



Wyndham Destinations
Asia 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.

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A Message from the President & Managing Director

At Wyndham Destinations Asia Pacific we believe in Hospitality with Heart. We are committed to inclusiveness, diversity, and respecting human rights, so our team members, customers, partners and communities feel welcome, safe and cared for.

We have a strong track record of taking leadership on important social issues and are committed to doing business responsibly to protect the people, communities and environment in which we operate.

It is fundamental to our core values and our commitment to uphold human rights that no form of modern slavery, including human trafficking, be tolerated. Acting to address modern slavery is a key aspect of preventing it. As a leading hospitality company in Asia Pacific it is our responsibility to identify risks and protect against modern slavery and human trafficking within our clubs, hotels, resorts, workplaces and supply chains.

In 2022, we are committed to further strengthening our modern slavery response. Wyndham Destinations Asia Pacific has commenced the process of understanding its obligations to report on actions taken to address the risk of modern slavery in our supply chains and operations. To assist in this endeavour, we have consulted with a third-party consultant to review a governance framework, assess the risks and develop a strategy for continuous improvement.

Our aim with reporting our actions against modern slavery is to be as transparent as possible. We hope our transparency will help other organisations to learn from our experiences, as they implement their own approaches. We welcome feedback, and look forward to learning from others, as we work together with our associates, customers, business partners and stakeholders to address this serious human rights violation.

Barry Robinson
President & Managing Director,
International Operations
Wyndham Destinations

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The reporting entity - Wyndham Destinations Asia Pacific Pty Ltd

Wyndham Destinations Asia Pacific Pty Ltd (ACN 090 083 613) 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 Wyndham Destinations Asia Pacific and its Australian subsidiary reporting entities listed below (collectively referred to in this Statement as "Wyndham Destinations"), to address modern slavery risks in our Australian business operations and our supply chain for the financial year ending 31 December 2021:

- Resort Management by Wyndham Pty Ltd ACN 099 634 830
- Wyndham Vacation Clubs South Pacific Ltd ACN 090 503 923
- Finance by Wyndham Pty Ltd ACN 091 790 993
- Travel by Wyndham ACN 090 106 077
- Resort Hospitality by Wyndham Pty Ltd ACN 104 243 209

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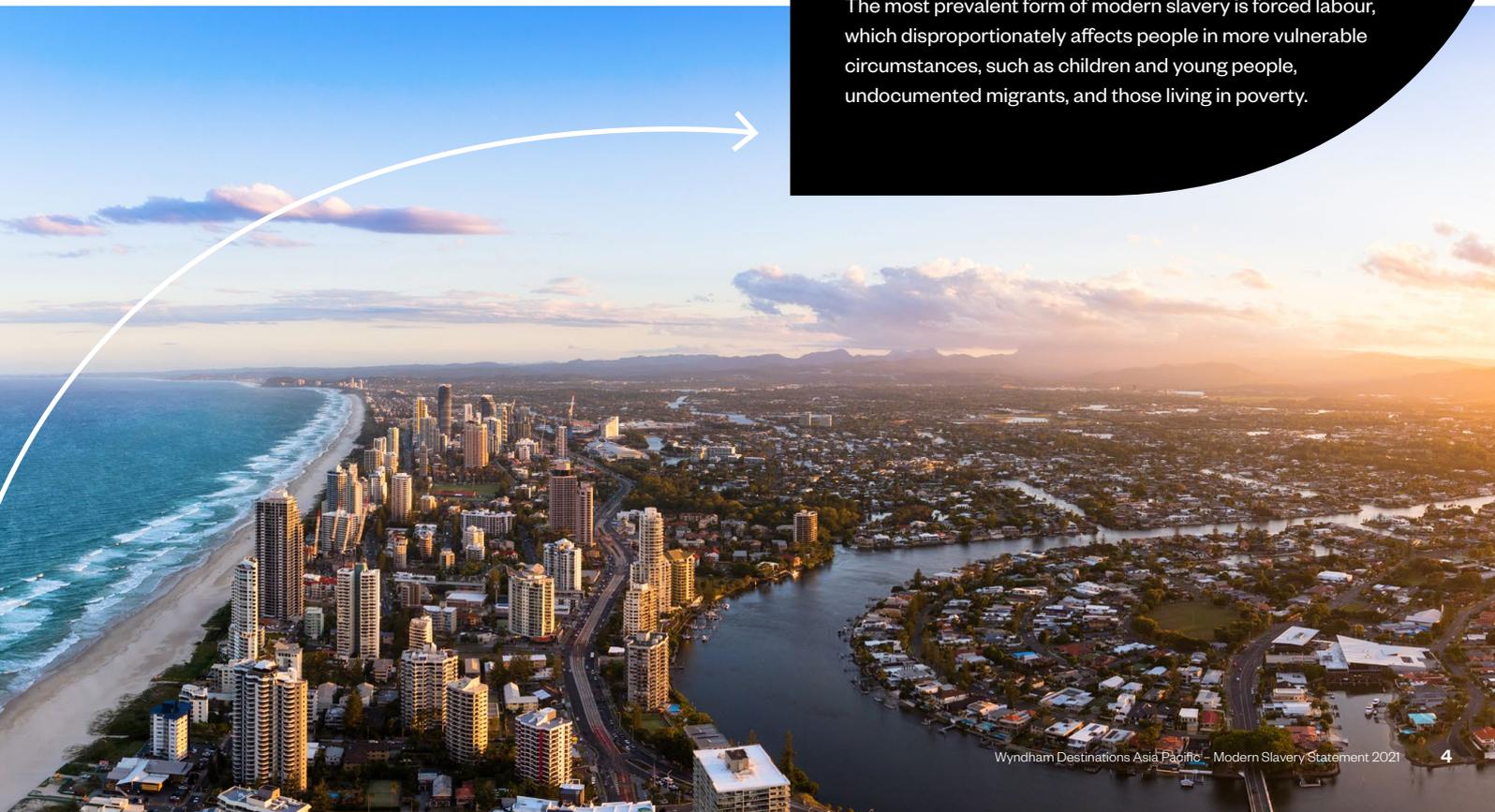
This 2021 Modern Slavery Statement articulates our position on modern slavery and our plans in the 2022 financial year to continue to understand and investigate the risk of modern slavery in our operations and supply chain.

