



IHG<sup>®</sup>  
HOTELS & RESORTS

# Modern Slavery Statement

2025



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# Our commitment to respecting human rights

At IHG, respecting human rights is an integral part of our approach to responsible business. We are committed to playing our part in eradicating modern slavery and recognise that transparency and collaboration are key. We continue to develop our policies and processes to support this approach.

Section 54 of the UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure that slavery and human trafficking are not taking place in any part of their own business or supply chains. This Statement refers to the financial year ending 31<sup>st</sup> December 2025 and covers InterContinental Hotel Group PLC and its group companies. The reporting entities covered by this Statement are: InterContinental Hotels Group PLC; Six Continents Limited; IHG Hotels Limited and Russell London Hotel OpCo Limited. Our previous statements can be read [here](#).

Hospitality is a unique industry, built upon a foundation of care by people for people. Guided by our purpose of True Hospitality for Good, we believe we can help shape the future of responsible travel together with those who stay, work and partner with us and advance human rights through our business activities.

The following key activities highlight the progress achieved in 2025:

- Taking action to address the findings from our on-site assessments at selected hotels in the United Arab Emirates, Saudi Arabia and Kuwait, driving stronger labour standards across our operations.
- Rolling out digital self-assessments of our Responsible Labour Requirements to our managed hotels globally, enhancing transparency, monitoring and the quality of corrective actions.
- Providing our franchised hotels with guidance on responsible labour to help support their efforts on this topic.
- Launching new, survivor-informed training on preventing human trafficking, developed in partnership with leading anti-trafficking NGO PACT and industry peers.
- Progressing our work to trial supplier assessments and audits.

We welcome any feedback you may have in relation to this Statement. Please contact us at [ethicsandcompliance@ihg.com](mailto:ethicsandcompliance@ihg.com).

The IHG Board approved this Statement on 12<sup>th</sup> February 2026.

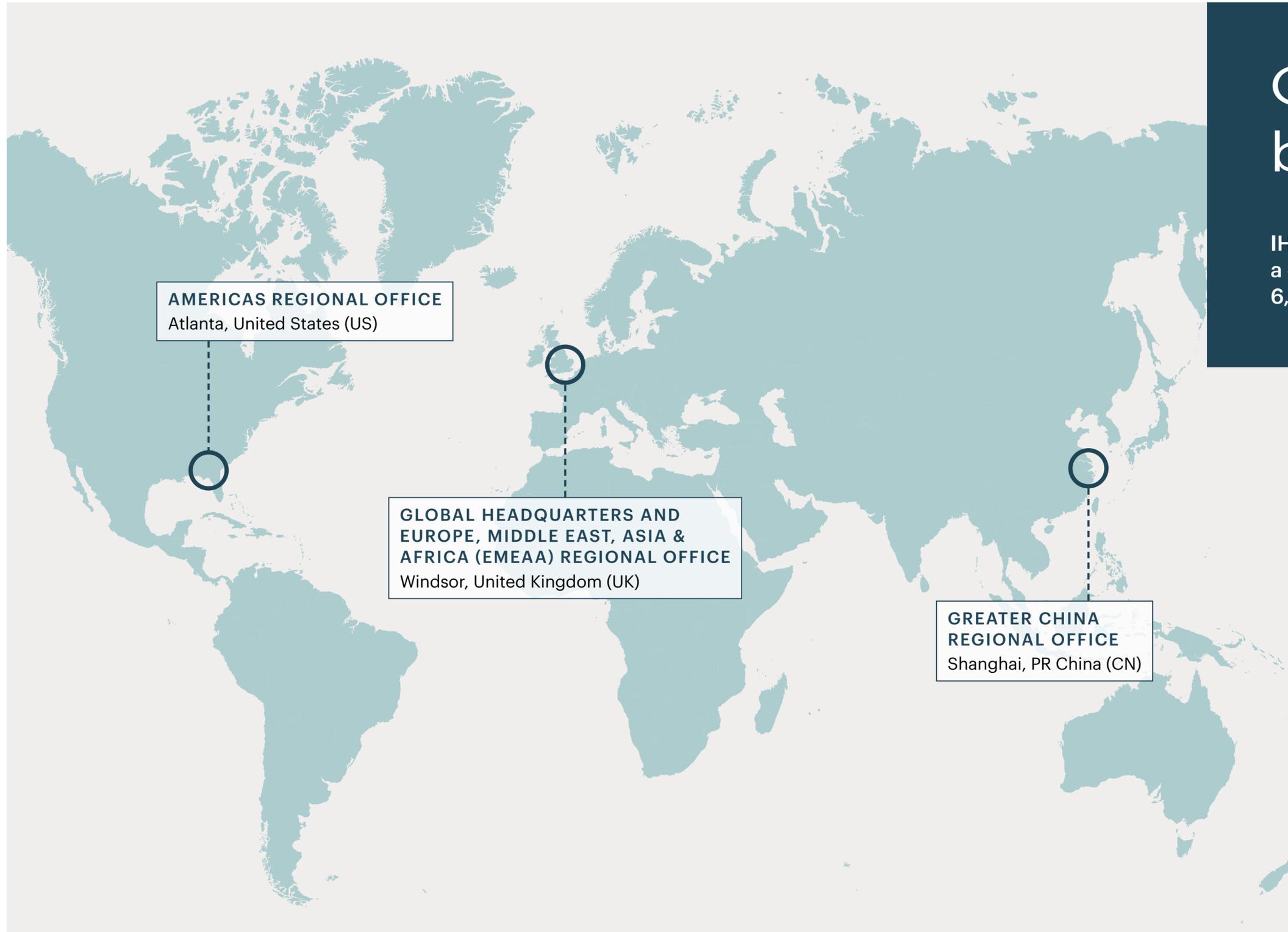


**Elie Maalouf**  
Chief Executive Officer



# Our structure and business model

IHG is one of the world's leading hotel companies, with a diverse portfolio of 20 hotel brands and more than 6,900 hotels operating in over 100 countries.



IHG employees*	27,849
Hotels in the Americas	4,603
Hotels in Europe, Middle East, Asia & Africa (EMEAA)	1,478
Hotels in Greater China	882

\*The average number of IHG employees, including part-time employees, during 2025 were as follows: 7,459 people worldwide (including those in our corporate offices, central reservations offices and owned & leased hotels (excluding those in a category below), whose costs were borne by the Group.

20,390 people who either worked directly on behalf of the System Fund and whose costs were borne by the System Fund, or as General Managers and (in the US predominantly) other hotel workers, who work in managed hotels, who have contracts or are directly employed by IHG and whose costs are borne by those hotel owners. Further information about the System Fund, please visit [how our business works](https://www.ihgplc.com/how-our-business-works) at ihgplc.com.

## Our structure and business model cont.

Our wide range of **brands** helps us to meet owner demand and consumer needs, providing guests with great choices, rewards and experiences. Beyond providing accommodation, our hotels offer – depending on the brand – a variety of different facilities and services, including restaurants, leisure facilities such as pools and spas, shops, catering, and banqueting services.

We brand or operate hotels in three main ways: as a franchisor; as a manager; and, for a very small number of hotels, on an owned and leased basis. We also have an exclusive partner, Iberostar Hotels & Resorts, through which certain Iberostar hotels have been added to IHG’s portfolio of brands under the Iberostar Beachfront Resorts brand. As an asset-light business, we focus on franchising and managing hotels, working closely

with independent third-party hotel owners. Whether we franchise to or manage hotels on behalf of owners depends largely on market maturity, owner preference and, in certain cases, the particular brand. For an overview of our brands and the locations we operate in, please visit [our global presence](#) at [ihgplc.com](#).

Having a predominantly franchised estate means that most workers in IHG-branded hotels are employed by third-party hotel owners, rather than by IHG directly. In addition, depending on operational needs, hotels may also choose to outsource certain roles and/or teams, such as security, maintenance, additional staff for events or housekeeping, to labour suppliers.

