



Modern Slavery Statement

TORRINGTON GROUP COMPRISING TSUNAMI AXIS LTD, AXIS@WORK LTD, TSUNAMI AXIS LABS LLP, TSUNAMI AXIS LUXEMBOURG, TSUNAMI AXIS GMBH, TSUNAMI AXIS SWITZERLAND SA, TSUNAMI AXIS FRANCE SAS, FREEDOM WORKPLACE LIMITED: MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31ST MAY 2025, ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

Give a brief detail of the organisation, the business activities it carries out and the nature of its supply chain:

The Torrington Group provides commercial furniture services. These services include planning, selection, procurement, consultation, move management, project management, installation, aftercare, and logistics. Tsunami Axis Ltd, Tsunami Axis Luxembourg, Tsunami Axis Switzerland SA, Tsunami Axis France SAS and Tsunami Axis GmbH are furniture dealerships. Tsunami Axis Labs LLP specialises in healthcare furniture, while Freedom Workplace Limited is a furniture consultancy dealership. Axis@Work Ltd is a design and build service dealership. The largest company in the group is Tsunami Axis Ltd.

The Torrington Group procures its furniture from approximately 75 established manufacturers, and the largest of these is Miller Knoll, for whom Tsunami Axis Limited is a premier dealer. The furniture industry in the company's main region of operation operates within recognised ethical parameters, driven by a customer base which includes architects, large corporate entities, government departments, and charities. These clients make strict ethical demands through the bidding process.

The Torrington Group conducts a prequalification process for its manufacturers, and records this information within its business management system, which is audited and certified to ISO9001. The Torrington Group is audited and certified to managing itself and its suppliers in line with the guidance standard ISO14001, ISO45001. Tsunami Axis Switzerland SA, Tsunami Axis France SAS and Freedom Workplace Limited expects to be audited and certified to ISO9001, ISO14001 and ISO45001 by 2027.

OUR POLICIES

- » Sustainable Procurement Policy
- » Quality & Environmental Policy
- » Anti-Bribery Policy
- » Health and Safety Policy
- » Corporate Social Responsibility, Equality and Ethics Policy
- » Employee Handbook
- » Subcontractor Controls Policy
- » Supplier Code of Conduct

DUE DILIGENCE PROCESSES

- » Surveying manufacturers, to ensure they meet minimum requirements.
- » Surveying subcontractors to ensure they meet minimum requirements.
- » Conducting internal audits to ensure manufacturers and suppliers are compliant

STEPS TO ASSESS AND MANAGE RISKS

Acknowledge the parts of your business and supply chains where there is a risk of slavery/human trafficking taking place, and detail the steps taken to assess and manage that risk.

The primary risk applicable to our business is the production of sub-components by our manufacturers. We understand that the primary area of concern are unbranded components, which are bought in by our suppliers, and which may be used to construct larger parts. We also assess the production of veneers as another area for concern through responsible sourcing.

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Policies

We will direct our internal auditing into these areas of our manufacturers' activities.

TRAINING

Tsunami Axis provides internal information dissemination, and instruction packs which incorporate the following topics:

- » Assessing the risk of slavery and human trafficking
- » Identifying the signs of slavery and human trafficking
- » "Actions On": If slavery or human trafficking is suspected
- » Escalating potential slavery or human trafficking issues
- » Organisational processes for supplier/sub-contractor non-conformance in high risk scenarios

OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY

As of the year ending 31st May 2025, Tsunami Axis has no evidence of modern slavery in use throughout its sub-contractors, or first-line suppliers, or their suppliers. However, we recognise the importance to audit, monitor, and disseminate awareness of the modern slavery risk within our supply chain.

Signed:

5th November 2025



Sam Baxter, Director

Review:

5th November 2026