



## 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 Wyndham Destinations' 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 May 31, 2021.

### About Wyndham Destinations

We believe in putting the world on vacation. Our global presence in approximately 110 countries at more than 220 vacation club resorts and 4,300+ affiliated exchange properties, distinguishes Wyndham Destinations (NYSE:WYND) as the world's largest vacation ownership and exchange company. We offer a contemporary take on the timeshare model – including vacation club brands [Club Wyndham®](#), [WorldMark® by Wyndham](#), and [Margaritaville Vacation Club® by Wyndham](#) – 4,300+ affiliated resorts through [RCI](#), the world's leader in vacation exchange with a portfolio of brands that includes Love Home Swap, one of the world's largest home exchange programs, DAE, a direct-to-member exchange company, and @Work International, a leading provider of property management systems. Each year our team of more than 23,000 associates delivers great vacations to millions of families as they make memories of a lifetime.

### 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 Wyndham Destinations 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 your 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 respect; avoiding actual and potential conflicts of interest; and safeguarding all Wyndham Destinations assets.

These standards and expectations are set forth in the Wyndham Destinations 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 suppliers through the Office of Foreign Assets Control (OFAC) database, which screens for any individual or company that might have sanctions against them for being tied to a targeting foreign country, narcotics traffickers, or engaged in activities related to proliferation of weapons of mass destruction. Additionally, suppliers are 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 on the 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 training to all resort leadership throughout the organization. In partnership with Human Resources, the Ethics and 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 on-line 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 on the Code of Conduct, Anti-Corruption, Information and Privacy Management, and Human Rights training. 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 Tourism Child-Protection Code of Conduct 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 its 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 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 employees and stakeholders across relevant areas of our business and supply chain.

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

This statement has been reviewed and approved by the Wyndham Destinations Board of Directors on May 29, 2020.



Michael D. Brown  
President and Chief Executive Officer, Wyndham Destinations