



SLAVERY AND HUMAN TRAFFICKING STATEMENT

Approved by the Board of Directors for Realty Holdings Corp.

1. INTRODUCTION

Realty Holdings Corp. (“Realty”) believes in the obligation to protect human rights all around the world. We take very seriously our responsibility to remain alert to any risks to human rights and are wholly committed to ensuring that our business practices, as well as those of our supply chains, do not foster or support slavery or human trafficking in any way.

This statement is published in accordance with the U.K. Modern Slavery Act 2015 and outlines the approach and steps we take to prevent modern slavery in our business and supply chains associated with the registered operations (including authorized franchisees) in the United Kingdom. This statement is made for the financial year ending 2021, builds on our previous disclosures and outlines the steps we have taken to prevent, identify, and address modern slavery risks across our business and supply chain.

2. STRUCTURE OF OUR COMPANY AND ITS BUSINESS

Realty’s headquarters is located in Madison, New Jersey, United States of America, and its annual revenues exceed £36 million per year. As of December 31, 2021, Realty reported its operations in three segments: (1) Realty Brokerage Group (company owned real estate brokerage operations in the United States); (2) Realty Franchise Group (franchisor for seven real estate brands with 21,000 offices worldwide in 119 countries and territories as of December 31, 2021), which segment also includes out lead generation and global relocation services operations; and (3) Realty Title Group (a title and settlement services company operating in the United States).

Realty’s business primarily operates in the provision of real estate services offered through company-owned and franchised brokerages operating under one of Realty’s owned or licensed brands: CENTURY 21®, Coldwell Banker®, Coldwell Banker Commercial®, Corcoran®, ERA Real Estate®, Sotheby’s International Realty® and Better Homes and Gardens® Real Estate. Realty Franchise Group, an indirect wholly owned Realty subsidiary, offers direct franchises and master franchise rights outside the United States through its affiliate Realty Group LLC. Realty Group LLC licenses its brand trademarks and systems to independent third parties to allow them to directly provide real estate services or operate a franchise system in a designated region under one of Realty Franchise Group’s brands. It is mandatory for all franchisees to comply with the law (including, since 2017, laws prohibiting human trafficking) when managing their business operations and Supply Chain. With very limited exceptions, neither Realty



Franchise Group nor Realogy Group LLC provide or approve a supply chain or individual suppliers for franchisees or master franchise owners outside the United States.

Cartus Corporation, also an indirect wholly owned Realogy subsidiary, provides relocation services to businesses globally, of which one location is in the U.K. Cartus Corporation maintains an office in Swindon via one of its ultimate U.K. subsidiaries, Cartus Limited (together referred to as “Cartus”). The Swindon office operates as a hub for its employees to use as a base for team or client meetings and when the need arises to work at the office. Cartus operates a remote working model for all of its employees in the U.K. Realogy, including Cartus’ area of operation, does not use seasonal workers. Cartus assists its clients in developing their global workforce and managing their mobility process (including packing and moving of furnishings). It also assists its clients with real estate purchase or rental and settling into new communities around the world. Relocation management services involves providing support to employees (and dependents) of its business clients when they have accepted a request from their employer to relocate domestically within a country or to another part of the world as part of their job role. Due to the ongoing global challenge as a result of the Covid-19 pandemic resulting in restricted movements of employees by their employer, Cartus continues to adapt its business model to meet the changing landscape of relocation support required by its clients. You may see the full range of International and U.K. domestic services offered by Cartus by clicking the following link: www.cartus.com.

3. SUPPLY CHAIN

Realogy’s supply chains vary based on the business unit. For Realogy’s business units that operate in the U.K., the supply chain is principally made up of third-party vendors from whom Realogy procures goods and services for the benefit of Realogy and Cartus. Such vendors provide goods and services that include facilities management, hospitality service, information technology equipment, post-room management, stationary, and cleaning. Cartus also maintains a global and U.K. domestic supply chain network that consists of sub-contractors that provide services to Cartus’ clients.