Business model	Ownership	No. of hotels	Employees
Corporate	IHG	N/A	Employed by IHG
Franchise (includes exclusive partner hotels)	Third-party	5,886	Employed by third-party owner
Managed	Third-party	1,060	Individuals are generally employed by third-party owners except in certain locations (such as the US, where IHG is the employer). Senior management positions, such as General Manager and Financial Controller, are typically employed by IHG.
Owned & leased*	IHG	17	Employed by IHG

\*Hotels operated by IHG where IHG is, or effectively acts as, the owner, with responsibility for assets, employees and running costs. For the purposes of this Statement, we refer to managed hotels and owned & leased hotels as “managed hotels”.

## Our brands



# Our supply chain

We recognise the potential social and environmental impact of our supply chain and the importance of our suppliers operating with the same principles as we do. We have continued to improve our understanding of our supply chains to better identify areas with greater exposure to modern slavery risks. Please see page 18 for further information.

Our procurement activities are split between two distinct supply chains, corporate and hotel.

## Corporate supply chain

Our corporate supply chain covers categories such as technology, including expenditure related to our reservations and loyalty systems, office building and facilities management, and professional services, including marketing and communications, HR and management consultancy.

In addition, we outsource some of our services, including call centre and technology support services, as well as cleaning, facilities management and catering services at some of our corporate office locations.

- Over 4,100 corporate suppliers
- Corporate suppliers based in over 100 countries

## Hotel supply chain

Most IHG-branded hotels are owned by third-party owners who manage their own supply chains. Owners can join IHG's centralised procurement programme in certain markets to access goods and services through centrally negotiated contracts. This programme operates in the US, Canada, Mexico, the Caribbean, Greater China, the UK, Australia,

Germany, and is expanding across EMEAA countries like France, the United Arab Emirates, India, New Zealand, Japan, Singapore, and Saudi Arabia.

- 604 centralised hotel suppliers
- Centralised hotel suppliers based in over 15 countries

Often, hotels acquire most of the goods and services they need for construction, opening, renovation and daily operations from local sources, rather than through our centralised procurement programme.

Whether purchased locally or via IHG's centralised programmes, hotel procurement covers a range of items and services, such as energy, operating supplies and equipment (including linens, bathroom amenities, cleaning products, uniforms, food and beverage, furniture, lighting, and wall and floor coverings), as well as third-party labour suppliers and services like elevator maintenance. For more details about our hotel labour supply chain, please see pages 11 and 12



# Governance and policies

**Our long-standing commitment to respect human rights is embedded in key policies and standards that guide our business conduct.**

## 2025 key activities

- Enhanced accessibility of IHG’s Responsible Sourcing Guide by translating it into further languages and making it available to hotels globally.
- Updated IHG’s Supplier Code of Conduct, including further clarifying our human rights expectations.
- Updated our brand standard, making the Preventing Human Trafficking training mandatory for all hotel colleagues globally.

## 2026 priorities

- Continue to review key policies and operational standards to ensure alignment with our human rights commitment and work to address modern slavery.

## Governance

The Responsible Business Committee of IHG’s Board of Directors is responsible for reviewing the overall strategy and progress of our human rights programme and generally meets four times during the year.

Overall accountability for the programme sits with our Executive Vice President, General Counsel & Company Secretary, who is a member of the IHG Executive Committee.

Our Human Rights team is responsible for integrating human rights into the business and works closely with other teams such as Operations, Procurement, Corporate Responsibility, Human Resources and Risk and Assurance to bring our human rights commitments to life across the business. This collaboration underpins our work to address modern slavery risks and is key to the development of this Statement.

## Policies and standards

As part of our commitment to responsible business, we have several group-wide policies and procedures in place to help govern our approach to human rights and modern slavery. These reflect IHG’s commitment to respecting human rights in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our policies are available in multiple languages to ensure accessibility and can be found externally on our website and internally via our intranet.

## Our values

**Our values, championed by the Board and Executive Committee, shape our behaviours and business ethics, guiding the way we execute our strategy, make decisions, and fulfil our purpose.**



Do the right thing



Show we care



Aim higher



Celebrate difference



Work better together

Policy	Description	Applies to	Reference to modern slavery	Communication and engagement
<b>Code of Conduct</b>	<ul style="list-style-type: none"> <li>Sets out our values and how they apply to our business activities.</li> <li>Reviewed and approved annually by the Board.</li> <li>Explains how to raise a concern and makes clear our commitment to non-retaliation.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues working in IHG’s corporate offices, reservations offices and managed hotels.</li> <li>Includes our expectation that those we do business with, including our franchisees, uphold similar standards.</li> </ul>	<ul style="list-style-type: none"> <li>Sets out our zero-tolerance approach to human rights abuses, including any form of modern slavery and the exploitation of children.</li> <li>Highlights that our confidential reporting channel can be used to report concerns related to human rights, which includes modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues working in IHG’s corporate offices, reservations offices and managed hotels are required to complete annual mandatory Code of Conduct training.</li> </ul>
<b>Human Rights Policy</b>	<ul style="list-style-type: none"> <li>Sets out our commitment to respect human rights in line with the UN Guiding Principles on Business and Human Rights.</li> <li>Explains our salient human rights issues and our overarching approach to addressing human rights risks.</li> <li>Highlights our commitment to provide remedy when we have caused or contributed to an adverse impact.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues working in IHG’s corporate offices, reservations offices and managed hotels.</li> <li>Includes our expectations that those we do business with, including our franchisees, uphold similar standards.</li> </ul>	<ul style="list-style-type: none"> <li>Sets out our prohibition of forced labour, child labour and human trafficking or sexual exploitation in our business operations and supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>Our annual Code of Conduct training includes information on our human rights commitment, key modern slavery risks and how to report concerns.</li> <li>The Human Rights Policy is regularly referenced in internal communications.</li> </ul>
<b>IHG Brand Standards (Human Rights and Preventing Human Trafficking Training)</b>	<p><b>Our Human Rights Brand Standard and supporting guidance state that all hotels:</b></p> <ul style="list-style-type: none"> <li>Must implement and display a human rights policy.</li> <li>Should engage with migrant workers during onboarding and employment to identify and address key risks.</li> <li>Should make the human rights policy available to workers in a language they understand.</li> </ul> <p><b>Our Preventing Human Trafficking Training Brand Standard states that:</b></p> <ul style="list-style-type: none"> <li>All hotel colleagues are required to complete annual training on preventing human trafficking.</li> </ul>	<ul style="list-style-type: none"> <li>All managed and franchised hotels.</li> </ul>	<ul style="list-style-type: none"> <li>Focuses on key modern slavery risks such as forced labour, deceptive recruitment practices and human trafficking.</li> </ul>	<ul style="list-style-type: none"> <li>Contractual requirements for all managed and franchised hotels.</li> <li>Included in IHG’s training programme for new General Managers.</li> <li>Regularly referenced in internal communications.</li> <li>Franchised hotels are provided with a template and guidance to support the development of a human rights policy.</li> </ul>

