



**LGL-POL-06-01**  
**Modern Slavery Act Statement**  
**2018**



## **Complying with the Modern Slavery Act 2015**

The Torus Group is committed to ensuring that we comply with our legal and regulatory responsibilities. One of these responsibilities is complying with the Modern Slavery Act 2015. This statement sets out how Torus ensures that slavery and human trafficking does not exist in any part of its business or supply chain.

### **Torus as an employer**

Torus reviews its terms of employment regularly to ensure that they comply with all relevant legislation. Its specialist teams participate in continuous professional development and seek external advice when required to support this process. Torus is also a living wage employer.

### **Ensuring that suppliers are compliant**

Every year Torus and its subsidiary companies invest a significant amount in procuring goods and services to be able to run the business.

This is how Torus ensures that its suppliers comply with the requirements of the Modern Slavery Act:

- When the legislation was introduced, Torus wrote to all of its existing suppliers seeking confirmation that they were aware of the Modern Slavery Act and requested that they set out the steps they had taken to adhere to its principles.
- The organisations who supply Torus are required to go through a formal process to become approved suppliers. This process was updated to include a requirement for them to declare that they are not involved in slavery or human trafficking and had not been subject to any investigation in connection with any offence involving slavery or human trafficking.
- Tender contract documentation was updated to ensure that suppliers satisfy the requirement to demonstrate that there is no slavery or human trafficking in their supply chains.

Torus will only do business with organisations who fully comply with this statement and the terms of contracts or those who are taking verifiable steps towards compliance.

The Group Head of Procurement and Business Development monitors the suppliers who are not providing adequate reassurance so that appropriate action can be taken.

Torus is committed to working with its suppliers to seek ongoing reassurance about this matter.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2018. This statement applies to all subsidiaries within the Torus Group and has been approved by the Torus Board of Management. It will be reviewed and updated on an annual basis.