

Modern Slavery Statement

This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015. This is the statement from Wyndham Destinations and its subsidiaries which outlines our actions and activities regarding efforts to combat slavery and human trafficking within our business and value chain during the period of May 31, 2019 to May 31, 2020.

About Wyndham Destinations

Wyndham Destinations (NYSE:WYND) believes in putting the world on vacation. As the world's largest vacation ownership and exchange company, Wyndham Destinations offers everyday travelers the opportunity to own, exchange or rent their vacation experience while enjoying the quality, flexibility and value that Wyndham delivers. The company's global presence in approximately 110 countries means more vacation choices for its four million members and owner families, with more than 220 resorts which 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, and 9,000 rental properties from coast to coast through [Wyndham Vacation Rentals](#), North America's largest professionally managed vacation rental business. Year after year, a worldwide team of 25,000 associates delivers exceptional vacation experiences to families around the globe as they make memories to last a lifetime.

About RCI

RCI, which is a subsidiary of Wyndham Destinations, is the worldwide leader in vacation exchange, housing a unique portfolio of brands. The industry's first global points-based exchange system, RCI offers its approximately 3.9 million members access to more than 4,300 affiliated resorts in 110 countries. RCI's portfolio of brands also 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.

Statement

Wyndham Destinations has publicly acknowledged our commitment to operate our business in a manner consistent with the United Nations Universal Declaration of Human Rights and Global Compact, 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

Wyndham Destinations has 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 Wyndham Destinations 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, anti-corruption, 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

Wyndham Destinations strives 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.

The company maintains 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 the Wyndham Destinations 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 to measure the effectiveness of the Wyndham Destinations Ethics & Compliance program and to identify ways to prevent, detect, and measure future misconduct. Wyndham Destinations has a consistent progressive disciplinary process to address substantiated allegations.

Supply Chain

Wyndham Destinations expects 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.

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 the Anti-Corruption Awareness Training.

Training and Awareness

Wyndham Destinations is 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, we launched Human Trafficking training to all resort leadership throughout the organization, which will be shared with all resort associates in 2019. 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, Wyndham Destinations will launch 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

Wyndham Destinations condemns 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, Wyndham Destinations commits 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

Wyndham Destinations 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 28, 2019.



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