

## Slavery & Human Trafficking Statement

*Published April 2022*

### *Introduction*

This statement is made by Trilogy International on behalf of its United Kingdom based subsidiaries in order to comply with the Modern Slavery Act 2015.

This statement sets out the steps Trilogy International has taken to prevent Slavery and Human Trafficking (as defined in the Act) from taking place in our supply chains or in any part of our business. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's initial slavery and human trafficking statement for the current financial year. It will be reviewed annually.

The Board believes Trilogy International's business model and supply chain represents a low risk of exposure to slavery and human trafficking. We have a strong emphasis on working to the highest professional standards from those parties with whom we engage.

### *Our Policy on Slavery and Human Trafficking*

We are seeking to detect and to prevent slavery or human trafficking, as defined in the Modern Slavery Act 2015, from occurring in our supply chains or in any part of our business. Our business principles and ethics statement reflects our commitment to acting ethically and with integrity in all our business relationships. We aim to implement and enforce effective and proportionate systems and controls to ensure slavery and human trafficking is not accepted anywhere in our supply chains.

Trilogy International does not accept any breach of human rights including slavery and human trafficking. The Code of Conduct is board-approved and this statement is aligned with the principles set out in the code. As a business we will raise awareness with our staff to be alert to the risk, however remote, that we might become party to either slavery or human trafficking in our business and in the wider supply chain. Should staff report concerns to management we will evaluate them and where necessary act appropriately.

### *Our Approach*

Considering Our Supply Chains:

When considering our supply chains we will focus on those firms who we pay for provision of goods and services.

We intend to amend our outsourcing policy to recognise the need for an assessment of the risk of exposure to possible slavery or human trafficking and we will require commentary on how this risk is mitigated as part of the due diligence process prior to approval of the material service provider.

We are considering the need to perform due diligence on our business services suppliers (office equipment, computer supplies, travel agents etc.). If we do, we will focus our

assessment on those firms deemed material suppliers and consider if they are exposed to a potential risk.

As part of our supply chain assessment undertaken to identify and mitigate risk -

- We will review our list of suppliers and assessed the risk they pose to our business
- We will review our list of Cover holders and risk assess them by country focusing on those operating in countries where slavery or trafficking is seen as a significant risk and understood whether there is a potential for exposure
- We will perform a similar review of our outsource providers

**Training:**

To promote an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff. This will include all Directors who have been briefed on the subject. We will also provide awareness training to new recruits during their induction period.

*Measuring our effectiveness in combatting slavery and human trafficking*

We intend to use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Policy board approved by the Board annually and on website
- Due diligence performed at the time a contract is established on material outsource providers and suppliers giving consideration of the risk
- Risk assessment performed annually of high risk countries with analysis of providers in those countries
- Delivery of training to all existing staff
- Delivery of training to new employees
- Monitoring of the whistleblowing policy which facilitates anonymous reporting by employees who wish to raise points of concern but do not feel able to do so through line management. This would enable escalate of any concerns about slavery and human trafficking
- Reporting by exception of any issues of possible slavery and human trafficking to the Board by the Compliance Officer
- Annual report by the Compliance Officer to the Board measuring against the KPIs when seeking the annual preapproval of this policy