

A man and a woman in business attire are sitting at a table in a modern hotel lobby. The man is pointing at a laptop screen while the woman looks on. The room is elegantly furnished with a bookshelf, a lamp, and a vase of flowers.

IHG[®]
HOTELS & RESORTS

Modern Slavery Statement

2023

ENTER

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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.

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 its own business or supply chains.

This Statement refers to the financial year ending 31 December 2023 and covers InterContinental Hotel Group PLC and its group companies. The reporting entities covered by this Statement are listed in the Appendix. Our previous statements can be read [here](#).

Hospitality is a unique industry, built upon a foundation of care 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.

In 2023, we focused on the following key activities:

- Updating our Supplier Code of Conduct and Human Rights Policy to strengthen alignment with international standards and stakeholder expectations.
- Continuing to embed our Responsible Labour Requirements across our managed, owned, leased and managed lease hotels.
- Conducting a global human rights risk assessment to ensure we focus on addressing our salient human rights issues and have updated our human rights approach and strategy in line with the findings.
- Developing a roadmap to enhance due diligence practices across our supply chain.
- Updating the categories in our confidential reporting hotline and introduced a human rights tagging system to enhance tracking and support for investigations and remediation.
- Developing guidelines for hotels on how to investigate and remediate payment of recruitment fees and costs.
- Initiating a review of our confidential reporting channel against the UN Guiding Principles (UNGPs) effectiveness criteria.
- Continuing to actively engage with external stakeholder groups, such as the Sustainable Hospitality Alliance, Business for Social Responsibility, Polaris and PACT.
- Sponsoring the Polaris National Survivor Study, pioneering research to learn directly from survivors of sex and labour trafficking to better understand their experiences and needs.

As our human rights programme develops, we will continue to deepen our understanding of modern slavery risks and trends and strengthen our approach. We welcome any feedback you may have in relation to this statement. Please contact us at ethicsandcompliance@ihg.com.

The IHG Board approved this Statement on 16th February 2024.



Elie Maalouf
Chief Executive Officer



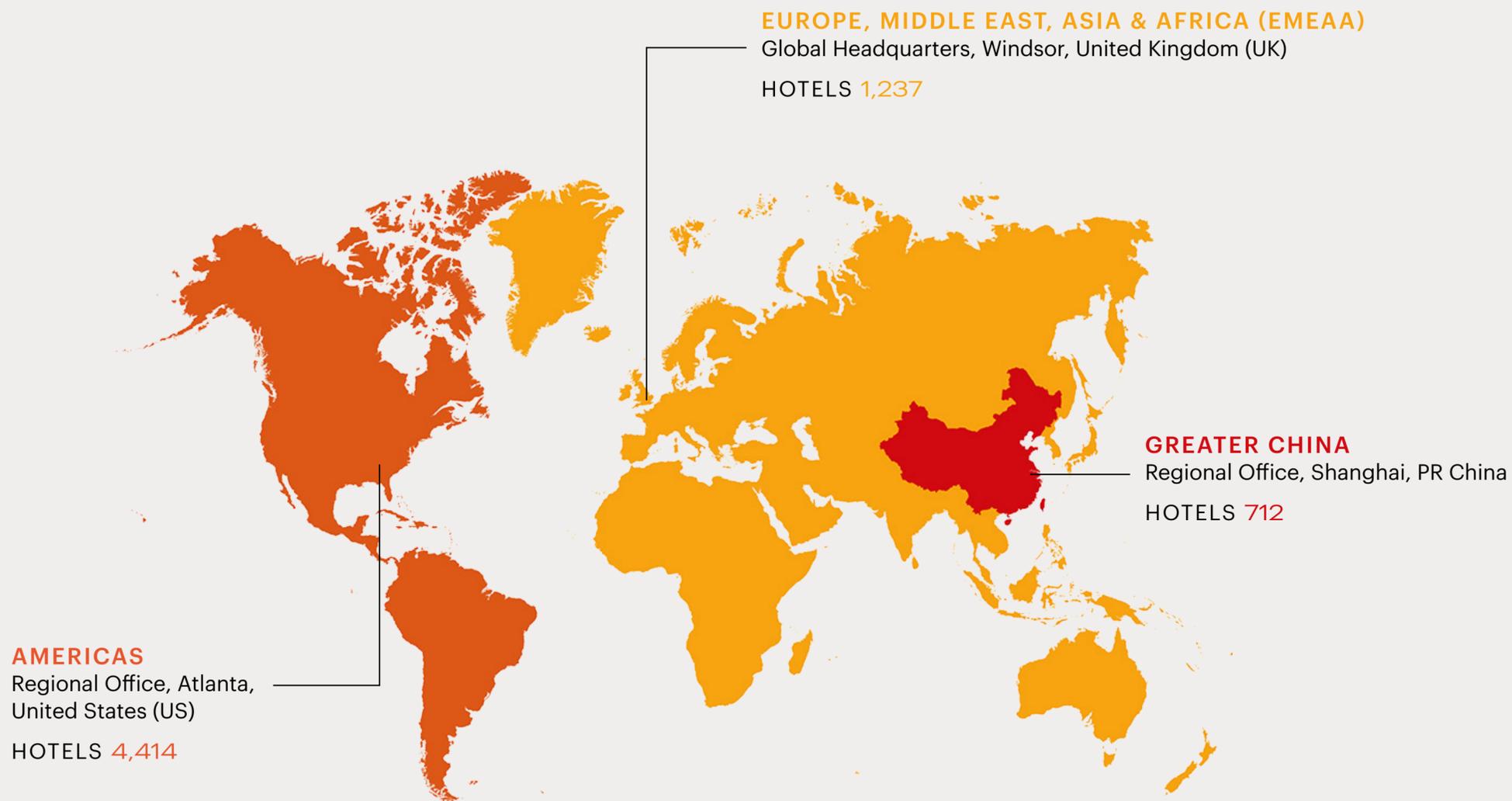
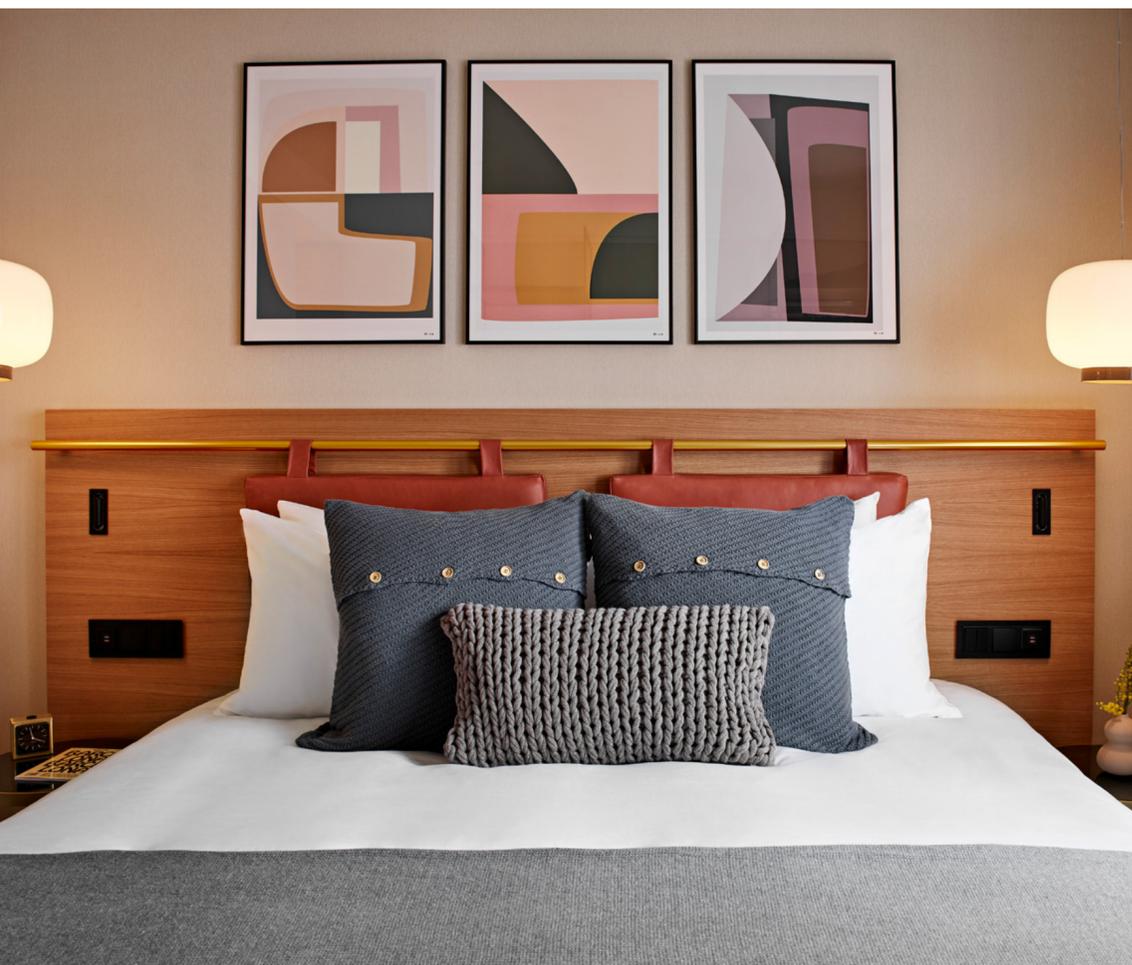
UK Modern Slavery Act 2015