4. POLICIES AND GOVERNANCE AGAINST SLAVERY AND HUMAN TRAFFICKING

Realogy is committed to ensuring that slavery and human trafficking do not exist in any part of our business or in our supply chain. We believe in operating with the highest ethical standards and respect for human rights everywhere. We understand that despite universal laws condemning the practice, modern slavery and human trafficking still occur and that every company must do its part to ensure that slavery does not play a role in its products or services. We must take part in this global mission to help



end the scourge of slavery around the world. As part of this mission, Cartus publishes a Human Rights Policy, which affirms its commitment to human rights and the prohibition on child labor and any form of compulsory labor within Cartus and its supply chain.

4.1 Corporate Governance

Realogy remains committed to ensuring that its people (including onsite contractors) are paid fairly for the important work they do. Realogy continues to adhere to internationally recognized pay standards such as the “Living Wage” in the U.K. or the “London Living Wage” if they are based in the capital.

Realogy’s Global Code of Ethics sets out our compliance position in line with internationally recognized human rights principles, which include modern slavery. Excerpts of this policy are displayed across all our offices, and the full policy is hosted on our global company intranet site and public facing websites. Compliance is embedded in the culture of our company, lead from Realogy’s Executive Leadership Team, who sets the tone and expectation for all of our employees and suppliers.

Accountability for compliance with Realogy’s Code of Ethics and Global Compliance Program rests with Shacara Delgado, Realogy’s Chief Ethics & Compliance Officer.

4.2 Supply Chain and Suppliers

We condemn all practices of slavery and human trafficking, and we require our supply chain and suppliers to comply with our values. As part of our process for onboarding a new supplier, we require them to review and agree to adhere to our Vendor Code of Ethics at all times during our relationship. Our Vendor Code of Ethics prohibits the use of forced labor and child labor for suppliers and their subcontractors.

Realogy and its subsidiaries’ contracts with suppliers also require compliance with all laws. Beginning in April 2017, Cartus included in all new supplier contracts and amendments to existing supplier contracts an express prohibition on the use of forced, bonded or indentured labor, slavery or human trafficking by suppliers and their subcontractors. Realogy Franchise Group and Realogy Group LLC also included this express prohibition in its franchise agreements both within and outside the United States beginning in April 2017.

Realogy acknowledges that no policy can address every scenario encountered by a supplier and that contractual obligations alone do not guarantee compliance. Therefore, Realogy’s contracts and Supplier Code of Ethics are not intended as a substitute for a supplier’s own responsibility and accountability to exercise their own good judgment and to conduct their operations professionally and responsibly in line with good business conduct. This responsibility also extends to each supplier’s obligation not to engage in modern slavery or human trafficking.

Where a supplier is found to be in violation of the Supplier Code of Ethics or any applicable laws including human trafficking or modern slavery, Realogy will work with all parties involved to ensure any victims



receive the correct support and help in terms of access to justice, compensation and remedy. Realogy will also investigate the incident and take appropriate steps with the applicable supplier to prevent this from occurring in the future. We have a zero-tolerance policy toward slavery and human trafficking. In the event Realogy feels the supplier's response is unsatisfactory or any organization within our supply chain fails to meet our ethical standards on this issue, Realogy will terminate its relationship with such supplier.

5. DUE DILIGENCE PROCESSES

In addition to maintaining robust policies prohibiting human trafficking and forced labor, we take the following actions to mitigate the risk of slavery in our business and supply chains:

5.1 Employee Recruiting and Onboarding

After a review of our hiring processes, Realogy deems the risk of modern slavery in its recruitment process as low. Specifically, Realogy conducts background checks on all individuals considered for employment within the company. In the U.K., we also require evidence of a candidate's Right to Work in the UK. Finally, we also conduct education and passport checks.

5.2 Supplier Diligence

After review of our key suppliers and their processes, Realogy considers the risk of modern slavery by the key suppliers we engage to provide services to our group of companies as low. However, we acknowledge that certain categories of suppliers who form part of Cartus' supply chain management network, and who provide services to Cartus' clients, may be at a slightly higher risk of having modern slavery occur within its operations. Therefore, Realogy employs the following procedures and conduct assessments on all its suppliers:

- Our selected suppliers are subjected to due diligence performed by our company employees, which includes, but is not limited to, regular OFAC and Politically Exposed Persons screening.
- Suppliers must agree to abide by Realogy's Vendor Code of Ethics, which includes a prohibition on any form of forced labor whether in the form of indentured labor, bonded labor, or prison labor by a Realogy supplier and/or its subcontractors.
- Realogy fosters an environment of open conversation where its employees or suppliers may report instances of unethical behavior or practices. This may be escalated through their Manager, Human Resources Business Partner, or the Ethics and Compliance Department. Additionally, if employees do not wish to report concerns through these channels, Realogy maintains a reporting system to allow persons to notify the company of any violations of its Code of Ethics. Reports may be made anonymously, where permitted by law. We encourage persons within and outside the company to submit any concerns about our operations to our system. We fully protect any person who makes a good-faith report from retaliation or victimization.



