

Modern Slavery & Human Trafficking Policy

Policy year 2026-27 · Effective 1 April 2026 to 31 March 2027 · Version 1.0 · Approved by the Management Board

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1. 1. Purpose

InterAtlas Estate has zero tolerance for slavery, servitude, forced labour and human trafficking. Construction and real estate supply chains carry recognised risk, and we take our responsibility seriously.

2. 2. Scope

This policy applies to InterAtlas Estate, its management, employees, contractors and anyone acting on its behalf, in every market where we operate. Third parties who act for us (agents, introducers, service providers) are expected to observe equivalent standards.

3. 3. Our commitments

- We do not use forced, bonded or child labour anywhere in our business, and we expect the same of every developer, contractor and supplier we work with.
- Developer due diligence: before listing a development we consider the developer's reputation and, where available, their labour-standards commitments.

- Contracts with suppliers include the right to terminate immediately where modern slavery is found.
- Employees are trained to recognise indicators of forced labour and trafficking and to escalate concerns.

4. Reporting

Anyone who suspects modern slavery in our business or supply chain should report it via compliance@atlasestate.estate or anonymously under our Whistleblowing Policy. Credible reports are investigated and, where appropriate, referred to law enforcement.

5. Where our risk sits

- Construction supply chains in developing markets: the highest inherent risk; addressed through developer reputation screening and contractual standards.
- Facility and hospitality services connected to completed buildings: medium risk; suppliers commit contractually to labour standards.
- Our direct employment: low risk; all staff are employed under written contracts with lawful pay and freedom to resign.

6. Supplier and developer expectations

- No forced, bonded, trafficked or child labour anywhere in their operations or supply chains.
- Workers hold their own identity documents and are free to terminate employment.
- Recruitment fees are never charged to workers.
- Right of InterAtlas Estate to terminate immediately upon credible findings of modern slavery.

7. If we find it

Our first duty is to the potential victim: we do not take sudden action that could endanger them. We escalate to management, take advice, involve law enforcement or NGOs where appropriate, and require time-bound remediation from the counterparty - or exit the relationship.

8. Governance and oversight

We operate three lines of defence. The first line is the business itself: every employee and manager owns the risks of their own activity and applies this policy in daily decisions. The second line is the compliance function, which designs the controls, advises the business, monitors adherence and reports independently. The third line is independent review - periodic internal audit work and, where engaged, external examination - which tests that the first two lines actually work. The Management Board sits above all three: it approves this policy, receives quarterly reporting on incidents, exceptions and control performance, and is escalated to within 24 hours for material events.

9. Risk assessment

Risk in this domain is assessed formally at least annually, and whenever our products, markets or the external environment change materially. Each identified risk is scored for likelihood and impact, assigned an owner and a mitigation with a deadline, and entered in the risk register reviewed quarterly by the Management Board. The factors below weigh most heavily in this policy's domain:

- Construction in high-growth markets relies on migrant labour with elevated exploitation risk.
- Sub-contracting chains obscure who actually performs site work.
- Facility staff serving completed buildings are often agency-supplied.
- Recruitment-fee practices in some corridors create debt bondage before workers arrive.

10. Procedures and controls

The operating procedures below are mandatory. Deviation requires prior written approval from the compliance function, recorded in the exceptions log with rationale and expiry.

- Developer onboarding includes a labour-standards representation covering forced labour, document retention, recruitment fees and sub-contractor flow-down.
- Supplier contracts include immediate-termination rights on credible findings and cooperation duties for investigations.
- Staff receive indicator training (restricted movement, withheld documents, fearful workers, unexplained third parties) with a clear escalation duty.
- Concerns follow the victim-first protocol: no abrupt action that could endanger the person; escalation to management, specialist advice, engagement of authorities or NGOs as appropriate.
- Remediation plans with deadlines are preferred where safe; exit follows failure to remediate.
- An annual statement summarises risk assessment, steps taken and planned improvements.

11. Application across our markets

Application across our markets: risk weighting is highest for large construction programmes with migrant workforces; market risk ratings are reviewed annually with the risk register.

12. Applying this policy: worked examples

The examples below illustrate how the requirements of this policy operate in practice. They are illustrative, not exhaustive; where a real situation is not covered, the escalation duty applies.