In accordance with the UK Modern Slavery Act 2015, modern slavery includes slavery, servitude, forced and compulsory labour and human trafficking. Combating modern slavery and other human rights abuses is an ongoing commitment at IHG, and we continue to develop our policies and processes to support this approach.



Our structure and business model

IHG is one of the world’s leading hotel companies, with a diverse portfolio of 19 hotel brands and more than 6,300 hotels operating in over 100 countries.



	Global
EMPLOYEES*	7,292
EMPLOYEES SYSTEM FUND, GMs AND HOTEL EMPLOYEES**	20,306

*People worldwide (including those in our corporate offices, central reservations offices and owned , leased and managed lease hotels (excluding those in a category below)), whose costs were borne by the Group.

**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.



Our structure and business model cont.

Our wide range of brands helps us meet consumer demand. Beyond providing accommodation, our hotels offer – depending on the brand – a variety of different facilities and services including restaurants, leisure facilities such as pool and spa, shops, catering, and banqueting services.

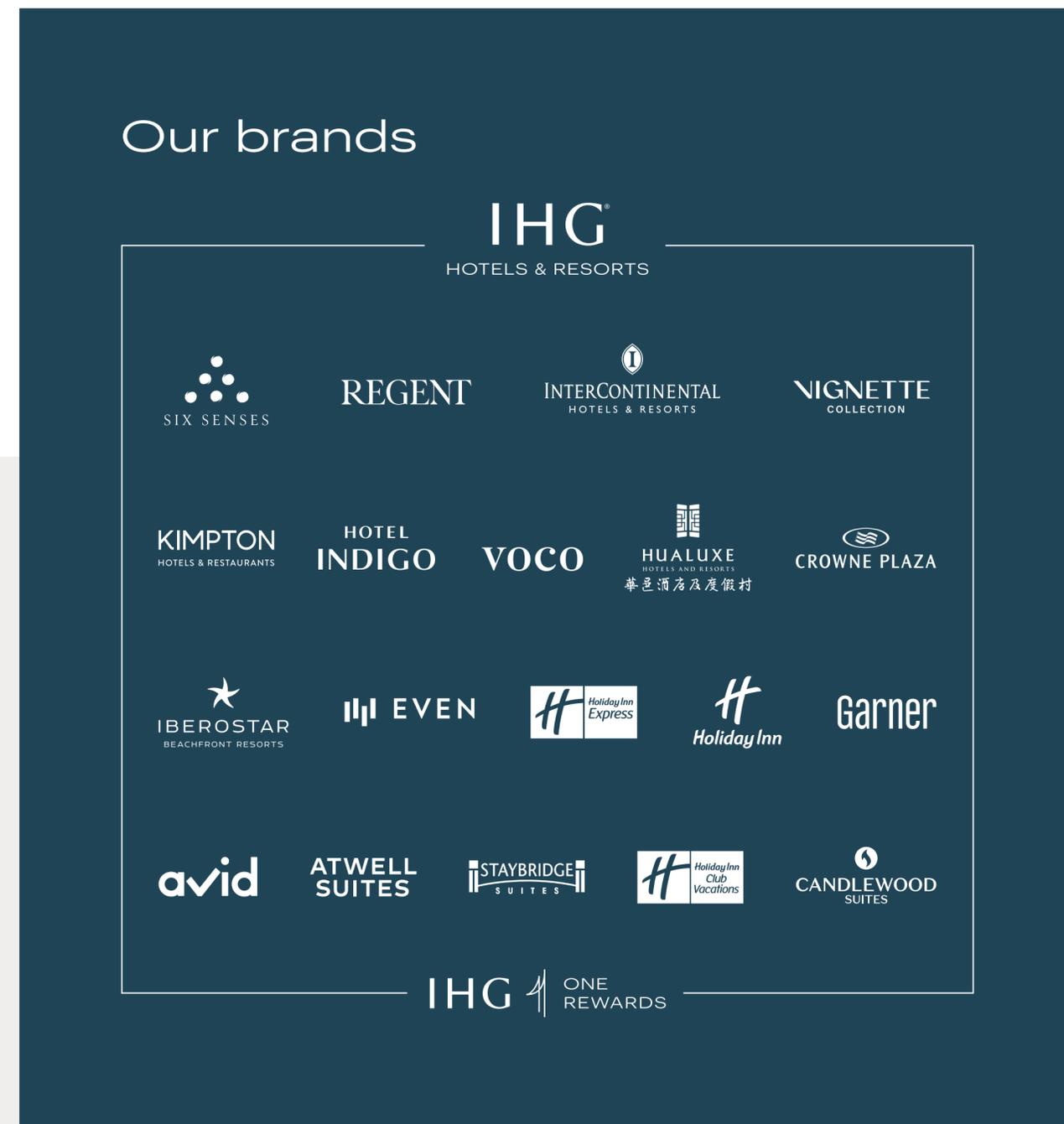
We brand or operate hotels in three different ways: as a franchisor; as a manager; and for a very small number of hotels, on an owned and leased basis.

We also have an exclusive partnership with 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. 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 third-party labour suppliers.

Business model	Ownership	Number of hotels	Employees
Corporate	IHG	N/A	Employed by IHG
Franchise (includes exclusive partner hotels)	Third-party	5,356	Employed by third-party owner
Managed	Third-party	990	IHG and third-party owner. 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 and managed lease*	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.



Our supply chain

We recognise the potential environmental and social impact of our supply chain and the need for our suppliers to operate with the same principles and respect as we do.

Our supply chain activities are split between the areas of corporate and hotel spend.

Corporate suppliers

Our corporate supply chain covers categories such as technology, 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 some cleaning, facilities management and catering services at some of our corporate office locations.

In our corporate supply chain, several global technology and outsourcing providers have been identified as strategic suppliers due to the critical nature of their services. IHG regularly engages with these suppliers to harness innovation, provide customer

service, manage risk and promote value realisation. We annually review our list of strategic suppliers and their delivery of our business objectives.

- 3,568 corporate suppliers
- Corporate suppliers based in approximately 30 countries
- Top supplier locations: United Kingdom, United States, China, India

Hotel suppliers

Local hotel suppliers

Due to the nature of our business model, procurement of hotel goods and services required for building, opening, renovating and operating a hotel predominantly occurs at a local hotel level, as our hotels are primarily owned by independent third-party franchisees, responsible for managing their own supply chain. These procurement activities include goods and services, such as energy, operating supplies and equipment (for example, linens, bathroom amenities, cleaning products), uniforms, food and beverage, furniture, lighting, wall and floor coverings and services (such as elevator maintenance).

Central hotel suppliers

A centralised procurement programme for key hotel goods and services is available in key markets – allowing owners of IHG-branded hotels to purchase from suppliers under centrally negotiated contracts in these markets, leveraging IHG’s system scale.

IHG has established procurement programmes in the US, Canada, Mexico, Latin America, the Caribbean and Greater China and has been expanding this support in the EMEAA region in countries such as the United Kingdom, Ireland, France, Germany, India, Belgium, the Netherlands, Luxembourg, the United Arab Emirates, Saudi Arabia, India, Australia, New Zealand, Japan, Thailand, Singapore, and Vietnam.

- 456 centralised hotel suppliers
- Centralised hotel suppliers based in over 15 countries
- Top supplier locations: United States, Greater China, Thailand, Singapore, Australia, United Kingdom



Governance and policies

2023 Key activities

- Updated our Supplier Code of Conduct and Human Rights Policy to strengthen alignment with international standards and stakeholder expectations.
- Updated our Procurement Policy to emphasise our commitment to responsible decision making when procuring goods and services.

2024 Priorities

- Continue to align key policies with IHG’s human rights expectations, including modern slavery.
- Start introducing the Supplier Code to managed hotels’ own locally appointed new suppliers.

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 – including those related to modern slavery – to life across the business.

Policies

As part of our commitment to responsible business, we have a number of group-wide policies and procedures in place to help govern our approach to human rights and modern slavery. Our policies are available in multiple languages to ensure accessibility and can be found externally on our website and internally via our company intranet.



