



# **MODERN SLAVERY STATEMENT**

**TRAVEL+**  
**LEISURE**

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## Acknowledgement of Country

Travel and Leisure South Pacific acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land on which we live.

We pay our respects to Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples.







## A MESSAGE FROM THE PRESIDENT & MANAGING DIRECTOR

Modern slavery is a grim form of exploitation which occurs in every country worldwide. It includes various human rights violations such as forced labour, forced marriage, human trafficking, debt bondage, slavery-like practices, and child labour. Modern slavery occurs when individuals are deprived of their freedom and the ability to choose their own work due to coercion, deception, threats, and abuses of power.

Travel and Leisure South Pacific Pty Ltd, a subsidiary of our global parent Travel + Leisure Co., is committed to delivering strong environmental, social, and governance (ESG) performance as a responsible business. A key component of our approach is our commitment to respecting human rights and working to identify and eliminate modern slavery.

Our goal is to take a leading role in addressing significant social issues and to conduct our business responsibly, ensuring the well-being of the people, communities, and environments we interact with. Central to our values is the firm belief that modern slavery, including human trafficking, is unacceptable.

As a prominent global hospitality company in the Asia Pacific region, we recognise the importance of proactive measures in combating modern slavery to prevent its occurrence. We are dedicated to identifying and preventing risks of modern slavery in our clubs, hotels, resorts, workplaces, and supply chains.

Our commitment to continually refining and reflecting on our methods and frameworks ensures that our processes remain effective in preventing and addressing exploitation.

### **BARRY ROBINSON**

President and Managing Director,  
International Operations  
Travel + Leisure Co.

# 1

## THE REPORTING ENTITY - TRAVEL AND LEISURE SOUTH PACIFIC PTY LTD

Travel and Leisure South Pacific Pty Ltd (ACN 673 494 981) is a private company incorporated in Australia. The company's registered office is at 1 Corporate Court, Bundall, QLD, Australia. This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) ("Act") and is a joint statement by Travel and Leisure South Pacific and its Australian subsidiary reporting entities listed below (collectively referred to in this Statement as "Travel and Leisure"), to address modern slavery risks in our Australian business operations and our supply chain for the financial year ending 31 December 2024:

- Resort Management by Travel and Leisure Pty Ltd ACN 099 634 830
- Wyndham Vacation Clubs South Pacific Ltd ACN 090 503 923
- Finance by Travel and Leisure Pty Ltd ACN 091 790 993
- Travel Club by Travel and Leisure Pty Ltd ACN 090 106 077
- ARM South Pacific Pty Ltd ACN 009 130 161
- A.P.V.C. Ltd ACN 093 228 141
- A.P.V.C. Finance Pty Ltd ACN 098 014 996
- A.P.V.C. Holdings Pty Ltd ACN 092 447 955
- A.P.V.C. Nominees Pty Ltd ACN 092 447 94

Travel and Leisure understands its obligations to report on actions taken to address the risk of modern slavery in our supply chains and has developed a strategy for continuous improvement.

This 2024 Modern Slavery Statement articulates our position on modern slavery and our plans in the 2025 financial year to continue to understand and investigate the risk of modern slavery in our

