



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 L+R

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.atlshotels.co.uk

Policies

We are committed to upholding the human rights of our employees and 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.

To strengthen our commitment to prevent Modern Slavery in the supply chain we have introduced a Code of Conduct for suppliers which reflects the importance of ethical business practices and principals of behaviour. The Supplier Code of Conduct which can be reviewed on our website at [Atlas-Supplier-CoC.pdf \(atlshotels.co.uk\)](#) stipulates that suppliers must comply with applicable laws and regulations, and prohibits the use of forced labour or human trafficking within the supply chain. We aim to only use suppliers that acknowledge their understanding of the Supplier Code of Conduct and their obligations within it and operate a robust and thorough supplier due diligence and onboarding process before onboarding a supplier, which includes Anti-Bribery and Corruption related checks as well as checks on their steps to prevent modern slavery.

We have policies and procedures in place across the Group to protect our employees and their labour rights across our operations including policies around equal opportunities, working hours and pay, as well as carrying out right-to-work checks. Compliance with these policies is monitored by the Human Resources team and reviewed on an annual basis with ad-hoc updates when there are changes in employment law.

We have also adopted other relevant policies and procedures, which reinforce our fundamental values of integrity, professionalism, transparency, accountability, client focus and excellence and which provide a robust foundation for identifying risks, including emerging risks, assessing mitigation factors and actions and establishing clear management responsibility. Our staff are encouraged to discuss the importance of ensuring fair and safe working practices and to report possible signs of modern slavery and trafficking through our whistleblowing channel as set out in the Group Whistleblowing Policy. Employee inductions on joining the Atlas Group includes an outline of our expectations for ethical business practices including how to conduct relationships with suppliers and clients. Through internal communications all employees are made aware of the Group’s policies and procedures including those on health and safety, anti-bullying and harassment, whistleblowing, anti-bribery and corruption, preventing slavery and human trafficking. Through these educational activities we increase awareness

of modern slavery and human trafficking with employees and contractors and ensure that they are equipped to identify, and report suspected instances.

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 relating to support services such as cleaning and maintenance amongst others. 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 to raising awareness concerning such exploitation wherever we do business.

Training & Looking Ahead

We recognise that modern slavery and human trafficking requires constant commitment and vigilance.

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

- Continue to monitor potential risk areas in our supply chains on an ongoing basis to ensure that there is no slavery or human trafficking in our supply chains.
- Audit current suppliers to ensure compliance with the Supplier Code of Conduct.
- Provide training for employees across the Group in anti-human trafficking, so that all are aware of the key risks of modern slavery;
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- 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 2023. It was approved by the executive board of L + R Group on 17 December 2024.

Desmond Taljaard
Director