



Our Code of Conduct

Empowering our colleagues to do the right thing,
wherever we are in the world



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“We all want
to work
somewhere
where we are
supported in
doing the right
thing.”



A Message from Elie

Chief Executive Officer

Dear Colleagues,

At IHG® Hotels and Resorts (IHG), doing business responsibly is a core part of our culture. It underpins our entire strategy and our commitment to providing True Hospitality for Good.

We have worked hard to build an excellent reputation and need to work just as hard to protect it. It's essential that the way we operate is trusted by our guests, our owners, those who do business with us, the communities we work in and by you, our colleagues. This means that wherever we are in the world and whoever we are working with, we must always operate with honesty, integrity and the highest ethical standards. Our Code of Conduct sets out the principles that help us to do this.

We all want to work somewhere where we are supported in doing the right thing. Please take the time to familiarise yourself with the Code, so that you can understand the way we work together at IHG.

Thank you,

A handwritten signature in black ink, appearing to read 'Elie'.

Elie Maalouf
Chief Executive Officer

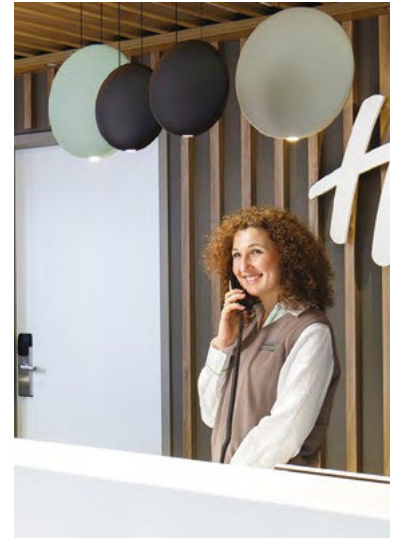
Helping us deliver



True Hospitality for Good

"We are committed to operating honestly and upholding the highest ethical standards."

Crowne Plaza - Adelaide



Holiday Inn - Hamburg



Holiday Inn - Oakland Airport

Introduction

What is the Code of Conduct?

The IHG Code of Conduct (Code) supports all of us in making the right decisions. It sets out the principles we must all work by at IHG, wherever we are in the world. It also provides guidance on where to go if you need further help or would like to raise a concern.

Failure to comply with the Code will be treated seriously. This may result in disciplinary action being taken which, in some cases, may include dismissal in accordance with our internal policies and local labour and employment laws.

Additional requirements

The information in the Code cannot address each and every situation that may confront colleagues throughout the world. It is an important guide and provides an introduction to many of our key global policies, but it does not cover every scenario. It is important to remember that there may be other policies, procedures and requirements that apply to you, which you must comply with in addition to the Code.

Who does the Code apply to?

All colleagues working in IHG corporate offices, reservation centres and IHG owned, leased and managed hotels must comply with the Code and the policies and procedures it refers to. Throughout the Code, where we refer to IHG, this includes IHG Hotels & Resorts and its affiliated companies.

IHG franchised hotels are independently owned and operated. However, all of our hotels and owners, both managed and franchised, have a shared vision to continue strengthening the IHG® brands and a commitment to responsible business. The principles, spirit and purpose of the Code are therefore relevant to all of IHG, including to our franchised hotels.

Playing your part

All colleagues have a duty to play their part in upholding the principles of the Code. You can do this by:

- Making sure you complete all of the [mandatory training](#) courses assigned to you within the required timelines.
- Seeking [support and guidance](#) when you are unsure about any aspect of the Code or related guidance.
- Applying the principles of the Code to your responsible behaviour on a daily basis.
- [Speaking up](#) and reporting any concerns or behaviours you observe that are in conflict with the principles set out in the Code.



“The Code helps us do the right thing wherever we are in the world.”

Additional responsibilities of managers

If you manage others, not only must you follow the Code yourself, you also must:

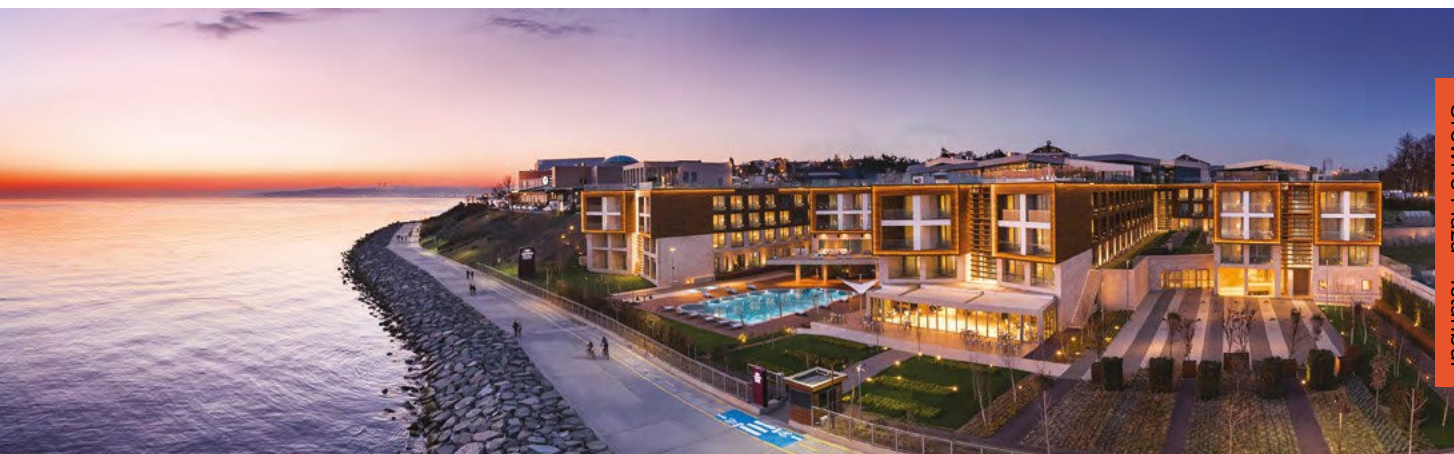
- Ensure that everyone who reports to you has read and understands the Code and completes all required training (this should also form part of your check-in conversations).
- Create an environment in which colleagues feel able to ask questions and raise concerns.
- Always follow up if you are aware of, or suspect, misconduct.

Legal compliance

We are committed to complying with the laws and regulations of the countries and jurisdictions in which we operate. If a law or regulation conflicts with the Code, you must comply with whichever applies the strictest standard. If you are not sure, you should contact [Ethics & Compliance](#).



[Our Code & Policies](#)
[Responsible Business Portal](#)
[IHG University](#)



Our values

Our values are important to us and provide a framework to help shape the way we work at IHG. Along with the other principles set out in our Code, they are a core part of the way we do business.



Do the right thing

We always do what we believe is right and have the courage and conviction to put it into practice, even when it might be easier not to. We are honest and straightforward and see our decisions through.



Show we care

We want to be the company that understands people's needs better than anyone else in our industry. This means being sensitive to others, noticing the things that matter and taking responsibility for getting things right.



Aim higher

We aim to be acknowledged leaders in our industry, so we have built a team of talented people who have a real will to win. We strive for success and value individuals who are always looking for a better way to do things.