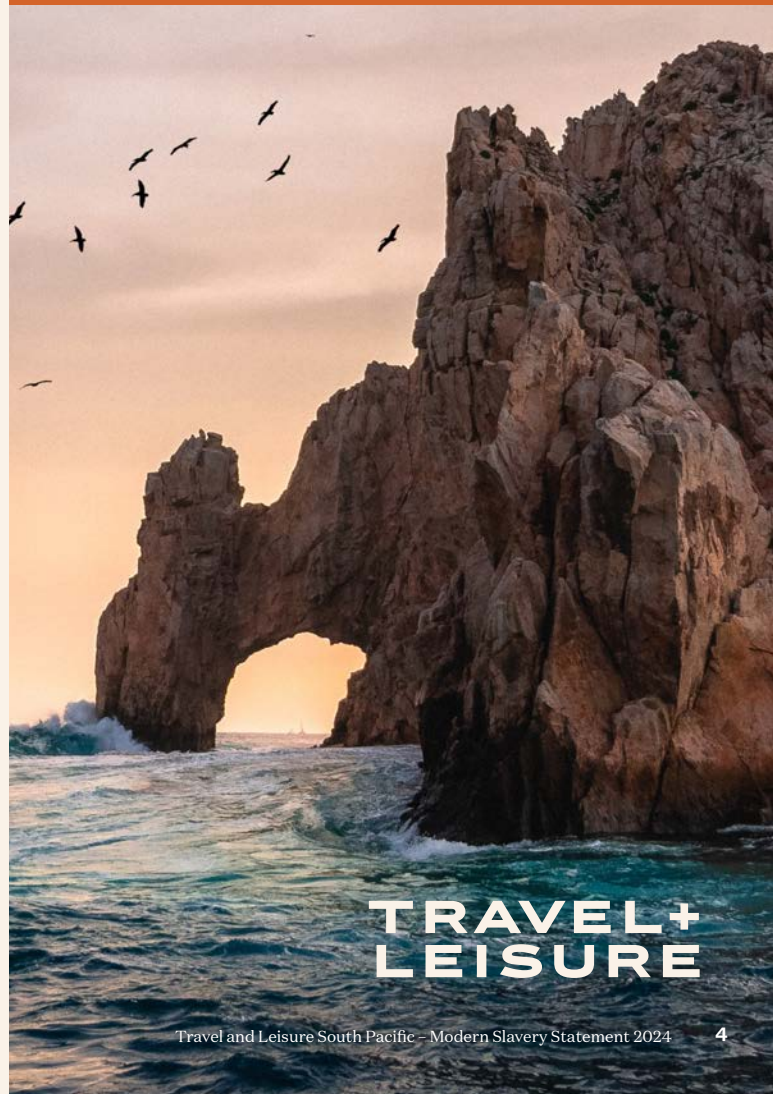
operations and supply chain.

# 2

## WHAT IS MODERN SLAVERY?

Modern slavery is a term used to cover practices such as forced labour, slavery, debt bondage, extreme forms of child labour, forced marriage, deceptive recruitment, and human trafficking. It is a human rights violation and exploitative crime that comes with devastating consequences for the health and wellbeing of its victims.

The Global Estimates of Modern Slavery indicate that there were more than 49 million people living in situations of modern slavery in 2021. Crises such as the Covid-19 pandemic, political conflict and climate change have contributed to disruption to employment and education, increasing extreme poverty and the risk of all forms of modern slavery.





# 3

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Structure

Travel and Leisure South Pacific is a limited liability company incorporated in Australia and a subsidiary of US company Travel + Leisure Co. (NYSE:TNL), a leading leisure travel company providing more than six million vacations to travellers around the world every year. Travel + Leisure Co operates a portfolio of vacation ownership, travel club and lifestyle travel brands.

Travel and Leisure South Pacific is responsible for all operations within the South Pacific including the operation of Club Wyndham and Accor Vacation Club brands, and has its corporate and registered office situated on the Gold Coast, Queensland.

The principal activities undertaken within the South Pacific (and via its service centre in the Philippines operated by related entity Travel + Leisure Global Support Services (Philippines) Inc.) are those associated with the development and operation of Club Wyndham South Pacific and Accor Vacation Club – holiday ownership clubs with nearly 90,000 member families and properties in over 90 locations within Australia and offshore.

In addition, Travel and Leisure has a long-term partnership with Wyndham Hotels & Resorts® and has acquired from hotel group, Accor SA, the license to operate the Accor Vacation Club brand across Asia Pacific, Middle East, Africa and Turkey.

