

## **Slavery and Human Trafficking Statement – Account year end April 2022**

### **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 2021.

### **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.

In August 2021, following an acquisition and merger of Diamond Resorts International Inc., Diamond became a subsidiary of Hilton Grand Vacations Inc. (‘**HGV**’) (a company incorporated in Florida, United States of America) and the group is now one of the largest vacation ownership companies in the world.

Diamond manages various timeshare clubs across Europe and owns/manages resorts in amazing holiday destinations across Europe. As one of the world’s leading vacation ownership companies, Diamond constantly aims to exceed expectations with its high quality resorts and incomparable hospitality.

Diamond remains fully committed to conducting its business affairs fairly and in an ethical manner, and has implemented various policies and procedures to prevent all forms of modern slavery within its organisation and its supply chains. Previous Modern Slavery Statements detailing the steps taken are posted on this site and can be reviewed,

### **Our supply chains**

Significant steps were undertaken during the course of the period covering the last Modern Slavery Statement, to introduce supplier risk assessments to enable the business to better understand and manage its supply chains and our supplier risk audits remain an active and useful tool in combatting modern slavery.

### **Our policies**

The Coronavirus pandemic has had a significant impact on the business, for better and for worse. One impact has been the ability to allow all corporate based staff members to operate from home (a feat that previously would not have been considered possible). To operate homeworking effectively, new homeworking policies were introduced which included a requirement to conduct employee risk assessments in order to safeguard their health and safety, including the assurance that they were not falling subject to any modern slavery practices (such as excessive working hours).

Furthermore, the re-opening of our resorts has allowed the business to evaluate its best practices for tackling modern slavery compliance. Alongside the supply chain risk assessments introduced last year, the business has now taken steps to introduce on-site risk assessments which aim to prevent modern slavery issues “on the ground” should they arise, by conducting visual inspections of sites, and conducting interviews with key staff alongside random interview selections of staff members on site.

### **Our recruitment**

During the recruitment process the business always requires sight of a candidates 'right to work' documentation to ensure that they are not in any way being subjected to any oppressive practices. As a matter of note, the business never retains original "right to work" documentation and will only take copies of such documentation when a candidate is offered employment with the business.

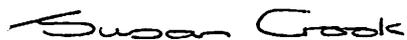
The business has also taken steps toward introducing a recruitment fraud warning on its career site to help potential recruits identify the potential signs of recruitment fraud. Recruitment fraud being the practice of rogue operators claiming to be representatives of Diamond or HGV offering fake job opportunities in exchange for money or personal data.

### **Our future**

As Diamond and HGV continue to come together as one entity over the forthcoming years, our policies and procedures regarding modern slavery will continue to develop. Processes will be merged, fine-tuned and honed to ensure they go beyond minimum expectations and seek to become best in class, as is the ethos of both Diamond and HGV.

### **Statement approval**

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



Susan Crook

Director

Date: 27 March 2022