Celebrate difference

We believe that it's the knowledge of our people that really brings our brands to life. Our global strength comes from celebrating local differences whilst understanding that some things should be kept the same.



Work better together

When we work together we are stronger. We're at our best when we collaborate to form a powerful, winning team. We listen to each other and combine our expertise to create a strong, focused and trusted group of people.

"The Code helps us to live our values and do business responsibly."

Journey to Tomorrow

At IHG, doing business responsibly is a core part of our culture and in 2021 we launched the Journey to Tomorrow 2030 plan to further strengthen our positive impact on our people, communities and the planet. Journey to Tomorrow supports our Code by providing a powerful framework for our colleagues in how they can focus their efforts to provide True Hospitality for Good around five key areas. It's a plan that will make IHG a stronger organisation, where we will build upon our inclusive culture and help people thrive. A plan that reflects the needs of our communities, from supporting social change to advancing human rights. And a plan that helps protect the planet now and for generations to come.



InterContinental – Phuket



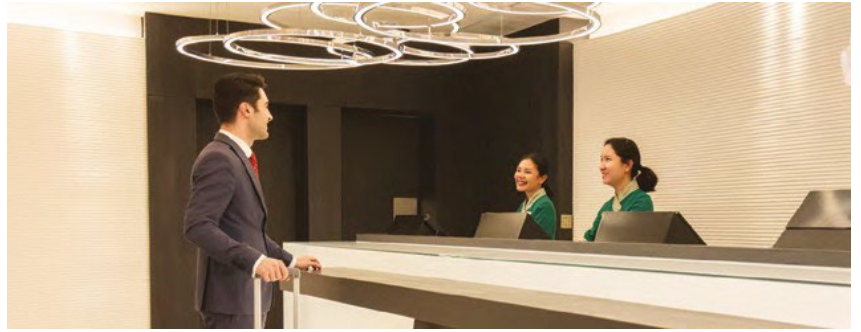
Six Senses – Ibiza

Progress is best achieved when we work together, and we will collaborate closely with those who stay, work and partner with us, and empower our people to make a difference in helping us get there. Building on important progress made in recent years, our plan sets out five clear ambitions:

- Our people: Champion an inclusive culture where everyone can thrive.
- Communities: Improve the lives of 30 million people in our communities around the world.
- Carbon & energy: Reduce our energy use and carbon emissions in line with climate science.
- Waste: Pioneer the transformation to a minimal waste hospitality industry.
- Water: Conserve water and help secure water access in those areas at greatest risk.



[Journey to Tomorrow progress and priorities](#)



Helping you make the right decisions

If you are faced with a concern or issue and are unsure what to do, consider the following questions:

- Is it legal?
- Is it ethical?
- Is it safe?
- Is it consistent with our Code and policies and procedures?
- Is it consistent with our values?
- Would I be comfortable explaining it to my friends, family or co-workers?
- How would I feel if it was made public in the newspapers or online?

If the answer to any of these is 'no' or you are not sure, you should always talk to someone, such as your line manager or supervisor, your local Human Resources representative or [Ethics & Compliance](#), who will be able to provide you with support and guidance.

IHG also offers a confidential reporting channel where you can raise concerns. Please see [Speaking Up](#) for further information.

Speaking



up

Reporting concerns

While we must all uphold our responsibility to behave ethically and protect the reputation of IHG, it is possible that a small number of colleagues may act in a way which conflicts with the principles set out in the Code.



We all have a responsibility to report concerns.

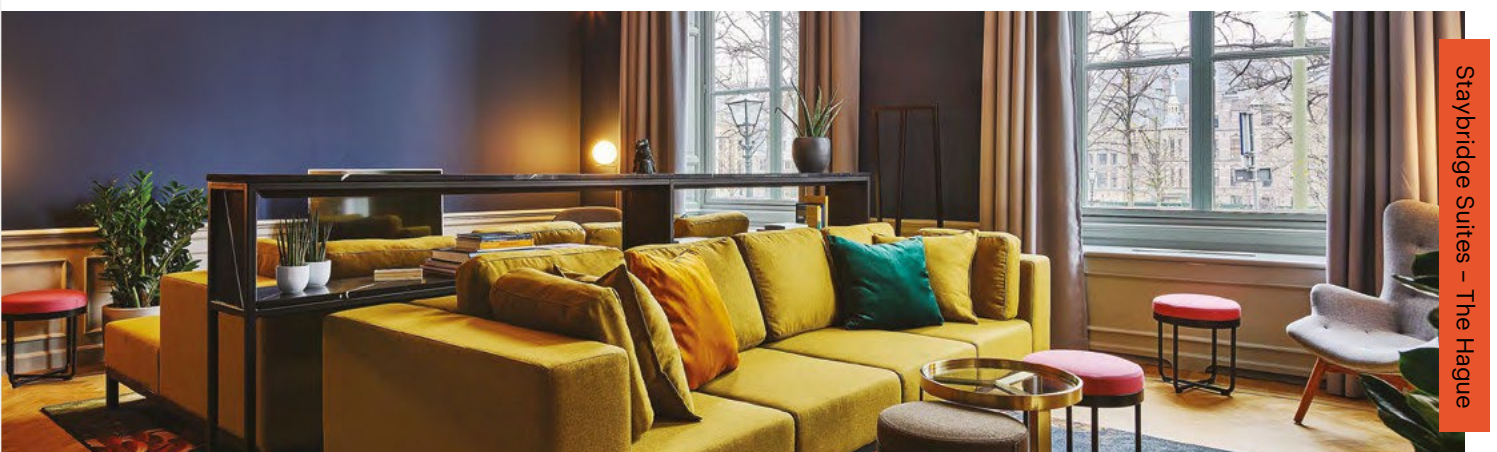
We hope that you will feel able to report your concerns directly to your line manager, supervisor, your local Human Resources representative or to another appropriate local manager in the first instance, as this is often the most effective way of obtaining a response. However, for certain matters, we recognise that it may not always be appropriate to do this. In these instances, a confidential report can be filed through the IHG Confidential Reporting Hotline:

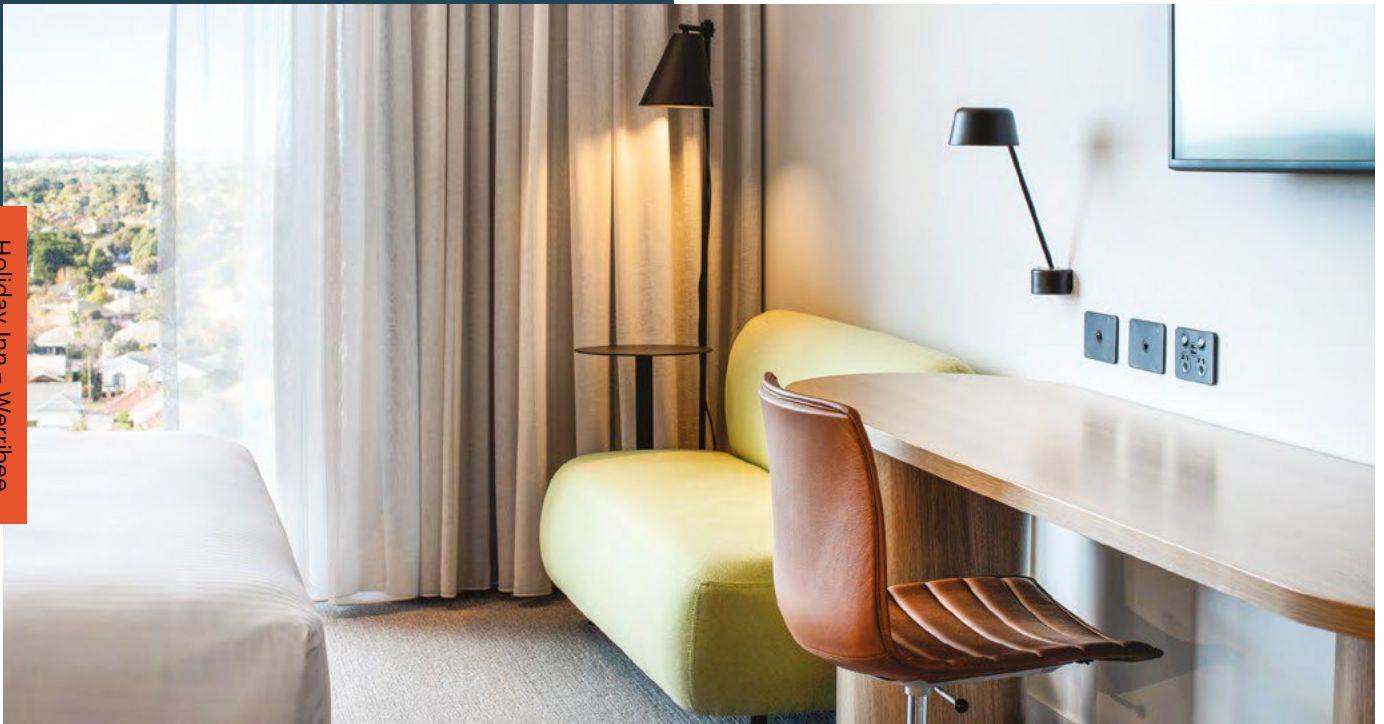
- Online reports can be filed at <http://www.ihgethics.com>.
- Mobile reports can be made with this QR code:



- For online and mobile reports, you can file a report in your local language and translators will translate your report into English.
- Telephone reports can be made using the toll-free number for your country. This number can be found on the IHG ethical concerns poster displayed in your hotel or office or online at <http://www.ihgethics.com>. If you need translation services, you must say the name of your preferred language in English when the operator answers the phone. You will then be passed to a translator who will speak to you in your preferred language.

If these steps do not deliver a satisfactory outcome, contact the Head of Risk and Assurance or the General Counsel and Company Secretary, both based at IHG's [UK Head Office](#).





Reporting concerns

Q What is the IHG Confidential Reporting Hotline?

A This is an independent, confidential channel, which can be accessed via the telephone or internet by our colleagues and any person with a relationship to IHG (including our suppliers and their workers) to report concerns about breaches of our Code (for example, related to human rights, discrimination or harassment, dangers to health and safety or the environment, accounting and auditing matters, bribery or conflicts of interest, insider trading, competition or antitrust violations, falsifying records, fraud or theft, facilitation of tax evasion).

Q What is IHG's stance on retaliation?

A IHG does not permit retaliation against employees making good faith reports of either suspected breaches of the Code of Conduct or suspected violations of the law, even if it may result in a loss of business to IHG. If you believe you have faced retaliation of any kind, please report it through the Confidential Reporting Hotline so that IHG can undertake inquiries and take appropriate action.

Taking care



of each other



Respect in the workplace

IHG has a zero tolerance to any form of discrimination, harassment or bullying in the workplace – whether it be from a colleague, guest or anyone else.

Any form of inappropriate behaviour which makes a colleague feel intimidated, humiliated, embarrassed, causes offence or has the effect of making them feel vulnerable, threatened or undermined may constitute bullying or harassment. This includes but is not limited to making derogatory remarks, jokes, sexual comments or innuendoes, abusive or insulting language or gestures and threats of violence.

As a general rule, discrimination occurs when an individual or a group of people is treated differently or less favourably because of a category or characteristic protected by applicable law. Unlawful discrimination can include, but is not limited to, discrimination based on race, colour, religion, sex, sexual orientation, gender, age, marital status, pregnancy, family responsibilities, disability, political beliefs, citizenship or national origin, and will not be tolerated by IHG.

We all have a responsibility to make sure that our working environment is as positive as possible and is therefore free from harassment, bullying or discrimination. All colleagues and managers are responsible for respecting the rights of their co-workers and ensuring that they treat each other with courtesy, professionalism, dignity and respect – avoiding any behaviour which could be seen as unacceptable or inappropriate.

Managers must be responsive and supportive to anyone who raises a concern and should ensure their teams are aware of our Respect in the Workplace Policy and how to raise concerns.

Q What should I do if I believe I am being bullied or harassed?

A If you believe you are being harassed or bullied you should talk to your line manager or supervisor, your local human resources representative or to a senior manager. Alternatively, IHG also offers a [Confidential Reporting Hotline](#) to report such incidents, should you prefer.



Inclusion and Impact

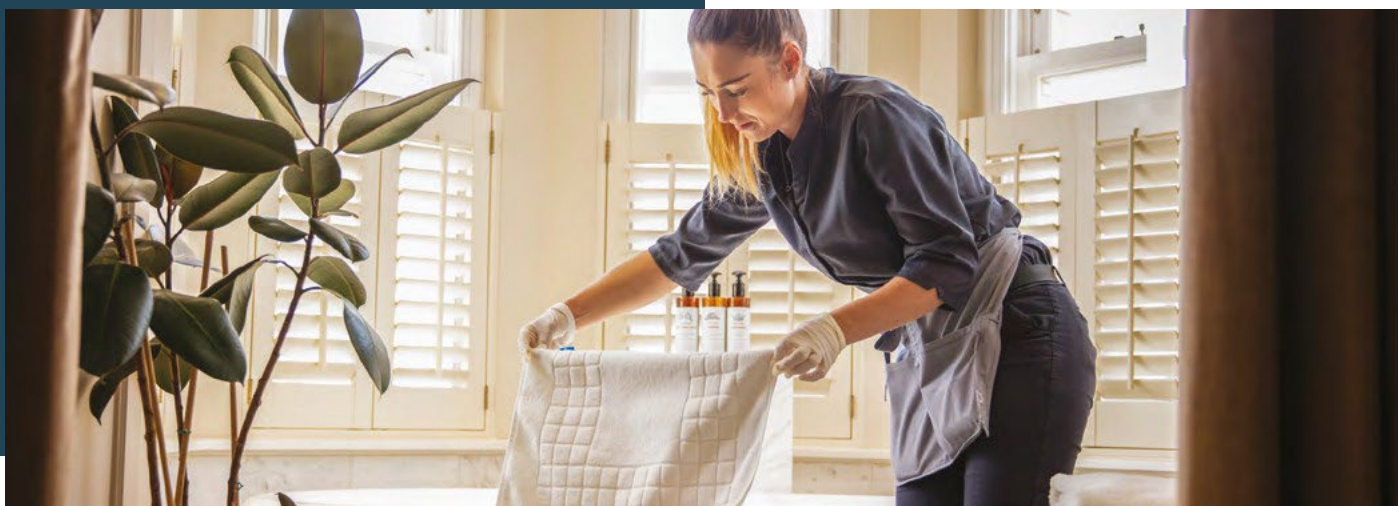
IHG represents many cultures, religions, races, sexualities, abilities, backgrounds and beliefs. We recognise the importance and benefit of ensuring our workforce fully represents the communities in which we operate and the guests who stay in our hotels.