### TRAVEL+LEISURE

CLUB  
WYNDHAM

WORLD  
MARK  
BY WYNDHAM

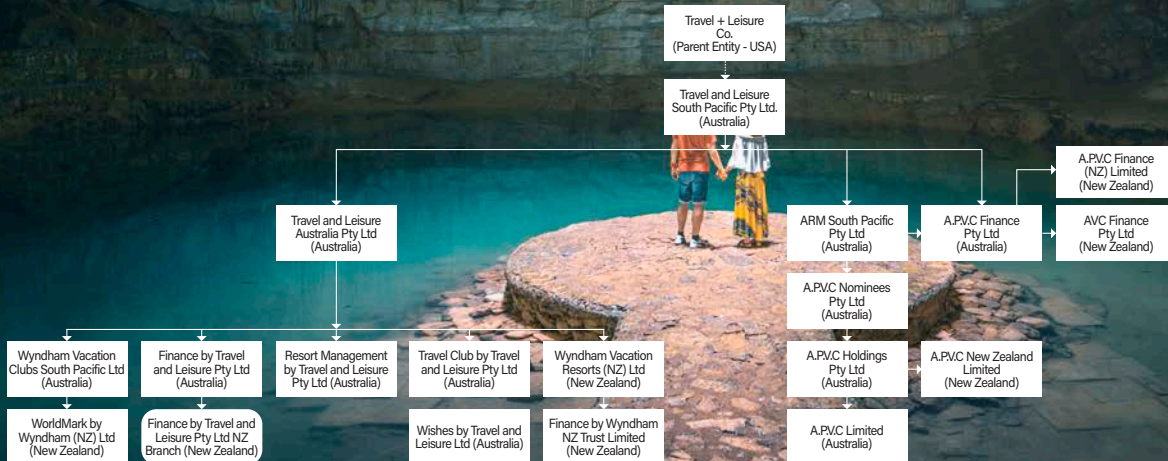
MARCARTAVILLE  
VACATION CLUB

Sports  
Illustrated  
RESORTS

ACCOR  
VACATION CLUB

RCI

### CORPORATE STRUCTURE



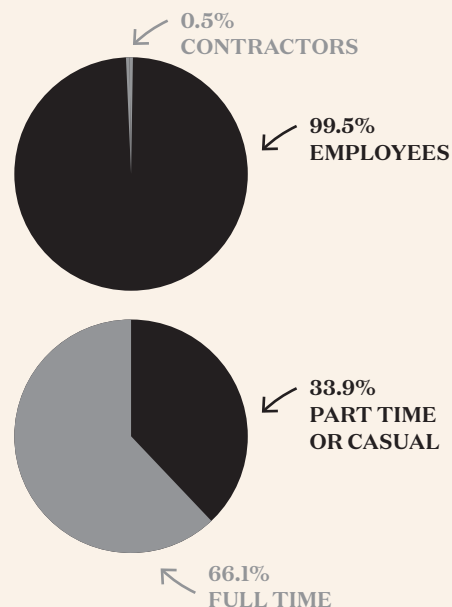
### Operations

The principal activities of Travel and Leisure within the South Pacific throughout the course of 2024 included:

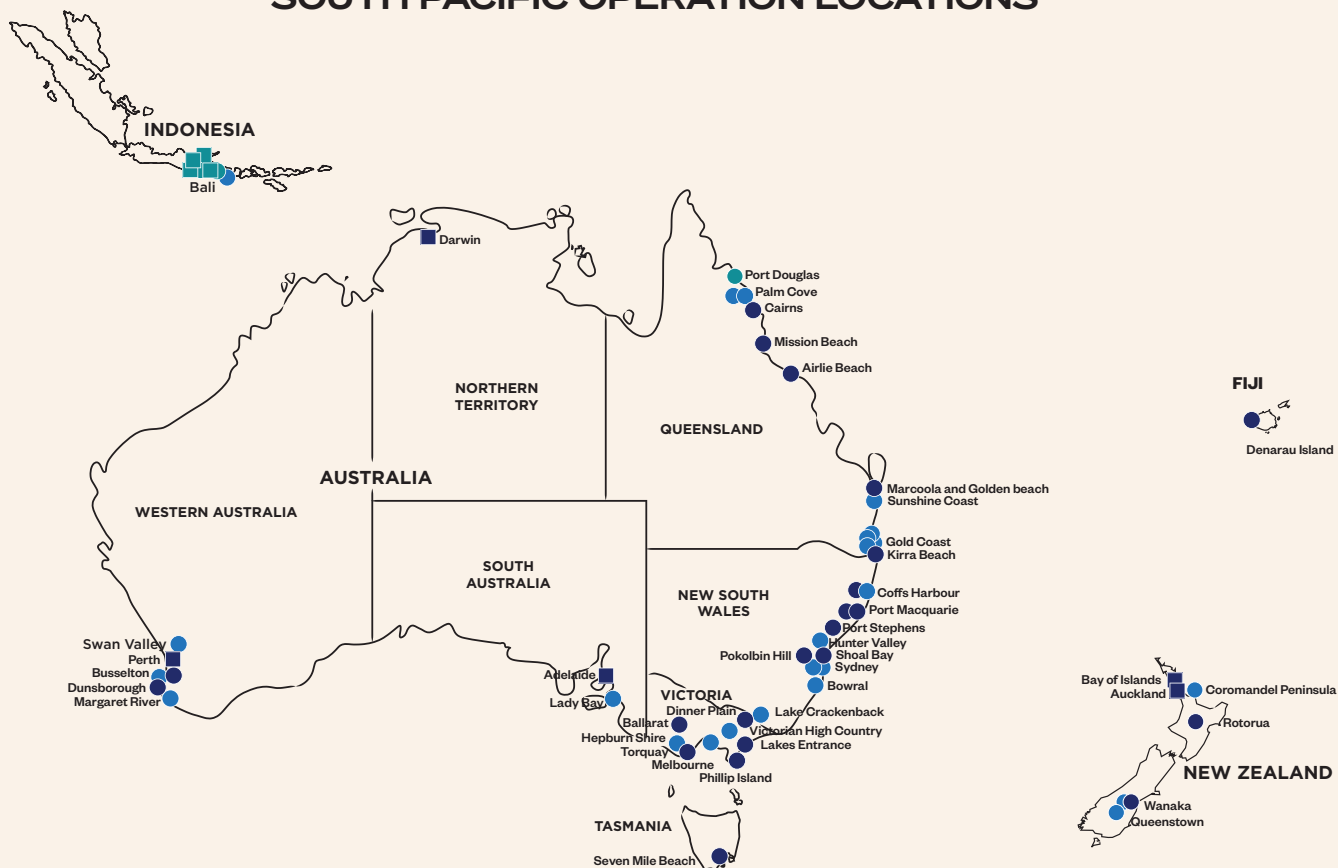
- Developer of Club Wyndham South Pacific and Accor Vacation Club (“Clubs”), the leading vacation clubs in the region. Travel and Leisure acquires resort properties to place into the Clubs free and clear of any encumbrances in exchange for the sale proceeds of all interests issued against the property
- Resort refurbishment projects throughout South Pacific for the Clubs
- Marketing and selling of interests in the Clubs pursuant to its authorisations under an Australian financial services licence
- Provision of consumer credit finance to consumers who purchase interests in the Clubs under an Australian credit licence and in compliance with responsible lending obligations
- Provision of management services to the Clubs
- Provision of travel services to Club members and guests
- Hotel and resort operations management