Policy	Description	Applies to	Reference to Modern Slavery	Communication and Engagement
Code of Conduct (Code) – available here.	<ul style="list-style-type: none"> • Sets our values and how they apply to our business activities. • Is reviewed and approved annually by the Board. 	<ul style="list-style-type: none"> • Colleagues working in IHG’s corporate offices, guest contact centres and managed hotels. • Includes our expectation that those we do business with, including our franchisees, uphold similar standards. 	<ul style="list-style-type: none"> • Sets out zero-tolerance approach to human rights abuses, including forced labour, any form of modern slavery and the exploitation of children. 	<ul style="list-style-type: none"> • Colleagues working in IHG’s corporate offices, guest contact centres and managed hotels are required to complete annual Code training.
Human Rights Policy – available here.	<ul style="list-style-type: none"> • Sets out our commitment to respect human rights in line with the UN Guiding Principles on Business and Human Rights. • Explains our salient human rights issues and our approach to addressing human rights risks. 	<ul style="list-style-type: none"> • Colleagues working in IHG’s corporate offices, guest contact centres and managed hotels. • Includes our expectation that those we do business with, including our franchisees, uphold similar standards. 	<ul style="list-style-type: none"> • Sets out our prohibition of forced labour, child labour and human trafficking or sexual exploitation in our business operations and supply chains. • Explains our commitment in relation to our other salient human rights issues. 	<ul style="list-style-type: none"> • Our annual Code training includes information on our human rights commitment, key modern slavery risks and how to report concerns. • Regularly referenced in internal communications, such as on World Day Against Trafficking in Persons, Anti-Slavery Day, and Human Rights Day.
Human Rights Brand Standard	<ul style="list-style-type: none"> • Requires all hotels to develop and implement a human rights policy. 	<ul style="list-style-type: none"> • All IHG managed, owned, leased and managed lease and franchised hotels. • Franchised hotels are provided with a template and guidance to support the development of a human rights policy. 	<ul style="list-style-type: none"> • Focuses on key modern slavery risk areas, such as recruitment practices and human trafficking. 	<ul style="list-style-type: none"> • Included in IHG’s ongoing training programme for new and existing General Managers.
Supplier Code of Conduct (Supplier Code) – available here.	<ul style="list-style-type: none"> • Sets out the standards under which IHG suppliers are expected to operate. 	<ul style="list-style-type: none"> • All new corporate suppliers and those suppliers covered by IHG centralised procurement programmes. • Where hotels form contracts directly with suppliers, they are encouraged to seek adherence to similar provisions. 	<ul style="list-style-type: none"> • Includes expectations on freely chosen employment, child labour, freedom of association and collective bargaining, wages and working hours, non-discrimination, and working conditions. 	<ul style="list-style-type: none"> • Communicated internally via the Responsible Business Portal. • All corporate suppliers and central hotel suppliers receive and are expected to adhere to (or provide evidence they have equivalent policies) before contracting with IHG.
Procurement Policy	<ul style="list-style-type: none"> • Emphasises our commitment to responsible decision making when procuring goods and services and supplier due diligence. 	<ul style="list-style-type: none"> • Colleagues in IHG corporate offices procuring goods and services for IHG, and in relation to programmes negotiated by Global Procurement for hotel owners to procure goods and services from third parties directly. 	<ul style="list-style-type: none"> • Outlines due diligence requirements for suppliers. 	<ul style="list-style-type: none"> • Training and Q&A guidance available via our procurement hub resource centre, which is available via the company’s intranet.

Due diligence, risk assessment and management

2023 Key activities

- Conducted a global human rights risk assessment to ensure we focus on addressing our salient human rights issues and have updated our human rights approach and strategy in line with the findings.
- Continued to embed our Responsible Labour Requirements across managed, owned, leased and managed lease hotels, including the integration of indicators to measure implementation into existing business processes.
- Developed a supply chain human rights roadmap to enhance due diligence practices across our supply chain.
- Commenced a review of our risk assessment process when contracting new suppliers.
- Developed and communicated due diligence guidelines for recruitment agencies and third-party labour suppliers to IHG managed hotels as part of the Responsible Labour Requirements.

2024 Priorities

- Conduct hotel-level assessments to validate implementation of the Responsible Labour Requirements.
- Continue mapping of high-risk procurement categories in our supply chain and strengthening of our due diligence processes.



Our human rights approach

This year, we conducted our second global human rights risk assessment in line with best practice and to further enhance our human rights programme. This updated our understanding of those human rights risks with the potential for the most severe negative impact across our business activities or business relationships, as well as how these risks are being addressed. Modern slavery risks, such as forced labour, child labour and trafficking, continue to be areas of focus for us along with the following salient human rights issues:

- Guest Welfare
- Freedom of Association and Collective Bargaining
- Discrimination and Harassment
- Wages and Working hours
- Health and Safety
- Forced Labour and Child Labour
- Sex Trafficking and Sexual Exploitation
- Environment and Community

Work is underway with teams across the business to develop action plans to address findings across the salient issues. To ensure our action on human rights is consistent, measurable, and targeted to activities that will have the biggest impact, our approach focuses on the following five areas:

Governance and policies: Agreeing clear accountability for salient human rights risks and aligning relevant policies with international human rights standards.

Due diligence: Conducting human rights risk and impact assessments (focusing on our salient issues), integrating findings into management systems, and tracking performance.

Remediation: Ensuring access to an effective grievance mechanism and providing remedy for adverse impacts that we have caused or contributed to.

Capabilities: Driving awareness of human rights across the company and developing targeted training for our colleagues to understand the human rights commitments and actions relevant to their role.

Engagement: Transparent dialogue with human rights stakeholders to learn from and address their concerns. We are also collaborating with our peers through industry forums, such as the Sustainable Hospitality Alliance, to address common human rights challenges and regularly reporting on our human rights progress and challenges.



Due diligence processes

We have a number of ongoing due diligence processes in place to help identify and address modern slavery risks across our business operations and supply chain.

