Trilateral Research Modern Slavery Statement 2018/19

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 30 March 2019 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 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 first 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 given the rapid rise in global migration, 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 responsibly 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 30 March 2019. 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. All Trilateral services sit within four industry sectors in which we have expertise: ICT, Smart Cities, Crisis & Security and Environmental Sustainability.

Our team collaborates across sociology, criminology, computer science, engineering, economics, technology studies and law and human rights to deliver bespoke, multi-disciplinary 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.

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

As a research and software 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. Additionally, none of its suppliers are considered key to the business’s ongoing success. 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 which details the policies in relation to ethics, anti-corruption and bribery. Trilateral Research will be undertaking a review of the anti-slavery internal controls during the year ended 30 March 2019, 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 will be reviewing 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’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 will take 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 will also assess its procurement process and policy to ensure that there is an appropriate approach taken to managing modern slavery in its supply chain and to set out its expectations of its supply chain partners in the UK and in Ireland.

With regard to the company itself, Trilateral Research’s 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's 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 capability, performance management, recruitment & selection etc.

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

As part of its initiative to identify and mitigate risk, Trilateral Research will increase its focus on modern slavery within its wider business operations, and will continue to do so during 2018/2019.

Trilateral Research will be putting 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;
- Monitor potential risk areas in its supply chains; and
- Protect whistle-blowers.

During 2018, we will be undertaking a risk assessment of the top suppliers by expenditures, which includes the review and risk assessment of the industries and products / services that Trilateral Research buys.

**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, Trilateral Research will be providing either training or training updates on the modern slavery regulation to the relevant personnel or departments within the company who are directly involved in procurement or who have governance of procurement.

**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 also 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.
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 30 March 2019.

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

Date: 30 March 2018

Kush Wadhwa

David Wright