Travel and Leisure oversees more than 90 properties in the Asia Pacific region, some of which are mixed-use with timeshare apartments and others which are conventional hotel or resort developments. Travel and Leisure offers access to globally renowned brands; management expertise; personalised and memorable customer experiences; powerful procurement solutions; efficient revenue, sales and marketing systems; and has a strong relationship with two of the world's largest and well known hotel brands. The selection of our hotel and resort staff is a carefully considered process based upon service culture, customer-oriented attitudes and each team is guided by highly skilled leaders. Corporate oversight is provided by widely experienced hospitality professionals committed to delivering the best possible interactions with customers and outcomes for properties.

## TRAVEL AND LEISURE HAS APPROXIMATELY 1520 WORKERS WITHIN AUSTRALIA:



## SOUTH PACIFIC OPERATION LOCATIONS





# Supply Chain

Travel and Leisure's supply chains cross multiple states and borders in order to source the products and supplies required to operate the varied operations undertaken. We work with approximately 1698 direct suppliers located in Australia (98.4%), New Zealand, Philippines, Fiji, India, Netherlands, Germany and USA.

Corporate supply chains cover items such as technology, marketing, energy suppliers, travel, printing, and professional services (e.g. custodial, legal and financial services).

Procurement of goods and services at resort level covers a wide range of items including those needed to equip a property for holiday accommodation (such as furnishing, electrical equipment, lighting, crockery, wall and floor coverings) as well as day-to-day operational items such as linen, cleaning products, food and beverage items and associate uniforms.

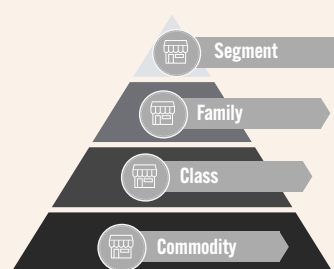
We have our own corporate procurement team supporting national and some international supply contracts. Procurement generally occurs at national

level, rather than individual resort level, given the number of properties that are managed and the opportunity for leveraging for scale.

