



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 Intel and our clients.

1. 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.

2. The scope of the policy

All suppliers are expected to comply with applicable laws and adhere to the principles set out in this Code of Conduct.

3. 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.

Section One – People

Intel 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).

Section Two – Environment

Intel 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.



Supplier Code of Conduct

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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 includes but is not limited to 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.

Section Three – Ethics

At Inntel we have a zero-tolerance approach to any type of bribery, fraud, or corrupt business practices. We expect all of our suppliers to conduct their business to the highest ethical standards, including comply 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 legislations 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.

Proprietary Info

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 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 employees are aware of our Anti-Bribery policy, why it's necessary and what steps to follow should they be offered anything by suppliers.

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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