pages 32 and 33.
- Anti-corruption and anti-bribery matters on page 40.
- Employee matters on pages 29 to 31, 103, 117, 118, 123, 124 and 127.
- Respect for human rights on page 39.
- A description of the Group’s business model on pages 10 to 13.
- The Group’s principal risks on pages 42 to 49.
- The Group’s KPIs on pages 60 to 63.

→ See our relevant policies at ihgplc.com/responsible-business

Climate-related financial disclosures

In accordance with Sections 414CB of the UK Companies Act 2006, the required climate-related financial information disclosures can be found integrated throughout the Strategic Report, primarily in the TCFD report on pages 52 to 59.

Reporting requirements

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a) Group’s governance for assessing and managing climate-related risks and opportunities	52 and 53
b) How climate-related risks and opportunities are identified, assessed and managed	54 to 56
c) How processes for identifying, assessing, and managing climate-related risks are integrated into the overall Group Risk Management	59
d) Description of climate-related risks and opportunities, and time periods over which they are assessed	54-56
e) Impact of the climate-related risks and opportunities on the Group’s business model and strategy	54-56
f) Analysis of the resilience of the Group’s business model and strategy (climate-related scenarios)	54
g) Targets used by the Group to manage climate-related risks and to realise climate-related opportunities	59
h) Key performance indicators (including basis of calculating) used to assess progress against targets identified under (g)	63, 238 and 239