Policy	Description	Applies to	Reference to modern slavery	Communication and engagement
<b>Responsible Labour Requirements (RLRs)</b>	<ul style="list-style-type: none"> <li>Operationalises elements of IHG’s Human Rights Policy by outlining minimum mandatory requirements for hotels on responsible labour risks – especially those faced by migrant workers.</li> <li>For further information, please refer to page 12.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues working in managed hotels.</li> <li>Made available to franchised hotels as guidance.</li> </ul>	<ul style="list-style-type: none"> <li>Addresses key human rights risks and business practices that can lead to situations of forced labour such as passport retention, worker-paid recruitment fees and related costs and deception.</li> <li>It reaffirms that employment should be freely chosen, with no one paying recruitment fees or related costs for a job or being indebted or coerced to work.</li> </ul>	<ul style="list-style-type: none"> <li>Communicated via key internal communications channels, including our intranet.</li> <li>Supporting guidance on worker interviews, a due diligence checklist for labour suppliers and recruitment agencies, and remediation guidelines for worker-paid recruitment fees and related costs are available to managed hotels via our intranet.</li> </ul>
<b>Supplier Code of Conduct (Supplier Code)</b>	<ul style="list-style-type: none"> <li>Sets out the standards under which IHG suppliers are expected to operate.</li> </ul>	<ul style="list-style-type: none"> <li>All new corporate suppliers and those suppliers covered by IHG centralised procurement programmes.</li> <li>Where hotels form contracts directly with suppliers, they are encouraged to seek adherence to similar provisions.</li> </ul>	<ul style="list-style-type: none"> <li>Includes expectations on freely chosen employment, child labour, freedom of association and collective bargaining, wages and working hours, non-discrimination, working conditions, grievance mechanisms and reporting concerns.</li> </ul>	<ul style="list-style-type: none"> <li>Communicated internally via the Responsible Business Portal and externally via IHG’s PLC website.</li> <li>All corporate suppliers and centrally negotiated hotel procurement programme suppliers are required to confirm adherence to the Supplier Code (or provide evidence they have equivalent policies) as part of the onboarding and contracting process.</li> <li>Supplier contract templates include reference to compliance with the Supplier Code and clarify our human rights requirements, including conducting due diligence.</li> <li>Our Responsible Sourcing Guide reinforces our expectations of suppliers by highlighting key risks and relevant third-party certifications for higher risk commodities (available to hotels, suppliers and global procurement).</li> </ul>
<b>Procurement Policy</b>	<ul style="list-style-type: none"> <li>Emphasises our commitment to responsible decision making when procuring goods and services on behalf of IHG and supplier due diligence processes in place.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues in IHG corporate offices procuring goods and services for IHG; and in relation to suppliers included in our central procurement programme.</li> </ul>	<ul style="list-style-type: none"> <li>Outlines our due diligence requirements for suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Training and Q&amp;A guidance are available via our procurement hub resource centre which is available via our intranet.</li> </ul>

# Due diligence, risk assessment and management

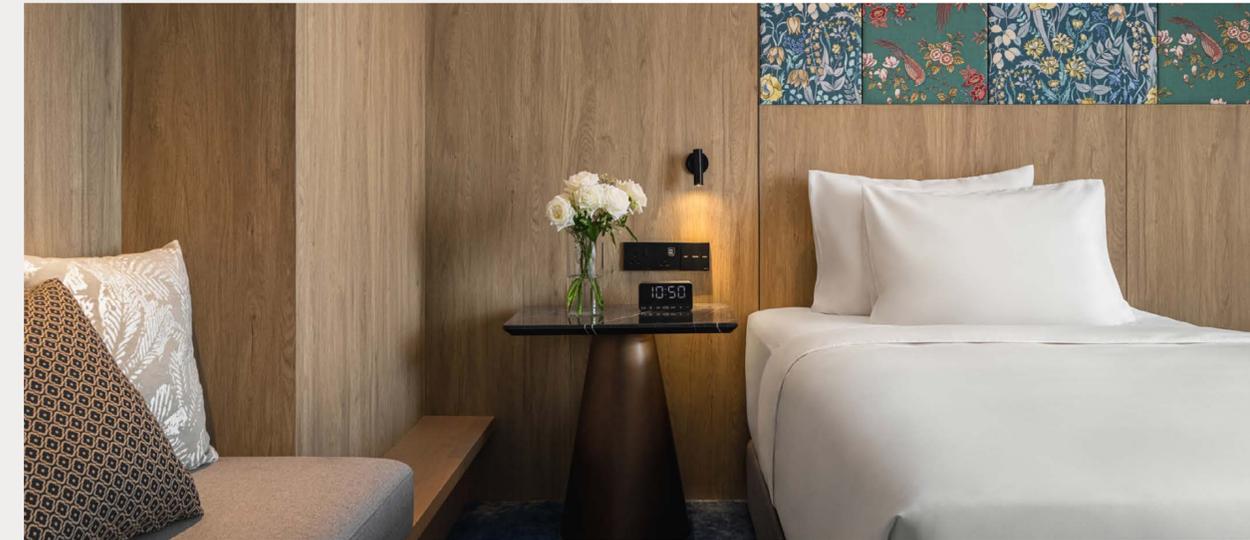
We are committed to conducting human rights due diligence in line with internationally recognised standards and continuously strive to strengthen our internal controls and processes to better identify and address modern slavery risks across our business and supply chain.

## 2025 key activities

- Launching a new digital self-assessment process for our Responsible Labour Requirements (RLRs) to all managed hotels globally and developing an approach to assess our corporate offices.
- Working with hotels to address the findings from our on-site responsible labour assessments at selected hotels in the United Arab Emirates, Saudi Arabia and Kuwait.
- Making the RLRs available to our franchised hotels as guidance on responsible labour to support their efforts on this topic.
- Progressing our work to trial supplier assessments and audits.
- Progressing our use of assessments to understand supplier maturity on key sustainability topics, including human rights.
- Launching new, survivor-informed training on preventing human trafficking.

## 2026 priorities

- Further strengthen how we implement, monitor and evaluate the effectiveness of the RLRs, including through on-site assessments and exploring the use of worker voice tools.
- Further enhance human rights due diligence in our supply chain by building on the findings of our trial supplier assessments to develop our audit approach.
- Continue to drive and monitor completion of our trainings on responsible labour and preventing human trafficking.



## Identifying and assessing modern slavery risks

We assess the risk of modern slavery in our business and supply chains in several ways, including by:

- Using external data on country and industry risk as well as information from our partners such as the IOM, Polaris and other NGOs.
- Ongoing risk and impact assessments, including meaningful engagement with workers.
- Reviewing internal data on workforce composition, recruitment practices and grievances.

Based on this, our efforts continue to focus on the following areas which we consider to be the highest risk for modern slavery: migrant workers; human trafficking in our hotel operations; and our supply chain. For an overview of our salient issues, please refer to [IHG's 2023 Modern Slavery Statement](#).

