



Modern Slavery Statement

2024

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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 2024 and covers InterContinental Hotel Group PLC and its group companies. The reporting entities covered by this Statement are listed on page 20. 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.

In 2024, our work to address modern slavery risks focused on the following key activities:

- Strengthening how we monitor and evaluate implementation of our Responsible Labour Requirements (RLRs) by piloting a new self-assessment process and conducting on-site assessments at selected hotels in the United Arab Emirates, Saudi Arabia and Kuwait.

- Launching a new e-learning module to help ensure colleagues involved in the recruitment and management of migrant workers know how to identify and address key human rights risks.
- Completing a review of our confidential reporting channel to improve its effectiveness in dealing with concerns related to human rights and modern slavery risks.
- Publishing new guidelines for hotels on how to investigate and remediate worker-paid recruitment fees and costs.
- Continuing to strengthen supply chain human rights due diligence practices.
- Continuing to actively engage with external stakeholders such as the International Organization for Migration, Business for Social Responsibility, Polaris and PACT to deepen our understanding of modern slavery risks and trends and strengthen our approach.
- Partnering with It's a Penalty leading up to and during the 2024 Olympic Games in Paris.
- Working with Polaris to map the location of our US hotels against areas where a greater level of human trafficking activity has been reported via the national trafficking helpline.

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 14th February 2025.



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 **6,600** hotels operating in over 100 countries.

AMERICAS

Regional Office, Atlanta, United States (US)

HOTELS 4,491

EUROPE, MIDDLE EAST, ASIA & AFRICA (EMEA)

Global Headquarters, Windsor, United Kingdom (UK)

HOTELS 1,349

GREATER CHINA

Regional Office, Shanghai, PR China

HOTELS 789

	Global
EMPLOYEES*	7,387
EMPLOYEES SYSTEM FUND, GMs AND HOTEL EMPLOYEES**	20,752

*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 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 pool and spa, 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. In 2024, we entered a long-term agreement with NOVUM – one of Germany’s largest private hotel operators, further expanding our presence across Europe.

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	No. of hotels	Employees
Corporate	IHG	N/A	Employed by IHG
Franchise (includes exclusive partner hotels)	Third-party	5,596	Employed by third-party owner
Managed	Third-party	1,017	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	16	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 purposes of this Statement only, we refer to managed, owned, leased and managed lease hotels as “managed hotels”.

Our brands



Our supply chain

We recognise the potential social and environmental impact of our supply chain and the importance 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, including expenditures 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 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.

- Over **3,500** corporate suppliers
- Corporate suppliers based in over **90** countries

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 certain markets – allowing owners of IHG-branded hotels to purchase from suppliers under centrally negotiated contracts in these markets, leveraging IHG’s system scale. IHG provides procurement programmes in the US, Canada, Mexico, the Caribbean, Greater China, the UK and Australia, and has been expanding this support across the EMEAA region in countries such as France, Germany, the United Arab Emirates, India, New Zealand, Japan and Singapore.

- **623** centralised hotel suppliers
- Centralised hotel suppliers based in over **15** countries





Governance and policies

2024 key activities

- Updating the guidelines supporting our Human Rights Brand Standard to include information on what hotels can do to identify and address the risks faced by migrant workers.
- Updating our Responsible Labour Requirements to address learnings and external developments.
- Updating supplier contract templates to clarify human rights requirements.
- Introducing a request to agree with IHG's Supplier Code of Conduct during the onboarding of managed hotels' own locally appointed new suppliers in key European markets.

2025 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 – including those related to modern slavery – to life across the business.

