



## Modern Slavery Statement

### 1. Introduction

Modern slavery happens across the world. As well as being a punishable crime, forcing people to work and exploiting their human rights for personal or commercial gain is a moral atrocity which has no place in the world of business.

In line with this view, we operate a zero-tolerance policy to modern slavery in our Group of companies. As well as being transparent in our operations, we also have the right policies and practises in place to ensure our business operates in a way which leaves no room for modern slavery.

This statement is pursuant to section 54 (1) of the modern slavery act 2015, and applies to the TorFX Financial Year ending 30 June 2019.

### 2. Organisation structure

This statement applies to TorFX which operates in the UK and Australia.

Whilst some of these locations are out-of-scope for the Modern Slavery Act 2015, we implement the policy on a global level, ensuring a consistent level of protection throughout our group whilst supporting abolition of modern slavery throughout the world.

### 3. Policies & training

We implement a suite of policies, guidelines and training initiatives in our organisation which help to ensure we uphold our stance on modern slavery. These include our Anti Money Laundering and Client Acceptance policies, alongside specific guidelines set out in our Employee Handbook and Whistleblowing manual.

### 4. Due diligence & risk management

We undertake a high level of scrutiny when recruiting staff in our global offices. All new members of staff undergo eligibility and criminal checks, ensuring that adequate local laws are adhered to with regards employment and minimum wage requirements.

In addition we have a robust risk-management process in place at TorFX which provides easily available channels for reporting any incidents surrounding modern slavery, with board-level review.

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## 5. Supply chain

We expect our entire supply chain – including all contractors, suppliers and other business partners – to adhere to the same principles we operate in relation to modern slavery. We communicate this statement to every supplier and expect them to adhere to the same principles. We ensure its application as appropriate during the relationship.

## 6. Action taken

TorFX assessed its business operations to ensure adherence to the requirements of the modern slavery act, and will continue to assess adherence to this statement periodically.

## 7. Responsibility and governance

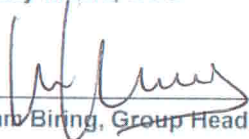
The Board of Directors of Tor Currency Exchange Ltd t/as TorFX approved this statement on 9 November 2018, and are ultimately responsible for ensuring this policy adheres to our ethical standards. The Group Head of Compliance is responsible for day-to-day implementation within the business, ensuring policies and training are up to date, and dealing with questions or concerns about this policy.

## 8. Non-compliance toward this statement

As detailed in our various policies, non-compliance in relation to modern slavery could constitute misconduct or gross misconduct and result in disciplinary action including dismissal.



Tracy Moore, COO



Karl Biring, Group Head of Compliance