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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 with devastating consequences for the health and wellbeing of its victims.

The International Labour Organisation estimated that 40 million people were victims of modern slavery worldwide in 2016, approximately 5.4 victims for every thousand people. The most prevalent form of modern slavery is forced labour, which disproportionately affects people in more vulnerable circumstances, such as children and young people, undocumented migrants, and those living in poverty.



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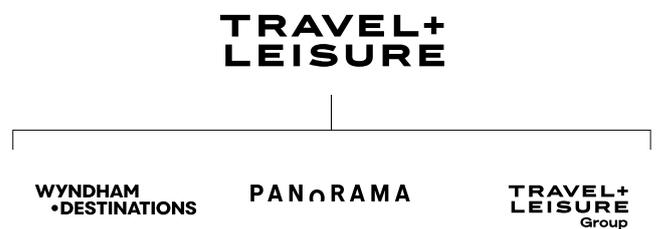
Our structure, operations and supply chains

STRUCTURE

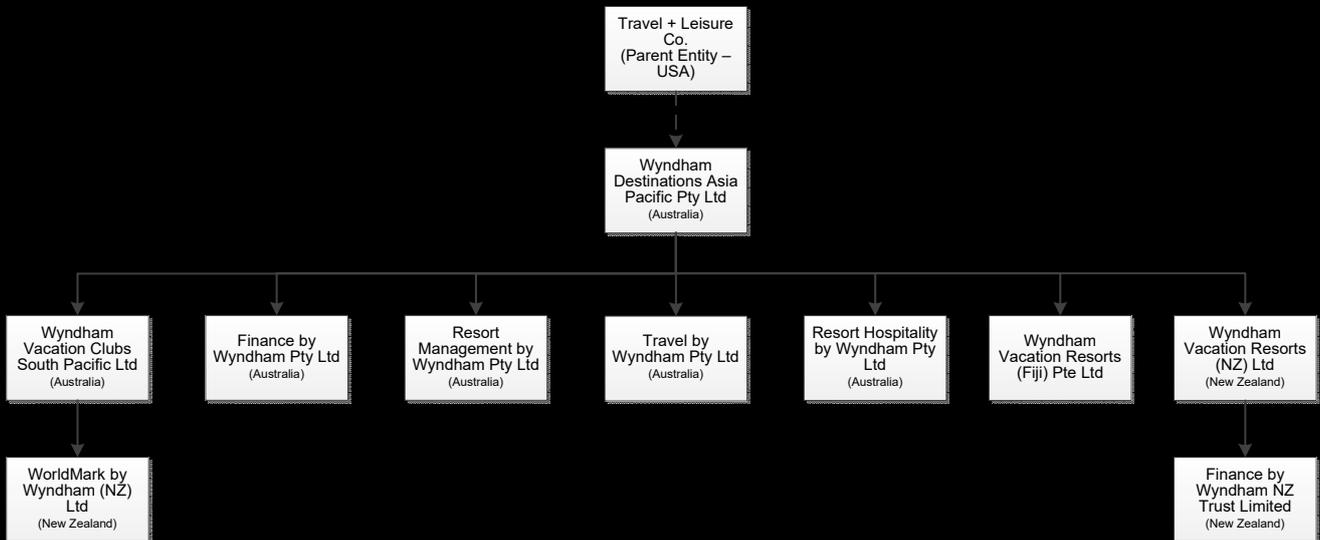
Wyndham Destinations is a limited liability company incorporated in Australia and a subsidiary of US company Travel + Leisure Co. (NYSE:TNL) the world's leading membership and leisure travel company with a portfolio of nearly 20 resort, travel club and lifestyle travel brands across three distinct business lines: Wyndham Destinations, the world's largest vacation ownership business; Panorama, the largest vacation ownership exchange network; and Travel + Leisure, a provider of premium travel content, travel booking platforms, subscription travel clubs and branded consumer products.