Policies and standards

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	<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	<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.The supporting guidelines for the Human Rights Brand Standard were updated in 2024 to include information on what hotels can do to identify and address the risks faced by migrant workers, including the importance of worker interviews to identify issues and making the human rights policy available in languages easily understood by workers.	<ul style="list-style-type: none">All IHG managed 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.
Responsible Labour Requirements (RLRs)	<ul style="list-style-type: none">Set out minimum mandatory requirements for identifying, addressing, and preventing human rights risks faced by migrant workers during recruitment and employment. The RLRs cover the following areas:<ol style="list-style-type: none">Recruitment and EmploymentStaff AccommodationThird-Party Labour Suppliers and Recruitment AgenciesWorker Voice	<ul style="list-style-type: none">Colleagues working in our managed hotels.	<ul style="list-style-type: none">Address key human rights risks that can lead to situations of forced labour such as passport retention, worker paid recruitment fees and costs and deceptive recruitment.	<ul style="list-style-type: none">Communicated via key internal communication channels including our intranet.Resources to support hotels in implementing the RLRs such as guidance on worker interviews, due diligence checklist for third-party labour suppliers and recruitment agencies, and remediation guidelines for recruitment fees and costs are available via the internal Responsible Business Portal.

Policy	Description	Applies to	Reference to Modern Slavery	Communication and Engagement
Supplier Code of Conduct (Supplier Code)	<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, working conditions, grievance mechanisms and reporting concerns.	<ul style="list-style-type: none">Communicated internally via the Responsible Business Portal and externally via IHG’s PLC website.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

2024 key activities

- Continuing to embed our RLR self-assessment process.
- Strengthening how we monitor and evaluate implementation of our RLRs by piloting the integration of the hotel self-assessment process into an established internal digital platform and conducting on-site assessments at selected hotels in the United Arab Emirates, Saudi Arabia and Kuwait.
- Initiated a review of our corporate offices against the RLRs.
- Publishing new guidelines for hotels on how to investigate and remediate worker-paid recruitment fees and costs.
- Revising and integrating the environmental and human rights due diligence questionnaire into a single digital Sustainability Scorecard making it easier to review supplier records and risks.
- Engaging with a third-party provider to help establish our approach to supplier audits focusing on responsible business.
- Continuing to explore ways to map the supply chains of selected higher risk commodities with a small number of suppliers.
- Updating supplier contract templates to clarify human rights requirements.
- Launching updated Responsible Sourcing Guidance for our suppliers and wider Global Procurement function.

2025 priorities

- Rollout our updated process for capturing data from the hotel self-assessment process for the RLRs to all regions and corporate offices.
- Identify further ways to strengthen how we monitor and evaluate implementation of the RLRs, including ongoing on-site assessments and exploring the use of worker voice tools.
- Address findings from the 2024 on-site assessments.
- Continue to strengthen supply chain human rights due diligence.
- Continue to develop the supplier audit programme focusing on responsible business criteria.

Our previous risk and impact assessments

- **2018**
Conducted first global human rights risk assessment across IHG's operations, including our hotels, corporate offices and supply chain.
- **2020**
Conducted 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 the labour migration process mapping exercise led by the IOM.
- **2022**
Conducted a labour rights impact assessment in the United Kingdom to get better understanding how Brexit and Covid-19 might impact human rights risks in our hotels.
- **2022**
Conducted a supply chain risk 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.

For information on our salient human right risks and our previous risk and impact assessments, please refer to IHG's 2023 Modern Slavery Statement pages 10–11, available [here](#).

Due diligence, risk assessment and management cont.

Due diligence processes for assessing and addressing modern slavery risks

We assess the risk of modern slavery in our business and supply chain in a number of ways, including:

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

Based on this, the following areas are considered highest risk for modern slavery and where we continue to focus our efforts: **migrant workers; human trafficking in our hotel operations; and our supply chain.**

Migrant worker risk

Due to the international nature of our business and the hospitality sector, IHG hotels often recruit talent from overseas. While we will aim to recruit and hire employees directly in our managed hotels, where necessary we will work with recruitment agencies and third-party labour suppliers to support the 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 or passport retention leading to situations of forced labour.

Responsible Labour Requirements

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

- Responsible recruitment and employment
- Staff accommodation
- Third-party labour suppliers and recruitment agencies
- Worker Voice

For further information on the RLRs, please refer to pages 09 and 12 in IHG’s 2022 and 2023 Modern Slavery Statements, available [here](#).

Our Human Rights and regional HR teams continue to drive compliance with IHG’s RLRs. This year, we updated our RLRs to address learnings and feedback from engagement with our hotels and external stakeholders. These updates included adding new criteria related to age verification processes, the prohibition of guarantor practices (see case study on page 18 of IHG’s 2023 Modern Slavery Statement) and further clarifying requirements when contracting and engaging with third-party labour suppliers and recruitment agencies.

