

## Being a responsible business continued

### Our culture continued

#### Code of Conduct and related policies

IHG's Code of Conduct (Code) sets the standard for how we do business at IHG, and underpins our commitment to providing True Hospitality for Good. The Code seeks to enable colleagues to make the right decisions, in compliance with the law and IHG's expectations about conduct. The Board, EC and all colleagues working in IHG corporate offices, reservation centres, managed, owned, leased and managed lease hotels must comply with the Code. We expect those we do business with, including our franchisees, to uphold similar principles and standards. The Code is reviewed and approved by the Board on an annual basis, and is supported by annual e-learning requirements. We continue to enhance our engagement and measurement approaches. We monitor and assess how our values are being embedded into our culture through a variety of methods, such as through direct engagement, employee engagement surveys, tracking of e-learning completion and our confidential reporting hotline.

The Code contains an overview of our values and Group-level policies, including those relating to human rights, respect in the workplace, equal opportunities, accurate reporting, information security, anti-bribery and corruption, and the environment. It also provides guidance on how colleagues can raise concerns or seek further help.

Additional detail regarding other areas of the Code, such as our commitment to creating a culture of inclusion is on pages 55 and 56. Initiatives to respond to legal and regulatory uncertainties and ethical and social expectations are on page 49.

**+** IHG's Code of Conduct is available in 14 languages on the Company's intranet and at [ihgplc.com/en/investors/corporategovernance/code-of-conduct](https://ihgplc.com/en/investors/corporategovernance/code-of-conduct)

#### 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 that processes are in place for investigations and follow-up.

#### Safety and security

IHG is dedicated to ensuring a safe, secure, and healthy environment for all colleagues, guests, and visitors. All operations must adhere to relevant health, safety, and security laws. In addition to legal compliance, IHG proactively seeks opportunities to enhance the management of safety and security risks, implementing mandatory Brand Safety Standards across all hotels worldwide to ensure consistency. Initiatives addressing safety and security risks can be found on page 50.

#### 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, EC 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 49.

IHG is a member of Transparency International UK's Business Integrity Forum.



#### 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. This year we held tabletop exercises to practise our ability to detect and respond to potential security events.

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 48 for further detail on uncertainties relating to data and information usage, storage, security and transfer.

#### Our behaviours

By demonstrating our growth behaviours, our leaders and employees create an environment that encourages high performance, while operating responsibly in a way that helps us achieve our strategic priorities and purpose. Our policies, communications, learning programmes and performance management processes reflect these behaviours, ensuring they act as a compass for how we do things and help us create an inclusive culture for all.

## Human rights

An integral part of our global approach to responsible business is to drive respect for and advance human rights in accordance with internationally recognised standards. Our Human Rights Policy sets out our commitment to respect the human rights of all individuals impacted by our business activities – our guests, our colleagues, workers in our supply chain and the communities in which we operate – and our expectation that those with whom we do business – including our suppliers, owners, and franchisees – uphold similar standards.

We seek to advance human rights by working with others to strengthen our practices and address common industry challenges, including through our membership of the World Sustainable Hospitality Alliance.

This year, teams across the business continued to collaborate to gain a deeper understanding of how our salient human rights are being identified and to address findings of our 2023 global human rights assessment.

Driving compliance with IHG's Responsible Labour Requirements (RLRs) across our managed, owned, leased and managed lease estate remains a priority for the human rights programme.

In 2024, we launched new e-learning on responsible recruitment and labour practices to build internal capabilities to identify and address common risks faced by migrant workers during recruitment and working in hotels. We also conducted on-site assessments including direct worker engagement, with selected hotels to evaluate implementation of the RLRs and to better understand current practices and common challenges.

Action plans to address areas for improvement, as well as learnings to further enhance the RLRs, are in development.

In 2024, we also completed a review of our confidential reporting hotline to ensure alignment with the effectiveness criteria outlined in the UN Guiding Principles on Business and Human Rights and continued to strengthen human rights due diligence in our supply chain.

**+** For further details on our human rights progress, please see page 17 of our Responsible Business Report and our Modern Slavery Statement.

## 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 124 to 125.

Further details can be found throughout the Strategic and Governance Reports, including in our key stakeholder engagement disclosures on pages 42 and 43.

## 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 52 to 63, 68 to 73, and 74 to 76.
- Social matters on pages 58 and 59.
- Anti-corruption and anti-bribery matters on page 78.
- Employee matters on pages 53 to 57, 125, 139, 142 to 143 and 165 to 166.
- Respect for human rights on page 79.
- A description of the Group's business model on pages 22 to 27.
- The Group's principal risks on pages 46 to 51.
- The Group's KPIs on pages 38 to 41.

**+** See our relevant policies at [ihgplc.com/responsible-business](https://ihgplc.com/responsible-business)

## Climate-related financial disclosures

In accordance with Section 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 68 to 73.

## Reporting requirements

	Page
a) Group's governance for assessing and managing climate-related risks and opportunities	69 and 122
b) How climate-related risks and opportunities are identified, assessed and managed	70 to 72
c) How processes for identifying, assessing, and managing climate-related risks are integrated into the overall Group Risk Management	70 and 44 to 51
d) Description of climate-related risks and opportunities, and time periods over which they are assessed	70 to 72
e) Impact of the climate-related risks and opportunities on the Group's business model and strategy	71 to 72
f) Analysis of the resilience of the Group's business model and strategy (climate-related scenarios)	70
g) Targets used by the Group to manage climate-related risks and to realise climate-related opportunities	73
h) Key performance indicators (including basis of calculating) used to assess progress against targets identified under (g)	41 and 74 to 76