# Due diligence, risk assessment and management cont.

## Our risk and impact assessments

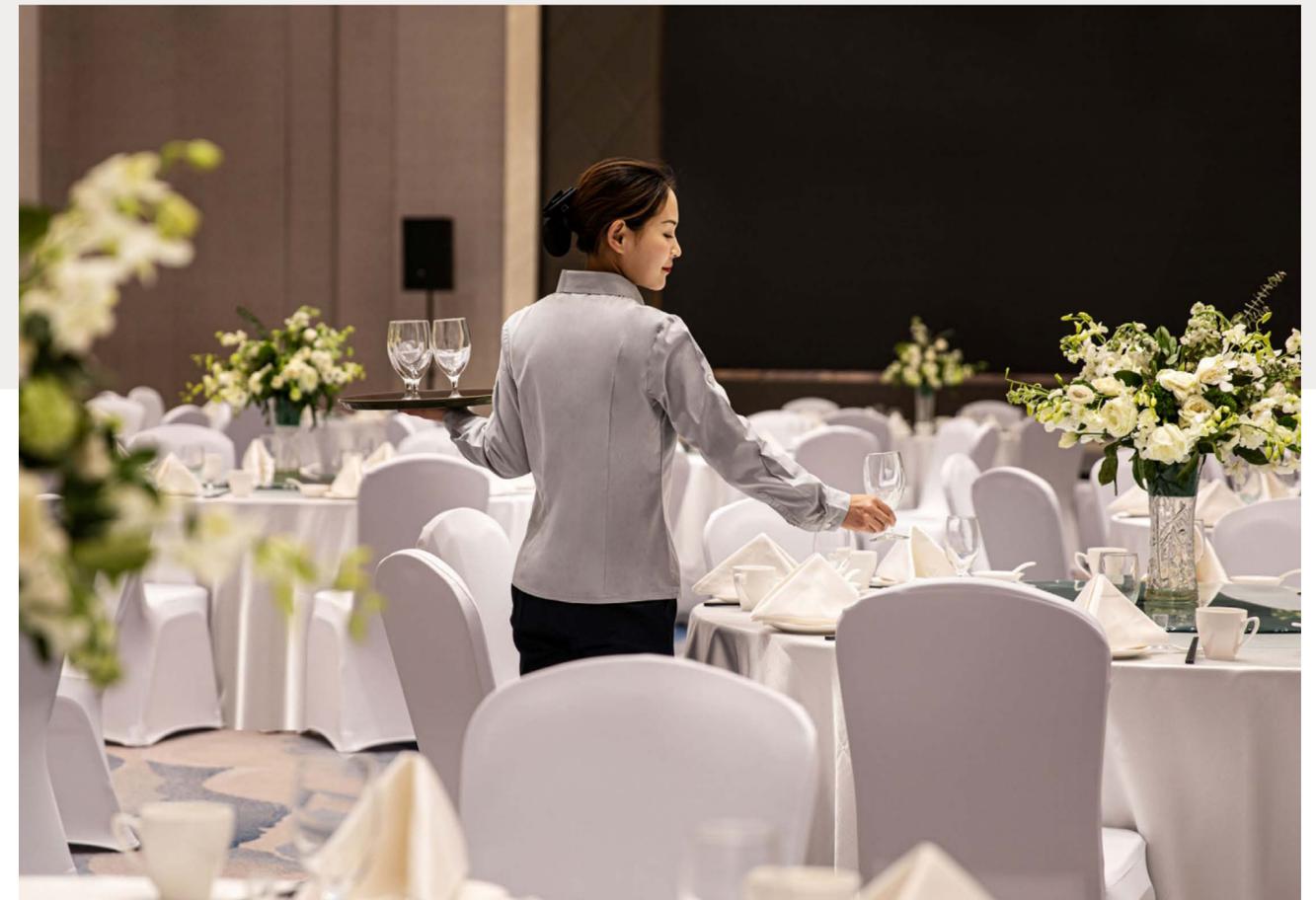
Our Human Rights team – often with the support of external consultants – regularly conducts risk assessments and impact assessments to better understand how human rights impacts may materialise in our hotels and supply chain. In line with the UN Guiding Principles on Business and Human Rights, we seek to embed meaningful consultation with potentially affected groups and other relevant stakeholders in these assessments and across other due diligence processes. Further information on the assessments below can be found in our previous Modern Slavery Statements, which are [here](#).

- **2018**  
Conducted our first global human rights risk assessment across IHG’s operations including our hotels, corporate offices and supply chain.
- **2020**  
Conducted a labour rights impact assessment in Oman with focus on migrant worker risks.
- **2021**  
Six managed IHG hotels from across Oman, Qatar, Kuwait and the United Arab Emirates participated in a labour migration process mapping exercise led by the International Organization for Migration.
- **2022**  
Conducted a labour rights impact assessment in the United Kingdom to get better understanding of how Brexit and Covid-19 might impact human rights risks in our hotels.
- **2022**  
Conducted a supply chain human rights risk assessment.
- **2023**  
Conducted our second global human rights risk assessment to update our understanding of IHG’s salient human rights risks and progress to date.
- **2024**  
Conducted on-site assessments with six hotels across the United Arab Emirates, Kuwait and Saudi Arabia to evaluate the effectiveness and implementation of IHG’s Responsible Labour Requirements.

### Migrant worker risks

Due to the international nature of our business and the hospitality sector, IHG hotels often recruit talent from overseas. While our hotels often recruit and hire colleagues directly, they may also work with recruitment agencies and labour suppliers to support the process, depending on the market.

We recognise that involving labour suppliers and recruitment agencies – particularly in the recruitment of migrant workers – heightens the risk of modern slavery and human trafficking. Migrant workers are especially vulnerable to experiencing various forms of exploitation such as payment of recruitment fees and related costs, passport retention, deception or inadequate living standards that could lead to situations of modern slavery or labour abuse.



# Due diligence, risk assessment and management cont.

## Strengthening our understanding of migrant worker risks

This year, we strengthened central visibility of hotel workforce composition and labour sourcing arrangements, addressing a long-standing data-gap. Through our new digital RLR self-assessments, we collected data from our managed hotels on the size of their migrant worker population, migrant worker nationalities/migration corridors, use of third parties to provide labour and the provision of staff accommodation. Key insights include:



The countries where our managed hotels have the highest percentage of migrant workers include Qatar, the United Arab Emirates, Kuwait, Bahrain and the Cayman Islands.



Key source countries for migrant workers in our managed hotels globally include India, Philippines, Nepal, Bangladesh and Indonesia.



Approximately 60% of our managed hotels provide some staff accommodation.



Approximately 70% of our managed hotels use labour suppliers.

We are now in a much stronger position to make risk-informed decisions about where to focus our efforts. We have begun a similar surveying exercise across our corporate offices and reservations offices, recognising that workers in these environments may also be exposed to some responsible labour risks. The results of this survey will help inform our approach to developing appropriate controls for our corporate sites.

## How we address this risk

The RLRs set out minimum requirements to support our managed hotels to identify and address human rights risks faced by migrant workers. They address key modern slavery risks including payment of recruitment fees and related costs, passport retention and deception across the following areas:

- Responsible recruitment and employment
- Staff accommodation
- Labour suppliers and recruitment agencies
- Worker voice

To support implementation of the RLRs, all hotels are provided with guidance on migrant worker interviews, due diligence for labour suppliers and recruitment agencies and how to identify and repay recruitment fees paid by workers. The RLRs and supporting guidance were developed based on international best practices and the findings of our internal assessments. We ensure they are regularly updated to reflect the latest developments.

We also continue to drive completion of IHG’s e-learning on Responsible Recruitment and Labour Practices to further strengthen the capabilities of colleagues to identify and address risks, which was launched at the end of 2024 (see page 20 for more detail).

We expect those we do business with, including our franchisees, to prevent, mitigate and address adverse impacts on human rights. This year, to support our franchised hotels in meeting these expectations, we made the Responsible Labour Requirements available to them as an optional resource and will continue to identify further opportunities for engagement with franchisees on this topic.



# Due diligence, risk assessment and management cont.

## Monitoring and evaluation

Our Human Rights and regional HR teams collaborate to drive implementation of the RLRs. Compliance is monitored and evaluated through several channels: regular hotel self-assessment, ongoing feedback from internal stakeholders and periodic on-site assessments.



## Self-assessments

This year, we transitioned from Excel-based self-assessments to using our internal digital compliance platform, following a successful pilot with selected hotels in 2024. This represents a significant enhancement to the RLR monitoring process. We now have central visibility of responses, improving our ability to identify higher-risk areas and to help ensure effective implementation of corrective actions. In 2025, 92% of managed hotels completed the self-assessment.

Hotels are required to provide updates via our digital platform on work to address corrective actions and have reported that most corrective actions have been completed or are in progress. We are currently assessing the way corrective actions have been managed and closed and will be reviewing the process in the coming year to strengthen overall consistency and effectiveness.

We are working with regional HR teams to identify any challenges hotels may have faced when completing the self-assessment or in addressing corrective actions in order to continue to drive completion rates.

As part of the self-assessment, hotels were also asked to disclose if they had identified any cases of colleagues paying recruitment fees and related costs, passport retention and guarantor practices. Whilst we have noted some limitations to the data in this first year of the new process, we intend to use this part of the self-assessment to assess the effectiveness of the hotels' policies and processes, including the provision of remediation for affected colleagues.

The outcomes of this year's self-assessments have been shared and discussed with regional HR teams and actions are underway to address areas that require improvement. Hotels have been provided with minimum criteria for corrective actions to ensure alignment with our requirements.

