

## **Slavery and Human Trafficking Statement – 2021**

### **Introduction**

This modern slavery and transparency statement is published by Diamond Resorts (Holdings) Limited and Diamond Resorts (Europe) Limited (together “**Diamond**”), in accordance with the UK Modern Slavery Act 2015 (the “**Act**”) for the period ending 31 December 2020.

Diamond has always had and maintains a zero tolerance approach to slavery and human trafficking and is committed to understanding the risks so that we can strive toward ensuring that no modern slavery exists in our business and in our supply chains. Diamond is aware of the enhanced risks of modern slavery and human trafficking occurring due to the industry in which Diamond operates and continues to act accordingly. However, Diamond does not operate resorts in countries which are deemed to be “not free” or “partially free” according to the Freedom House website, and where possible seeks to co-ordinate with local suppliers to ensure the risk of modern slavery remains minimal.

Diamond has reviewed in detail the report “Beyond Compliance in the Hotel Sector: A Review of UK Modern Slavery Act Statements” 2019 which provided a broad and comprehensive review of the hotel industry work toward complying with the modern slavery obligations. Diamond has also taken a keen interest in the UK government’s report and review of the Act. Diamond awaits, and is well prepared for, any forthcoming changes to the Act that the UK government intends on making as a result of this review.

2020 has undoubtedly been a challenging year for the tourism industry, but such challenges have not prevented Diamond continuing its high standards in ensuring slavery does not exist in any form in our business.

### **Our business**

Diamond Resorts (Holdings) Limited is the parent company of the Diamond Resorts® group of companies in Europe and Diamond Resorts (Europe) Limited is the main European operating company for the group. Diamond manages various timeshare clubs across Europe and owns/manages resorts in amazing holiday destinations across Europe.

As part of one of the world’s leading vacation ownership companies, Diamond aims to exceed expectations consistently with our high quality resorts and incomparable hospitality. Diamond is committed to conducting our business affairs fairly and in an ethical and proper manner.

There has been no significant change to our business operations in the year since publishing our previous Modern Slavery Transparency statement, save for the implications of the Coronavirus pandemic.

### **Our supply chains**

Diamond continues to operate with a network of trusted and established suppliers, which service our resorts across the UK and Europe as well as our corporate offices. Our suppliers range from providers of cleaning and laundry services through to providers of office stationary. We do also use a number of approved employment agencies for our recruitment at our resorts and occasionally for our corporate offices.

Our suppliers vary in size from sole traders through to PLCs. Inevitably the larger the supplier, the more likely it is that they will be reliant upon their own supply chain. To that extent, we will

seek to ensure that where we utilise suppliers, who are regulated by the Act, that they have appropriate modern slavery compliance in their own supply chain.

2020 has seen the introduction of a new initiative launched by Diamond to audit suppliers to ensure no modern slavery exists in their business. This is a new roll out of a project, and Diamond expects the need to iron out potential issues that may arise in the development of such a large scale project over the course of 2021. The legal team has worked with the purchasing and human resources department in the roll out of the initiative. We anticipate that by the end of 2021 and moving into 2022 this audit process will be fully operational.

Further, Diamond has conducted its first annual internal modern slavery risk assessment, which Diamond will continue to develop over the coming years.

### **Our policies**

We have updated various internal policies within Diamond to ensure our continued compliance with the Act. Diamond is also aware of the forthcoming EU directive relating to whistleblowing. Whilst Diamond already has a substantive global whistleblowing policy, a review is currently being undertaken in anticipation of that directive.

### **Our recruitment**

Diamond is aware of the importance of having an ethical recruitment policy in place to seek to prevent people exploiting or fraudulently using Diamond and the reputation of Diamond to procure recruitment fees from vulnerable individuals.

Diamond's recruitment processes in the UK are strictly managed by our dedicated HR team. This year has seen the introduction of an approved recruiter list, where agencies are only used where they can confirm they abide by the Act or are able to confirm compliance with our Labour code of conduct. The list requires that Diamond actively review each recruiter on either an annual/bi-annual basis to monitor continued compliance.

### **Our future**

The tourism industry will seek to reboot itself during the year of 2021, and it is hoped that Diamond will be a strong industry leader in that reboot. Whilst inevitably there will be significant focus on ensuring our resorts remain "Covid safe", Diamond will not let its focus and energies on modern slavery dip. Our legal team retains a dedicated function to dealing with modern slavery issues and will continue to liaise with departments across the business to ensure that existing practices continue to be adhered to and that, where appropriate and relevant to the business, new procedures will be brought in.

Diamond will continue to work on new initiatives and policies that protect our team members, our supply chain and our valued members and guests.

### **Statement approval**

This statement has been reviewed, approved and signed by our statutory director.

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Date 15 March 2021

Susan Crook

Director