Supplier Code of Conduct

Policy statement

This code of conduct sets out the standards required from our suppliers and those within their supply chain who assist them in performing their obligations to Inntel and our clients.

Who is covered by the policy?

This policy applies to the supplier's sphere of influence, including any approved subcontractors that the supplier uses to deliver goods, services and works to us.

Responsibility for implementation of the policy

The Leadership Team have overall responsibility for the effective implementation and operation of this policy.

The Supplier Partnership Team are responsible for monitoring and reviewing the compliance of this policy and making recommendations for changes to minimise risks to our operations.

People

Inntel has a zero-tolerance approach to slavery and human trafficking and expects its suppliers and contractors to uphold the same values.

As a minimum we expect:

- Employment is freely chosen
- The right of collective bargaining
- Safe and hygienic working conditions
- No use of child labour
- Living Wages are paid
- No excessive working hours
- No discrimination
- Regular employment
- No harsh or inhumane treatment
- A full understanding of your business operations and wider supply chain
- That any potential human rights and modern slavery risks are assessed, managed, and mitigated
- Compliance with the requirements of any relevant Modern Slavery Acts (e.g. The Modern Slavery Act 2015 for England and Wales) in a suppliers operating area(s).

Sexual harassment

Inntel maintains a zero-tolerance approach to sexual harassment in all forms. We expect all suppliers, their employees and subcontractors to uphold the highest standards of respectful and professional conduct when interacting with our employees, whether on-site, off-site or during business travel.

Suppliers must:

- Ensure their staff are trained to recognise and prevent harassment.
- Take immediate corrective action if any harassment is reported or observed.

- Cooperate fully with any investigation initiated by Inntel.
- Avoid placing our employees in environments or situations where harassment risks are heightened e.g. unsupervised settings.

Any incident of harassment must be reported to The Director of Partnerships at Inntel with immediate effect. Failure to comply may result in termination of the supplier relationship and potential legal action.

Environment

Inntel are committed to promoting a broader sustainability agenda. Our impact on the environment stems largely from our office-based operations and we believe that managing the implications of our activities is an integral part of good management practice and responsible corporate governance.

We expect our suppliers to actively work towards making a positive impact on environmental factors.

As a minimum, we expect you to:

- Ensure environmental considerations are included in your operations, activities, and documentation throughout the lifecycle of works.
- Comply with all applicable legal and statutory requirements which include but is not limited to the Environmental Protection Act 1990.
- Have in place or work toward an environmental management system that is aligned to the requirements set out in recognised standards such as ISO14001
- Assess ways to reduce the impact of climate change on your activities by implementing mitigation and/or adaptation measures
- Hold or be actively working towards a recognized industry Green Accreditation such as EcoSmart or Green Tourism.
- Accordingly, we have set targets to reduce our own carbon emissions and continue to explore opportunities for setting more ambitious ones.

Therefore, we encourage all our suppliers to:

- Commit to the Science Based Target initiatives (SBTi's)
- Implement an environmental strategy and establish relevant performance indicators and targets, including, but not limited to: a systemic waste management process tailored to waste hierarchy, prioritising waste prevention and zero waste to landfill, tracking of energy usage, using renewable sources and increasing energy efficiency where possible, the procurement and use of sustainable materials, using less packaging, re-use, recovery, and recycling of materials in a way that supports the circular economy methodology.

Ethics

At Inntel we have a zero-tolerance approach to any type of bribery, fraud, or corrupt business practices. We expect all our suppliers to conduct their business to the highest ethical standards, including complying with relevant legislation and we will not tolerate fraud, bribery, corruption and prohibited business practice

Therefore, we expect you to:

- have a programme in place to prevent bribery, fraud, or corrupt business practices
- have procedures in place in accordance with all applicable laws or regulations. This includes without limitation, the UK Bribery Act 2010, UK Criminal Finances Act 2017 (Criminal Facilitation of Tax Evasion) and any relevant legislation in your country of operation.
- have reporting channels in place so employees can raise concerns about inappropriate business practices or unethical behaviour

- have processes in place to protect employees who raise concerns which includes protecting their identity

Further information can be found in Inntel's Good Business Conduct Policy which should be read and understood in conjunction with this Supplier Code of Conduct.

Entertainment, hospitality, gifts, and cash rewards

We require you to help enforce our stance on business rewards, such as gifts, meals, hospitality, and entertainment.

Any financial inducements that are accepted from suppliers (gifts, vouchers, flowers, wine, chocolates etc) are awarded to Inntel and not to any individual employee. All rewards are recorded, in accordance with Inntel Anti-Bribery Policy and are equally divided between all employees in the Company, as appropriate, or donated to our local charities.

Further information on our expectations can be found in Inntel's Anti Bribery and Anti-Fraud Policy.

Health and safety

We expect our suppliers to uphold the highest standards of health and safety at their premises. Suppliers are required to implement and maintain effective health and safety management systems, adhere to all applicable laws and regulations, and ensure a safe environment. This includes but is not limited to:

- Conducting regular risk assessments to identify and mitigate hazards.
- Providing necessary training for all employees
- Ensuring that all areas and equipment are well maintained and safe to use.
- Promoting a culture of safety encourages reporting of unsafe conditions and practices without fear of reprisal.

Proprietary information

As a supplier, you have an important role in helping sustain confidence in our organisation through maintaining confidentiality. Any information (including commercial and technical information) you receive as our supplier must be kept confidential and never used for personal gain. We expect you to safeguard any client and employee information and communications, protecting such information as required under your contracts with us and this Code of Conduct.

Encouragement

- We ask all suppliers to adhere to our Supplier Code of Conduct and will support them with compliance where reasonably practical to do so.

Training and awareness

- Inntel will ensure that all employees are aware that we have a Supplier Code of Conduct.
- Inntel will ensure that all suppliers have access to this code of conduct and receive regular updates to any changes in this code.

Continuous improvement

- Inntel will annually review our Supplier Code of Conduct and make changes where possible.

Compliance and reporting

- Inntel will monitor suppliers on a regular basis to ensure adherence to this policy.
- Any supplier deemed to not be complaint with the Supplier Code of Conduct risks being removed from Inntel's supplier listing, and potentially being reported to the relevant authorities should non-compliance be deemed significant enough that there has been a breach or potential breach of any legislation.

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