Area	Due diligence
Hotels	In line with the Responsible Labour Requirements, our managed, owned, leased and managed lease hotels are required to screen and monitor new and existing third-party labour suppliers and recruitment agencies. To support this, a checklist has been developed that includes criteria on labour sourcing practices, transparent contracting, passport retention, recruitment fees and costs, and accommodation standards.
Supply chain	<p>New suppliers participating in our centralised tendering process must acknowledge IHG’s Supplier Code of Conduct. Certain suppliers must also complete IHG’s responsible procurement due diligence questionnaire, including questions on where products are sourced and/or manufactured to improve our understanding of risk in our supply chain.</p> <p>Certain suppliers located in higher-risk countries or industries are required to complete additional human rights questions on topics such as passport retention, payment of recruitment fees and costs, worker accommodation and grievance mechanisms to help us evaluate modern slavery risks.</p>
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 – this may include concerns or allegations around human rights violations, such as those related to human trafficking, forced labour, or child labour.

Our risk and impact assessments

We have conducted several country-level impact assessments, and broader risk assessments, to better understand how human rights risks materialise in our hotels and supply chain. In line with the UN Guiding Principles on Business and Human Rights, we seek to ensure that our risk and impact assessments include meaningful consultation with potentially affected groups and other relevant stakeholders.

2018: With the support of external advisors, we undertook our first global human rights risk assessment across IHG’s operations. This covered our supply chain, our hotels and corporate offices, which included a gap analysis of existing policies and processes and resulted in the identification of IHG’s salient human rights risks. [\(MSS 2019, page 08\)](#)

2020: We conducted a labour rights impact assessment in Oman focused on migrant worker risks. With the support of external advisors, the assessment included external stakeholder engagement and interviews with colleagues across all seven IHG hotels in the country. [\(2020 MSS, page 12\)](#)

2021: Six managed IHG hotels from across Oman, Qatar, Kuwait, and the United Arab Emirates took part in a project, led by the International Organization for Migration (IOM), to map the migration process of Filipino workers working in the Gulf Cooperation Council countries. This involved hotels completing a self-assessment and interviews with colleagues. [\(2021 MSS, page 14\)](#)

2022: We conducted a labour rights impact assessment in the United Kingdom to get a better understanding of how Brexit and Covid-19 might impact human rights risks in our hotels. With the support of external advisors, the assessment included a sample of our UK franchisees, external stakeholder engagement and interviews with colleagues. [\(2022 MSS, page 15\)](#)

2022: With the support of external advisors, we undertook an assessment to identify areas of our supply chain where human rights risks are higher and a review of the policies and processes in place to manage these risks. We also conducted a deeper dive into part of our textile supply chain, which involved engagement with key suppliers to understand their ability to manage human rights risks. [\(2022 MSS, page 16\)](#)

2023: We conducted our second global human rights risk assessment with the support of external advisors to update our understanding of IHG’s salient human rights risks and progress to date. [\(MSS 2023, page 10\)](#)



Assessing and addressing modern slavery risks

We assess the risk of modern slavery in our business and supply chain in a number of ways: through ongoing risk assessments, country-level impact assessments and reviewing grievance data, alongside external information on country and industry risk. Based on this, we continued to focus on addressing risk related to **migrant workers, human trafficking and our supply chain**.

Migrant worker risk

Responsible Labour Requirements

Due to the international nature of our business and the hospitality sector, IHG hotels often recruit talent from overseas. While we will aim to hire employees directly in our managed, owned, leased and managed lease hotels, where necessary we will work with recruitment agencies and third-party labour suppliers to support the recruitment and hiring process. We recognise that where this involves migrant workers, the risk of modern slavery and human trafficking increases, as they are vulnerable to exploitation – for example, through the payment of excessive recruitment fees leading to situations of forced labour.

To address this risk, and to respond to broader findings from previous market-level labour assessments, in 2022 we launched the Responsible Labour Requirements across our managed, owned, leased and managed lease estate. These are minimum mandatory standards to support hotels in identifying, preventing and mitigating modern slavery risks and to promote ethical labour practices. The Responsible Labour Requirements cover the following areas:

1. Responsible recruitment and employment
2. Staff accommodation
3. Third-party labour suppliers and recruitment agencies
4. Worker voice

For further information on the Responsible Labour Requirements, please refer to [IHG's 2022 Modern Slavery Statement](#).

In 2023, we continued to embed the Requirements, with hotels expected to complete a self-assessment to identify areas for improvement in their current practices. A number of resources have been developed to support hotels with

implementation of the Requirements, including guidance on how to conduct due diligence with third-party labour suppliers and recruitment agencies and how to interview migrant workers.

All hotels in scope are required to complete the self-assessment checklist annually and we will continue to incorporate findings into future updates of the Requirements. In 2023, 66% of hotels completed the self-assessment checklist and we will continue to work with the remainder to ensure fulfilment. This data will help identify where hotels may benefit from further resources and guidance. In response to feedback from across different regions regarding topics where colleagues would benefit from additional training, we are in the process of updating our responsible recruitment e-learning module.

In 2024, with support from the Human Rights team, our regional HR leads will continue to manage the implementation of the Requirements, including the identification of hotels in higher-risk markets for assessments to validate the self-assessment responses.

Case Study: Responsible Labour Requirements - Engagement with third-party labour suppliers

