

# Trilateral Research Modern Slavery Statement 2023/24

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Trilateral Research Ltd and its wholly owned company based in Ireland during the financial year ending 31 March 2023 to prevent modern slavery and human trafficking in its business and supply chains.

Trilateral Research Limited ('the Company'), and its wholly owned subsidiary Trilateral Research Ireland ('Trilateral Ireland'), are committed to continually improving their practices to combat modern slavery and human trafficking. Trilateral Research Ltd, in the UK and Ireland, have zero tolerance of modern slavery, in all its different forms, both in its business and in its supply chains. This is the Company's third Modern Slavery Statement in response to the Modern Slavery Act 2015 (the 'Act') and this statement sets out the steps taken or to be taken by Trilateral Research and Trilateral Research Ireland to prevent modern slavery and human trafficking in its business and supply chains.

## Introduction

We know that modern slavery and human trafficking are global and growing issues, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted. Trilateral Research Ltd has a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

The Company's modern slavery statement is made pursuant to section 54(6) of the Act and constitutes the Company's anti-slavery and human trafficking statement for the financial year ending on 31 March 2023. We are not required to make a statement, as Section 54 of the Modern Slavery Act 2015 only applies to commercial organisations carrying out business in the UK, with a turnover of at least £36 million. This notwithstanding, given our commitment to addressing modern slavery and human trafficking, we choose to make this statement. Trilateral Research aims to be transparent about its approach to modern slavery and this statement outlines its approach to tackling modern slavery where it can.

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## Definitions

The Company considers that the term “modern slavery” encompasses the following definitions for the purposes of the Modern Slavery Act 2015. These are:

- ‘slavery’ is where ownership is exercised over a person
- ‘servitude’ involves the obligation to provide services imposed by coercion
- ‘forced or compulsory labour’ involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
- ‘human trafficking’ concerns arranging or facilitating the travel of another, through means such as coercion, deception, force, abuse of power or position of vulnerability, with a view to exploiting them.

## Our business and organisational structure

At Trilateral Research, we feel passionately about making the world a better place by providing Ethical AI solutions to tackle complex social problems.

With award-winning services in research, data protection and cyber-risk, ethics innovation and sociotech insights our team takes an end-to-end approach that fully integrates the technical, legal and social science dimensions. This helps our clients answer the right questions, analyse the right data and get meaningful insights to focus their action for the greatest impacts.

Our ethical AI has a tangible impact in the fight against the biggest challenges we are currently facing such as modern slavery and human trafficking, climate action, child exploitation, human security in conflict and crisis settings, and many more.

We are a Participant in the United Nations Global Compact (UNGC) and a member of the UN Global Academy Network UK. The UNGC is a strategic policy initiative for businesses committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labour, environment and anti- corruption.

The labour supplied to the company in pursuance of its operation is carried out in the UK, Ireland, and certain countries within the EU. Our main office is in London, but we have a number of employees who are based remotely around the UK. We have a smaller wholly owned subsidiary, Trilateral Research Ireland, which is based

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in Waterford in Ireland, and has approximately 25 employees. We also work with a number of consultants based around the EU and one who is based in Pakistan.

## **Commitment**

Trilateral Research acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Trilateral Research does not knowingly enter into business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

## **Modern slavery and human trafficking policies and framework**

### **Supply Chains**

Trilateral Research is committed to acting ethically and with integrity in all of its business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking does not take place anywhere in the business or supply chains. Trilateral Research policy to this effect is included in its Business Ethics and Supplier Ethics policies and Code of Conduct which details the policies in relation to ethics, anti-corruption and bribery. Trilateral Research has undertaken an annual review of the anti-slavery internal controls during the year ended 31 March 2023, with the purpose of:

- Identifying, assessing and monitoring potential risk areas in the supply chains; and
- Mitigating the risk of slavery and human trafficking occurring in the supply chains.