Wyndham Destinations operates under the global Wyndham Destinations business line and is responsible for all operations within the South Pacific with corporate or registered offices situated on the Gold Coast, Queensland, Wanaka in New Zealand, Denarau Island in Fiji and Clark, the Philippines.

The principal activities undertaken within the South Pacific (and via its service centre in the Philippines operated by related entity Wyndham Services Asia Pacific (Philippines) Inc.) are those associated with the development and operation of Club Wyndham South Pacific – a holiday ownership club with close to 60,000 member families and properties in 52 locations. In addition, Wyndham Destinations has a long-term partnership with Wyndham Hotels & Resorts® and is a development partner of choice in Asia Pacific.



CORPORATE STRUCTURE



OPERATIONS

The principal activities of Wyndham Destinations within the South Pacific throughout the course of 2021 included:

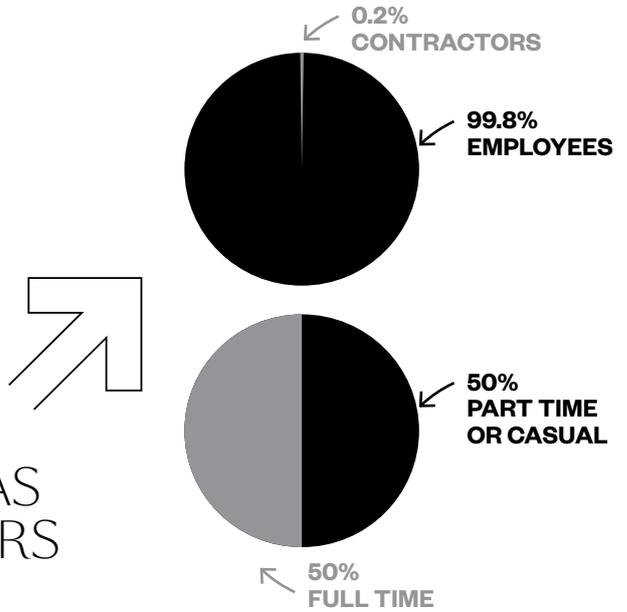
- Developer of Club Wyndham South Pacific (“Club”), the leading vacation club in the region. Wyndham Destinations acquires resort properties to place into the Club free and clear of any encumbrances in exchange for the sale proceeds of all interests issued against the property
- Resort refurbishment projects
- Marketing and selling of interests in the Club pursuant to its