Travel and Leisure has performed an analysis of its accounts payable data for the reporting period following the United Nations classification of products and services as follows:

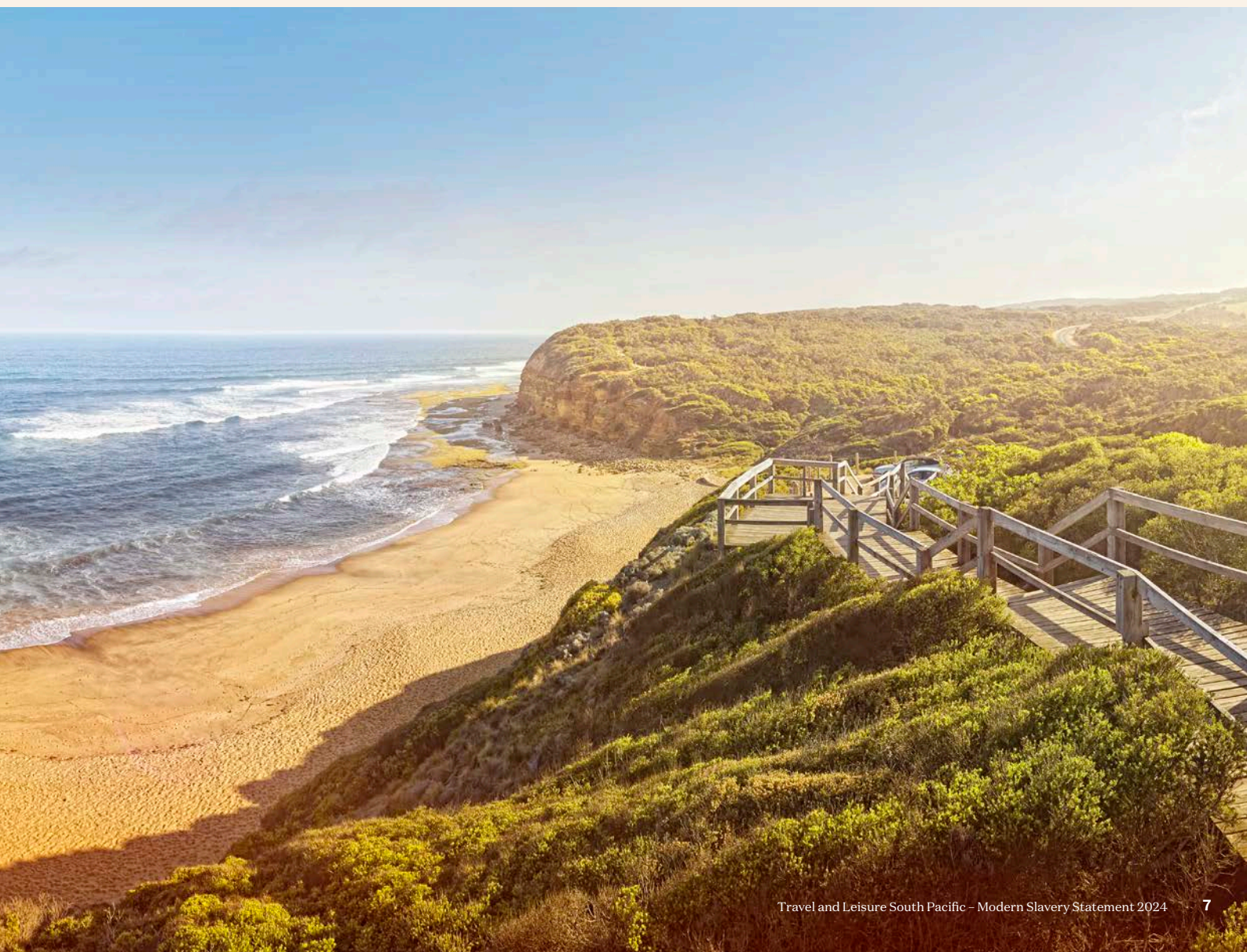
## | UNSPSC

The United Nations Standard Products and Services Code® (UNSPSC®) is a **global classification system of products and services**.



It is a four-level hierarchy coded as an eightdigit number, with an optional fifth level. It has 156,478 codes.

Widely recognised, it is used by procurement professionals to categorise spend and is prevalent in organisations that use procurement tools to manage their expenditure.







## Segment

# 47

### Segments

Our suppliers are categorised into 47 segments. Segments are the most general element of the product or service.