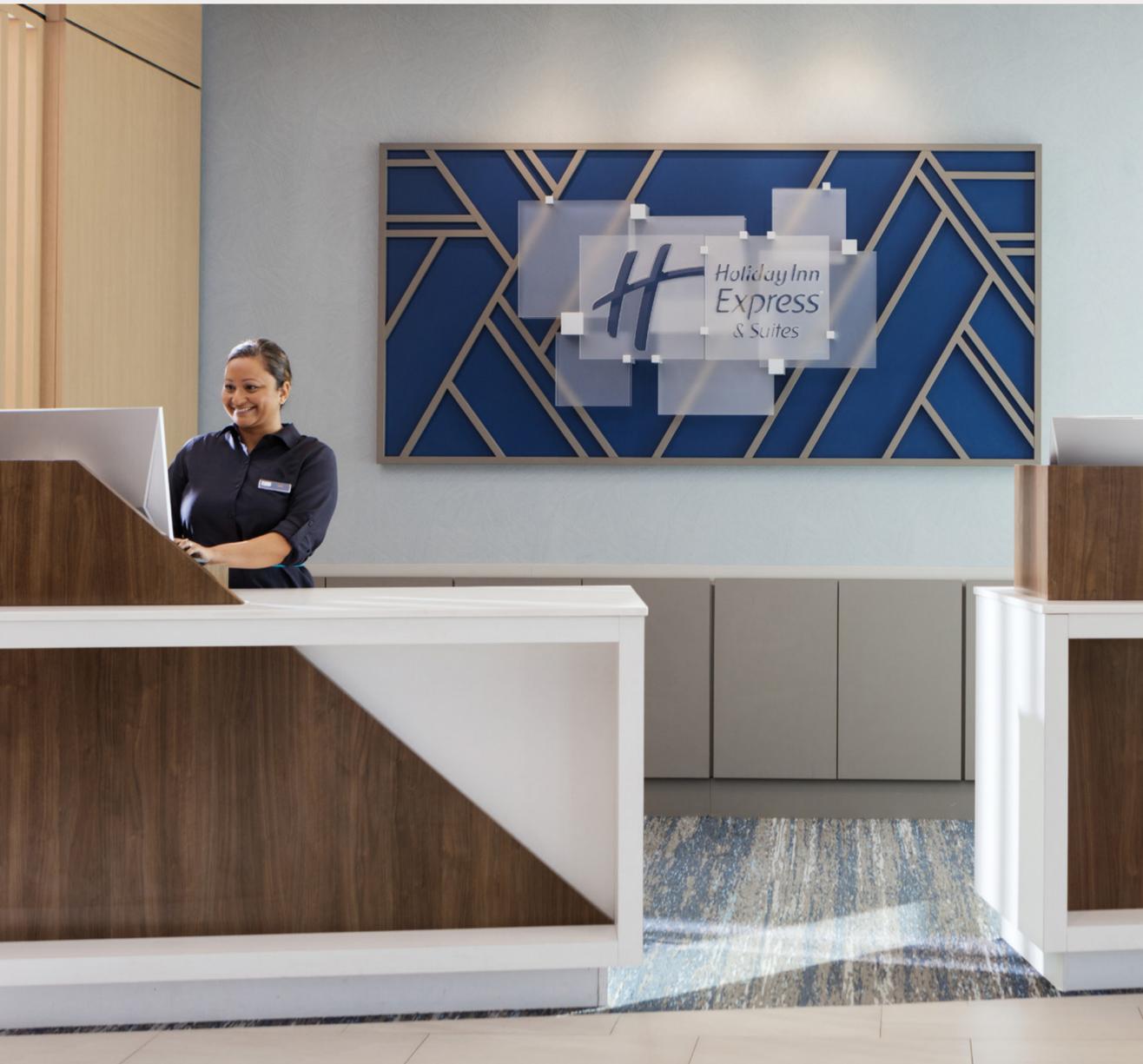
Following the completion of the Responsible Labour Requirements self-assessment checklist, a hotel in Poland identified areas of improvement in contracts with third-party labour suppliers. By adding additional clauses related to payment of a minimum wage and ensuring workers receive a written contract in a language workers understand, the hotel further strengthened their contractual requirements when working with third-party labour suppliers.

The hotel plans to verify compliance via interviews and to conduct interviews with a number of workers employed by third-party labour suppliers.

Case Study: Responsible Labour Requirements - Worker engagement

In line with the Responsible Labour Requirements, a hotel conducted check-in conversations with outsourced housekeeping colleagues and discovered that they were not being paid as per the industrial agreement. This issue was immediately raised with the supplier, who was initially reluctant to change the terms of payment. However, additional check-in conversations conducted by other IHG hotels using the same supplier and further engagement with the supplier ultimately led to improved terms of employment for the outsourced housekeeping colleagues.

Assessing and addressing modern slavery risks *cont.*



Human trafficking

Human trafficking is a global criminal business that impacts every country in the world. We recognise that hotels are particularly at risk of being used by criminals who may try to utilise hotel rooms to traffic human beings for exploitation. Our efforts to address this include training employees on how to identify and report suspected trafficking activities, developing partnerships with external stakeholders who have expertise in this area, and supporting programmes that help survivors.

IHG's Human Rights Policy condemns and prohibits trafficking and we ensure that all hotel and corporate colleagues have access to relevant training, which has been developed by PACT and Polaris.

This year, we sponsored the development of the National Survivor Study, which focuses on survivors sharing their experience of human trafficking and hopes for the future. Led by Polaris, the study highlights the barriers survivors face to rebuild their livelihoods, including the challenges in finding a job and opening a bank account, and provides insight to what businesses can do to support survivors. For further information, please see [here](#).

To support the launch of the Polaris study, IHG's CEO and several leaders in the Americas, joined survivors of human trafficking and other major businesses working to combat this issue for a panel discussion in Atlanta. To further extend our efforts to tackle human trafficking, IHG's Chief Operating Officer for the

Americas joined the American Hotel and Lodging Association's (AHLA) No Room for Trafficking Advisory Council, which brings industry leaders together to champion collective efforts to address human trafficking and support survivors. The council developed and is overseeing a survivor fund to support community-based organisations in engaging and supporting human trafficking survivors.



Assessing and addressing modern slavery risks cont.

Supply chain risk

We recognise our exposure to the risk of modern slavery increases when we engage with suppliers in certain categories or geographies. In 2022, we conducted a supply chain risk assessment that identified a number of higher-risk categories, including services such as cleaning, repair and maintenance, security and utilities, as well as products such as fresh produce, seafood, technology hardware, and cotton-based textiles. For further details on this assessment, see page 16 of our 2022 Modern Slavery Statement.

To respond to these risks, this year we developed a roadmap that sets out strategic priorities for strengthening human rights due diligence in our supply chain. This includes enhancing our risk assessment of new suppliers, strengthening risk monitoring and controls for existing suppliers, building human rights capabilities within our procurement teams and supporting capability building for suppliers.

