# SLAVERY AND HUMAN TRAFFICKING STATEMENT

Approved by the Audit Committee of the Board of Directors on February 28, 2018

## INTRODUCTION

Realogy Holdings Corp. 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 to ensure that our business practices, as well as those of our supply chains, do not foster or support slavery or human trafficking in any way.

## STRUCTURE OF OUR COMPANY AND ITS BUSINESS

Realogy comprises four operating business units: (1) NRT LLC (real estate brokerage operations in the United States); (2) Realogy Franchise Group LLC/Realogy Group LLC (franchisor for six real estate brands licensed in 105 countries); (3) Cartus Corporation (relocation service organizations operating in 150 countries); and (4) Title Resource Group (a title and settlement services company operating in the United States). Realogy's business focuses on real estate services offered through company-owned and franchised brokerages operating under one of Realogy's owned or licensed brands: CENTURY 21®, **Coldwell Banker®**, Coldwell Banker Commercial®, ERA Real Estate®, *Sotheby's International Realty® and* Better Homes and Gardens® Real Estate. Realogy is headquartered in Madison, NJ. Its annual revenues exceed £36 million per year. Realogy maintains a corporate office for Cartus Corporation in Swindon, UK.

## SUPPLY CHAIN

Realogy's supply chains vary based on the business unit. For our business units that operate outside the United States, our supply chain is principally made up of vendors of Cartus Corporation, our relocation services division. Cartus assists its clients and their employees in developing their global workforce and managing their mobility process from packing and moving of furnishings, real estate purchase or rental assistance, and settling into new communities around the world.

Realogy Franchise Group offers direct franchises and master franchise rights outside the United States through its affiliate Realogy Group LLC. Realogy Group LLC licenses our 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 our six brands. With very limited exceptions, neither Realogy 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.

REALOGY

## POLICIES 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.

## DUE DILIGENCE PROCESSES

We take the following actions to mitigate the risk of slavery in our business and supply chains:

- Our selected vendors are subjected to due diligence performed by our company employees.
- Vendors 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 vendor and/or its subcontractors.
- 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.

## SUPPLIER COMPLIANCE

We condemn all practices of slavery and human trafficking, and we require our supply chain and vendors to comply with our values. As part of our process for bringing a vendor onboard, we require our supply chain vendors to review and agree to follow our Vendor Code of Ethics at all times during our relationship. Our Vendor Code of Ethics prohibits forced labor and child labor for vendors and their subcontractors.

In addition, Realogy and its subsidiaries' contracts with vendors require compliance with all laws. Beginning in April 2017, Cartus included in all new vendor contracts and amendments to existing vendor contracts an express prohibition on the use of forced, bonded or indentured labor, slavery or human trafficking by vendors 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

We have a zero tolerance policy toward slavery and human trafficking. Any organization within our supply chain failing to meet our ethical standards on this issue will be terminated.

## TRAINING

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.

## EFFECTIVENESS IN FIGHTING SLAVERY

Cartus requires its vendors 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.

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.

Signed,

Michael J. Williams
Realogy Holdings Corp., Director

Dated: June 7, 2018