In line with the RLRs, our managed hotels are required to screen and monitor new and existing third-party labour suppliers and recruitment agencies. To support this, hotels are provided with additional resources, such as a checklist including criteria on labour sourcing practices, transparent contracting, passport retention, recruitment fees and costs, and accommodation standards.

This year we also tested the use of an internal digital compliance platform for a subset of hotel self-assessments, allowing for better collection of risk data (e.g. reliance on migrant labour, use of labour suppliers, presence of staff accommodation etc), improved tracking and escalation while ensuring a more efficient process for hotels. The pilot demonstrated improved central visibility and monitoring of completed assessments, analysis of outcomes and support for corrective actions.

132 hotels participated in the pilot and completed the self-assessment. An initial review of the data has shown that hotels reported a good understanding



of and high levels of compliance with the RLRs. To validate the self-assessment responses, and better understand how we can improve the process going forward, we also piloted peer reviews of the self-assessments with a selected number of hotels. One key improvement area that has been identified is the need to further ensure a consistent implementation of controls to mitigate the risks associated with using third parties to source labour. Follow-up with hotels to review corrective actions and improvements is underway.

Following the success of this pilot, we will transition to the digital compliance platform for annual self-assessments across all regions in 2025. The new process and functionality will improve our ability to identify risks and monitor and report on completed assessments and compliance in future years.

*Due to the changes in the way we track completion and a phased rollout across different regions, this year’s completion rate is not comparable with previous years.

Due diligence, risk assessment and management cont.

Evaluating the effectiveness of the Responsible Labour Requirements – on-site assessments 2024

To help evaluate the effectiveness of the RLRs at hotel level, and to get a better understanding of good practices and common challenges, we partnered with a specialised human rights consultancy to conduct on-site assessments at six hotels across the United Arab Emirates (UAE), Saudi Arabia and Kuwait in the fourth quarter of 2024. The selection of hotels was informed by an extensive desktop risk assessment which included a review of country risk, workforce composition, labour sourcing arrangements, self-assessment and grievance data. To ensure an adequate representation of our wide range of brands and hotels, we selected hotels of different brands and sizes for the assessment.



In line with the UN Guiding Principles on Business and Human Rights, these assessments focused on “meaningful consultation with potentially affected groups and other relevant stakeholders”. Alongside conversations with hotel leadership, the two-day assessments at each hotel included focus group interviews with diverse groups of workers, one-to-one interviews with workers and managers as well as engagement with third-party labour suppliers.

Over 300 workers (including more than 80 outsourced workers) participated in the interviews and we engaged with 12 third-party labour suppliers across the six hotels.

A visual assessment of each hotel including staff accommodation was also conducted to better understand working and living environments for workers. To further enhance the skills of the hotel HR teams and create an open environment for questions, hotel-level HR leads from the countries of participating hotels were invited to join a workshop on responsible recruitment practices.

Findings gathered during the on-site assessments have been analysed against IHG’s RLRs, international best practices and local legislative frameworks. In 2025, we will collaborate with participating hotels to address areas of improvement, share learnings with teams across other regions, and update global policies and processes in line with the findings as required.

While we consider the risk of modern slavery to be lower in our corporate offices, this year we began evaluating these sites against the RLRs to ensure a consistent approach across our corporate operations. We aim to complete a review of all corporate offices in 2025.

These efforts reflect our ongoing commitment to promote responsible labour practices and to continuously improve our standards in this area.

CASE STUDY Addressing findings of the Responsible Labour Requirements self-assessments

Where hotels are yet to fulfil certain aspects of the RLRs, they are required to make improvements over time. This year, the piloting of a digital compliance platform for selected hotels has enabled better visibility of these improvement areas, as well as closer monitoring of progress being made to address gaps. Below are examples of improvement areas identified by hotels and how they are being addressed:

Access to passports

Several hotels shared that some outsourced workers’ passports are held by third-party labour suppliers. Although passport retention was initially flagged as a non-compliance, a peer review of the self-assessment confirmed that outsourced workers in these hotels had agreed to leave their passports with their employer for safekeeping, with a process in place to document their consent and allow for the retrieval of passports in an expedient manner.

