

IHG Supplier Code of Conduct

OUR COMMITMENT

Across IHG, we are committed to operating responsibly. More than ever, conducting business with honesty, integrity, and the highest ethical standards is essential. We intend to grow our business in a way that respects human rights, promotes inclusion, and positively impacts the environment and local communities. Our actions are shaped by a culture of strong governance and policies and a series of ambitious commitments related to our sustainability goals and objectives as set out in our Journey to Tomorrow 2030 responsible business plan.

OUR EXPECTATIONS OF OUR SUPPLIERS

As part of our commitment to operating responsibly, we work with parties who share this commitment by placing requirements on our suppliers as set out in this Supplier Code of Conduct (Supplier Code). This is informed by the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic Social and Cultural Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development, the Ten Principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights. We expect our suppliers to adhere to these standards across their businesses and apply them to their supply chains.

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

OUR STANDARDS

IHG suppliers must comply with the following standards:

1. Compliance with Laws and Regulations

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

2. Labour practices

Comply with the following labour practices and ensure adherence to them by their own suppliers:

- a. **Freely chosen employment.** No worker should be indebted or coerced to work or pay recruitment fees or costs for a job. Workers must always have freedom of movement, including unrestricted access to passports and valuable possessions. Workers must be informed of their employment terms and conditions in writing and in advance without misrepresentation.
- b. **Child labour and young workers.** No employment of children younger than the country's legal minimum age for employment or the age established for completing compulsory education. When young workers are employed (above the legal working age but under 18 years of age) they must not do work that could jeopardise their physical, mental, moral well-being or schooling.
- c. **Freedom of association and collective bargaining.** Respect employees' rights to freedom of association, under the law. Employees should have the right to organise or join associations, and bargain collectively if they so choose.
- d. **Wages and working hours.** Compensation paid to workers shall comply with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Workers are not required to work more than the regular and overtime hours allowed by local law or an applicable collective agreement.
- e. **Non-discrimination.** Provide equal opportunity in all hiring and employment practices. Workers must not be discriminated against based on race, colour, ethnic or national origin, sex, sexual orientation, gender identity or expression, age, religion, marital status, disability, or any other characteristic protected by local legal requirements.
- f. **Humane treatment.** Treat workers with dignity and respect and provide a workplace free from physical, sexual, psychological or verbal harassment, abuse or other form of intimidation. Workers should be able to communicate openly with management regarding working conditions without fear of retaliation.

3. Human Trafficking

Adopt a zero-tolerance approach to human trafficking and sexual exploitation of any person, including children and ensure compliance with all applicable laws and regulations regarding the prevention of human trafficking.

4. Diversity and Inclusion

We encourage our suppliers to use good faith efforts to include diverse suppliers, and businesses owned by individuals from historically disadvantaged or underrepresented communities in their supply chain, generating economic opportunity for these groups.

5. Health and Safety

Provide a safe, secure and healthy working environment in compliance with all applicable health, safety and security laws. Where worker accommodation is provided, it must be clean, safe, and meet the basic needs of the workers, including adequate privacy and access to clean sanitary facilities, potable water, and food storage.

6. Land Rights

Ensure the rights to property and land of individuals, indigenous people and local communities are respected. All negotiations with regard to their property or land adhere to the principles of free, prior and informed consent.

7. Environment

Preserve and reduce the environmental impact of operations, products and services, including complying with environmental regulations and in making business decisions suppliers are expected to endeavour to:

- a. reduce energy use and greenhouse gas emissions (GHGs), and maximise and optimise the role of renewable energy
- b. reduce unnecessary waste and plastics and explore circular economy solutions
- c. incorporate efficiency measures to preserve and conserve water
- d. monitor, record and benchmark their environmental performance on a regular basis. Seek to set specific and measurable goals.
- e. take steps to support biodiversity conservation and regeneration, where possible

8. Business Integrity and Anti-Bribery

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

9. Gifts and Entertainment

Ensure any gifts or entertainment to IHG are not used to improperly influence business transactions or decisions related to awards of future business. Gifts and entertainment to IHG personnel are prohibited if the supplier is engaged in negotiations for the award or renewal of business/contracts.

10. Conflicts of Interest

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

11. Confidentiality and Data Protection

Respect IHG's confidential and proprietary information as well as its employee and customer privacy and personal information. Suppliers are expected to respect IHG's intellectual property rights and ensure the data security posture of their supply chains.

12. Accurate Financial Records

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

13. Grievance Mechanisms

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

REPORTING CONCERNS

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



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