



Modern Slavery Act Statement 2021

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0.1	SUMMARY		
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1. Complying with the Modern Slavery Act 2015

This statement sets out how Torus62 Limited and its subsidiaries (HMS, Torus Developments and Torus Foundation) ensure that slavery and human trafficking does not occur in any part of its business or supply chain.

Torus62 Limited is a Registered Provider (RP) of social housing, servicing customers across the North West of England and has 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 is a commercial subsidiary providing construction and repairs and maintenance services to Torus and to third party organisations. Torus Developments delivers new homes across the North West, whilst Torus Foundation provides community regeneration and social investment across our operating area.

2. Supply Chain

- We do not have any supply chain outside of the UK.
- We have a robust procurement / tendering process and undertake due diligence to ensure we engage with reputable contractors who will adhere to relevant legislation and regulation. We also maintain our contracts, reviewing these on a regular basis to ensure compliance with legislation / regulation.
- Torus62 Limited also operates a Procurement Policy which ensures all subsidiaries owned and controlled by Torus62 Limited operate in compliance with legal obligations.
- We will continue to monitor our supply chain and ensure that our approved suppliers take appropriate steps to comply with relevant legislation.
- We will only conduct business with organisations who fully comply with this statement, the terms of contracts or those who are taking verifiable steps towards compliance.
- The Group Head of Procurement monitors suppliers, providing further reassurance of compliance.
- Torus62 Limited and our subsidiaries are committed to working with our suppliers to seek ongoing reassurance and compliance with the Modern Slavery Act 2015.

3. Torus Group as an employer

Torus62 Limited and its subsidiaries review terms of employment regularly to ensure they comply with all relevant legislation. We feel there is a very low risk of slavery or human trafficking within our business however, we have a suite of 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

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

4. 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 and training is mandatory for employees. We will continue to engage with our customers, be vigilant and continue to provide training to employees and, if appropriate, our suppliers.

Future Activities

Torus Group will continue to raise awareness and understanding across the organisation of the risk of slavery and human trafficking.

Anti-Slavery day (18 October 2021) provides an opportunity to raise awareness of human trafficking and modern slavery and we will mark the day with communication and awareness-raising throughout the Group and our supply chain to highlight good practice and focus attention where improvements may need to be made.

5. Governance

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 2022. This statement applies to all subsidiaries within the Torus Group and has been approved by the Torus (Group) Board of Management.

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