authorisation under an Australian financial services licence

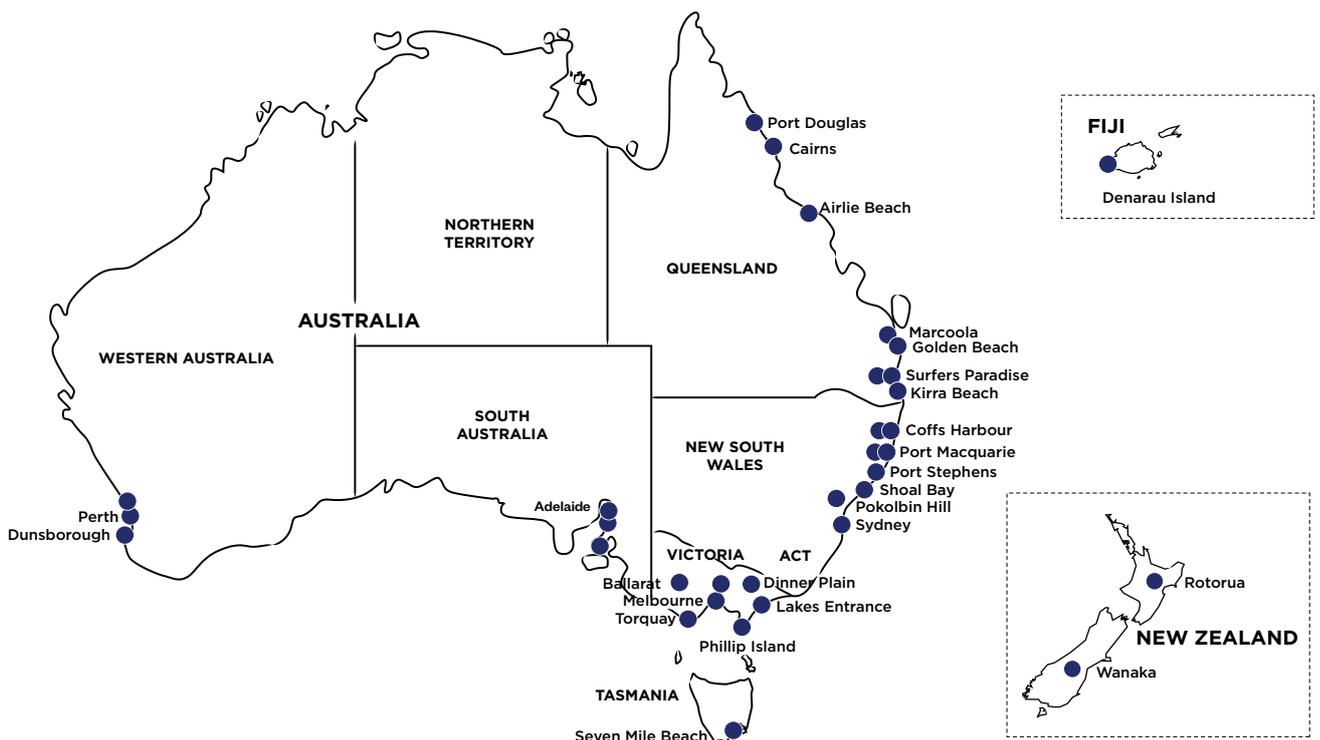
- Provision of consumer credit finance to consumers who purchase interests in the Club under an Australian credit licence and in compliance with responsible lending obligations
- Provision of management services to the Club
- Provision of travel services to Club members and guests
- Hotel and resort operations management

The Wyndham Destinations group oversees approximately 70 properties in the Asia Pacific region, some of which are mixed-use with timeshare apartments and others which are conventional hotel or resort developments. Wyndham Destinations 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 one of the world's largest and most generous hotel loyalty programs. 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.

WYNDHAM DESTINATIONS HAS APPROXIMATELY 1023 WORKERS WITHIN AUSTRALIA:



SOUTH PACIFIC OPERATION LOCATIONS



SUPPLY CHAIN

Wyndham Destination'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 734 direct suppliers located in Australia (98.2%), 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).

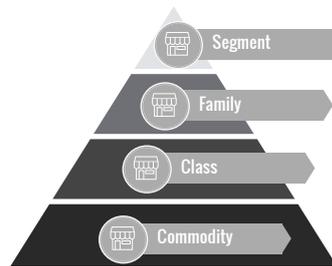
Procurement of goods and services at resort level covers a wide range of items including those needed to equip a property for holiday accommodation (such as furnishing, electrical equipment, lighting, crockery, wall and floor coverings) as well as day-to-day operational items such as linen, cleaning 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 resorts level given the number of properties that are managed by us and the opportunity for leveraging for scale.

Wyndham Destinations 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 eight-digit 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

42

Segments

Our suppliers are categorised into 42 segments. Segments are the most general element of the product or service.