We value our colleagues as unique individuals, with the different ideas, perspectives and energy they bring. That's why we continue to drive changes within our business that champion an inclusive culture where everyone can thrive. It's not just crucial to who we are, but also to how we work together, grow our business, and to the sense of belonging colleagues feel at IHG to be able to bring their true selves to work.



IHG is committed to providing equal opportunity without discrimination. This commitment includes recruiting and promoting individuals based solely on their suitability for the role. IHG does not discriminate on the grounds of race, colour, ethnicity, national origin, religion, sex, sexual orientation, gender, age, disability, marital or familial status, veteran status or any other characteristic protected by law.





Human rights and modern slavery

Respecting human rights in accordance with internationally recognised standards is an integral part of our global commitment to responsible business.

We understand the importance of human rights in relation to our colleagues, guests and the communities in which we operate. We also encourage those with whom we do business – including our suppliers, owners and franchisees – to prevent, mitigate and address adverse impacts on human rights.

We will not tolerate human rights abuses including forced labour, any form of modern slavery or the exploitation of children either within our own operations or our supply chains. We must also ensure that our hotels are not used as locations for human rights violations such as human trafficking or sexual exploitation. Where we have caused or contributed to adverse human rights impacts, we are committed to providing effective remedy.

Any allegations that human rights are not being respected are taken very seriously. If you ever have any concerns about the treatment or safety of guests or colleagues, you should notify your line manager or supervisor as soon as possible. IHG also offers a [Confidential Reporting Hotline](#) to report such concerns, should you prefer.

Q I heard a rumour that an agency that provides our temporary staff makes people work very long hours and does not pay them for all the hours they work. We have never had any problems with the agency. Do I need to do anything?

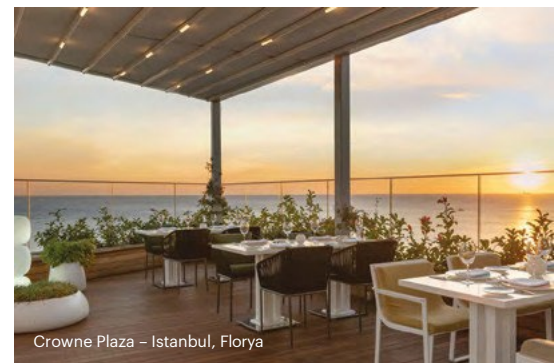
A Even though the rumours may be incorrect, this must be investigated. If we confirm the rumours and the agency does not satisfactorily address the issues, we will need to terminate our contract with them and may need to report them to the relevant authorities.

Environment

It is important to us that we operate sustainably and help preserve our planet for all generations to travel and explore. Working with our hotel owners, suppliers and our industry, we will continue to create more sustainable guest stays by reducing our carbon emissions, managing waste, and conserving and preserving natural resources such as water.

We are committed to complying with environmental regulations, preserving and protecting the environment and reducing our environmental impact. We endeavour to reduce our use of energy and water. We re-use and recycle the resources consumed by our business, wherever practical, and encourage the development and integration of sustainable technologies. One way we do this is through [IHG Green Engage™](#), our online sustainability programme which tells our hotels what they can do to be a 'green' hotel.

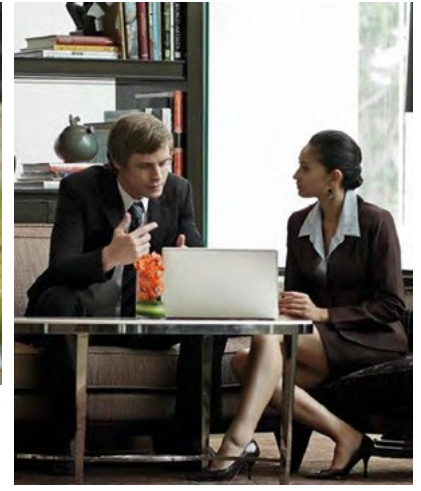
We are committed to constructive participation with all stakeholders in the ongoing process of sustainable growth.



Holiday Inn - St Augustine

- Q** Our local authority requires that we separate trash and recyclables at the hotel. Can't I simply send everything to the landfill?
- A** No, if recycling is available, your hotel should use the service. Our hotels are committed to reducing our environmental impact and protecting the communities in which we operate.
- Q** We don't currently report our energy consumption in our hotel. Is this okay?
- A** All IHG-branded hotels are required to report energy, water and waste data on Green Engage. The system works to set and track property-specific reduction goals for carbon, energy, water and waste, and demonstrate potential cost savings associated with a plan.





Community activities and charitable donations

To achieve our purpose of delivering True Hospitality for Good, we work together to care for our people and communities while preserving our planet.

Each one of our hotels and offices around the world plays an important role in its local community. The activities we support in our communities must be aligned with our values and the principles set out in this Code. Charitable giving should only take place in accordance with our Supporting our Communities Policy.

Donations should never be made where they could be viewed as improperly influencing IHG business.

- Q** My son's school is holding a charity event next week. Can I make a donation via my corporate credit card?
- A** Corporate credit cards should never be used to make charitable donations or for personal expenses. Donations made by IHG should support our Journey to Tomorrow priorities, with some exceptions for local market or business unit donations. Charitable requests must be approved by the [Corporate Responsibility team](#). If you have mistakenly made a charitable or personal expense using your corporate credit card, you should immediately inform your line manager.





Safety and security

IHG is committed to providing a safe, secure and healthy environment for all our colleagues, guests and visitors.

All our operations must comply with all applicable health, safety and security laws. Beyond compliance with the law, IHG works collectively to identify further improvements to the way we manage safety and security risk – for example, through our mandatory Brand Safety Standards and applicable policies and procedures. Managing safety and security risk is a fundamental part of doing business responsibly.

Learning from experience is a crucial ingredient to managing safety and security risk effectively. One way in which we do this is by understanding the safety and security incidents that occur across the business, identifying how those incidents might be prevented in future, and acting on that insight. It is therefore vital that you report all safety and security incidents.

If you have a safety or security related concern you should immediately talk to your line manager, supervisor or Human Resources representative.

Q We recently had a fire in our hotel that prevented some guest rooms being used for a few days. No one was hurt but my manager says that we are not to tell anyone about this. Is this right?

