

## Modern Slavery Statement

This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015 and Australian Commonwealth Modern Slavery Act 2018. This statement outlines Travel + Leisure Co.'s commitment, actions and activities regarding efforts to combat slavery and human trafficking within our business and value chain during the period of May 31, 2020 to June 4, 2021.

### **About Travel + Leisure Co.**

Travel + Leisure Co. is the world's leading membership and leisure travel company, with nearly 20 travel brands across its resort, travel club, and lifestyle portfolio. The company provides outstanding vacation experiences and travel inspiration to millions of owners, members, and subscribers every year through its products and services: Wyndham Destinations, the largest vacation ownership company with more than 245 vacation club resort locations across the globe; Panorama, the world's foremost membership travel business that includes the largest vacation exchange company, industry-leading travel technology, and subscription travel brands; and Travel + Leisure Group, featuring top online and print travel content, online booking platforms and travel clubs, and branded consumer products. At Travel + Leisure Co., our global team of associates brings hospitality to millions, turning vacation inspiration into exceptional travel experiences. We put the world on vacation.

### **Statement**

We have publicly acknowledged our commitment to operate our business in a manner consistent with the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization's Fundamental Conventions, and is best reflected in the company's Human Rights Policy Statement. This policy statement is reflective of the company's values, culture of ethical business practices, and commitment to social responsibility.

### **Policies**

To affirm our commitment, we have policies in place to help eliminate the potential use of Travel + Leisure Co. properties for slavery and human trafficking. Aligned with our global commitment to ethics and compliance, these practices are enforced through the company's Code of Conduct, which outlines our expectation of all associates and serves to foster a culture of compliance and transparency within the organization. In addition to associates, all stakeholders within the our value chain, such as suppliers and resort developers, are also required to operate in a manner that is compliant with all applicable laws and are subject to certain operating standards. Our Code of Conduct includes topics that range from equal and fair treatment, health and safety, conflicts of interest, protecting our information, anticorruption, and financial and reporting integrity.

In addition, our Human Rights Policy Statement is a reflection of our commitment to protect human rights within our sphere of influence. We are committed to conducting business with honesty and integrity, and in full compliance with all applicable laws. We have established clear ethical standards and guidelines for how we do business and established accountability.

### **Risk Management & Governance**

We strive to create open channels of communication throughout the organization to ensure all associates feel valued and respected. We ensure all associates are aware of the Human Rights Policy through training and communication throughout the year.

We maintain a strict anti-retaliation policy to encourage the reporting of any concerns to the organization without fear of retaliation. Options for communicating concerns include reporting to directly to an associate's manager, Human Resources Business Partner, the Ethics and Compliance team, or through Wyntegrity. Wyntegrity is our internal reporting hotline, which is managed by a third-party to ensure anonymity and availability 24-hours-a-day, 7-days-a-week.

Data analyses are performed on internal and external entities to measure the effectiveness of our Ethics & Compliance program and to identify ways to prevent, detect, and measure future misconduct. We have a consistent progressive disciplinary process to address substantiated allegations.

### **Supply Chain**

We expect our suppliers to conduct business with ethical standards consistent with our own, which includes treating each other fairly, with dignity, and with respect; avoiding actual and potential conflicts of interest; and safeguarding all Travel + Leisure Co. assets.

These standards and expectations are set forth in the Travel + Leisure Co. Supplier Code of Conduct, for

which all suppliers must acknowledge and comply. In our Supplier Code of Conduct, we strictly prohibit the use of child labor, and expect that our suppliers provide transparency in their business and approach to tackling modern slavery throughout their own supply chain, consistent with disclosure obligations under the UK Modern Slavery Act 2015 and Australian Commonwealth Modern Slavery Act 2018.

We also screen and monitor suppliers, members, owners, affiliates, and other third parties we conduct business with as part of our robust Third Party Due Diligence Program. Third parties are researched thoroughly and screened through the Office of Foreign Assets Control (OFAC) database to identify sanctions and other illegal activity related to targeted foreign countries, narcotics trafficking, sex offences, terrorism, cybercrimes, or other business crimes such as fraud and bribery. Additionally, suppliers may be required to take Anti-Corruption Awareness Training.

#### **Training and Awareness**

We are committed to providing all associates globally with the proper tools and resources to identify, prevent and mitigate relevant slavery and human trafficking incidents. We recognize the importance for all associates to understand the impacts and to be aware of all resources available. All associates are required to complete training of our Code of Conduct, which reinforces the organization's commitment to operate business with honesty and integrity. Compliance with this training requirement is monitored. In addition, in 2019, we launched Human Trafficking Awareness and Prevention training to all resort leadership throughout the organization. In partnership with Human Resources, the Ethics & Compliance team offers a variety of training opportunities to associates with a clear and concise curriculum. The formalized training program is offered in a variety of formats ranging from online and instructor-led courses and address all business needs and audiences across the organization. In 2019, we launched a new and improved training for associates focused on our Code of Conduct, Anti-Corruption, Information and Privacy Management, and Human Rights. As part of our ongoing Business Continuity Plan Emergency Preparedness Guide and Training, we include checklists, escalation protocols, and information to assist our property management staff in identifying the key warning signs of human trafficking and guidance on how to report cases.

#### **Community and Stakeholder Partnerships**

We condemn all forms of exploitation of children, including but not limited to: child labor and sexual exploitation. The company is supportive of laws duly enacted to prevent and punish the crime of sexual exploitation, and cooperates with law enforcement authorities to address such instances. The travel and tourism industry has an opportunity to play an important role in preventing the exploitation of children. We have taken a stand against the commercial sexual exploitation of children, by partnering with ECPAT International and signing The Tourism Child-Protection Code of Conduct (The Code). The Code is an industry-driven responsible-tourism initiative in collaboration with ECPAT, founded by UNICEF International, and supported by The World Tourism Organization (UNWTO), which is specifically focused on protecting children from sexual exploitation in the travel and tourism industry. As a subscriber to The Code, we commit to enhancing all policies condemning child trafficking, and providing training to associates globally. The training includes the proper tools and resources for identifying and reporting potential trafficking activities at any of the company's locations globally.

#### **Key Performance Indicators**

We will continue to track a number of key performance indicators relative to our initiatives to combat slavery and human trafficking. Program results are published annually in the Social Responsibility Report. This includes a description of our policies, education, and training, as well as guest and stakeholder engagement. We also track key metrics relative to slavery- and human-trafficking-prevention that include training, education, assessments, and reporting.

Looking forward, we plan to maintain our commitment to combatting slavery and human trafficking by continuing to develop resources, refine our goals, and educate our associates and stakeholders across relevant areas of our business and supply chain.

We look forward to continuing this process and our work within the industry to make an impact within our sphere of influence.

This statement has been reviewed and approved by the Travel + Leisure Co. Board of Directors on June 8, 2021.



Michael D. Brown  
President and Chief Executive Officer