- Situation: during a site visit, workers indicate their passports are held by a foreman. Response: victim-first protocol - no confrontation on the spot; immediate escalation, specialist advice, engagement of the competent authorities.
- Situation: an unknown sub-contractor's crew appears on a partner site. Response: flow-down check invoked; the developer must evidence the sub-contractor's labour standards before work continues.
- Situation: an agency worker reports paying a recruitment fee to get their job. Response: remediation demanded from the agency - repayment to the worker - with monitoring; exit on failure.

13. Definitions

- Modern slavery — slavery, servitude, forced or compulsory labour, and human trafficking in all forms.
- Forced labour — work exacted under menace of penalty and for which the person has not offered themselves voluntarily.
- Debt bondage — labour demanded as repayment of a debt on terms the worker cannot

realistically discharge.

- Supply chain — every developer, contractor, supplier and service provider connected to our business activities.

14. Roles and responsibilities

- Management Board — owns this policy, approves it annually, sets the risk appetite and receives escalation of material issues within 24 hours of identification.
- Compliance function — maintains this policy, delivers training, performs monitoring, investigates concerns and reports quarterly to the Board on incidents, exceptions and control performance.
- Line managers — embed the policy in day-to-day operations, ensure their teams have completed training, and act as the first escalation point.
- All employees and associated persons — read and follow this policy, complete required training on joining and annually thereafter, and escalate concerns promptly rather than act on doubt.

15. Training and communication

Everyone in scope receives training on this policy at induction and at least annually, with targeted refreshers whenever the policy or the law changes materially. Completion is recorded. The current version of this policy is available to all staff and is published on the Governance page of atlasestate.estate; material changes are communicated directly.

- Induction: policy walkthrough within the first 10 working days, before unsupervised client contact.
- Annual refresher: scenario-based session covering the red flags and escalation routes in this document.
- Role-specific modules: deeper training for the functions most exposed to this policy's risks.
- Attestation: annual written confirmation of having read and understood the current version.

16. Records and retention

Records evidencing compliance with this policy - approvals, screenings, registers, training logs, investigation files - are kept accurately, stored securely with access restricted to those who need them, and retained for at least six years (or longer where law requires), after which they are securely destroyed.

17. Monitoring, audit and review

Compliance monitors adherence to this policy through periodic sample testing, exception reporting and review of escalations. Findings, together with any breaches and remediation actions, are reported to the Management Board quarterly. This policy is reviewed at least annually, and additionally whenever our operations, the law or regulatory guidance change materially.

- Quarterly: sample testing of controls and registers; exception-log review; Board reporting pack.
- Annually: full policy review against legal developments and incident learnings; training completion audit.

- Ad hoc: thematic reviews triggered by incidents, near misses or external findings.

18. Breaches and consequences

A breach of this policy is a serious matter. Confirmed breaches by employees are handled under our disciplinary process and may result in sanctions up to dismissal; breaches by suppliers, introducers or other associated persons may result in contract termination. Where conduct may amount to a criminal offence, we will cooperate fully with the competent authorities. Honest mistakes that are self-reported promptly are treated as learning opportunities, not misconduct - concealment, not error, is the aggravating factor.

19. Regulatory context and related documents

We design our controls by reference to internationally recognised frameworks and the local law of each market in which we operate. The frameworks most relevant to this policy include:

- ILO forced-labour conventions
- UK Modern Slavery Act 2015 transparency principles applied voluntarily
- EU corporate-duty developments monitored for applicability

This policy forms part of the InterAtlas Estate governance framework and should be read together with the other policies published at atlasestate.estate/en/governance, including the Code of Conduct, the Whistleblowing Policy and the Data Protection Policy.

20. Version control

- Version 1.0 - 1 April 2026 - Initial adoption for policy year 2026-27 - Approved by the Management Board.
- Next scheduled review: March 2027 (or earlier upon material change in law or operations).
- Policy owner: Compliance function, compliance@atlasestate.estate.

Annex A - Contacts and escalation routes

- Compliance function: compliance@atlasestate.estate - policy questions, approvals, escalations and suspicion reports; acknowledgement within 1 business day.
- Whistleblowing routes: any route in the Whistleblowing Policy, including anonymous reporting; acknowledgement within 3 business days.
- Urgent matters (suspected live fraud, sanctions hit, data breach): escalate immediately by the fastest available channel, then confirm in writing the same day.
- External: nothing in this policy prevents any person from reporting directly to a competent authority at any time.