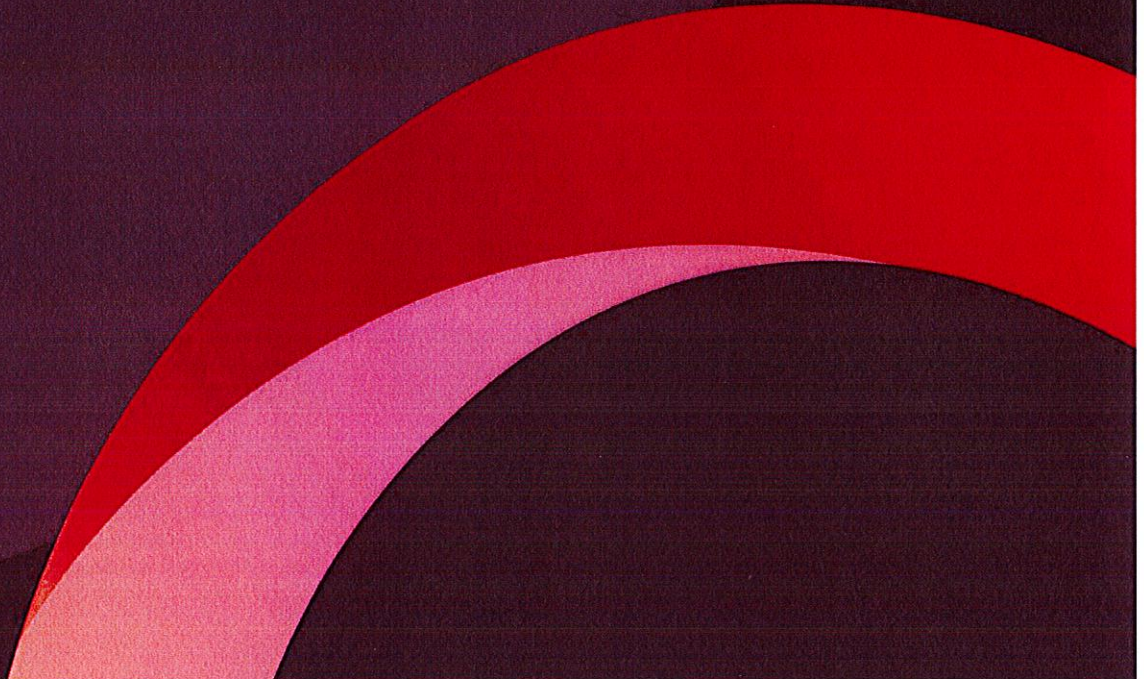


# Modern Slavery Act Statement 2023/24

LGL-POL-06-03



<b>Role</b>	<b>Name/Position</b>	<b>Date</b>
<b>Author</b>	Catherine Fearon	July 2023
<b>Approved by</b>	Torus (Group) Board	3 August 2023
<b>Document Reference</b>		

### 0.3 DOCUMENT STATUS HISTORY

<b>Version</b>	<b>Date</b>	<b>Change owner</b>	<b>Reason for Update</b>
1	Nov- 2019	Catherine Fearon	Annual review
2	July – 2021	Ronnie Clawson	Annual review
3	July 2022	Catherine Fearon	Annual Review
4	July 2023	Catherine Fearon	Annual Review

### 0.4 DOCUMENT REVIEW DATE

<b>Review Due</b>	July 2024
<b>Responsible Officer</b>	Catherine Fearon, Legal Counsel & Company Secretary

### 0.5 DISTRIBUTION

<b>Name / Department</b>	<b>Title</b>
Torus Group	All staff

**1. Complying with the Modern Slavery Act 2015**

**2. Supply Chain**

**3. Customers**

**4. Torus Group as an employer**

**5. Training and awareness**

**6. Compliance**

**7. Governance**

human trafficking does not occur in any part of its business or supply chain.

The Group consists of:

- Torus62 Limited, a Registered Provider (RP) of social housing, serving customers across the North West of England with approx. 40,000 homes offering a blend of social and affordable rent, home ownership and outright sale properties. It is incorporated as a Community Benefit Society, registered with the Financial Conduct Authority and is registered with the Regulator of Social Housing under the Housing Act.
- HMS are commercial, wholly owned subsidiary (100% shareholding to Torus62 Limited) providing construction and repairs and maintenance services to Torus and to third party organisations.
- Torus62 Developments Limited is a wholly owned subsidiary (100% shareholding to Torus62 Limited) and delivers new homes across the North West.
- Torus Foundation is a company limited by guarantee, it is a registered charity and a wholly owned subsidiary of Torus62 Limited.

All employees within the above group structure work in UK.

## **2. Supply Chain**

We do not have any direct supply chain outside of the UK and utilise a robust procurement and tendering process and undertake due diligence to ensure we engage with reputable contractors who adhere to relevant legislation and regulation and are not subject to any investigation. We also maintain our contracts, reviewing these on a regular basis to ensure compliance with legislation and regulation.

Torus has a Procurement Policy which ensures all subsidiaries owned and controlled by Torus operate in compliance with legal obligations. We will continue to monitor our supply chain

all relevant legislation. We feel there is a very low risk of slavery or human trafficking within our business. With agency staff, we use reputable suppliers and we have policies and procedures designed to mitigate any risks. Relevant policies may include (but are not limited to);

- Anti-bribery
- Anti-fraud
- Safeguarding
- Recruitment
- Tenancy Fraud
- Whistleblowing
- Diversity and inclusion
- Code of Governance
- Employee Code of Conduct & Probity Policy
- Board Code of Conduct

All policies and procedures are available to staff and some are published on our website. We will continue to review and update policies and procedures where necessary to ensure there is no slavery and human trafficking within our business.

## **5. Training and awareness**

We are aware that the sector in which we operate has vulnerable persons who may be exposed to slavery and human trafficking. We operate under robust safeguarding procedures (Adult & Child Safeguarding) and training is mandatory for all employees.

Throughout the covid-19 pandemic we have increased our safeguarding training and awareness with mandatory training across the Group and strengthened our message with internal communication around this subject.

We will continue to engage with our employees, customers and Board and be vigilant and continue to provide training to employees and, if appropriate, our suppliers.

2024. This statement applies to all subsidiaries within the Torus Group and has been approved by the Torus Group Board.

This statement will be reviewed and updated on an annual basis.

Signed: .....

A handwritten signature in black ink, appearing to read 'S. Coffey', written over a horizontal dotted line.

**Steve Coffey**  
**Group Chief Executive**  
**On behalf of the Torus Group Board**