

## Trilateral Research Modern Slavery Statement 2021/22

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 2022 to prevent modern slavery and human trafficking in its business and supply chains.

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Trilateral Research Limited ('the Company'), and its wholly owned subsidiary Trilateral Research Ireland ('Trilateral Ireland'), are committed to continually improving their practices to combat slavery and human trafficking. Trilateral Research and Trilateral 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 second 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 Ireland to prevent modern slavery and human trafficking in its business and supply chains.

### Introduction

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue, 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 2022. 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, 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.

## **Our business and organisational structure**

Trilateral Research, founded in 2004, is a leading multidisciplinary consulting and technology development company. Our team collaborates across social science and technology, to bring insights from each to capture the benefits of data-driven innovation. We create knowledge and tools that empower our clients to transform research into innovation and innovation into impact. Our foundation is in social science research, with a special focus on the ways in which new technologies may have privacy, social, ethical or data protection impacts. We have built upon this foundation to add cutting edge competencies leading to a rich, diverse set of consulting services within innovation management and technology development.

Our team collaborates across sociology, criminology, data science, ethics, engineering, economics, technology studies and law and human rights to deliver bespoke, multidisciplinary services to clients in the public and private sector. This blend of expertise, along with our experience working at different levels in the government sector and across different industrial verticals provides a unique value proposition to our clients.

We are a Signatory Partner of the UN Global Compact since May 2019. The [United Nations Global Compact \(UNGC\)](#) 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](#). Our own Corporate Business Principles incorporate the 10 UNGC Principles and we reflect the basic concepts of fairness, honesty and respect for people and the environment in our business actions.

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 in Waterford in Ireland, and has approximately 25 employees. We also work with a number of consultants based around the EU. Demand for our services is consistently high and therefore none of the work that Trilateral undertakes is seasonal.

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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.

## 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

As a research and development company, Trilateral Research does not use an extensive range of local or international suppliers where modern slavery or human trafficking would generally be a material risk.

However, 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 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 2022, 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.

Trilateral Research's Whistleblowing Policy also encourages its employees 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 and what steps have been taken to understand how they comply with the requirements of the Act. Trilateral Research has assessed its procurement process and policy 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. To this end, Trilateral Research has developed a Supplier Ethical Code that will be made available to all suppliers.

Financial Policies and Procedures have been reviewed and new Policies and Procedures 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. Trilateral Research has procedures and policies 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.

## 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 2022/2023 and beyond.

Trilateral Research has already, and will continue to put in place 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.

While the company considers its exposure to slavery / human trafficking to be relatively limited, 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.

These steps include the following:

- During 2022, we will continue our risk assessment of the main suppliers by expenditure and business continuity significance,
- We will review any existing supplier contracts to include termination powers in the event that the supplier is, or is suspected to be, involved in modern slavery
- We will continue to develop and provide training for staff to ensure they understand the company's zero tolerance approach to modern slavery and their responsibilities.

## Training

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 will provide 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. We will also formalise training based on our policies

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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.

## **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 2022.

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

Date: 25th May 2022

*Kush Wadhwa*

Kush Wadhwa

*David Wright*

David Wright