



Modern Slavery Transparency Statement

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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 for the period ending 31 December 2018.

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.

We require the highest possible standards of ethical and business conduct of our team members in the performance of their corporate responsibilities and all of our staff are obliged to undertake yearly training in ethical business practices.

We condemn modern slavery and human trafficking in all of its forms and are committed to working to ensure that no such activity takes place within our sphere of influence.

We engage most team members directly and ensure that the appropriate checks are carried out on our directly employed staff in accordance with applicable laws in the countries in which we operate. Where we use agency workers, relationships are managed by our HR teams who are supported by our own legal function as well as external specialists.

At our resorts, we enjoy many close relationships with our smaller suppliers and providers of services who are often personally known to our resort managers and local to the resort. Often, such relationships have endured for many years. Larger projects are sourced centrally using the expertise of our purchasing and legal teams.

In the last financial year, we included appropriate contractual terms in our supply contracts to facilitate greater transparency and to mandate ethical behaviours in their working and sourcing practices. We also developed and introduced due diligence measures relating to ethical sourcing as part of the procurement process for certain spend categories.

We look forward to developing policy further in this area, to working more closely with our key suppliers and to training our team members to raise awareness of potential issues within our business and industry.

Signed:  Dated: 4 April 2019

SUSAN CROOK

Vice President of Legal Services and European General Counsel

Approved by the Board of Directors of Diamond Resorts (Holdings) Limited and Diamond Resorts (Europe) Limited on 4 April 2019

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