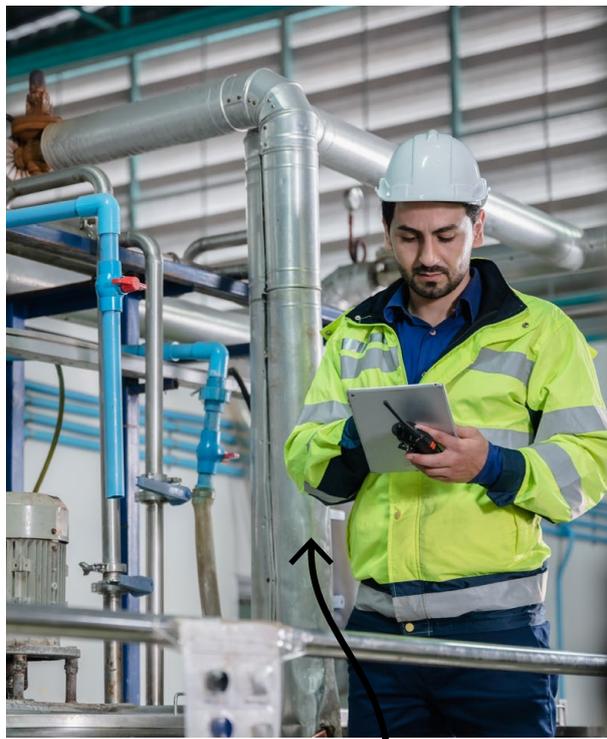


 **21%**
Business Professionals

 **17%**
Public Utilities

 **11%**
Building and Facility Construction

 **8%**
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

16% 
Utilities

16% of our class spending is on public services such as Water and Energy

11% 
Marketing

11% 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.



16%

Electric utilities



11%

Sales and Business Promotion



8%

Building maintenance and repair services



8% 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.



16%

Industrial electric power distribution



9%

Gift personalisation services



8%

Emergency medical services

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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:

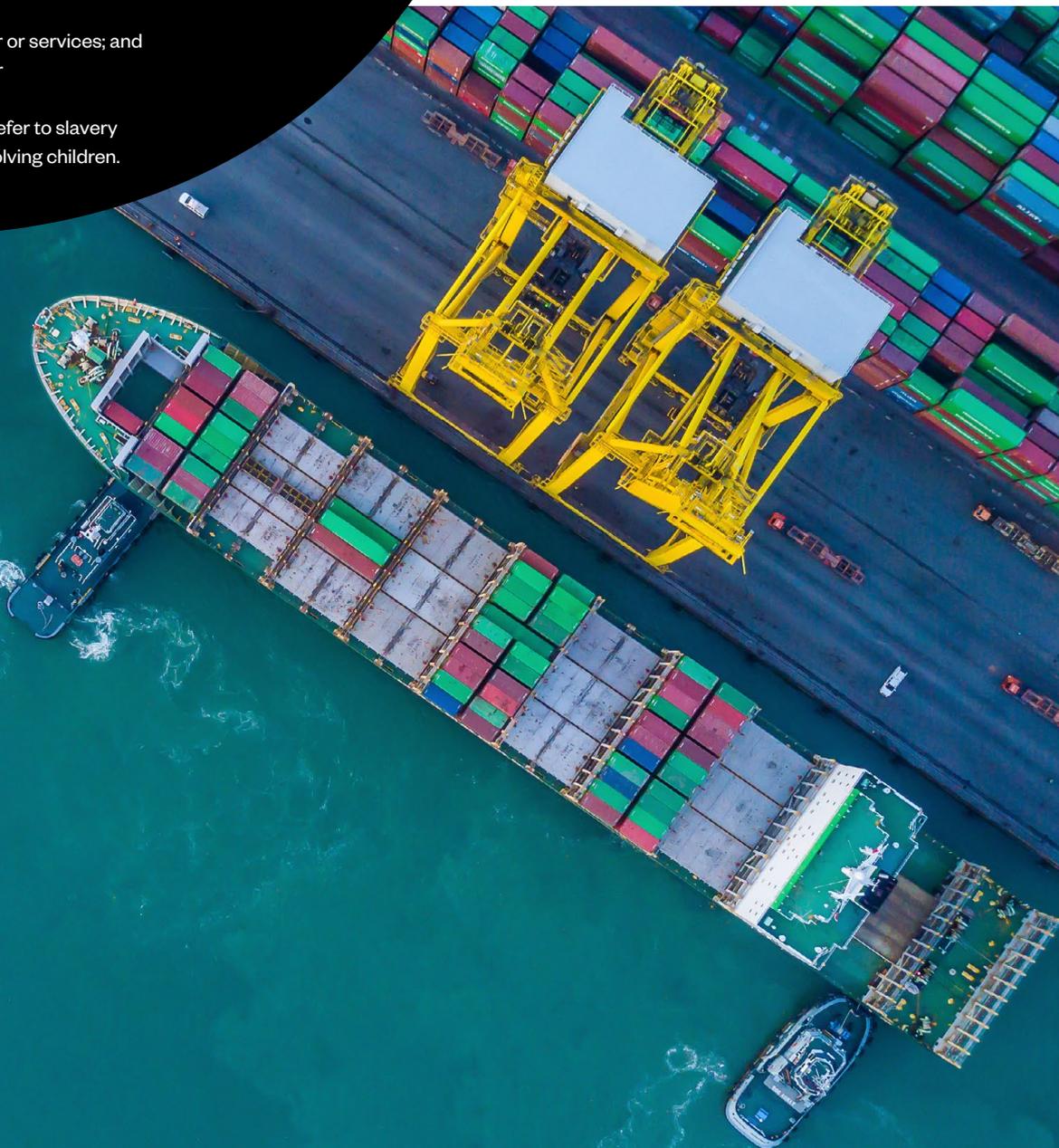
- 1) trafficking in persons
- 2) slavery
- 3) servitude
- 4) forced marriage
- 5) forced labour
- 6) debt bondage
- 7) deceptive recruiting for labour or services; and
- 8) the worst forms of child labour