## 18%

**Business Professionals**



## 16%

**Public Utilities**



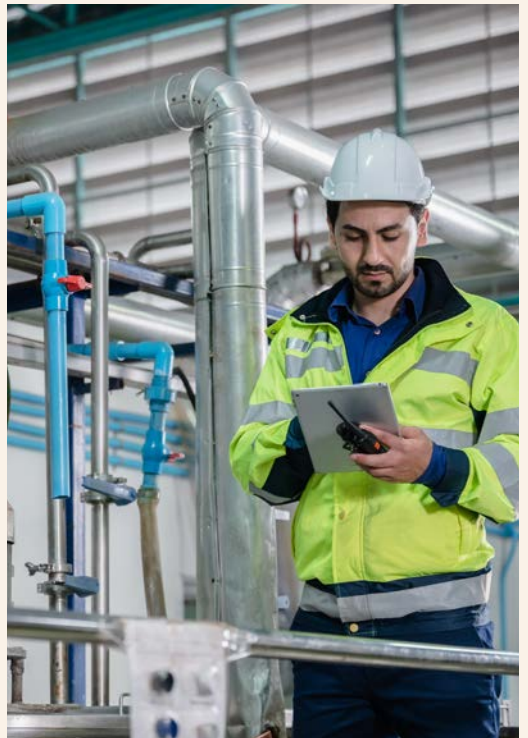
## 11%

**Building and Facility Construction**



## 9%

**Medical Equipment and Accessories and Supplies**



## Class

# 100

### Classes

Our suppliers are categorised into 100 classes. Classes are groups of families sharing similar characteristics.



Utilities



Marketing



Building maintenance

## 17%

**Utilities**



17% of our class spending is on public services such as Water and Energy

## 8%

**Marketing**



8% of our class spending is related to promotional merchandise and product or gift personalisation services





## Family

**149**

Families

Our suppliers are categorised in 149 families. Families are groups of classes sharing common characteristics.



**18%**

Electric utilities



**14%**

Sales and  
Business  
Promotion



**10%**

Building maintenance  
and repair services



10% of our family spending is related to plumbing, electrical and equipment maintenance.



## Commodity

**199**

Commodities

Our suppliers are categorised into 199 commodities. Commodities are a group of products and services sharing similar characteristics.



**14%**

Industrial electric  
power distribution



**9%**

Gift personalisation  
services



**7%**

Emergency medical  
services

# 4

## ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY

The Act provides eight types of exploitation that meet the definition of modern slavery. They are:

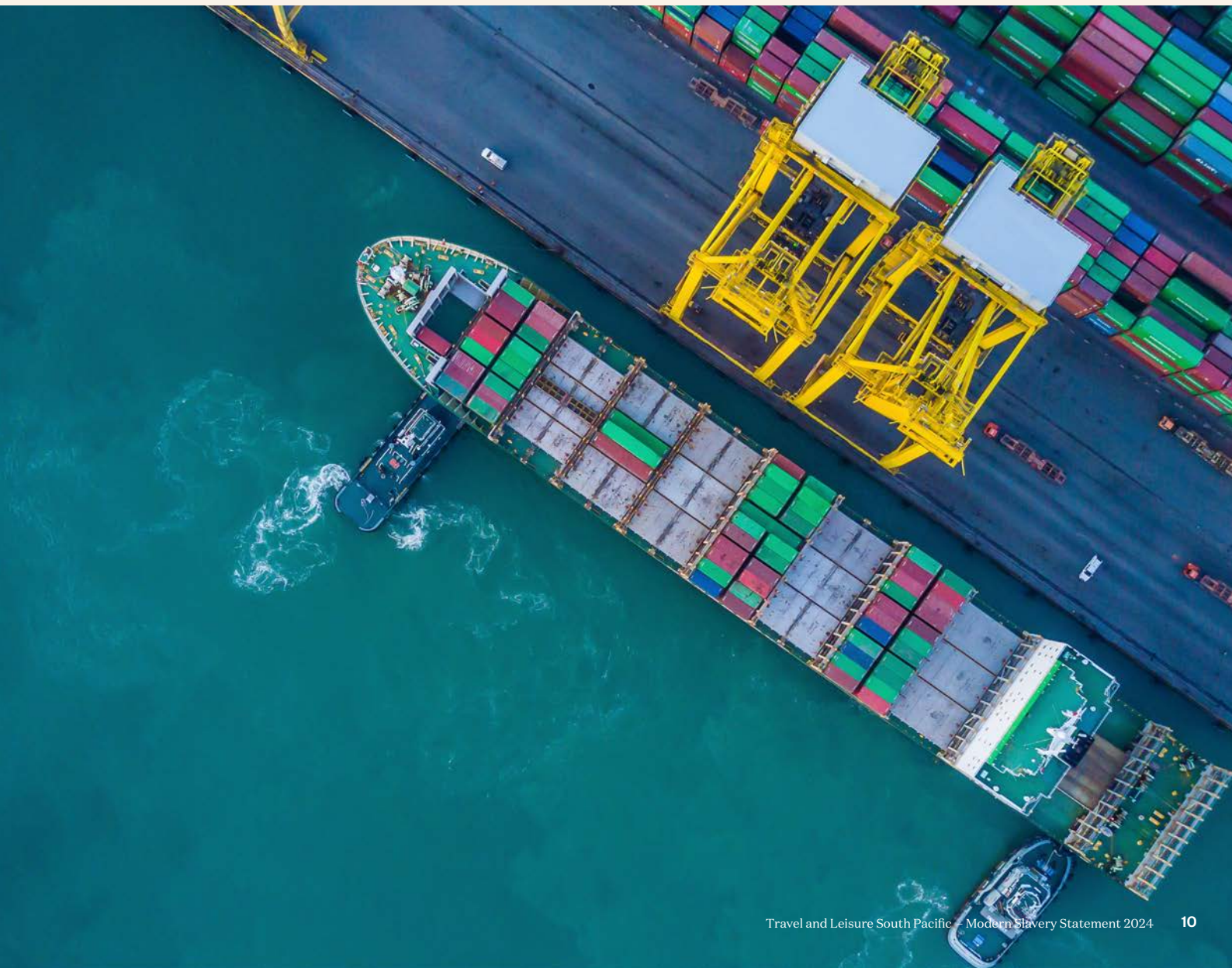
- 1) trafficking in persons
- 2) slavery
- 3) servitude
- 4) forced marriage
- 5) forced labour
- 6) debt bondage
- 7) deceptive recruiting for labour or services; and
- 8) the worst forms of child labour