Hotels generally demonstrated good overall understanding and compliance with the RLRs. However, they continue to face challenges in ensuring that the practices of labour suppliers align with our requirements. This includes:

- Weak regulation, or poor enforcement of regulation related to labour suppliers in some countries.
- Limited ability of hotels to conduct adequate due diligence on labour sub-contracting.
- Challenges in identifying risks faced by workers in their home markets, particularly if several parties are involved in the recruitment journey.
- In most countries, labour suppliers are engaged locally by hotels. A limited supplier market combined with hotels' reliance on third-party labour, constrains their leverage to influence supplier practices.

We continue to explore options to further support hotels in addressing these challenges. This includes developing template contract clauses for hotels to use with their labour suppliers and recruitment agencies (initially available to hotels in our India, Middle East and Africa region) and collaborating with our peers to address industry-wide challenges. Whilst self-assessments allow us to achieve high coverage of hotels, we recognise the inherent limitations of this approach. Therefore, we continue to explore and test ways to strengthen how we assess hotel compliance with the RLRs at scale.

This year, hotels in our IMEA region followed up the self-assessments with peer reviews (conducted by a colleague from another IHG hotel or regional HR colleague) to examine the accuracy of responses. Initial findings indicate that most hotels received scores consistent with their self-assessment. However, we identified discrepancies across a small number of hotels, where they rated themselves more favourably in the self-assessment underlining the value of peer reviews. We are reviewing the feasibility of rolling out peer reviews in other regions and considering how worker voice tools could be introduced to supplement self-assessments.

## Due diligence, risk assessment and management cont.

### On-site assessments

Our periodic on-site assessments rely on worker engagement to help us evaluate the effectiveness of our controls. At the end of 2024, we partnered with a specialised human rights consultancy to conduct on-site assessments across six hotels in the UAE, Saudi Arabia and Kuwait to examine how the RLRs were being implemented, as well as their effectiveness in improving outcomes for colleagues.

To inform the selection of hotels, our consultants conducted a comprehensive desktop risk assessment considering various factors such as country risk, hotel workforce composition and labour sourcing arrangements. To ensure an adequate representation of our diverse portfolio of brands and types of hotels, we selected hotels from different brands, locations and sizes to be visited.

The consultants conducted a two-day assessment at each hotel, which included focus groups and one-to-one interviews with a diverse range of colleagues, interviews with managers, engagement with selected labour suppliers and a tour of staff accommodation. Across the six hotels:

- **Over 300 colleagues**, including more than 80 outsourced workers, were consulted.
- **12 labour suppliers** were interviewed to better understand how they identify and address human rights risks.
- **Approximately 200 colleagues** (largely HR teams, department heads and hotel management) participated in a workshop on worker welfare.

The on-site assessments identified good responsible labour practices across all hotels, demonstrating the ongoing progress being made and the value of the RLRs. Colleagues hired directly by the hotel generally reported more positive experiences, while greater gaps were noted for colleagues employed by labour suppliers who continue to be the priority at-risk group across all responsible labour themes (aligning with findings from previous RLR self-assessments). Adverse impacts identified include lack of direct access to passports, payment of recruitment fees and related costs, long working hours, inconsistent compensation for overtime, low confidence in raising concerns and/or awareness of grievance channels and accommodation standards.

This year, hotels in scope were provided with details of the findings and action plans with guidance on how to address any gaps or adverse impacts identified. Our regional and local HR colleagues have been essential in engaging with hotel leadership teams, who continue to demonstrate steady progress in implementing actions to strengthen their practices. This includes the development of new local policies on working hours and overtime, enhanced communication to increase worker awareness of their rights and hotel policies, improved third-party monitoring and engagement to reinforce implementation of relevant requirements, more regular visits of hotel and third-party staff accommodation, the provision of new lockers to ensure safekeeping of passports and other valuable items.

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See the following pages for further detail of how some of the gaps and adverse impacts identified through the on-site assessments are being addressed.

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# Due diligence, risk assessment and management cont.

## Addressing findings from on-site assessments

### Recruitment fees and related costs

Though most workers did not report being charged any recruitment fees or related costs linked to their role at the hotel, around a quarter of those interviewed indicated they had – which largely consisted of payments to labour suppliers or brokers and recruitment agencies. In some cases, workers reported paying to obtain a job with a previous employer or to enter the country without a contract secured, with some taking place up to 15 years ago.

Hotels were asked to investigate this further and, after conducting additional interviews, identified some instances of workers having paid recruitment fees and related costs to secure a job at the hotel (mainly to local agents prior to deployment). The most common fees and costs reported were for medical checks, administrative costs including document processing and visa issuance fees, placement fees, travel costs and insurance.

In 2025, a total of approximately 6,000 USD in repayments have been made by the hotels to approximately 40 affected colleagues, with the following improvements to processes also implemented:

- Proactive and regular communication to job candidates (e.g. through offer letters) to ensure they know not to pay any recruitment fees or related costs and to contact the hotel prior to deployment with any concerns.
- Where the charging of recruitment-related costs to workers is an established practice and legally permitted in the source market, prospective employees are informed that they will be repaid. This is communicated through the recruitment agency the hotel is working with and during the onboarding process to avoid any miscommunication. If employees cannot afford these costs, the hotel will transfer the required funds to complete the recruitment process.

- Updating policies, contracts and formally reminding labour suppliers and recruitment agencies that the full cost of recruitment must be borne by the employer and that no one should pay to secure a job at the hotel.
- Establishing more regular colleague interviews to surface concerns and adverse impacts early, taking into account that some colleagues often do not feel comfortable raising concerns when they initially join a hotel so engagement on this topic should be repeated periodically.

Where hotels have asked for feedback from colleagues on the actions taken, they have indicated satisfaction with the remedy provided. Further work is needed to ensure that workers are routinely asked for their feedback across all hotels. Hotels have raised several challenges related to identifying and reimbursing charges, including workers lacking proof of payment, labour suppliers unwilling to engage, determining responsibility for fees paid in the lower tiers of supply and typically in workers’ home countries, and communication barriers and/or fear of retaliation that can initially limit disclosure from workers employed by labour suppliers. We are committed to ensuring that the remedy provided to workers is aligned with external expectations and recognise that further work is needed to achieve this.

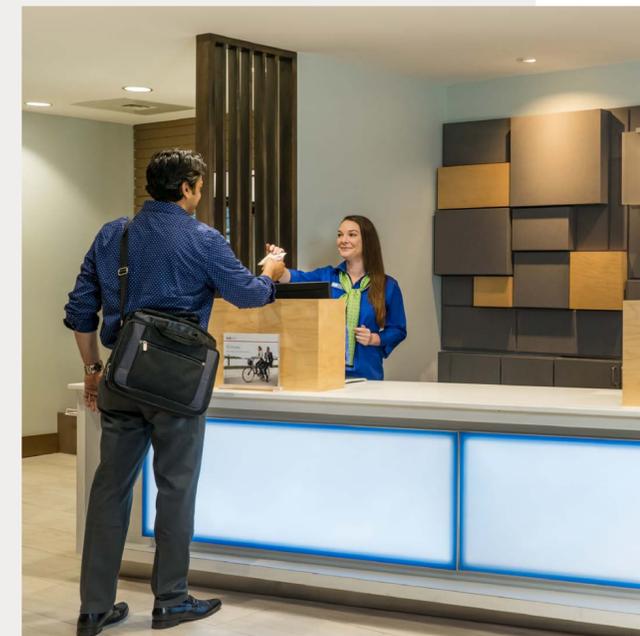
### Passport retention

While hotel employees reported having unrestricted access to their passports, several third-party workers raised concerns. This remains an ongoing challenge across the region, as labour suppliers continue the practice of withholding workers’ passports despite ongoing efforts to raise awareness and reminders of policy and contractual requirements. Although the RLRs require labour suppliers to provide workers with lockable storage for their passports, hotel engagement with suppliers has revealed that this is not always immediately feasible. In such circumstances, hotels have asked suppliers to show evidence of a process in place to document workers’ consent to leave their passports with their employer for safekeeping and the ability to retrieve passports without restriction. Hotels are verifying this practice, and workers’ agreement with it, through regular worker interviews.

