Modern Slavery Statement 2026

Contents

MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps the Titan Wealth Group ('TWG') has undertaken, and will continue to take, to ensure modern slavery or human trafficking is not taking place within our business or supply chain. We have prepared this statement based on our understanding of the definition of 'modern slavery' – a term which encapsulates slavery, servitude, forced or compulsory labour and human trafficking.

OUR POSITION

At TWG, we are committed to becoming a leading responsible business, which means putting responsible and sustainable decision making at the heart of everything we do. As such, we are committed to operating in a responsible and ethical manner and ensuring the relationships we have with all our stakeholders adhere to high standards, including clients, partners, employees, shareholders and suppliers. We will not tolerate or condone the abuse of human rights (including modern slavery) in any part of our business. We are committed to identifying and minimising the risk of slavery or human trafficking in all parts of our supply chain.

OUR BUSINESS

TWG is a made up of advice, discretionary fund management/wealth, asset management and investment research businesses providing high-quality execution and administration to the asset and wealth management sectors in the UK. There are Titan Funds domiciled in Ireland and the United Kingdom. TWG is a signatory to the United Nations supported Principles for Responsible Investment, a voluntary framework for incorporating environmental, social (including modern slavery) and governance ("ESG") issues into investment and ownership decisions.

As part of a bottom-up investment research process, TWG considers a range of factors that might affect a company's intrinsic value, which can include ESG issues. TWG's research on ESG factors informs decisions not to invest as much as it informs decisions to invest.

RISK OF HUMAN TRAFFICKING AND SLAVERY

TWG does not tolerate modern slavery or human trafficking and takes a risk-based approach to its supply chain. The nature of our business means that TWG does not have complex supply chains and does not procure material services from suppliers in high-risk countries.

Our suppliers are predominantly regulated financial and professional service companies, including banks, data service providers, accountants and law firms. TWG also have suppliers of equipment and maintenance and support services for our office locations. Given the professional nature of our business, TWG have a low risk of modern slavery or human trafficking existing within our business operations and supply chains

STEPS TAKEN

TWG believe that they undertake appropriate due diligence in relation to new suppliers and expect suppliers, and their supply chains, to comply with all relevant legislation and regulations in the countries in which they operate or which are otherwise applicable to them. As part of this due diligence we will be mindful of the risks of modern slavery and exercise enhanced due diligence for suppliers and clients where we believe there is greater risk in this area.

TWG also has a Whistleblowing Policy, which provides employees a clear path to report issues and concerns. The policies of TWG are periodically reviewed and, where necessary, will be updated to reflect TWG's continuing commitment to ensuring that modern slavery and human trafficking are not present in their supply chain.

Policies in relation to slavery and human trafficking

- All employees receive a copy of our Diversity, Equality & Inclusion Policy, which makes it clear we oppose all forms of discrimination or victimisation and
- sets out our approach in relation to allegations of harassment and/or bullying. Harassment, in general terms, is defined as unwanted conduct affected the dignity of people in the workplace. It may be related to age, sex, race disability, religion, nationality or any personal characteristics of the individual and may be persistent or an isolated incident.
- We have a robust recruitment and onboarding process with multiple checks built in to ensure all individuals employed by us have the right to work in the UK, are paid a fair salary in compliance with all relevant rules and regulations, and are not subjected to human trafficking or forced labour.
- On an annual basis the risks of Modern Slavery will be reviewed and, if applicable, entered onto our risk register
- This policy is made available to all staff, with senior management available to answer questions if required. To ensure awareness, formal online training is undertaken by all employees on an annual basis.
- Our Whistleblowing Policy is in place that enables employees (including temporary or permanent employees, contractors, agency workers, interns and those on work experience) to raise any concerns they may have about illegal or improper behaviour by anyone connected to TWG, without fear of victimisation, discrimination or disadvantage. We provide annual training to employees on the whistleblowing process and how to make a disclosure.

In addition to the above policies, we offer our employees the opportunity to seek independent and impartial advice via confidential telephone and email counselling services provided through our employee assistance programme, should they wish.

CONCLUSION

This statement will be reviewed annually and updated as required. It has been reviewed by key stakeholders and was reviewed by all TWG Boards and approved by the Board of directors of Titan Wealth Holdings in 2026.

Appendix 1

Version	Date & Reviewer	Notes	Date of Approval
1.0	May 2024 T. Roberts	Newly created policy, to be adopted at Titan Wealth (Group) level	July 2024
2.0	Sept 2025 K Dewar K Parmenter	Review and general update	
3.0	Mar 2026 K Parmenter	Review and general update	April 2026

Firm Reference No.	Name of entity
533039	Titan Settlement & Custody Ltd
568089	Titan Asset Management Ltd
781720	Titan Investment Solutions Limited
226392	Titan Private Wealth Limited
143390	Titan Pensions & Investments Limited
609277	Ravenscroft Investments (UK) Limited
625562	Square Mile Investment Services Limited
114563	IWP Investment Management Limited
727510	FS Wealth Management Limited
574458	Titan Wealth Planning Limited
441359	IWP Financial Planning Limited
551177	Finance Shop Ltd
727510	FS Wealth Management Ltd
211626	Innes Reid Investments Limited
450497	Thomas, Carroll Independent Financial Advisers Limited
974252	Titan Alternatives Limited