

MODERN SLAVERY STATEMENT

Introduction

Torque Logistics Limited and its subsidiaries (“Torque”) is a wholly independent group of companies operating in the United Kingdom and providing seamless end-to-end supply chain logistics services to a large number of third party customers.

Torque is committed to ensuring that there are no instances of modern slavery or human trafficking in any part of its business or its supply chains and, as part of the wider third party logistics services industry, recognises that it has a responsibility to take a robust approach to all aspects of modern slavery.

Risks and Actions

This statement sets out the continuing actions taken by Torque during the financial year ended 30th April 2018 to address potential modern slavery and human trafficking risks related to its UK-based warehousing and transport activities.

These activities utilise the services of third party agency staff providers and the associated risks in relation to slavery or human trafficking are managed by Torque through:

- the operation of new supplier due diligence and approval processes;
- the establishment of long-term relationships with suppliers;
- formal written agreements and contracts with suppliers; and
- periodic reviews and audits of supplier performance, policies and records.

In addition, in order to provide services to its customers, Torque engages with numerous suppliers of other goods and services. Torque undertakes necessary due diligence when first considering, and before taking on, any new suppliers and undertakes periodic reviews of all approved suppliers following their engagement.

Torque also assists and co-operates fully with any independent audits undertaken by its customers in relation to their respective supply chains.

Responsibility

The Company Secretary of Torque has delegated authority and responsibility from the Board of Directors for Torque’s anti-slavery initiatives, including where appropriate and necessary:

- establishing and reviewing appropriate policies;
- undertaking risk assessments;
- undertaking and overseeing all investigations and/or due diligence exercises in relation to any known or suspected instances of modern slavery and human trafficking; and
- organising the education of relevant employees.

Supporting Policies

Torque operates a number of policies and procedures that contain provisions relevant to the identification and prevention of modern slavery and human trafficking in its operations:

- Whistleblowing Policy;
- Grievance Procedure;
- Anti-bribery and Corruption Policy;
- Recruitment Policy; and
- Equal Opportunities Policy.

Board Approval

The Board of Directors of Torque is committed to ensuring its business and its supply chains are slavery free and approved this statement on 31st October 2018. The statement and the on-going actions being undertaken to prevent, identify and report any instances of slavery and/or human trafficking will be reviewed again by the Board of Directors in October 2019, or earlier should circumstances indicate this is necessary.