Access to grievance mechanisms

A hotel stated that while a QR code related to the various speak – up channels is available, colleagues interviewed were not fully aware of all grievance and feedback mechanisms available to them. The hotel has identified the opportunity to include this information more explicitly during the orientation period.

Third-party staff accommodation

During the self-assessment a hotel identified that their contracts with third-party labour suppliers do not include sufficient requirements in relation to staff accommodation. The hotel is now updating the relevant contracts to ensure alignment with the staff accommodation standards set out in the Responsible Labour Requirements.

Due diligence, risk assessment and management 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.

IHG’s Human Rights Policy condemns and prohibits trafficking and our efforts to address it include ensuring that all hotel and corporate colleagues have access to training 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.



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

- We partnered with It’s a Penalty leading up to and during the 2024 Summer Olympic Games in Paris and the Super Bowl LVIII in Las Vegas to help prevent human trafficking in the cities through local awareness raising activities, including providing our hotels with enhanced resources and reporting tools such as posters and materials on recognising and reporting instances of human trafficking.
 - In France, approximately 70 IHG hotels were engaged in the awareness campaign, which was also shared with corporate colleagues across IHG’s Windsor, Branston, Frankfurt and Paris offices.
 - In an It’s a Penalty post-campaign survey, 83% of respondents indicated increased awareness of human trafficking and exploitation and 82% reported increased knowledge of how to find help and report suspected cases.
 - In Las Vegas, approximately 25 IHG hotels across the metro area were engaged and received campaign awareness kits. The overall It’s a Penalty campaign impact publication reported 15 children identified as missing being recovered and 13 juvenile victims of sex trafficking being recovered by the Las Vegas Metropolitan Police Department. An additional 26 arrests were made for luring a child or soliciting a minor online.
 - We continue to work with It’s a Penalty for the 2025 Superbowl in New Orleans, including virtual anti-human trafficking training for hotel colleagues.
- In the US, we partnered with Wellspring Living to support their Women’s Academy, a programme that helps survivors of human trafficking acquire employment skills. IHG hosted one cohort of participants for an IHG Discovery Day at the corporate offices in Atlanta, to help resume building and interview tactics. Additionally, we held a graduation ceremony for two cohorts of participants that had completed the program that included a 3-month apprenticeship with a corporate partner.
- We continued to support the American Hotel & Lodging Foundation’s No Room for Trafficking Survivor’s Fund, which provided grants to eight US community-based organisations that provide services and resources to help support human trafficking survivors on their path forward.
- We worked with Polaris to map the location of our US hotels against areas where human trafficking activity have been reported via the national trafficking helpline to identify hotels that might benefit from additional awareness interventions.
- During National Human Trafficking Prevention Month, we hosted an interactive exhibit from Wellspring Living. This provided a detailed, first-hand account of a day in the life of a trafficking victim through a series of journal entry-style boards with the timeline of the day.

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.

Informed by a supply chain risk assessment in 2022, higher-risk categories include products such as fresh produce, seafood, technology hardware and cotton-based textiles, as well as services related to cleaning, repair and maintenance, security, and utilities.

For further details on this assessment, see page 16 of our 2022 Modern Slavery Statement, available [here](#).

In addition to confirming acceptance of IHG’s Supplier Code of Conduct, new suppliers participating in our tendering process must 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. Those suppliers located in countries or industries that increase our exposure to human rights risks, including modern slavery, 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.

In addition, we partner with EcoVadis to assess strategic and certain high-risk suppliers on environmental, social, ethical, and sustainable supply criteria. The EcoVadis Scorecards help us to understand suppliers’ risk management maturity and ability to manage social and environmental risks, including modern slavery.

In 2024, utilising the capabilities of a new digital procurement system we revised and combined our previously separate internal environment and human rights due diligence questionnaires into a single digitally enabled Sustainability Scorecard, which allows us to keep more advanced supplier records including risk data. The combined questionnaire includes the implementation of a new weighted scorecard, which incorporates environmental and social risk factors into the supplier selection.