The worst forms of child labour refer to slavery practices or hazardous work involving children.

### Risk in supply chain

More than 97.8% of our first-tier suppliers are based in Australia providing 93.5% of the goods and services to our group. It is likely that the potential to be linked with or contribute to modern slavery in our supply chain sit beyond the first tier of our supply chain and most probably outside of our national borders.

With that in mind we see the focus of our actions to strengthen our understanding of our suppliers' supply chain and raise their awareness of the issue, as well as strengthening our supplier on-boarding process procedures.





# Risk in operations

## Direct dealings

Almost all of our workforce is employed directly (either by Travel and Leisure or by related entities or subsidiaries) and their employment terms and conditions are governed by the laws of Australia, New Zealand, Fiji and the Philippines. The risk of modern slavery in our immediate workforce is extremely low.

As a long term operator within the region, we are able to rely on local knowledge and intelligence, industry commentary, media and civil society reports together with reporting by regulatory authorities and community and stakeholder partnerships to identify and avoid high risk suppliers.

Every supplier must agree to abide by a Supplier Code of Conduct and generally suppliers must enter into structured ongoing relationships (depending on service or product).

## Policies

We have policies in place to help eliminate the potential use of Club or managed properties for slavery and human trafficking. Aligned with Travel + Leisure's global commitment to ethics and compliance, these practices are enforced through the Travel + Leisure Code of Conduct, which outlines expectations of all associates and promotes a culture of compliance and transparency within the organisation. All stakeholders within the 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.

In addition, Travel + Leisure's global Human Rights Policy Statement reflects 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 and Governance

We strive to create open channels of communication throughout the organisation 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 and annual Modern Slavery training is mandatory for all associates throughout the South Pacific who are involved in any procurement, management or senior roles. This means any associate who is authorised to enter into arrangements with vendors will undertake this mandatory training at least once per year.

Associates have a number of options available to communicate concerns which include reporting directly to an associate's manager, Human Resources Business Partner, the Ethics and Compliance team, or through the Integrity Helpline. The Integrity Helpline is our internal associate reporting channel allowing associates to "speak up" about any concerns 24 hours a day, 7 days a week via email, telephone or online report through an integrity hotline. It is managed by third-party company EthicsPoint to allow anonymous reporting and confidentiality if requested. The service is available in multiple languages to accommodate access by all associates. Reports are stored in EthicsPoint's own secure server to prevent any breach of security and reports are made available to a small number of designated senior associates, depending on the type of violation reported and the location of the incident. All associates who deal with these reports are provided training to ensure they are dealt with appropriately and in confidence, except where information is required to be reported by law.

## Supplier conduct

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 and Leisure 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 labour, 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 Act.

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 party partners are researched thoroughly and screened through various databases 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.

