

Modern Slavery Policy Statement



Introduction

This statement sets out TRL's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TRL's slavery and human trafficking statement for the financial year ending 30 June 2016.

TRL is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout TRL's supply chains. TRL expects the same high standards from all of its suppliers and TRL is continually evolving and updating its contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. TRL expects its suppliers to hold their own suppliers to the same high standards.

The environment in which TRL operates is primarily research, technology and software, which is a low risk industry for slavery and human trafficking activities. A few of the countries TRL works within have a high risk profile for forced labour and slavery, however, the goods or services sourced by TRL are low risk for slavery and human trafficking activities. Therefore, TRL operates in a low risk environment for slavery and human trafficking activities, but is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring, as far as it is reasonably able, that TRL supply chains are free from slavery and human trafficking.

TRL's headquarters is in Wokingham, Berkshire, although it has a number of satellite offices throughout the UK and overseas; in addition to the UK these include Qatar and the United Arab Emirates.

TRL also undertakes work in other countries, but prior to undertaking this work it carries out a detailed risk assessment, which includes identifying and assessing all potential legal and regulatory matters which could affect TRL's work. The decision to undertake work in new countries is formally approved by the CEO and the identified risks are documented into the Project Risk Log, which is managed throughout the lifetime of the project.

Steps for the Prevention of Modern Slavery

TRL operates various policies and procedures to prevent slavery and human trafficking, which are designed to:-

- Identify and assess potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Cascade the modern slavery requirements down our supply chain
- Provide adequate protection for whistle blowers.

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TRL Policies and Procedures

- **Fraud, Bribery, Corruption and Business Integrity Policy** – This is the TRL employee code of conduct which makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Purchasing Procedure** – TRL is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. When considering taking on a new supplier, TRL undertakes a due diligence process in which a supplier has to complete a Supplier Assessment Questionnaire and agree to our Supplier Standards of Conduct, which safeguards against slavery and human trafficking in our supply chains.
- **Whistleblowing Policy** - TRL encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy to make disclosures, without fear of retaliation.

Communication and Awareness of this Policy

TRL has raised awareness of modern slavery by:-

- Making its employees aware of the Modern Slavery Act and what is expected of them
- Informing employees what to do if they suspect any slavery or human trafficking issues.

TRL encourages members of the public or people not employed by TRL to write, in confidence, to the Company Secretary or the Head of Risk, Compliance & Business Improvement to raise any concern, issue or suspicion of modern slavery in any part of TRL's business or related supply chain.

A handwritten signature in black ink, appearing to read 'Rob Wallis'.

Rob Wallis
CEO
November 2016