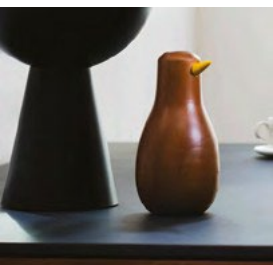
A No – the incident should be reported to a senior manager who has a duty to report to IHG's Risk Management team and the appropriate insurance company. If it is not reported, we will not learn why the fire occurred and how to prevent a similar fire in the future. It could invalidate any insurance claim and also affect the trusted reputation of IHG if it was reported in the press and we did nothing about it.



Acting



responsibly



Conflicts of interest

We must always act in the best interests of IHG and avoid any conflicts of interest. It is important that we also avoid even the appearance of conflicts, as we want to make sure suppliers and other business partners trust us to do business fairly and transparently.

Conflicts of interest can arise when personal, family or financial interests may influence, or be perceived to influence, business decisions or actions.

Determining whether a conflict of interest may arise can sometimes be difficult. In these circumstances we encourage you to consider our [decision-making guidance](#). In particular: would you be comfortable explaining the conflict to your friends, family or co-workers? How would you feel if it was made public in the newspapers or online? Will it influence, or appear to influence, your decision-making?

If you find yourself in a situation where there may be a conflict of interest or you are unsure if a conflict exists, irrespective of the potential outcome, you must disclose the details to your line manager or supervisor as soon as you become aware of it. They will be able to advise on next steps, which may include agreement on how the conflict can be managed or a requirement to avoid or immediately resolve the conflict.

Q There is a job opening in my hotel. Can my brother apply for it?

A IHG permits the employment of qualified relatives of colleagues as long as such employment does not, in the opinion of IHG, create actual or perceived conflicts of interest. Your brother may be able to apply but you must have no involvement in the recruitment process and the role must not be one that reports into you. If you will work in the same team you must disclose this potential conflict of interest to your line manager and to the person managing the recruitment process.

Q I am reviewing bids from several companies for the supply of hotel linen. My wife works in the Sales team of the company that has made the best offer. My decision has not been affected by the fact that my wife is involved so do I really need to disclose this?

A Yes, you must disclose this to your line manager, and you may need to step back from the selection process. Even if the bid from your wife's company is the best and we decide to select that company we still need to be careful to avoid the appearance of any conflicts of interest.

Gifts and entertainment

While they can often build goodwill in business relationships, we must always think carefully about gifts and entertainment.

Do not give or accept any gifts, complimentary arrangements, hospitality, entertainment or favours which might place you under an obligation or could reasonably be viewed as improperly influencing business transactions. Offering or accepting gifts, entertainment or hospitality is only acceptable if the value is modest and the practice is consistent with local business culture.

We must comply with the reporting and approval requirements contained in the Gifts and Entertainment Policy when offering or accepting gifts and entertainment. This applies in addition to normal IHG travel and expense reporting requirements.

Some departments and teams may also have stricter requirements in place – if you are unsure of the requirements that apply to you, speak to your line manager or supervisor.

Q I was recently given a very expensive gift by a guest staying at the hotel. I don't know if I should have accepted it, but I didn't want to offend the guest. What should I do?

A You should review the Gifts and Entertainment Policy to check the applicable reporting and approval requirements. As it is an expensive gift, it is likely that it will need to be reported and approved before it can be accepted. However, in some cultures it may be insulting to refuse a gift. In this case, you should record the gift and seek the required approvals as soon as possible. You may be able to retain the gift or it may need to be returned, retained by IHG or sold for charity. For additional guidance, see the Gifts and Entertainment Guide.

Q I received a gift from an IHG owner – should I accept it?

A IHG owners are independent third parties and therefore gifts or entertainment given or received from owners is subject to the requirements of the Gifts and Entertainment Policy. You should consult the Gifts and Entertainment Policy and Guide to determine if the gift is acceptable and follow the applicable reporting and approval requirements.

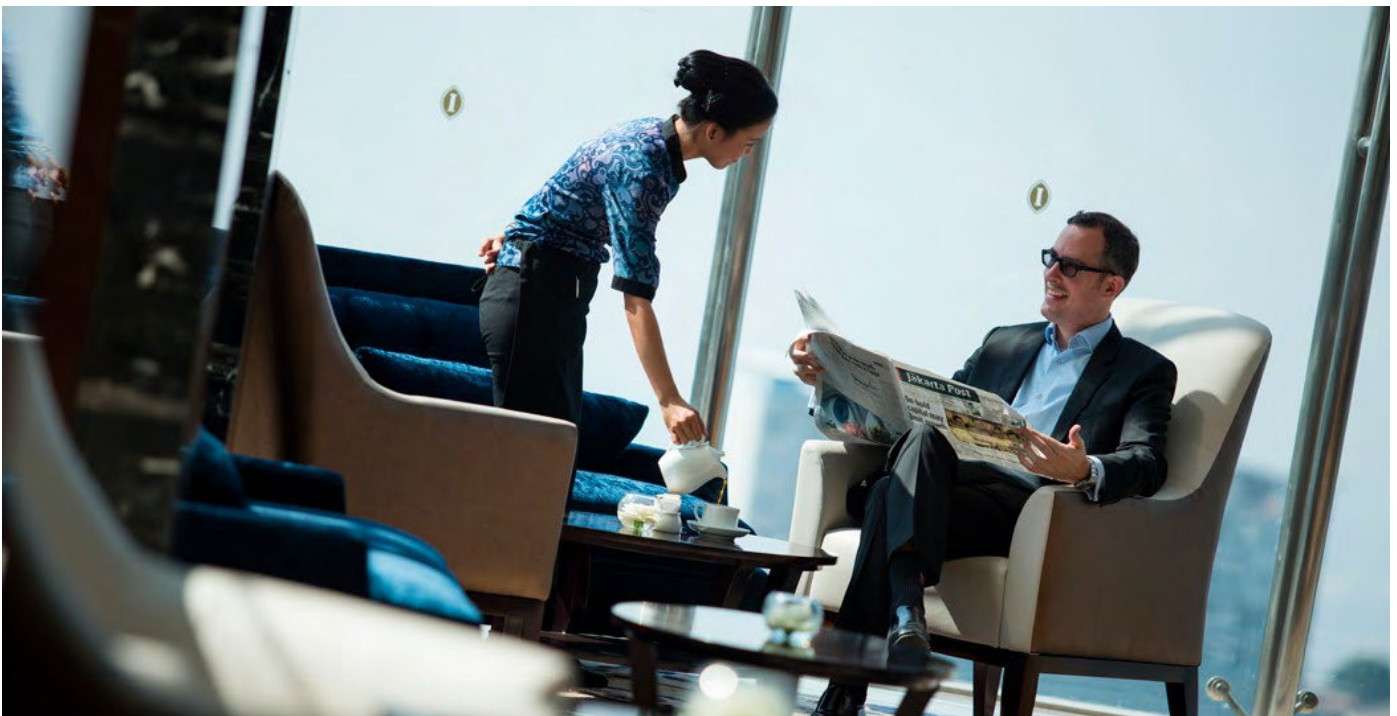
Bribery and corruption

We are committed to operating 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 all other third-party service providers working on our behalf.