## Engagement with labour suppliers

The on-site assessment identified third-party workers as the priority at-risk group for all responsible labour topics. Hotels have been taking action to strengthen their third-party risk management processes, including more regular engagement with labour suppliers to review their practices on recruitment, employment and provision of accommodation to ensure alignment with the RLRs. Topics discussed have included recruitment fees and related costs, workers’ contracts, wages and working hours (including if any delays or discrepancies in payment of wages have occurred), access to passports, worker treatment and wellbeing, staff accommodation standards, compliance with local laws and ways to improve communication and co-ordination during peak business periods.

Where issues are identified, hotels aim to work with labour suppliers to resolve these. In one case, a document review found expired identity verification cards for third-party workers, which could result in their freedom of movement being restricted. The hotel asked the supplier, as the employer of these workers, to immediately renew and share updated copies and stricter document tracking was enforced. In another case, a hotel had to terminate its contract with a labour supplier that was failing to ensure that all its workers had valid work permits, following unsuccessful engagement to find a resolution. The hotel was able to support the transition of some of the impacted workers to an alternative, compliant, supplier, ensuring they could freely move.





## Due diligence, risk assessment and management cont.

We are committed to continuous improvement and asked participating hotels for feedback on the on-site assessment process and corrective action plans. They shared that the on-site assessments provided them with further insights into the risks faced by migrant workers, enabling them to foster a better work environment and implement new processes to address areas for improvement. In particular, hotels highlighted that they were now taking a more structured approach to engaging with labour suppliers and to improving communication with workers. They also shared that a focus on building understanding and capabilities of labour suppliers on responsible labour topics would be beneficial – this is something we are exploring.

Findings from the on-site assessments have been shared with relevant teams and senior stakeholders across the business and will be integrated into future RLR updates and related monitoring and evaluation processes. We also presented a high-level summary of key findings to peer members of the World Sustainable Hospitality Alliance’s Human Rights Working Group, recognising that many of the impacts identified are common across the industry and can only be effectively addressed through collaboration.

### Multi-stakeholder collaboration

IHG is participating in a multi-stakeholder, cross-industry initiative facilitated by Impactt to develop a freely available map of labour migration corridors at higher risk of recruitment fees and related costs. This resource aims to provide companies across all sectors with data on recruitment fees and related costs paid by workers to inform human rights due diligence processes and decisions affecting migrant workers’ human rights.

## Due diligence, risk assessment and management cont.

### Human trafficking risks

Human trafficking is a global criminal business that impacts every country in the world. Hotels are particularly at risk of being used by criminals who may try to utilise rooms to traffic human beings for exploitation. This exploitation is carried out through force, fraud or coercion – often for labour or commercial sex – and typically targets people who are especially vulnerable.

### How we address this risk

IHG's Code of Conduct and Human Rights Policy condemn and prohibit human trafficking in all forms. Our efforts to address it focus on ensuring that hotel and corporate colleagues have access to training on how to identify and report suspected trafficking activities, developing partnerships with external experts to help inform our approach and supporting programmes that support survivors.

This year, we worked on the following key initiatives to drive action against human trafficking:

### Survivor support

In the US, we continued to support survivors through our partnership with Wellspring Living, focusing efforts on the Women's Academy with which we recently hosted trainees and graduates to explore careers in the hospitality industry. Former graduates of the programme have previously served in apprenticeships in IHG hotels.

IHG One Reward members can also donate points to PACT and other organisations, where IHG converts points into cash donations to support survivors.

### Training and awareness

This year, we collaborated with long-time partner PACT, a leading non-profit organisation against trafficking and industry peers Hilton and Hyatt to develop new training on preventing human trafficking. We recognise that by partnering with our peers, we can leverage our collective knowledge and resources and reinforce key messages across the industry in a consistent way. The training incorporates guidance from experts in the field and, importantly, PACT's Survivors' Council, whose members bring lived experience of human trafficking. It includes live-action scenarios and has been developed for a global audience. It is designed to empower colleagues to understand human trafficking, recognise indicators of trafficking in a hotel setting and know how to report concerns and handle situations safely.

The new training comprises a self-paced e-learning module, materials for instructor-led group sessions, and short pre-shift guides to reinforce the knowledge acquired. It was launched in December 2025 and colleagues in all IHG hotels globally are required to complete it annually.

In 2025, we also worked with our external partners on the following initiatives to raise broader awareness of human trafficking:

- Leading up to and during the Super Bowl in New Orleans, we partnered once again with It's a Penalty to support local awareness-raising initiatives. This included providing approximately 40 hotels with resources such as posters and materials on recognising and reporting instances of human trafficking. Colleagues from these hotels also attended an online training event led by the US Department of Homeland Security and representatives from It's a Penalty. It's a Penalty reported that the education campaign along with focused local law enforcement efforts contributed to the recovery of four missing children and three juveniles safely removed from exploitative situations along with multiple arrests.
- IHG hosted this year's American Hotel & Lodging Association Foundation "No Room for Trafficking Summit" at the InterContinental The Willard in Washington D.C., bringing together representatives from governments, NGOs, and industry leaders to discuss how the hotel industry can continue to lead the fight against human trafficking.



# Due diligence, risk assessment and management cont.

## Supply chain risks

**We recognise our exposure to the risk of modern slavery increases when we engage with suppliers in certain categories and geographies.**

Previous risk assessments have identified certain suppliers, providing specific goods and services from particular regions, as presenting elevated modern slavery risks. Categories include food and beverages (such as fresh produce, seafood, coffee and tea, sugar, dairy and cocoa), technology hardware, textiles containing cotton, wood and paper products, and labour-related services (including cleaning, repair and maintenance, laundry and security).

As outlined in the Our Supply Chain section, procurement activities at IHG are divided into corporate and hotel expenditure. Hotels may source from suppliers participating in IHG’s central procurement programmes, or alternatively, negotiate and source directly with local suppliers depending on their location and preference.

### How we address this risk

Our Supplier Code of Conduct sets out the standards under which IHG suppliers are expected to operate for corporate and centrally negotiated procurement programme suppliers. This includes ensuring freely chosen employment, no use of child labour and a zero-tolerance approach to human trafficking.

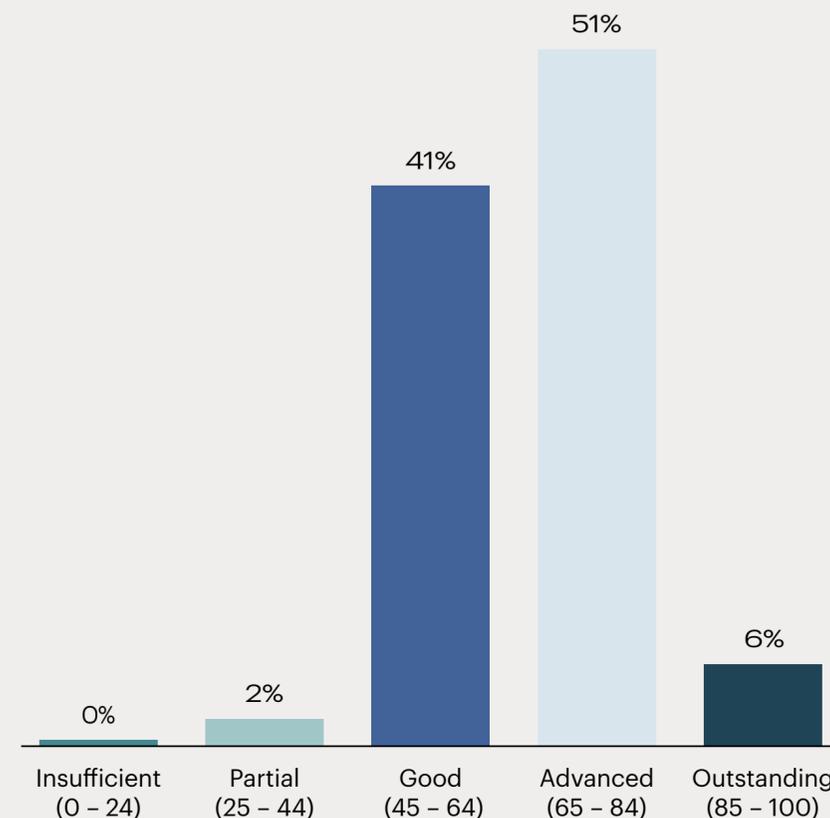
Before entering into a contract with IHG, all corporate and central procurement suppliers must confirm acceptance of IHG’s Supplier Code of Conduct or demonstrate that they have an equivalent policy in place. They are also required to complete a questionnaire detailing where goods are sourced and/or manufactured to help us better identify and assess risks. Those suppliers operating in high-risk countries or industries are required to complete additional questions related to the policies and processes they have in place to prevent risks such as worker passport retention, payment of recruitment fees and related costs, forced labour and channels for workers to raise concerns. They may also be asked to provide information on workforce composition and labour sourcing arrangements.