## Training and Awareness

We are committed to providing all associates globally with the proper tools and resources to identify, prevent and mitigate the risk of modern slavery. This includes training on Code of Conduct, Anti-Corruption, Information and Privacy Management and Modern Slavery for every Wyndham Destination associate authorised to enter into supply agreements. In addition, Human Trafficking Awareness and Prevention training is undertaken by all resort leadership teams. Compliance with all training is monitored by our Human Resources Teams.



### Community and Stakeholder Partnerships

We condemn all forms of exploitation of children, including but not limited to: child labour and sexual exploitation. Travel and Leisure 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. Travel + Leisure Co. has taken a stand globally 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, Travel + Leisure commits to enhancing all policies condemning child trafficking, and ensure that all resort leaders undertake Human Trafficking Awareness and Prevention training. The training includes the proper tools and resources for identifying and reporting potential trafficking activities at any of the company's locations globally.

In the 2025 reporting period, we have committed to the following actions:

- a. Continuing to improve and build on our processes across the South Pacific applying feedback from 2024 learnings
- b. Development of modern slavery statement for 2025 financial year
- c. Reviewing the modern slavery statement in the induction handbook for onboarding employees to ensure it remains updated and relevant
- d. Training personnel on modern slavery
- e. Monitor and act promptly on any complaints or concerns raised

**THE TRAVEL  
AND TOURISM  
INDUSTRY HAS  
AN OPPORTUNITY  
TO PLAY AN  
IMPORTANT ROLE  
IN PREVENTING THE  
EXPLOITATION OF  
CHILDREN.**



# 5

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Looking forward, we plan to maintain our commitment to combatting modern slavery 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. We are committed to continuous improvement and the following measures will identify the effectiveness of our actions:

- Regular review of policies and processes, and the degree of socialisation within the organisation
- Completion of all allocated modern slavery training by associates identified by role and risk
- The number of grievances or concerns raised by associates with modern slavery indicators
- The number of suppliers rejected or exited for non-compliance with Supplier Code
- Publishing the modern slavery statement on the company website

This will lead us to develop an effectiveness framework for ongoing reporting including objectives, indicators, outputs and the collection of data.



# 6

## GROUP CONSULTATION PROCESS

Our human rights and modern slavery programs are established initially by our ultimate parent company, Travel + Leisure Co., which is committed to the highest standards of ethics, integrity and responsible business practices across our global operations.

Travel and Leisure South Pacific aligns with its standards and complies with both global and regional policies to ensure compliance by all associates.

All Travel and Leisure subsidiaries are operated under the same governance and reporting structure. In addition, the CEO and executive leadership team are responsible for the day to day business functions of every entity owned or controlled by Travel and Leisure including the use of the same centralised procurement team. The executive team may further delegate to other management personnel but remains accountable for managing modern slavery risks across the group. The Travel and Leisure Board and senior leadership have contributed to the drafting of this statement.

### TRAVEL + LEISURE CO. BOARD

*Provides oversight and approval of the global strategy on ethics and human rights.*

**Executive Vice President, General Counsel & Corporate Secretary, James Savina (Ethics & Human Rights Champion)**

*Engages with senior executives to integrate efforts and initiatives across the Travel + Leisure Group.*



### TRAVEL AND LEISURE SOUTH PACIFIC PTY LTD BOARD

**Barry Robinson  
Liam Crawley  
Bruce Harkness**

*Monitors and complies with the global and regional specific policies. Responsible for the Modern Slavery Statement.*



### CEO AND EXECUTIVE LEADERSHIP TEAM

**Barry Robinson                      Liam Crawley  
Elizabeth Collinson              Kieran McKenna  
Craig Wood                          Bruce Harkness  
Warren Cullum                      Frederich Becker**

*Responsible for ensuring that all risks are managed and directly responsible for the below business functions:*

**Procurement                      Resort and Operations.**

# MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

## PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the Board of Directors of Travel and Leisure South Pacific Pty Ltd, the responsible governing body on or around 28 July 2025, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

## SIGNATURE OF RESPONSIBLE MEMBER



**Barry Robinson**  
President & Managing Director,  
  
International Operations  
Travel + Leisure Co.



## MANDATORY CRITERIA CHECKLIST

The below table outlines the page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Act.

	Mandatory criteria	Page number/s
a)	Identify the reporting entity.	4
b)	Describe the reporting entity’s structure, operations and supply chains.	5
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	10
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11
e)	Describe how the reporting entity assesses the effectiveness of these actions.	13
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultations with the entity covered by the statement).	13
g)	Any other information that the reporting entity, or the entity giving the statement, consider relevant.	13





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**LEISURE**