Our first actions in implementing the roadmap have been:

- Updating our Supplier Code of Conduct to strengthen alignment with international standards and stakeholder expectations.
- Reviewing our tier one suppliers to identify those in key industries and geographies where there is a high risk of modern slavery.
- Reviewing the self-assessment questionnaire completed by new suppliers who participate in a tendering process and are covered by our central purchasing programmes alongside associated mitigation controls to identify opportunities to strengthen our approach.
- Identifying options to further integrate human rights due diligence requirements into our standard contract terms with suppliers.

- 226 new suppliers have completed the responsible due diligence questionnaire.
- 35 new suppliers completed the questions on labour practices.
- 66 suppliers shared their scorecards and participated in the EcoVadis assessment (see below).

In addition, our forward-looking plans will focus on the multi-regional introduction of integrated procure-to-pay systems in managed hotels, allowing for an additional opportunity to enhance visibility and oversight of sourcing activities at hotel level.

EcoVadis and HARP (Hospitality Alliance for Responsible Procurement)

We partner with EcoVadis to assess strategic suppliers on environmental, social, ethical, and sustainable supply criteria. This year, we joined EcoVadis and leading global hospitality organisations as a founding member of HARP. The Alliance aims to improve supplier performance by fostering close collaboration with trading partners to build transparency and scale positive impact across the value chains. For further information, please see [here](#).

Supply Chain Risk Council

In 2023, we continued to build our supply chain risk programmes and have worked with Procurement leadership teams globally to develop risk profiles based on IHG's material supply chain risks. This has helped to identify control mechanisms and to mitigate current risks. Following a review of the objectives of our Supply Chain Risk Council in 2022, we continued regular cross-functional collaboration, reviewing IHG's profile of supply chain risks and corresponding methodology, and identifying emerging risks.

Training and awareness

- 2023 Key activities**
- Commenced the development of our Responsible Labour Requirement e-learning.
 - Participated in a workshop for legal colleagues on Business and Human Rights hosted by Business for Social Responsibility (BSR).
 - Continued to drive completion of our Preventing Human Trafficking training for frontline hotel colleagues.
-
- 2024 Priorities**
- Continue to strengthen training approach on human rights by developing targeted training and resources for key stakeholders across the business.

It is crucial that our colleagues, especially those working in hotels and with suppliers, are equipped with the right skills on how to spot human rights-related risks, including modern slavery, and to report concerns.

Training Overview

Training	Description	Format	Audience	Completions
Code of conduct	<p>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 for corporate office, guest contact centre, and senior managed hotel colleagues includes specific content on human rights, including modern slavery.</p> <p>Our Code of Conduct and policies encourage employees to speak openly and raise concerns about possible breaches of our Code of Conduct, policies, or the law. We do not tolerate retaliation against anyone who reports or speaks openly about suspected misconduct, even if the concern is not substantiated.</p>	E-learning supported by classroom training resources available in multiple languages	Mandatory for all colleagues in corporate offices, guest contact centres and for certain colleagues in managed, owned, leased and managed lease hotels.	46,931
Preventing Human Trafficking	The Preventing Human Trafficking Training is developed by PACT USA and Polaris. It is designed to support hotel colleagues in identifying signs of trafficking and explain how to report suspected human trafficking.	E-learning	Available to all colleagues	68,717
Responsible Recruitment	The Responsible Recruitment Training developed by the SHA provides colleagues responsible for and involved in hiring and recruitment with information on responsible recruitment practices. In 2023, we began the development of a new e-learning module to replace the current Responsible Recruitment Training, with content aligned to IHG's Responsible Labour Requirements.	E-learning	Recommended to colleagues responsible for or involved in hiring and recruitment.	4,690

Training and awareness cont.

Events

Ahead of the 2024 Super Bowl in Las Vegas, IHG once again partnered with It's a Penalty leading up to and during the event to raise awareness and help prevent human trafficking in the city through local activities. More than 20 IHG hotels in the Las Vegas area will receive awareness kits that contain campaign resources about recognising and reporting instances of human trafficking. The campaign material will be distributed to hotel teams and guests to raise awareness of human trafficking, with training on how best to use the resources provided to hotel teams.

Working together

We strongly believe that industry and cross-industry collaboration 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. We continue to expand our partnerships and stakeholder engagement. In 2023, we worked with the following organisations:

POLARIS

- Continued our partnership with Polaris to further strengthen IHG's efforts against trafficking and support of survivors.
- Sponsored Polaris' National Survivor Study.

PACT (previously ECPAT)

- Continued our partnership with PACT to further strengthen IHG's efforts against trafficking.
- Participated in PACT's webinar on 'Sharing best practices and guidance on making the industry sustainable by implementing the six criteria of The Code'.
- Senior advisor of PACT joined IHG's Anti Human Trafficking steering committee to provide subject matter expertise in support of our ongoing work on this area.

Global Compact Network UK

- Joined the UNGC UK Modern Slavery Working Group, including participating in the annual peer review of Modern Slavery Statements.

BSR

Human Rights Working Group

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

Sustainable Hospitality Alliance

- Continued our membership of the SHA, including participation in the Human Rights Working Group and ethical recruitment conference to collaborate with industry peers.
- Provided feedback on the human rights aspects of SHA's strategic framework.

unseen

- Joined the Unseen Business Portal to further enhance our understanding of modern slavery risks and trends related to the hospitality industry, including by being notified of concerns linked to our business or supply chain raised via the UK Modern Slavery & Exploitation Helpline.

IOM UN MIGRATION

- Commenced a partnership with IOM to leverage its expertise to further strengthen our approach to addressing migrant worker risks on our operations.

For further information on previous collaborations, please refer to [IHG's 2022 Modern Slavery Statement](#).



Reporting and investigating concerns

2023 Key activities

- Updated the categories for our confidential reporting hotline and introduced a human rights tagging system to enhance tracking and support for investigations and remediation.
- Initiated a review of the confidential reporting channel against the UNGPs effectiveness criteria.

2024 Priorities

- Strengthen how human rights concerns are reported, investigated and remediated.