We must never offer, promise or give bribes in connection with IHG or hotel business and we must never ask for or accept bribes. This applies globally, even in countries where bribery may be perceived to be more common. It applies to government and public officials and also to bribery of individuals and entities in the private sector.

Bribes are intended to influence or encourage someone to act improperly. They can include payments or anything of value, such as money, complimentary meals/rooms, loans, discounts or the award of a contract. Facilitation payments (sometimes known as “grease” payments) are also prohibited. These are small, unofficial payments made to secure or expedite a routine action by a public official to which the payer is entitled, such as clearing goods through customs or obtaining a licence.

Caution must also be exercised when giving or receiving gifts and entertainment, as there is a risk of bribery in certain situations. See [Gifts and entertainment](#) for more information and guidance.



Bribery and corruption



Q There is an advertised “fast track” for visa extensions at my local consulate, provided an additional fee is paid. I need to urgently extend my visa, so can I use this service?

A Yes. The additional fee appears to be a legitimate cost for an advertised service which many countries offer. The cost of the new visa including the additional “fast track” expense should be recorded and approved in accordance with applicable IHG/hotel policies and procedures.

Q We have hired a consultant to help obtain all the licences we need for our hotel. The consultant has asked for an additional \$20,000 to “help keep things moving”. Should I be concerned about this?

A Yes, you should be concerned. IHG can be liable for the improper actions of third parties such as consultants. We must ensure they do not offer bribes on our behalf. You need to confirm exactly what the payment is for and until you are comfortable that it is for a legitimate purpose and will be appropriately recorded and accounted for, you must not pay it. If you are in any doubt, you should contact [Ethics & Compliance](#) for assistance.

Q You are asked by your hotel owner to approve and arrange payment of an invoice. The payment is for a large purchase of furniture, but you are not aware that the hotel is buying any new furniture. You question this, but the owner says not to worry about it.

A This request could be indicative of improper conduct and raises concerns of fraudulent activity, including tax evasion. Accordingly, by making this payment you could be facilitating the owner’s tax evasion, which is a crime. You should not approve the payment until you are comfortable it is for a legitimate purchase of furniture by the hotel. If the payment still seems suspicious, you should report it to your local IHG corporate office and [Ethics & Compliance](#).

Preventing Fraud and Accurate Reporting



Regent - Beijing

At IHG, we conduct business with the highest ethical standards and do not tolerate fraud. This prohibition includes all forms of fraud including committing fraud for your own benefit or for the benefit of others. You must also never commit fraud on behalf of IHG or for its benefit or for the benefit of an IHG branded hotel.

Falsifying or making misleading records, reports or expenses or approving any report, records of expenses that you are aware are inaccurate may constitute fraud. We all have a responsibility to make sure our financial reporting and other external reporting and publications are complete and accurate.

Any judgments and accounting estimates must be reasonable and prudent. We must be honest and never falsify or include misleading information in any documents, reports or other records, either on behalf of IHG or at the request of any third party. This includes expense claims, invoices, tax returns and all other reports and records.

- | | |
|---|---|
| <p>Q I have lost my meal receipts from a recent work trip. Can I substitute some personal receipts of similar value to reclaim my expenses?</p> | <p>A No, it's never acceptable to falsify records like this. You should talk to your line manager or supervisor to work out a solution.</p> |
| <p>Q My hotel is a little bit short of its Guest Heartbeat target. I know guests love my hotel, but they don't complete the surveys. Can I submit surveys in lieu of guests?</p> | <p>A No, this is not permitted. Misrepresentation of a guest's experience may provide a false impression of operational performance targets.</p> |



Competing fairly

Competing fairly is an essential part of doing business responsibly – it benefits our guests and helps to protect the trusted reputation of IHG and our brands.

Competition laws (also known as antitrust laws) promote fair competition between companies and help protect consumers. We should compete vigorously on price and service but we must not discuss, agree or coordinate prices with our competitors or share or facilitate the exchange of any information directly or indirectly with or between competitors that may influence market conduct or pricing decisions (competitively sensitive information).

Competitors of IHG may include non-IHG branded hotels and hotel groups, including independent hotels and chains or accommodation providers, as well as any other businesses that compete with IHG-branded hotels. IHG-branded hotels with different owners may also be competitors of each other. In certain circumstances it can be difficult to recognise who our competitors may be. If you are unsure, you should contact your Legal team or [Ethics & Compliance](#), who will be able to provide further guidance.



Holiday Inn Express – Nice

Competing fairly



Q My hotel is in a country that does not have competition laws. Do I still have to comply with the IHG Antitrust/Competition Law Policy?

A Yes– competition laws from some countries can apply anywhere in the world and the IHG Antitrust/Competition Law Policy sets the minimum standard. Wherever you are located, you must comply with the Policy. If requirements conflict with local law you must contact [Ethics & Compliance](#).

Q I met the General Manager of a competitor hotel at a local event who mentioned they were thinking of raising their prices next year and that we should all avoid price wars. What should I do?

A You must be very clear with the individual that you cannot agree or even discuss pricing. Even casual conversations like this can breach competition laws.

Q A friend who works in the Sales team of a competitor hotel has sent a message to you via social media with the proposed rate information for a mutual corporate client whom you are both engaged in a tender for. It's a personal message, so is it okay to use this information to support your proposal?

A No – this information is confidential to the competitor hotel and competitively sensitive, as it could influence your rate decisions. You should not enter into further conversation on this topic and immediately contact your Legal team or [Ethics & Compliance](#), who will be able to advise on next steps, which will include an explicit rejection of the information.

Information security and confidentiality

We are all responsible for safeguarding IHG information under our care.

Information held within IHG is an asset with a business value and must be protected accordingly. Certain types of information, such as personal data of our guests and colleagues, must also be handled legally and responsibly. We must all follow IHG's information security policies, standards and procedures to enable us to take appropriate technical and organisational measures to protect IHG data.

Confidential information, such as business plans, pricing and financial data, must not be disclosed outside IHG without a legitimate business reason and without prior required approvals. If you are transferring confidential information to someone outside IHG you must make sure that a written agreement is in place to protect confidentiality and that the transfer complies with our information security requirements.

Our suppliers, owners and other business partners may also share their confidential information with us. We must ensure we protect this and treat it responsibly including complying with any confidentiality obligations. Information gathered about competitors must only be obtained legally and ethically. Never use a competitor's confidential or proprietary information if you suspect it has been obtained improperly.

Q I used to work for a competitor. While working there I had access to highly confidential information about the competitor's development strategy. Can I share the information with my new team at IHG?

A No. You have an obligation to your previous employer to protect their confidential information. Sharing this information would be unethical and would breach the Code.

Q I'm going on vacation and need a colleague to cover some work for me. Can I share my username and password if it is only for one system/application?

A No. You must never share your password. You should review the Information Security Policies and contact the IT team for guidance on how to provide the necessary access.

Q I'm working with colleagues and contractors on a project that involves documents with large file sizes. May I set up and use third-party file-sharing tools such as GoogleDrive, WeTransfer, or DropBox to share sensitive or confidential IHG information?

A Sensitive or confidential IHG information should not be shared, stored, backed-up or otherwise used on third-party file sharing sites without contractual agreements in place to protect IHG information. Only approved solutions such as IHG SharePoint or OneDrive should be used.



