

Anti-Slavery and Human Trafficking Statement

1 Opening statement

- 1.1 This modern slavery and transparency statement is published by Diamond Resorts (Holdings) Limited (now known as Hilton Grand Vacations (Holdings) Limited) and Diamond Resorts (Europe) Limited (now known as Hilton Grand Vacations (Europe) Limited) (together “Diamond”), in accordance with the UK Modern Slavery Act 2015 (the “Act”) for the period ending 31 December 2025.
- 1.2 Diamond Resorts (Holdings) Limited is the parent company of the Diamond 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 the UK and Europe and owns/manages resorts in holiday destinations across the UK and Europe. Diamond is an operating entity in the UK and Europe for Hilton Grand Vacations Inc. (‘HGV’) a company incorporated in Delaware, United States of America.
- 1.3 As one of the world’s leading vacation ownership companies, Diamond, as part of HGV, aims to exceed expectations consistently with our high-quality resorts and hospitality. Diamond is committed to conducting our business affairs fairly and in an ethical and proper manner.

2 Our business and supply chains

- 2.1 Diamond operates in the hospitality and vacation ownership sector, managing and operating resort accommodation and associated guest services across the UK and Europe. Our core activities include resort management, guest services, accommodation operations, housekeeping, maintenance, food and beverage services (at certain locations), and sales and marketing functions related to vacation ownership products.
- 2.2 Our supply chains support both our primary value chain (the delivery of accommodation and guest services) and our secondary value chain (corporate, administrative and support functions).
- 2.3 Our workforce is predominantly employed directly, but we also engage agency workers and subcontracted labour in certain operational areas, particularly housekeeping, construction, cleaning and maintenance.
- 2.4 As part of our ongoing efforts to strengthen our understanding of modern slavery risk, we are implementing a structured programme to map our supply chains. This will be supported by the development of a more formalised supply chain risk assessment framework.

3 Contracts

- 3.1 All contracts executed in the UK and Europe ensure that there are clauses committing our suppliers to abide by Modern Slavery Regulations. Even where our suppliers are not necessarily caught by the provisions of the Act, our expectations on our suppliers are that they will, to the best of their abilities, ensure there are no Modern Slavery practices within their organisation.
- 3.2 Where we determine, either at our discretion or via other channels that a supplier has potentially breached those obligations we will take steps to terminate that relationship and conduct an appropriate audit to determine what impact that supplier relationship had on our business.

4 Policies

4.1 As part of our commitment to combating modern slavery and human trafficking, we are implementing the following policies:

4.1.1 Anti-Slavery and Human Trafficking Policy;

4.1.2 Whistleblowing Policy.

4.2 We have engaged with internal stakeholders, including operational, HR and legal teams, to identify areas where additional guidance, controls or awareness-raising may be required. This has been particularly focused on higher-risk areas such as labour intensive services and third party contractors operating at our resort locations.

4.3 Over the next reporting period, we will continue to develop our approach by improving the consistency with which policy requirements are communicated to suppliers and contractors and strengthening supplier onboarding and engagement processes to reinforce expectations regarding labour standards and ethical conduct.

5 Due diligence

5.1 Our due diligence activities are focused on areas where we have the greatest level of oversight and where modern slavery risks are more likely to arise. Current due diligence measures include engagement with operational teams to identify risks arising from the use of agency labour and subcontractors.

5.2 During the reporting period, we have not identified any confirmed incidents of modern slavery within our operations or supply chains. We recognise, however, that the absence of identified incidents does not necessarily indicate the absence of risk, and we are continuing to enhance our ability to identify and respond to potential issues.

5.3 Over the next reporting period, we will focus on enhancing our due diligence approach by implementing more formalised supplier onboarding and risk assessment processes.

6 Risk management

6.1 Responsibility for coordinating modern slavery risk assessment activities sits with the Legal and Human Resources functions, supported by operational management teams at resort level.

6.2 Our most recent modern slavery risk assessment was carried out during the current reporting period. Based on our current assessment, we have identified the following areas as presenting the highest priority modern slavery risks within our operations and supply chains:

6.2.1 third party housekeeping and cleaning services;

6.2.2 facilities maintenance and other on-site contractors; and

6.2.3 recruitment agencies and labour providers.

These areas are prioritised due to their labour intensive nature, reliance on third-party delivery models and, in some cases, the use of subcontracted or agency labour, which can reduce visibility over workforce practices.

6.3 Over the next reporting period, we will continue to develop our risk assessment approach by:

- 6.3.1 enhancing the quality and consistency of information gathered from suppliers; and
- 6.3.2 increasing awareness among operational teams of modern slavery risk indicators and reporting pathways.

7 Recruitment

- 7.1 When hiring candidates directly through our internal channels, we conduct all appropriate due diligence on candidates to ensure no third parties are involved in their recruitment. This means we conduct 'right to work' checks directly with candidates to ensure we have sight of their original identification documents and ask for confirmation of their personal bank details by requiring sight of redacted bank statements to ensure monies paid as salary to employees are paid directly to them.
- 7.2 When using third part recruitment agencies, we use long-standing trusted providers who commit to ensuring their practices are transparent and all agencies must comply with modern slavery contractual clauses before we engage with them.

8 Training

- 8.1 We recognise the importance of training and awareness in supporting the identification and prevention of modern slavery risks within our business and supply chains.
- 8.2 We are developing a more structured approach to modern slavery training, which will be targeted at employees and managers who are most likely to encounter modern slavery risks in practice. This includes resort management teams, HR, and those responsible for engaging third-party contractors.

Statement Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Hilton Grand Vacations (Europe) Limited's slavery and human trafficking statement for the financial year ending 31 December 2025.

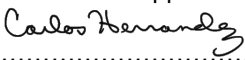
This statement was approved by the Board of Hilton Grand Vacations (Holdings) Limited

Signed:  Date: **Aug 26, 2026**

Director

Hilton Grand Vacations (Holdings) Limited

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Director

Hilton Grand Vacations (Europe) Limited

2025- Anti-Slavery and Human Trafficking Statement

Final Audit Report

2026-08-27

Created:	2026-08-26
By:	Claire Lawson (claire.lawson@hgv.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-bfL_XO5VLFuslTyIsXPxpVf8x9irxm

"2025- Anti-Slavery and Human Trafficking Statement" History

-  Document created by Claire Lawson (claire.lawson@hgv.com)
2026-08-26 - 3:09:39 PM GMT
-  Document emailed to Kevin Speidel (kevin.speidel@hgv.com) for signature
2026-08-26 - 3:12:51 PM GMT
-  Email viewed by Kevin Speidel (kevin.speidel@hgv.com)
2026-08-26 - 5:46:54 PM GMT
-  Document e-signed by Kevin Speidel (kevin.speidel@hgv.com)
Signature Date: 2026-08-26 - 5:47:11 PM GMT - Time Source: server - Signature Appearance Selected: MOBILE_IMAGE
-  Document emailed to Carlos Hernandez (carlos.hernandez@hgv.com) for signature
2026-08-26 - 5:47:12 PM GMT
-  Email viewed by Carlos Hernandez (carlos.hernandez@hgv.com)
2026-08-26 - 5:48:18 PM GMT
-  Document e-signed by Carlos Hernandez (carlos.hernandez@hgv.com)
Signature Date: 2026-08-27 - 0:56:53 AM GMT - Time Source: server - Signature Appearance Selected: MOBILE_IMAGE
-  Agreement completed.
2026-08-27 - 0:56:53 AM GMT