

TRILATERAL RESEARCH

Modern Slavery and Human Trafficking Statement

Financial Year Ending 31 March 2026

Company	Trilateral Research Ltd (and Trilateral Research Ireland)
Published	July 2026
Approved by	Kush Wadhwa, CEO
Statement Period	Financial year ending 31 March 2026
Review Cycle	Annual
Legal Basis	Voluntary — published in the spirit of s.54 Modern Slavery Act 2015

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 Irish subsidiary during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our business and supply chains.

Trilateral Research is not legally required to publish this statement, as our turnover falls below the £36 million statutory threshold. We have chosen to do so voluntarily every year since 2020, because we regard transparency as a cornerstone of responsible and ethical business practice.

1. Introduction and Zero-Tolerance Commitment

Modern slavery and human trafficking are serious global crimes. No sector, geography or organisation, however small, can consider itself entirely immune. Trilateral Research takes a zero-tolerance approach to all forms of modern slavery and human trafficking within our own operations and across our supply chains.

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All employees are expected to remain alert to potential indicators of exploitation and to report concerns promptly through appropriate channels. Management is expected to investigate and act on any concerns raised.

2. Definitions

For the purposes of this statement, “modern slavery” encompasses the following forms of exploitation as defined in the Modern Slavery Act 2015:

- Slavery - exercising ownership or control over a person as property.
- Servitude - compelling a person to provide services through coercion, with no genuine freedom to leave.
- Forced or compulsory labour - work extracted under threat of a penalty, where the individual has not voluntarily offered their services.
- Human trafficking - recruiting, transporting, transferring, harbouring or receiving people through coercion, deception or abuse of power, for the purpose of exploitation.

3. About Trilateral Research

Trilateral Research is a UK-based SaaS and research company specialising in Responsible AI, data protection, ethics innovation and sociotechnical insights. We help public and private sector clients address complex social challenges; including modern slavery and human trafficking, child exploitation, climate action and human security in conflict settings.

Our principal office is at One Knightsbridge Green, London SW1X 7QA. We operate a flexible and remote working model, with employees based across the UK and Ireland. Our Irish subsidiary, Trilateral Research Ireland, is based in Waterford.

During the reporting period, Trilateral Research Ltd and Trilateral Research Ireland together employed approximately 106 people. We also engaged a limited number of specialist consultants and subcontractors to support specific client delivery activities.

Our supply chain consists primarily of professional service providers, technology and software suppliers, recruitment providers, managed office services, travel and accommodation providers, and general business support organisations. We do not operate in sectors with inherently high labour exploitation risk, and we do not use zero-hours contracts.

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4. Policies and Governance Framework

Our approach to preventing modern slavery is underpinned by a suite of policies that set out the standards expected of all employees, suppliers, contractors and business partners:

- Business Ethics Policy
- Supplier Ethics Policy
- Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Procurement Policies and Procedures

These policies are reviewed periodically and updated to reflect changes in legislation, best practice and operational context.

We prefer to contract directly with employees rather than through third-party labour providers, which supports fair and transparent employment practices and reduces intermediary risk. Demand for our services is consistent throughout the year and is not subject to seasonal variation that might otherwise create pressure to use unvetted labour arrangements.

5. Due Diligence

5.1 Our Own Operations

Trilateral Research maintains robust recruitment and employment procedures designed to ensure legal compliance and fair treatment. These include:

- Identity verification and right-to-work checks for all employees and contractors.
- Structured induction and onboarding processes.
- Clear policies covering disciplinary matters, grievances, harassment and bullying, performance management, attendance and employee wellbeing.

We are committed to advancing equality, eradicating unfair treatment and promoting good working relations across the organisation.

5.2 Supply Chain Due Diligence

Supplier due diligence forms part of our procurement and supplier onboarding process. Particular attention is given to suppliers considered critical to operations or operating in sectors where labour exploitation risks are higher. During the reporting period this included:

- Continuing supplier due diligence and ethical supplier assessments where appropriate.
- Reviewing procurement governance and supplier management procedures.
- Encouraging suppliers to demonstrate compliance with relevant legislation, including the Modern Slavery Act 2015.

6. Risk Assessment

Given the professional and knowledge-intensive nature of our work, our direct exposure to modern slavery risk is considered relatively low. However, we recognise that risks can arise indirectly; particularly within supply chains involving manual labour, international contractors, or sectors with weaker regulatory oversight.

We maintain a Modern Slavery Risk Register, reviewed annually. During the reporting period, the following areas were identified as warranting particular attention:

- Recruitment and labour supply arrangements
- International consultancy and subcontractor engagements
- Facilities and office services (cleaning, maintenance, security)
- Technology hardware supply chains
- Travel and accommodation providers

During the reporting period, no instances of modern slavery or human trafficking were identified within our operations or supply chains, and no concerns were raised through formal reporting channels.

7. Training and Awareness

All new employees receive modern slavery awareness training as part of their induction, covering:

- What modern slavery and human trafficking are and why they matter.
- The Company's zero-tolerance approach and relevant policies.

- How to recognise potential indicators of exploitation.
- How to raise a concern, including through the Whistleblowing Policy.

Ongoing awareness activities are provided for existing employees, with targeted guidance for those involved in procurement, supplier management and recruitment. Training is delivered through a combination of direct instruction and on-demand learning.

8. Measuring Effectiveness

During the reporting period:

- No incidents of modern slavery or human trafficking were identified within our operations.
- No concerns were raised through formal whistleblowing or reporting channels.
- Supplier due diligence continued to be applied as part of procurement and onboarding activities.
- Staff awareness activities continued through induction and governance programmes.

We recognise that an absence of reported concerns does not guarantee an absence of risk. We remain committed to strengthening our processes, improving staff awareness, and reviewing the effectiveness of controls on an ongoing basis.

9. Actions Completed in 2025/2026

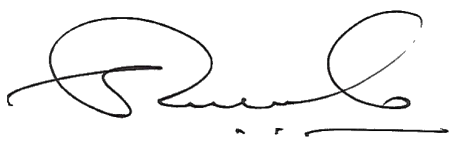
- Maintained and reviewed the internal Modern Slavery Risk Register.
- Continued supplier due diligence and ethical supplier assessments where appropriate.
- Reviewed procurement governance and supplier management procedures.
- Provided awareness and guidance to staff on modern slavery risks and indicators.
- Maintained robust recruitment, identity verification and right-to-work checking procedures.
- Continued to embed modern slavery considerations within wider ESG and responsible business activities.

10. Planned Actions in 2026/2027

- Further develop supplier due diligence and onboarding processes.
- Continue to maintain and review the Modern Slavery Risk Register.

- Deliver updated modern slavery training to all staff.
- Review and refresh supplier risk classifications and procurement controls.
- Continue to integrate modern slavery and human rights considerations within ESG governance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Trilateral Research Ltd's slavery and human trafficking statement for the financial year ending 31 March 2026.



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