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

RISK IN SUPPLY CHAIN

More than 98.2% of our first-tier suppliers are based in Australia providing 95.6% of the goods and services. 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 Wyndham Destinations or by related entities) 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 & 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.

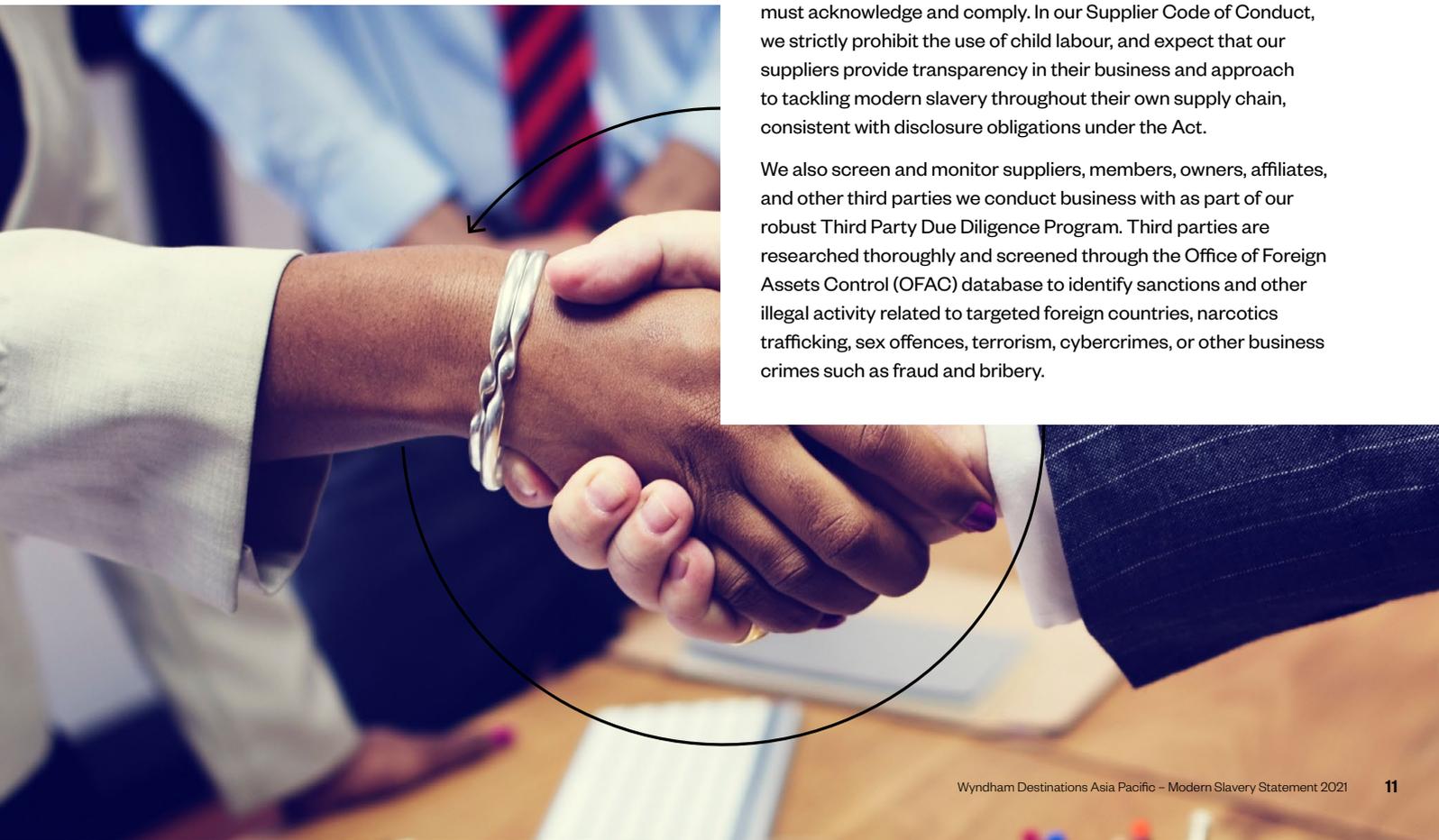
Associates have a number of options available to communicate concerns which include reporting directly to an associate's manager, Human Resources Business Partner, the Ethics and Compliance team, or through the Integrity Helpline. The Integrity Helpline is our internal associate reporting channel allowing 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 Wyndham Destination 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 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.