It is important that our colleagues, including those working in franchise hotels and any person that has a relationship with IHG, such as our guests, our suppliers, and workers in our supply chain, feels comfortable reporting ethical concerns, including those related to modern slavery. To facilitate this, individuals can raise issues – anonymously if they choose to – either via phone or online through our publicly available

confidential reporting channel, which is operated by an independent third party and with a translation service for approximately 150 languages. We do not permit retaliation against colleagues making good faith reports of the IHG Code of Conduct or IHG policies. We are committed to undertaking inquiries into all reports received, which includes them being reviewed and investigated by a group of dedicated personnel. Once the investigation is completed, a feedback survey is sent out to all reporters.

IHG managed hotels and corporate offices raise awareness of the confidential reporting hotline by displaying posters in hotel staff areas in English and local languages and information about the hotline is also available on our intranet and our external website. To increase accessibility, a QR code linked to the hotline’s web page is also available.

Indicators related to IHG’s speak-up culture are measured annually via IHG’s Employee Survey completed by colleagues in managed hotels and corporate offices.

- 97% confirm that they know how to raise a concern about the workplace (corporate and managed hotel colleagues)
- 95% confirm they feel safe to speak up without fear of adverse consequences (corporate and managed hotel colleagues)

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.

This year, we updated the categories that individuals can select when using the confidential reporting hotline and introduced a human rights tagging system, to enhance tracking and support for investigations and remediation. This work has included defining the types of cases that may have a potential human rights impact, including those involving a potential indicator of forced labour such as concerns raised involving excessive overtime; identity document retention; and freedom of movement or recruitment fees. Using this new system, seven cases relating to our managed, owned, leased and managed lease hotels were identified as raising concerns containing potential indicators of modern slavery, mainly related to excessive overtime. Where cases were substantiated, remedial actions included: correctly compensating colleagues for overtime worked; improving how overtime hours are tracked; reviewing scheduling practices; training for team members and management; and ongoing monitoring of the issue to prevent recurrence.



This year, we publicly responded to the following external stakeholder queries related to migrant worker risks:

- **BHRRC** – June 2023
- **BHRRC** – July 2023
- **BHRRC** – October 2023
- **BHRRC** – November 2023



Reporting and investigating concerns cont.

Through the piloting of this new system, we have also recognised the need to provide further guidance and tools to relevant teams on how to identify and investigate the signs of forced labour and ensure that the remedy provided meets human rights standards. One area where we have started to do this in is recruitment fees and costs, where guidance has been developed to support hotels in identifying, investigating, and remediating worker payment of recruitment fees and costs.

To further strengthen our processes, we have commenced a review of our confidential reporting hotline, with the support of external advisors, in line with the UN Guiding Principle 31.

We take all allegations concerning modern slavery issues within our hotels and supply chain very seriously and encourage third parties, including media channels, civil society organisations and others, to contact us directly with any concerns, either via our confidential reporting channel or via ethicsandcompliance@ihg.com.



Case Study: Migrant worker risks

Following information provided to us by external stakeholders on concerns faced by workers at IHG hotels in the Gulf region, our investigation identified the following:

1. One instance of an IHG hotel retaining the passports of colleagues handling cash. This was not in compliance with our policy requirements and we took immediate action to ensure the passports were returned to their owners and to reiterate our requirements to the hotel leadership team to prevent recurrence.
2. A small number of IHG hotels with a “guarantor” practice in place. Where a hotel has attempted to support a colleague, at the colleague’s request, by advancing pay (e.g. because they were ineligible to borrow from a bank) or annual leave, the hotel has requested a “guarantor”. The guarantor is a co-worker, who voluntarily agrees to pay back the amount due should the colleague fail to return to the hotel. Following consultation with our external human rights stakeholders on how to address this issue without placing colleagues in situations of greater vulnerability, this practice has been prohibited. We are reviewing ways for such colleague requests to be supported without inadvertently putting other workers at risk.

Our position on these issues, as well as guidance to support hotels in conducting interviews with migrant workers to uncover such practices, continues to be communicated regularly to our managed, owned, leased and managed lease hotels.

Our effectiveness and performance indicators

IHG is committed to continuously reviewing the impact of its activities to address modern slavery. We recognise that modern slavery is a complex and hidden issue that requires proactive effort to uncover. As we continue to strengthen our due diligence activities, we will explore additional ways to assess the effectiveness of our actions.

The key measures we currently use to assess our approach include:

Relevance	Indicator	Completion
Regular targeted training ensures our colleagues are equipped with the right knowledge to identify, prevent, and mitigate modern slavery risks, especially at hotel level.	Number of colleagues completed the annual Code of Conduct training	46,931
	Number of colleagues completed the Preventing Human Trafficking training	68,717
	Number of colleagues completed the Responsible Recruitment training	4,690
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.	Number of hotels have completed the Responsible Labour Requirements self-assessment checklist	66%
	Number of new suppliers completed the Human rights due diligence questionnaire	35
Regular communication and engagement with key stakeholders enable 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 risks.	For an overview of external stakeholder queries and our public responses, please refer to page 17.	
	For further information on external disclosures, please refer to IHG's Responsible Business Report.	
We are committed to providing remedy where we have caused or contributed to an adverse human rights risk. Mechanisms such as the confidential hotline enable us to get a better understanding of risks within our business and effectiveness of our processes.	Number of issues raised that included a potential indicator of forced labour, such as concerns related to excessive overtime, retention of identity documents, freedom of movement or recruitment fees (This includes substantiated and non-substantiated issues raised via IHG's confidential reporting hotline by managed, owned, leased and managed lease hotels only in 2023.)	7
	Colleague HeartBeat – I know where to go if I have to raise a concern about the workplace (Managed, Corporate).	97%
	Colleague HeartBeat – I feel safe to speak up without fear of adverse consequences (Managed, Corporate).	95%

Appendix

List of entities

The 2023 Modern Slavery Statement covers the InterContinental Hotels and Resorts Group. The following represent the reporting entities:

- InterContinental Hotels Group PLC
- Six Continents Limited
- IHG Hotels Limited
- Russell London Hotel OpCo Limited