- **81** new suppliers completed the responsible procurement due diligence questionnaire.
- **22** new suppliers completed the additional human rights questionnaire.

This year, to further strengthen human rights due diligence practices across our supply chain, we focused on the following key actions:

- Revising and updating the human rights section of the responsible procurement due diligence questionnaire to enable better collection of supplier risk data.
- Updating our supplier contract template, including to further clarify our human rights requirements and to strengthen social and environmental assessment provisions.
- Partnering with a third-party provider to help establish our approach to supplier audits with a focus on responsible business practices. Initial actions have included an outreach to suppliers for additional information where required (for example, location of the site where goods are manufactured) to help ensure we focus further assessments on where the risks are greatest.

- Ongoing supply chain mapping with selected suppliers of higher risk commodities to further develop our understanding of risks and stakeholders in our supply chain as well as the opportunities and challenges of acquiring supporting information.
- Conducting targeted human rights learning sessions for procurement colleagues to further strengthen their capabilities in conducting human rights due diligence with suppliers.
- Expanding the scope of suppliers invited to participate in the EcoVadis assessment to include more suppliers in categories with higher human rights risk.
- Launching updated Responsible Sourcing Guidance for our suppliers and wider Global Procurement function that includes a set of relevant third-party certifications and guidelines by commodity, which are intended to support and educate our suppliers in high-risk supply chain operations.

EcoVadis and HARP (Hospitality Alliance for Responsible Procurement)

As one of the founding members of the Hospitality Alliance for Responsible Procurement, we are utilising this partnership to collectively develop and deliver learning modules to our suppliers on responsible procurement topics. In 2025, we plan to continue this work to deliver supplier-facing training focused on capability building in the context of Human Rights.

Supply Chain Risk Council

In 2024, we strengthened our supply chain risk programmes and collaborated with Procurement colleagues globally to update risk profiles based on IHG’s material supply chain risks. Our Supply Chain Risk Council continues cross- functional collaboration, meeting quarterly with senior leaders across IHG to understand enterprise supply chain risk and identify emerging risks.

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.

We also carry out country risk assessments, including reviewing potential human rights risk and providing recommendations for mitigation when entering a new country for the first time.

Training and awareness

2024 key activities

- Launching a new e-learning module on the RLRs to help ensure colleagues involved in the recruitment and management of migrant workers know how to identify and address key human rights risks.
- Conducted human rights learning sessions for colleagues working in procurement.
- Continued to drive completion of our Preventing Human Trafficking training for frontline hotel colleagues.

2025 priorities

- Continue to strengthen training approach on human rights by developing targeted training and resources for key stakeholders across the business
- Commence the development of a new Preventing Human Trafficking training in collaboration with other leading hospitality companies.



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

Training	Description	Format	Audience	Completions 2024
Code of Conduct	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. 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.	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 hotels.	40,894
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 explains how to report suspected human trafficking.	E-learning	Available to all colleagues.	54,393
Responsible Recruitment and Labour Practices at IHG	In 2024, we developed a new e-learning module to replace the current Responsible Recruitment Training. The new training, in line with IHG’s RLRs, follows a migrant worker on her journey to find work abroad. It outlines how migrant workers can be especially vulnerable to exploitation, provides practical actions and resources to promote responsible recruitment practices.	E-learning	Available to all colleagues, particularly recommended to colleagues involved in the following: <ul style="list-style-type: none">Hiring and recruiting workers especially migrant workers.Managing and engaging with recruitment agencies and third-party labour suppliers.	1,053 (since launch in October 2024)
Internal learning sessions on Human Rights in 2024	We organise internal learning sessions on human rights for colleagues across the business to increase awareness and enhance their ability to identify potential human rights risks. This year, we provided colleagues across the procurement function with an introduction to human rights, overview of expectations for businesses and how this is relevant to their respective roles in the business.	Online webinar	Available to all all procurement colleagues.	
Workshop on Worker Welfare (conducted alongside the 2024 RLR on-site assessments)	As part of the RLR on-site assessments, our external consultants conducted workshops for hotel management focusing on the importance of worker welfare, related opportunities and risks, including recommendations on how to address those. Various case studies from companies globally enabled open discussion and engagement on these topics.	Hybrid (in-person and online)	Available to management of hotels participating in on-site assessments and across the region.	