Handling personal data

It is up to all of us to ensure that everyone we deal with trusts the way we handle their data.

As part of our roles at IHG, many of us need to handle personal data (sometimes referred to as personal information or personally identifiable information) of our guests, colleagues, shareholders, owners, business partners and others. Personal data includes any information that relates to an identified or identifiable individual such as name, contact details, account numbers, online identifiers and many other types of information. Global data privacy laws (also known as data protection laws) determine how we need to treat this data.

Complying with these laws is an essential part of doing business responsibly and we are committed to only using individual's personal data in a fair, lawful and transparent manner.

In addition to information security requirements, we must always consider data privacy implications whenever we are handling personal data, including designing with privacy in mind when setting up any new system or process that involves personal data or when using personal data in a different way. Where required by our policies a privacy assessment must be carried out to help identify, assess and address any risks to the rights and freedoms of individuals in relation to the processing of personal data.

We must consider what information we need to give people about how we handle their personal data, before we handle it, to ensure we are acting fairly and transparently, use and retain only the minimum amount of data we need and respect individual's privacy choices.



Handling personal data



- Q** One of our guests wants more information about how IHG handles personal data. What shall I tell them?
- A** The privacy and security of our guest's personal data is extremely important to us. You can direct the guest to our privacy statement which is available on the IHG website. This provides information on how we manage personal data. It also contains contact details for the IHG Privacy Office who can be contacted with any questions or concerns regarding personal data.
- Q** I have some papers that include a lot of employee personal data and salary details and which I no longer need. Can I just throw these in the general recycling bin?
- A** No. Records containing personal data need to be disposed of securely, for instance, by shredding or using secure document disposal facilities.
- Q** I have some personal data that I collected for one purpose; can I use it for another?
- A** You can only use personal data collected for one particular purpose for another purpose if the purposes are compatible. In general, we should only use individual's data as they would expect it to be used. The new use of data may need additional notice to be given to individuals or require consent. Using the personal data for a new purpose may require a privacy assessment. You should check the Handling Personal Data Policy for requirements.

Trade restrictions and sanctions

We are committed to complying with and continually monitoring all applicable trade restrictions that may affect our business.

Trade restrictions, such as sanctions or export controls, may restrict or prohibit us from doing business in other countries or with certain governments, entities or individuals.

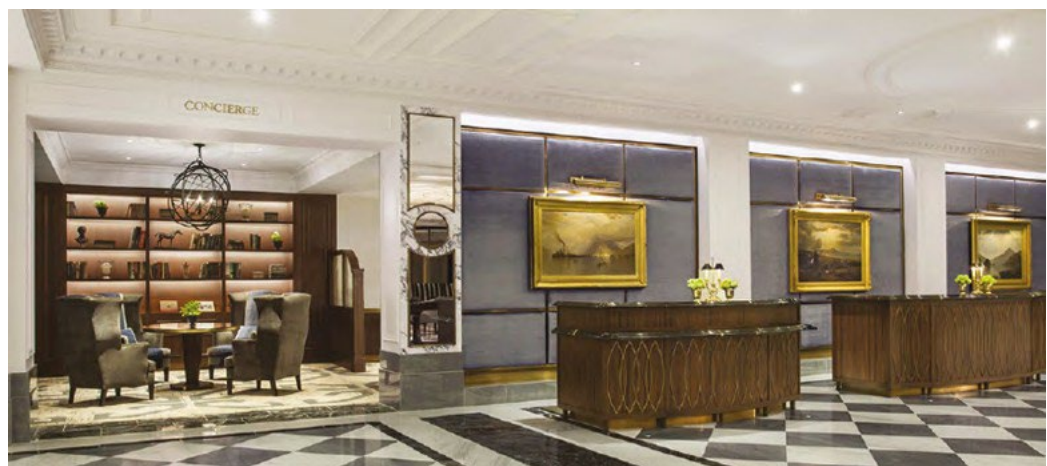
Our approach to trade and sanctions compliance is managed by our Legal teams and Ethics & Compliance. If you have any concerns in relation to restrictions that may apply to you or your activities on behalf of IHG, you must always contact [Ethics & Compliance](#) for advice.



Candlewood Suites – Olympia



Kimpton – Goodland



InterContinental – New York

Inside information and insider dealing

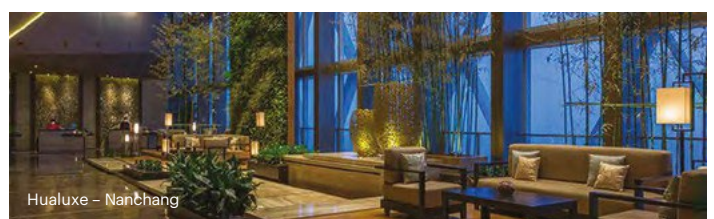
As a publicly listed group, we must comply with laws and regulations relating to the disclosure of “inside information”.

Inside information is information relating to IHG which is not publicly available, would likely have a significant effect on IHG’s share price if it were made public, and which an investor could use as part of their decision to buy or sell IHG securities.

If you are in possession of inside information relating to IHG, you must not buy or sell or otherwise deal in IHG securities. This includes providing inside information to any other person for them to deal. Insider dealing is a criminal offence in the UK, US and many other countries.

If you are concerned that you may have inside information, you should immediately speak to the [Company Secretariat team](#), as there are particular obligations around the disclosure of inside information. You should also seek advice from the Company Secretariat team before trading in any IHG securities.

It is important to remember that even if information is not inside information, it still may be confidential to IHG and must not be disclosed outside of IHG without a legitimate business reason. If you are in any doubt, you should contact the Company Secretariat team for guidance before disclosing any information.

