



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 “Atlas Hotels”, 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

Atlas Hotels is a portfolio of 59 branded hotels 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

Our Structure

The leadership team of the Group are hands-on operators, who understand the markets we invest in because we own and manage assets ourselves. This owner-operator perspective informs every decision we make and helps us maintain a framework that ensures accountability along with an appropriate culture that actively supports and respects human rights.

Training and Policies

We recognise that preventing modern slavery and human trafficking requires constant commitment and vigilance and we work to raise awareness of trafficking and modern slavery, which is key to identifying and helping to prevent modern slavery and human trafficking.

We are a responsible employer, and we are committed to treating our employees with fairness, dignity, and respect. We have policies and procedures in place across the Group, developed to ensure high standards of conduct and ethical behaviour and to protect our employees and their labour rights, including policies around equal opportunities and employment contracts that set out clear details relating to working hours and pay. Compliance with these documents is monitored by Senior Management and is reviewed on an annual basis with ad-hoc updates made when there are changes in employment law. We also carry out Right to Work checks on all employees, compliance of which is monitored by Senior Management and our People Team.

We have also adopted other relevant policies and procedures, which reinforce our values of guest focus, working together, own it and data driven, 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, Speak Up as set out in the Group Whistleblowing Policy. Where relevant, 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. All employees also receive annual Anti-Bribery training. 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.

Our Supply Chain

To strengthen our commitment to prevent Modern Slavery in the supply chain we operate 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 here ([Supplier Code of Conduct](#)) 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 setting out our expectations of them to undertake duties to prevent modern slavery.

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. 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.

All staff have identity checks undertaken prior to commencing employment. Where there is a need to employ temporary workers during peak periods of demand or to address specific short-term skill set shortages and where recruitment agents are used to source such labour, they are regularly vetted, and only reputable agents are engaged. Employment contracts allow such workers to cease employment at will, subject to contractual notices being served.

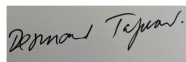
Looking Ahead

We continue to build upon our existing efforts to support and uphold human rights throughout our business and increase transparency in our operations and supply chain so that we can respond effectively to new risks as they are identified. All of our employees across Atlas Hotels undertake a 'Modern Slavery' training on an annual basis. This includes learning about modern slavery legislation, human trafficking and recognising signs that modern slavery could be occurring. Employees have to complete this training annually in order to be able to work in our hotels and head office.

During the next year, 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.
- Ensure our current and new suppliers acknowledge our expectations for them to comply with our Supplier Code of Conduct and continue to audit them appropriately
- Undertake an assessment and review of policies periodically.
- Continue to drive awareness around Speak Up and our Whistleblowing policy, to reassure those that may raise concerns that they will be treated sensitively and seriously

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 2025. It was approved on 17 September 2026.



Desmond Taljaard,
Director