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.



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

Community and Stakeholder Partnerships

We condemn all forms of exploitation of children, including but not limited to: child labour and sexual exploitation. Wyndham Destinations 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 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 2022 reporting period, we have committed to the following actions:

- a. Review of policies and processes associated with the issue of modern slavery
- b. Consultation with modern slavery experts
- c. Gap analysis of policy framework and development of an action plan for FY22 and FY23
- d. Supplier categorisation and initial risk assessment of first-tier suppliers to understand where the risks lie our supply chain
- e. Development of modern slavery statement for 2022 financial year.

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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 training by associates
- 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
- Number of associates who complete the annual Modern Slavery training
- Independent review of Modern Slavery Statement and related policies

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



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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 its global operations.

Wyndham Destinations aligns with those standards and complies with both global and regional policies to ensure compliance by all associates.

All Wyndham Destinations subsidiaries are operated under the same governance and reporting structure. In addition, the CEO and executive leadership team are responsible for the business functions of every entity owned or controlled by Wyndham Destinations including the use of the same centralised procurement team. The Wyndham Destinations 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.



WYNDHAM DESTINATIONS ASIA PACIFIC PTY LTD BOARD

**Barry Robinson
Liam Crawley**

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
David Wray Warren Cullum
Bruce Harkness**

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

**Procurement Resort & Operations
Legal Human Resources**

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COVID-19 Impact

Covid-19 disrupted labour markets globally, and the travel and hospitality industry in particular has faced considerable challenges in retaining and recruiting talent. To prevent and mitigate recruitment risks, we will continue to employ the majority of our associates directly subject to employment contracts that comply with local employment legislation. We also work with industry bodies.

Despite extended lockdowns, supply chain interruption and labour shortages, cleanliness and safety standards have remained a priority at all properties that we own and manage and our resort operations team have worked tirelessly to provide safe environments for guests and associates. Wyndham Destinations required an increased amount of personal protective equipment and cleaning product as a consequence. We recognise that the most vulnerable in our supply chains are under additional threat due to the demands placed on supply chains by the COVID-19 crisis, however, our experienced team were able to obtain these items quickly without compromising our due diligence processes.

We further recognised the ongoing impact on many of our associates and have increased our monitoring of our associates' wellbeing and health and safety.

WE RECOGNISE THAT THE MOST VULNERABLE IN OUR SUPPLY CHAINS ARE UNDER ADDITIONAL THREAT



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the Board of Directors of Wyndham Destinations Asia Pacific Pty Ltd, the responsible governing body on 27 May 2022, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

SIGNATURE OF RESPONSIBLE MEMBER



Barry Robinson
President & Managing Director,
International Operations
Wyndham Destinations Asia Pacific Pty Ltd



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.	10
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.	13-14

**WYNDHAM
• DESTINATIONS**