Our Anti-Bribery and Corruption Policy, together with our Whistleblowing Policy, ensures all staff know what is expected of them, and also encourages them to speak up and report any wrongdoing. This includes matters related to the Modern Slavery Act 2015. In addition, we make every effort to make staff aware of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking (see training below).

Trilateral Research has reviewed how it engages with its network of suppliers, e.g. managed office services, travel services, managed IT services, and what steps have been taken to understand how they comply with the requirements of the Act. It has assessed and updated its procurement policy and procedures to ensure that there is an appropriate approach taken to managing modern slavery in the supply chain and to set out our expectations of our supply chain partners in the UK and in Ireland. It has developed and incorporated a

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Supplier Ethical Code that is made available to all suppliers. All Financial Policies and Procedures have been reviewed in 2022 and new Policies and Procedures are being added to ensure that all those involved with procurement are aware of our approach and requirements, and their responsibilities under that.

With regard to the company itself, Trilateral Research remains highly committed to advancing equality, eradicating unfair treatment, and promoting good relations across and between all our employees. We have clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation. Procedures and policies are in place on all major employment issues – e.g. disciplinary, grievance, harassment and bullying, as well as other policies that support fair treatment of employees including attendance management and ill health capability, performance management, recruitment & selection, induction and onboarding amongst others, which more than meet the minimum standards under relevant employment legislation. We rarely contract with third parties to employ staff, preferring to contract with our staff directly and thus further ensure fair treatment.

Demand for our services is consistently high and therefore none of the work that Trilateral undertakes is seasonal. We do not operate zero hours contracts.

## **Due diligence processes for slavery and human trafficking**

As part of its initiative to identify and mitigate risk, Trilateral Research has increased its focus on modern slavery within its wider business operations and will continue to do so during 2023/2024 and beyond.

Trilateral Research has already, and will continue to put in place systems and processes to:

- Identify and assess potential risk areas in its supply chains;
- Mitigate the risk of slavery and human trafficking occurring in its supply chains;
- Protect whistle-blowers.

## **Risk Assessment and Management**

While the company considers its exposure to slavery / human trafficking to be relatively limited (e.g., because it is not working in a sector prone to modern slavery), nonetheless, we will take steps to ensure that such practices do not take place in our business nor the businesses of any organisation that supplies goods or services to us.

In 2022, these steps included the following:

- Risk assessment of main suppliers by expenditure and business continuity significance.
- Review of existing supplier contracts to include termination powers in the event that the supplier is, or is suspected to be, involved in modern slavery
- Training for staff to ensure they understand the company's zero tolerance approach to modern slavery and their responsibilities.

In 2023, these steps will include:

- Proactively sourcing specific suppliers who meet our required ethical supplier requirements
- Rewriting existing, and developing new, procurement policies and procedures to ensure further clarity for staff on their responsibilities
- Increased focus and training for awareness of spotting signs of forced labour
- Better procedures for ID and right to work checks
- Creation of an internal modern slavery risk register

## Training

To continue to ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chains and to the business, the company provides training, advice and guidance for all staff. This is a combination of induction training which provides advice and guidance for all new staff, plus refresher training for existing staff, on the modern slavery regulation, their role in preventing modern slavery and our commitment to it. We have also developed new training in line with our new and revised financial and procurement policies and procedures for those involved in procurement or who have governance of procurement, so that they understand how to apply our approach to the management of modern slavery risks. Training is delivered in a variety of ways, both direct and on demand and is considered mandatory.

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## Trilateral Research's effectiveness in combating slavery and human trafficking

Trilateral Research understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in its supply chain in the long term. While Trilateral Research continues to make progress in this area, future developments will be to update understanding and reassess the nature of that risk, assessing whether policies and controls are appropriate and to ensuring that controls to manage any risk are operating effectively if that risk arises. It is expected that the nature of the risk may change over time and ongoing vigilance will be required, particularly as the company grows.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 March 2023.

Signed by Kush Wadhwa and David Wright, Directors, on behalf of Trilateral Research Limited.

Date: 25<sup>th</sup> Sept 2023



Kush Wadhwa



David Wright