



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

*Statement under Section 54(1) of the UK Modern Slavery Act 2015 (“MSA”)
for Titan Investment Atlas Limited and their affiliated entities
(together the “Atlas Group” or the “Group”)*

The Atlas Group recognises the importance of respecting human rights as embodied in the United Nations Universal Declaration of Human Rights and as a Group is committed to preventing forced or compulsory labour, human trafficking, and other kinds of slavery across all business dealings and transactions in which we are involved, regardless of location, and throughout our supply chain. We always strive to work to the highest professional standards and comply with all laws, regulations and rules relevant to our businesses.

About Atlas Hotels

The Atlas Group is a hotel franchise group with 58 hotels across England, Scotland and Wales. The Atlas Group works to create lasting value for investors and communities, building on the strength of its properties and people including employees, guests, partners and investors.

- For more information on the Atlas group, please visit our website at www.atlashotels.co.uk

Policies

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business in the UK and wherever we operate, globally. The policies of the Group have been developed to ensure high standards of conduct and ethical behaviour in all of our business activities and we expect the same standards from all our contractors, suppliers and other business partners.

We have policies and procedures in place across the Group to protect our employees and their labour rights across our operations. We expect our suppliers to meet the same standards and only engage with suppliers who comply with anti-slavery laws and that do not engage in any slavery or human trafficking practices.

We have adopted other relevant policies and procedures which provide a robust foundation for identifying risks, including emerging risks, assessing mitigation factors and actions and establishing clear management responsibility. These policies include:

- A Whistleblowing Policy for the reporting of suspicious and illegal activity with appropriate protections in place for anyone who raises a concern to ensure there is no fear of reprisal;
- An Anti-Bribery Policy which requires that business be conducted with honesty and integrity, in compliance with all applicable laws.

Risk Assessment & Due Diligence Procedures

From a slavery and human trafficking perspective, given the nature of our business, we are highly sensitive to the existence of slavery and human trafficking in the hospitality industry and within our supply chain. We are committed to assessing, monitoring and mitigating risks relating to slavery and human trafficking on a Group-wide basis, with individual operating companies taking specific actions where appropriate to the level of risk and taking actionable steps to prevent the use of any Atlas Group property for human trafficking and slavery, and raising awareness concerning such exploitation wherever we do business.

As part of our initiative to identify and mitigate risk we assess potential risk areas in our supply chain through:

- Risk reviewing suppliers based on spend, location and type of product or service provided;
- Risk assessing suppliers on size and type of organisation ranging from large corporates to small independents;
- Encourage reporting of concerns through our Whistleblowing Policy and
- Audit supplier's compliance with the MSA by requesting copies of their MSA statement.

Training & Looking Ahead

The importance of respecting human rights and combating modern slavery is communicated to all employees across the Atlas Group with information on how to report concerns provided and information provided to operational teams on how to identify human trafficking.

All employees undertake modern slavery and human trafficking training on an annual basis.

Going forward we intend to take the following steps aimed at mitigating modern slavery, forced labour, and human trafficking risks in our operations:

- Seek assurances from suppliers that their supply chains comply with the Modern Slavery Act 2015, Human Rights Act 1998 and Modern Slavery Act 2018;
- Continue to embed human rights in our policies, governance practices and contracts;
- Continuing to review our training compliance and
- Undertake an assessment and review of policies periodically.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the Atlas group, for the financial year ending 31 December 2022. It was approved by the executive board of L + R Group on 06 June 2023.

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Director, Titan financing Holdco Limited