We also partner with EcoVadis and Sedex to assess selected suppliers’ maturity on several ESG topics, including human rights. These programmes generally focus on our Tier 1 suppliers, however, we will review this criterion over time.

## Supplier assessments

We use EcoVadis assessments to evaluate our strategic and high-risk suppliers’ environmental, human rights, ethics and sustainable procurement risk management capabilities. Insights from the resulting scorecards help us to identify social and environmental risks within our supply chain and collaborate with suppliers to strengthen their sustainability performance. Building on previous work to increase our engagement with the platform and extend coverage across our supply chains, we aim to continue to expand the number of high-risk suppliers invited to take an EcoVadis assessment over time. In 2025, 93 suppliers were scored by EcoVadis.

### IHG suppliers by EcoVadis maturity



## Supplier audit approach

Building on work started in 2024, we are continuing to partner with Sedex to progress the development of our approach to supplier auditing. Our initial focus has been to collect critical site-level information from our highest risk Tier 1 centralised hotel procurement programme suppliers of labour and goods, and we aim to increase the scope over time. So far, 60 centralised hotel programme suppliers have been invited to complete a Sedex self-assessment questionnaire and we will be analysing the results to determine which suppliers to invite to participate in a Sedex Members Ethical Trade Audit.

## Third-party owners

We carry out risk-based due diligence and compliance checks on new third-party hotel owners with whom we are entering hotel franchise and management agreements. This includes the use of automated screening and monitoring tools and the provision of guidance for our legal, franchise administration and development teams. Escalation criteria ensure a committee of senior IHG decision makers consider and review any potentially material issues, which include concerns or allegations around human rights violations, such as those related to human trafficking, forced labour or child labour.

# Training and awareness

Ensuring that our colleagues, especially those working in hotels and with suppliers, are equipped with the right skills to identify and report concerns relating to human rights, including modern slavery, is crucial.

## 2025 key activities

- Developed and launched new Preventing Human Trafficking training in collaboration with PACT, and industry peers Hilton and Hyatt.
- Conducted human rights awareness sessions for colleagues in legal and compliance, procurement and corporate responsibility.
- Launched a refreshed Code of Conduct e-learning with updated human rights content.
- Continued to drive completion of our e-learning on Responsible Recruitment and Labour Practices.

## 2026 priorities

- Continue to strengthen our training approach on human rights by developing targeted training and resources for key stakeholders across the business.



Training	Description	Format	Audience	Completions 2025
<b>Code of Conduct</b>	The importance of respecting human rights and combating modern slavery is made clear to colleagues as soon as they start working for IHG. Our mandatory annual training on the Code of Conduct includes specific content on human rights, including modern slavery and labour abuse. It encourages employees to speak up openly and raise concerns about possible breaches of our Code of Conduct, policies or the law and makes clear that IHG does not permit retaliation. The Code training was updated in 2025 and included new human rights content.	E-learning available in 18 languages.	Mandatory for all colleagues in corporate offices, reservations offices and for certain colleagues in hotels including General Managers.	104,842
<b>Preventing Human Trafficking</b>	Our Preventing Human Trafficking Training is designed to support colleagues, particularly those working in hotels, to identify and report signs of trafficking. It was updated in 2025, in collaboration with other leading hospitality companies and PACT.	E-learning supported by classroom training resources and pre-shift guides available in 16 languages.	Available to all colleagues, mandatory for all colleagues in managed and franchised hotels.	95,576
<b>Responsible Recruitment and Labour Practices</b>	The Responsible Recruitment and Labour Practices e-learning supports implementation of IHG's RLRs. It follows a migrant worker on her journey to find work abroad. It outlines how migrant workers can be especially vulnerable to exploitation and provides practical actions and resources to promote responsible recruitment practices.	E-learning	Available to all colleagues and particularly advised for colleagues involved in the following: <ul style="list-style-type: none"> <li>Hiring and recruiting colleagues especially migrant workers.</li> <li>Managing and engaging with recruitment agencies and third-party labour suppliers.</li> </ul>	8,381
<b>Internal Learning Sessions on Human Rights</b>	We regularly conduct learning sessions for teams across the business to create awareness of IHG's human rights programme and to strengthen our colleagues' ability to identify potential human rights risks. These sessions typically cover an introduction to human rights, overview of expectations for businesses and how this is relevant to teams' respective roles in the business. This year, we ran sessions for colleagues in our legal functions and our corporate responsibility and procurement teams.	In-person/online webinar	Colleagues working in procurement, legal and corporate responsibility teams.	144 colleagues

# Working together

We strongly believe that collaboration with experts and peers, both in our industry and across wider industries, plays an important role in addressing human rights risks through focusing attention and action towards a joint purpose, with the potential of driving systemic change.

In 2025, we engaged with the following organisations:

## PACT (Protect All Children from Trafficking)

- Continued our partnership with PACT to further strengthen IHG’s efforts against trafficking.
- Developed a new e-learning on preventing human trafficking in collaboration with PACT and other leading hospitality companies.

## Polaris

- Continued our partnership with Polaris to further strengthen IHG’s efforts against trafficking and support of survivors.

## BSR (Business for Social Responsibility)

- Continued our membership of BSR’s Human Rights Working Group, including regularly joining webinars and in-person meetings to learn about key trends in modern slavery and to consult and engage with experts and cross-industry peers on best practices and challenges.

## IOM (International Organization for Migration)

- Continued our partnership with the IOM to leverage its expertise to further strengthen our approach to addressing migrant worker risks in our operations.

## Centre for Sport and Human Rights

- Joined as an “Engaged Organisation” to improve our understanding and management of human rights risks our industry is exposed to during major sporting events.

## Wellspring Living

- Strengthened our partnership with Wellspring Living to advance IHG’s commitment to combating trafficking and supporting survivors.
- Led IHG Discover sessions for three cohorts of survivors through the Wellspring Living Women’s Academy, providing skills training to prepare them for new career opportunities.
- Hosted two graduation ceremonies for survivors completing the Women’s Academy, which combines skills training with a 12-week internship to foster workforce readiness.

## World Sustainability Hospitality Alliance

- Continued our membership of the WSHA, including co-chairing the Human Rights Working Group.
- Partnering with the Global Fund to End Modern Slavery to support survivors of human trafficking to access employment within the hospitality industry through its youth employment programme.

## Our collaborators



# Reporting and investigating concerns

We are committed to providing remedy where we have caused or contributed to an adverse human rights risk and do not permit retaliation.

## 2025 key activities

- Continued to address recommendations from the 2024 review of our confidential reporting channel. More information can be found on page 19 of our 2024 Modern Slavery Statement.
- Ongoing support provided by the Human Rights team to teams investigating complex cases and those involving serious human rights concerns.
- Expanded the number of languages IHG's Speak Up posters are available in, prioritising those commonly spoken by migrant workers.

