

Slavery and Human Trafficking Statement – 2020

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 2019.

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.

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, we aim to exceed expectations consistently with our high quality resorts and incomparable hospitality. We are committed to conducting our business affairs fairly and in an ethical and proper manner.

Our supply chains

Diamond has 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 small 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.

In the event that we contract with a new supplier to provides services to Diamond we will ensure that all contracts contain appropriate modern slavery compliance clauses, even with suppliers that would not necessarily be caught by the Act. If a supplier refuses to accept these clauses, Diamond would not proceed in a relationship with the supplier.

Our policies

We have adopted and updated various internal policies within Diamond to ensure our continued compliance with the Act. In the preceding 12 months, we have introduced two new policies:

- General recruitment policy; and
- Anti-slavery and ethical recruitment policy.

We have also significantly updated our whistleblowing policy which encourages stakeholders within Diamond to report any anti-slavery or human trafficking violations without fear of

retribution or retaliation. Diamond takes all reports of slavery however so arising extremely seriously and all reports are and will be investigated fully.

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 does not require payment of fees to be considered for any role within the company and only accept applications for employment via approved employment agencies or via our own dedicated internal recruitment efforts, which are strictly managed by our Human Resources department.

Our implementation of our ethical recruitment policy seeks to highlight this point and provides guidance on the issue to all of Diamond's European employees.

Our future

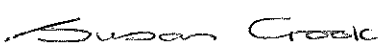
Diamond is aware of the potential changes to the Act following the public consultation on transparency in supply chains conducted in 2019. Diamond has considered the results of the consultation in detail, and now awaits official guidance and updated legislation from the UK government.

In 2020, we will look to roll out interactive training programmes across Europe to ensure our continued compliance with the Act and we shall continue to identify ways in which Diamond can meet the challenges posed by human trafficking and modern slavery in the hotel and tourism industry.

Our policies will be kept under continual review and updated as and when is necessary.

Statement approval

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

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Susan Crook - European General Counsel
Vice President of Legal Services