5.3 Cartus Supply Chain Management Network Diligence

Cartus' supply chain management network consists of over 250 suppliers globally. Although our highest concentration of suppliers is within the United States and United Kingdom, our suppliers deliver services in over 100 countries. Suppliers go through a rigorous vetting and onboarding process which includes OFAC screening, credit review and contractual terms that expressly prohibit the use of forced, bonded or indentured labor, slavery or human trafficking.

6. TRAINING

6.1 Corporate Employees

All employees are required to complete annual Global Code of Ethics Training. Each employee must attain a certification at the end of this training course by answering a series of multiple questions on topics covered in the course to ensure understanding of the principles and recognize any breach of the policy. Furthermore, each employee has the opportunity to report any concerns as part of this training and a copy of the policy is made available to all employees.

Cartus delivered training to employees who work with supply chain vendors to ensure an understanding of modern slavery risks and to prevent modern slavery and human trafficking risks in our supply chains and our business. Realogy provided the same training to its corporate procurement personnel. In 2021, Cartus expanded this training to employees in its Account Management, Pricing, Legal and Intercultural departments who either have a certain level of involvement in the procurement process or manage a different category of suppliers.

6.2 Suppliers (including Cartus Supply Chain Management Network)

Cartus' supply chain network members must complete and successfully pass an annual online compliance-training course. The course covers a variety of topics under Ethical Behavior, PII/System Security and Health Safety & Environment, including human trafficking, forced labor, illegal child labor and bonded labor practices. Furthermore, such suppliers also need to complete a specific module within this training course on Modern Slavery to assist them in recognizing and how to address such practices.

During our annual Global Supplier Network Conferences, we set the tone at the top and review with our supplier's leadership the compliance training course, including the Realogy Vendor Code of Ethics. We highlight the Code of Ethics Line and remind them of their responsibility and ability to report any possible violation, even anonymously.



7. EFFECTIVENESS IN FIGHTING SLAVERY

7.1 Reporting Concerns

Realogy maintains a reporting mechanism for its employees to raise or report any concerns relating to a breach of Realogy's Code of Ethics. For the reported financial year, there has been no reports of any breach or concerns regarding modern slavery or human trafficking.

7.2 Supply Chain and Supplier Assessments

Cartus requires its suppliers to complete annual assessments, which include an affirmation of their commitment to prohibit the use of forced, bonded or indentured labor, slavery or human trafficking. The assessment requires our suppliers to read and attest to the entire Realogy Vendor Code of Ethics. We have had 100% compliance with this area of our assessment.

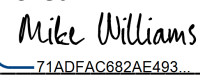
Cartus has the contractual right to conduct on-site audits of suppliers. When Cartus performs on-site audits of our vendors, its auditors check for violations of the Realogy Vendor Code of Ethics. For the financial year 2021, there have been no reported cases of labor concerns related to human trafficking, forced labor, illegal child labor and bonded labor practices made to Cartus supply chain management.

8. CONTINUED COMMITMENT

Realogy remains committed to reviewing and assessing its policies, procedures and training to protect against human trafficking and modern slavery. Our policies play an integral role in our work to embed respect for human rights throughout our business. In 2021, we updated our Company Code of Ethics which explicitly includes a policy statement that we are holding our vendors to our ethical standards, and that we expect our colleagues not to take part in or facilitate modern slavery and to report suspicions through the relevant channels. Our policies reflect how seriously we take our responsibility to protect human rights globally and ensure that our business practices do not foster or support slavery or human trafficking in any way. They also help us set clear expectations for our employees, suppliers, and other business partners, and they also establish a framework that helps us hold others accountable as they work to meet our compliance standards.

This statement was approved by the Board of Realogy Holdings Corp and is signed by:

Approved and Signed by:


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Michael J. Williams
Realogy Holdings Corp., Chairman of the Board
Date: May 4, 2022