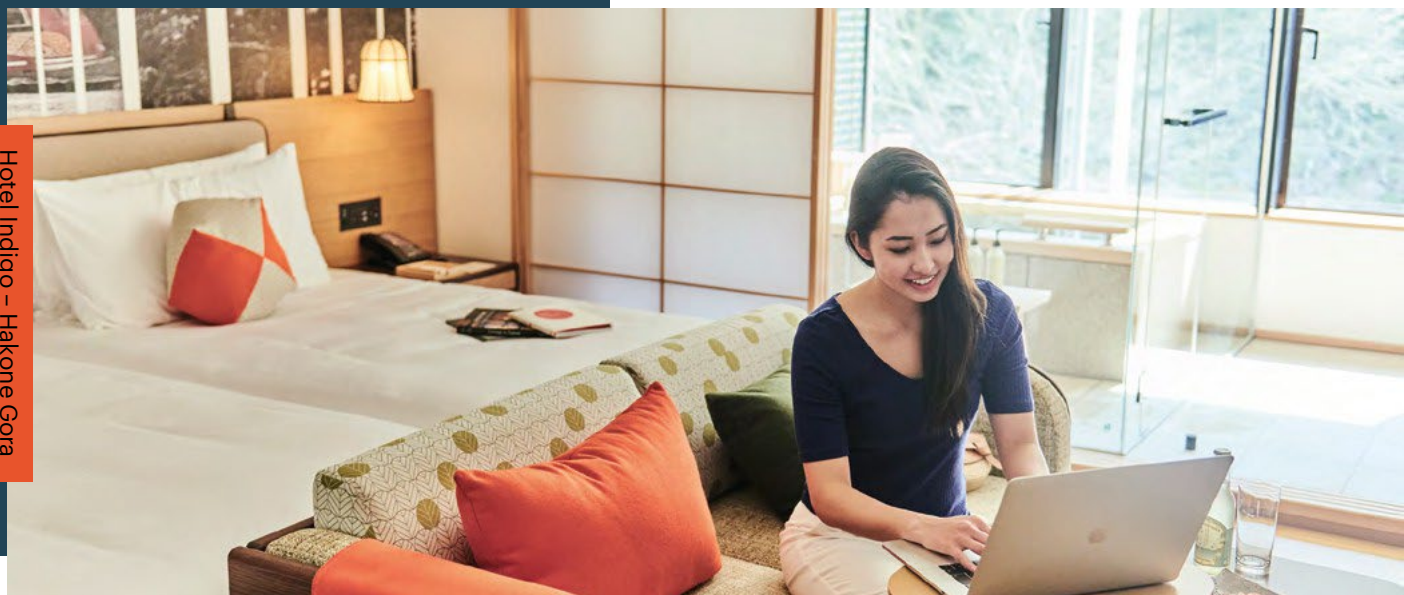


Inside information and insider dealing



Q The half-yearly results have not been published yet. Is it okay if I share the new pipeline figures for our region with my team members?

A No. Any IHG-related information which is not publicly available and could be used as part of an investment decision to buy or sell IHG securities should be treated with caution, as it is restricted information and may be considered to be inside information. In addition, results information is highly confidential and must not be included in internal updates or given to employees generally. Wait until it has been publicly announced before you share this information with your team.



Political activities

IHG does not make political donations.

We may choose to take part in political activities in our personal time. However, we must not create the impression that we represent IHG in these matters.

In dealing with regulatory and policy issues that affect IHG, IHG does not make political donations but deals with the government of the day on matters which concern our business.

This includes engaging with governments and industry partners around the world to ensure that the interests of our colleagues, guests and communities are at the forefront of the agenda.

IHG plays an active role in influencing and driving change through our government engagement work and we would encourage colleagues to help shape our strategy by raising issues that matter to them with the Global Corporate Affairs team.

Contributions by IHG's US Political Action Committee (PAC) are not affected by this policy. The PAC is funded by voluntary contributions from US employees. Aside from permissible administration costs, IHG does not contribute any corporate funds to the PAC.

Q I have read in the newspaper that the Government are looking to implement a new policy that would adversely affect my hotel and my staff. What should I do?

A If you have any concerns about a Government decision or policy, please raise any questions with the Public Affairs team in the first instance. They will be more than happy to discuss the issue and advise on any necessary steps to raise the matter with the Government.

Protecting our



business

Protecting assets from misuse

We all utilise and have access to IHG or hotel assets as part of our jobs. This includes tangible assets such as stock, equipment and cash, in addition to intangible items such as intellectual property, computer systems, confidential information and performance insights.

IHG or hotel assets must not be used for personal gain, and we each must take the appropriate steps available to us to protect those assets. We will not tolerate misuse of assets including fraud of any description. You must report any suspicions of fraud to your line manager or supervisor or in accordance with our [Reporting Concerns](#) processes.



InterContinental – Doha



InterContinental – Berlin



InterContinental – Malta

Q My hotel has not met the Enrol for Rewards targets. Can I enrol guests into the IHG® Rewards programme without their consent?

A No, enrolling a guest without their consent is not permitted. Notwithstanding data privacy implications, it may also result in incentives paid to the hotel that would otherwise have not been earned.

Q What should I do if I suspect one of my colleagues is depositing hotel Reward points into their personal Rewards account?

A You should immediately report your concerns to your line manager or alternatively, if you do not feel comfortable doing this, submit a report via the [Confidential Reporting Hotline](#).



External communications and social media

All IHG communications need to be consistent and accurate.

Our Global Corporate Affairs and Investor Relations teams will coordinate any external announcements, statements or responses to questions from the media, particularly those which relate to share price or commercially sensitive information. Matters relating to the activities and performance of IHG must not be discussed with representatives of the media unless specifically authorised as part of your role.

As another form of external communications, IHG's official social media activity is coordinated at a global, regional and brand level to ensure consistency and accuracy. Only those colleagues specifically authorised to do so as part of their role may post updates on behalf of IHG. If you are authorised to update social media channels on behalf of IHG, you must be transparent about your association with IHG and you must make clear that you are posting on behalf of IHG.

Q Can I mention IHG on social media?

A IHG encourages colleagues to participate in social media in compliance with our Global Social Media Policy. You need to be transparent about your association with IHG and be clear whether you are posting your own views or posting on behalf of IHG. If in doubt about whether to post, forward or otherwise share something, please speak to a member of the Global Corporate Affairs or Social Marketing teams.



Delegation of authority

The Global Delegation of Authority Policy sets out the extent to which IHG sub-committees and employees can approve financial commitments and expenditures. It applies to all IHG corporate activities and to owned, leased and managed hotels.

IHG colleagues must never enter into commitments without first ensuring all required approvals are obtained, including whether prior review by the Finance, Procurement or Legal teams is required.

As set out in the Global Delegation of Authority Policy, all contracts, agreements, statement of works, and other legal documents must only be signed by an IHG employee who is an appropriate officer or director of the IHG entity that is a party to the agreement or who otherwise has the power of attorney to do so.

Guidance for managed hotels is included within the Hotel Accounting Manual and reference should also be made to the relevant Hotel Management Agreement.



Intellectual property

Intellectual property is one of our most valuable assets and must be treated correctly.

Our Intellectual property (IP) includes IHG trademarks (names and logos), patents, copyrights, “know how” and trade secrets. Our trademarks, which represent our brands, must be used properly or protection for these marks could be lost. Contact the Legal team for guidance on the correct use of our trademarks and to report misuse of any IHG IP.

If you develop or create any IP as part of your role or while using IHG resources or information, this is IHG property. This includes designs, ideas, artwork, software programmes, inventions and other original materials.

We must also respect the IP of others, including photographs, logos, music, movies, software and other written information. These types of materials may be protected under copyright, trademark or other intellectual property laws and IHG may need a licence before they can be used, copied or downloaded.

Q I am using a consultant for some design work. Do I need to think about IP?

A If IP will be created by external consultants you must make sure that an appropriate written agreement is in place to ensure that IHG will own the rights before any work on the project begins.

Q I need a photograph to display on a hotel website for a promotion. Can I take one from the internet? Isn't that in the public domain?

A Photographs are protected under copyright law and typically require a licence to use for commercial purposes such as marketing. If you need to use a third-party image for a marketing campaign, you should make sure you have an appropriate licence in place that permits you to use the image.





[Ethics & Compliance
Reporting Concerns](#)



[Our Code and Policies](#)
[Responsible Business Portal](#)
[IHG University](#)

IHG® HOTELS & RESORTS