## 2026 priorities

- Continue to strengthen how human rights concerns are reported, investigated and remediated.

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IHG does not permit retaliation against anyone making good faith reports of either suspected breaches of the Code of Conduct or suspected violations of law.

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## Reporting and investigating concerns cont.

**It is important that our colleagues, including those working in franchised hotels and any person who has a relationship with IHG, such as our guests, our suppliers and workers in our supply chain, feel comfortable and have access to channels to report ethical concerns, including those related to modern slavery.**

While colleagues are encouraged to raise any concerns directly with their line manager, supervisor or local Human Resources representative, we understand that for certain matters this might not always be appropriate. Therefore, individuals can raise issues – anonymously if they choose to – either via phone or online through our publicly available confidential reporting hotline, which is operated by an independent third-party and with a translation service covering approximately 150 languages.



IHG managed hotels and corporate offices raise awareness of the confidential reporting hotline by displaying posters in staff areas in English and local languages. Information about the hotline is also communicated via our intranet and external website, key policies, our annual colleague engagement survey and risk management processes (for example, the RLRs, which include criteria on worker engagement and hotline accessibility), regular internal communications and relevant e-learning. To increase accessibility, a QR code linked to the hotline's web page is also available.

The training for our investigators has been updated to emphasise the importance of providing reporters with regular updates on the steps being taken to investigate their concerns once a case is logged in the hotline. More information on the hotline can be found [here](#). Reporters are also given the opportunity to provide feedback on the process. This year, the feedback survey was translated into 10 additional languages to increase accessibility. We also track indicators related to IHG's Speak Up culture that are included in our annual Engagement Survey, which is completed by colleagues in managed hotels and corporate offices. In 2025, 92% (vs 91% in 2024) colleagues confirmed they know how to raise a concern about the workplace and 88% (vs 87% in 2024) confirmed they feel safe to speak up without fear of adverse consequences.

## Raising awareness and reporting concerns

During our on-site assessments, several workers reported not being fully aware of policies related to responsible recruitment and the channels available to them to raise concerns. Whilst information on the various complaint channels was communicated in most hotels visited (such as Speak Up posters, suggestion boxes and QR codes for feedback) some materials were only available in English and Arabic – languages that many colleagues were not fluent in. Where colleagues were aware of ways to report concerns, some expressed limited confidence in them.

**Hotels have been taking action to address these findings, including:**

- Making key materials available in additional languages spoken by migrant workers to increase accessibility.
- Introducing regular HR roundtables and surveys to raise awareness of key policies and understand colleagues' satisfaction with their working conditions.
- Improving onboarding and training sessions, with increased focus on responsible recruitment and grievance mechanisms.
- Introducing sessions that allow for open dialogue between workers and management.
- Sharing anonymous examples of how concerns have been resolved to further strengthen trust in the investigation and remediation process.

Hotels reported that they have seen a noticeable improvement in worker engagement and the sharing of feedback along with workers' appreciation of increased transparency.



## Improving our Confidential Reporting Hotline

In 2024, with the support of an external consultancy specialising in human rights, we completed a review of our confidential reporting hotline against the UNGP’s effectiveness criteria. This year, we continued to implement recommendations from the assessment, including:

- Making the reporter feedback survey available in additional languages to enhance accessibility.
- Translating hotline posters in additional languages.
- Continuing to review and test approaches to investigating human rights concerns and strengthening communication with reporters during and following investigations.

## Reporting and investigating concerns cont.

### Identifying and remediating cases with potential indicators of labour abuse or modern slavery

We are committed to proactively avoiding human rights infringements resulting from our business activities. Where we do cause or contribute to adverse human rights impact, we are committed to providing effective remedy.

We continue to strengthen our approach on identifying human rights concerns through various channels. In 2025, we received reports with potential indicators of labour abuse or modern slavery from our managed estate via the following channels:

<b>Channel</b>	Confidential Reporting Hotline or other reporting channels, such as to our Ethics & Compliance team.
<b>No. of reports</b>	16
<b>Concerns mainly relate to</b>	Excessive overtime, appropriate compensation for hours worked and staff accommodation standards.

For cases that have been substantiated and where we either caused or contributed to an adverse impact, remedial actions included: reviewing and updating policies and processes such as those relating to overtime; strengthening employee communication such as through open door policy meetings and establishing monthly GM table meetings; ensuring workers are compensated for all hours worked; training for colleagues and leadership; and adjusting staffing levels.

Hotels are also provided with guidance and criteria on how to address cases reported via the RLR self-assessment and this is followed up by the Human Rights team to ensure adequate actions are taken.

### CASE STUDY

#### Hotline report

**This year, we received an anonymous report through our hotline raising concerns about an IHG hotel related to colleagues not being appropriately compensated for overtime.**

An investigation led by our regional office included an on-site visit and interviews with randomly selected colleagues. The investigation confirmed that some colleagues had not been appropriately compensated for overtime hours worked. This was remediated with payment and time off in lieu, as agreed with workers, and improvements made to how overtime is tracked. The hotel also implemented a new overtime policy that clearly explains the process that workers and managers must follow (including pre-approval and documented consent) to agree to additional hours worked.

We take all allegations concerning human rights issues, including modern slavery seriously and encourage third-parties, including media channels, civil society organisations and others, to contact us directly with any concerns either through our confidential reporting channel or via [ethicsandcompliance@ihg.com](mailto:ethicsandcompliance@ihg.com).

# Our effectiveness and performance indicators

**We are committed to continuously reviewing the impact of our activities to address modern slavery.**

We recognise that modern slavery is a complex and hidden issue that requires proactive effort to uncover, and we continue to explore additional ways to assess the effectiveness of our actions. The key measures we currently use to assess our approach are shown in the table opposite.

## Transparency and reporting

CCLA, the largest charity fund manager in the UK, produces an annual **benchmark** that assesses the largest UK-listed companies on the degree to which they comply with Section 54 of the Modern Slavery Act 2015, disclose information outlined in the Home Office Guidance on modern slavery and report on finding, fixing and preventing modern slavery. In 2025, IHG demonstrated improvement to achieve a Tier 1 ranking alongside other leading companies – a recognition of our ongoing commitment to transparency and the progress we have made in our overall approach to identifying and addressing modern slavery risks.

### Relevance

### Indicator

### Outcome

**Regular targeted training** ensures our colleagues are equipped with the right knowledge to identify, prevent and mitigate human rights risks, including modern slavery, especially at hotel level.

Number of colleagues who completed the annual Code of Conduct training.

104,842

Number of colleagues who completed the Preventing Human Trafficking training.

95,576

Number of colleagues who completed the Responsible Recruitment and Labour Practices training.

8,381

**Risk assessment and due diligence processes** enable us to get a better understanding of our risks across the business and prioritise the most impactful actions.

#### RLR self-assessment

- Percentage of managed hotels that completed the RLR self-assessment.
- Average score of the RLR self-assessment.

92%

98.7%

#### Supply chain

- Number of suppliers scored by EcoVadis in 2025.
- Suppliers by EcoVadis maturity.

93

Insufficient – 0%  
Partial – 2%  
Good – 41%  
Advanced – 51%  
Outstanding – 6%

**Providing remedy** where we have caused or contributed to an adverse human rights risk is an integral part of our commitment. Mechanisms such as the confidential reporting hotline and RLR self-assessment enable us to get a better understanding of risks within our business and effectiveness of our processes.

Number of issues raised – via IHG’s Confidential Reporting Hotline or other reporting channels such as to our Ethics & Compliance team – that included a potential indicator of labour abuse or modern slavery (including substantiated and non-substantiated issues raised by managed hotels in 2025).

16

**Regular communication and engagement** with key stakeholders enables us to determine the effectiveness of our initiatives and processes. We regularly participate in external disclosures and communicate externally on our approach to address human rights.

We continue to engage with key investors and customers and participate in external benchmarks and ratings. In 2025, we progressed to be ranked in Tier 1 in the CCLA UK Modern Slavery benchmark.