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 2024, we worked with the following organisations:



- Piloted use of the Unseen Business Portal to further enhance our understanding of modern slavery risks and trends related to the hospitality industry.
- Received feedback on our Modern Slavery Statement.



- Continued our partnership with PACT to further strengthen IHG's efforts against trafficking.
- Continued to be recognised as top member of The Code.



- 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.



- Continued our membership of the WSHA, including participation in the Human Rights Working Group and ethical recruitment conference to collaborate with industry peers.
- Co-Chair of Human Rights Working Group.



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



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



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

For further information on previous collaborations, please refer to our previous Modern Slavery Statement available [here](#).

Reporting and investigating concerns

2024 key activities

- Completed a review of our confidential reporting channel to improve its effectiveness in dealing with concerns related to human rights and modern slavery risks.
- Updated our guidelines on Identifying and Repaying Recruitment Fees and Costs.

2025 priorities

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

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 concerns being reviewed and investigated by a group of dedicated personnel. Once the investigation is completed, a feedback survey is sent out to all reporters.

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, feel 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 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 and information about the hotline is also available on our intranet and our external website and highlighted during regular internal communications. This is further supported by the RLRs, which include criteria related to worker engagement and hotline accessibility. 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 Engagement Survey completed by colleagues in managed hotels and corporate offices.

- **91%** confirm that they know how to raise a concern about the workplace (corporate and managed hotel colleagues).
- **87%** confirm they feel safe to speak up without fear of adverse consequences (corporate and managed hotel colleagues).



Reporting and investigating concerns cont.

Review of IHG's confidential reporting hotline

This year, with the support of an external consultancy specialising in human rights, we completed a review of our confidential reporting channel considering factors such as legitimacy, accessibility, predictability, equity, transparency, rights-compatibility, continuous learning and engagement. The assessment involved a review of internal documents and processes, as well as engagement with internal stakeholders who are regularly involved in managing and investigating complaints. The assessment determined that our processes are generally well aligned with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights, but also identified areas for further improvement. As a result of the assessment, we have started to take the following actions:

- Reviewing and updating our FAQ displayed on IHG's confidential hotline web page to ensure that intended users are provided with clear and relevant information on the procedure for processing and addressing complaints.
- Enhancing accessibility of the confidential hotline website and intake process by expanding its availability in an additional 13 languages.
- Continuing to review and test approaches to investigating and remediating human rights concerns.

Identifying cases with potential indicators of 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.

In 2024, we received 12 reports through our confidential reporting hotline that included potential indicators of modern slavery in our managed hotels. These were mainly related to concerns about excessive overtime and appropriate compensation for hours worked.

For cases that have been substantiated and where we either caused or contributed to an adverse impact, remedial actions included: implementing updated policies and processes, closely monitoring overtime hours and payments and regularly reviewing staffing levels, conducting random spot checks and training for leadership to prevent recurrence.

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.



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. We continue to explore additional ways to assess the effectiveness of our actions, while strengthening our due diligence activities.

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

List of entities

The 2024 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

Relevance

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

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.

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.

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.

Indicator

Number of colleagues completed the annual Code of Conduct training.

Number of colleagues completed the Preventing Human Trafficking training.

Number of colleagues completed the Responsible Labour Requirements training (launched October 2024).

Number of hotels participated in the pilot and submitted self-assessment data via IHG’s digital compliance platform.

Number of new suppliers completed the human rights due diligence questionnaire.

Number of suppliers who have shared their scorecard and participate in EcoVadis sustainability risk assessment.

We continue to engage with key investors and clients and participate in external benchmarks and ratings. For an overview of our key partnerships, please see page 17.

Number of issues raised that included a potential indicator of forced labour (including substantiated and non-substantiated issues raised by managed hotels in 2024).

- via IHG’s Confidential Reporting Hotline.

Colleague HeartBeat – I know where to go if I have to raise a concern about the workplace (managed, corporate).

Colleague HeartBeat – I feel safe to speak up without fear of adverse consequences (managed, corporate).

Completion

40,894

54,393

1,053

132

22

108

12

91%

87%