



DIAMOND RESORTS INTERNATIONAL*

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Diamond Resorts Gender Pay Gap Report 2022

Diamond Resorts (Europe) Limited is committed to the promotion of gender equality in the workplace, including ensuring that equal jobs are paid at an equal wage.

The UK Equality Act 2010 (Gender Pay Gap Information) Regulations (**Regulations**) requires that we calculate and publish the average salary paid to our UK team members throughout the UK operations in April 2021. To do this, we reviewed our salaried team members during April 2021, and identified the relevant team members who received full pay during this period. Then, we divided them into four even quartiles by headcount. Using a prescribed method, we conducted an analysis on each quartile to calculate both the mean and median average hourly rate of pay. The results are given in quartiles and split by gender. This provides a comparable snapshot of the 'average' team member salary from which we draw our data.

In 2020, we highlighted that our analysis was challenged by the impact of Covid-19 on our workforce, and this impact has continued into 2021. As with many hospitality companies, a high proportion of our team members were placed on to government furlough scheme due to the enforced closures of our Resort and Sales Operations in early 2021. The furlough scheme enabled us to retain our impacted workforce by placing them on enforced leave, the payment for which was 80% of salary. During our snapshot period in April 2021, our Operations had gradually begun to reopen but with a high proportion of team members placed on either full or 'flex' furlough due to the ongoing restrictions around hospitality at that time. This has resulted in a reduced population of 'relevant' (active/full pay) team members for our April 2021 analysis, predominantly based within back-office functions.

As a result, a population of 198 'relevant' team members have been identified, which is based on a skewed population of the UK business.

What do the results tell us?

Gender Pay Gap

The impact of furlough has meant that the analysis is based on a smaller range of team members, the majority of whom fall into "clerical/administrative," "professional," "technical" or "management," categories and are not balanced by operational areas.

Proportion of Males and Females in each Pay Quartile

As a result of this, the usual representation of the organisation is skewed. We see a clearer division between clerical/administrative and the associated managerial roles, which are predominantly held by women, within quartiles 1 and 2, and those roles that are categorised as "professional" and "technical," which are predominantly held by men, within quartiles 3 and 4.

Quartiles	Female%	Male %
Q1	54%	46%
Q2	55%	45%
Q3	42%	58%
Q4	47%	53%
Grand Total	49%	51%

In totality, the shift toward corporate and management based recording means that we identify a higher male to female ratio amongst our team members, with 49% women employed versus 51% of men.

Mean Gender Pay Gap

Our analysis has identified a variable gender pay gap across the business, with a bias toward male employees, of which the largest variance falls within Quartile 4.

Quartiles	% F to M
1	1%
2	3%
3	3%
4	22%
Grand Total	13%

The impact of furlough in the 2021 means that a substantial proportion of operational team members are not captured by the 2021 snapshot. This means that the balance of data across the quartiles is slightly skewed because we have a smaller frame of reference with fewer roles (particularly within Resort Operations such as Housekeeping, Reception, Grounds and Maintenance), captured within comparable quartiles. As a result, we see the impact of technical and supervisory roles nudging male salaries slightly higher earlier in Quartiles 1, 2 and 3 than those of domiciliary and administrative roles which are more likely to be held by women.

This divergence becomes more evident in Quartile 4 where we find a higher proportion of senior, professional, and more technical roles. As highlighted in our 2020 report, this is in part attributed to a gender divide between traditionally masculine and feminine roles, demonstrated in departments such as IT and Finance (male) and HR and Legal (female). In addition, the quartile also comprises a number of managerial and technical roles requiring a specific level of education and/or expertise. Such positions are subject to external market forces which the business takes into account to ensure team members are paid appropriately.

We anticipate that this will change in later pay gap reporting where furlough and business closures are not a predominant factor.

Median Gender Pay Gap

In 2021, we see a gradual increase in the Median Gender Paygap across the Quartiles, which is consistent with the findings within the Mean Gender Paygap. As previously highlighted, the balance of roles across the quartiles due to the influence of furlough on operational and non-managerial positions is most notable in Q3, due to more technical and supervisory roles being captured within this quartile.

	% F to M
Q1	1%
Q2	3%
Q3	13%
Q4	27%
	16%

Cumulatively this leads to a gender pay gap of 16% on average.

Bonus Gender Pay Gap

The Regulations also require that we calculate an average of bonuses paid to relevant team members during the 12-month period leading to April 2021.

Again, using a prescribed method we identified the total number of team members who were paid a bonus during this period, divided the payments by gender, and determined the mean and median value of the payments made to both men and women. This is provided as a comparable snapshot of the 'average' bonus payment.

Proportion of Males and Females receiving a bonus payment

The term 'bonus' means additional payments that relate to bonuses and commissions. Within the 12-month period leading to April 2020, a total of 114 team members received bonus payments. Of these, 48% were women and 52% were men.

Gender	Percentage
F	48%
M	52%
Grand Total	100%

Mean Bonus Gender Pay Gap

The Mean Bonus Gender Pay Gap indicates that men earned 23% more in bonuses than women.

Mean Gender Pay Gap	23%
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This is in part attributed to the gender split of those roles which attract a bonus payment. A higher number of women work in positions that attract some form of bonus, but where the bonus does not form the majority of salary.

In contrast, a higher proportion of men are hired into target driven sales related roles where bonuses against performance form a large percentage of remuneration. Where senior non-sales roles attract a company bonus, these payments are based on a percentage of salary. Variations in payments are created by either the monetary value of the salary paid, the percentage awarded as a bonus, or a combination of the two.

In 2021, we also see the impact of the pandemic and furlough on this data. The closures of Resort Operations during 2020/21 saw a downturn in guest stays, reducing earning opportunities during this period. This is further impacted by the number of Team Members also in receipt of furlough during April 2021 as this also reduced number of relevant employees captured within the snapshot data.

Median Bonus Gender Pay Gap

The Median Bonus Gender Pay gap reduces the average differential between men and women to 5%.

Median
-5%

This indicates that at the midpoint for both genders, women earn 5% more than men do.

Diamond Resorts is committed to equal opportunity employment.

Through the implementation of family friendly policies such as flexible working and shared parental leave, we hope to continue to encourage more women into our workforce. We continue to offer childcare

vouchers (the scheme was closed in 2018, by the UK government to new members) to members of staff originally participating in the scheme.

We commit to the upskilling and promotion of our current employees throughout the business. Using internal initiatives such as the Diamond Mentorship Programme (DMP), we aim to identify developing talent within the organisation and partner them with Senior Leaders within the Company as Mentors. The programme is administered through our Global Training Team, ensuring gender impartiality throughout the process, with Mentors from key areas of the business identified and trained to support, develop and champion Mentees across the business for the duration of the programme. We will also use externally recognised programmes such as Government Apprenticeships to identify key development areas and upskill internal talent in both technical and managerial areas to ensure the promotion and development of a rounded and loyal workforce, regardless of gender.

Where roles are traditionally seen as masculine, generally technical, or feminine, generally administrative, we continue to review our recruitment practices and focus on encouraging men and women into all areas of the business.

(Statement to be signed by Susan Crook, Statutory Director)

I hereby confirm that the data contained within this report is true and accurate.

Susan Crook
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Name: SUSAN CROOK
Position: DIRECTOR
Date: 31 March 2022