

Human Trafficking and Modern Slavery Policy

1. Introduction and Purpose

TRN is committed to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chain or in any part of our own business. This policy sets out the steps we have taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains and forms part of TRN's commitment to comply with the Modern Slavery Act 2015.

2. Scope

This policy applies to all employees, directors, contractors, trainees, volunteers, and any other persons working on behalf of TRN, as well as to our supply chain and business partners worldwide. It covers all activities, processes, and transactions related to the delivery of training services and the management of our business operations.

3. Definitions

- **Modern Slavery:** An umbrella term covering slavery, servitude, forced and compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, abduction, fraud, or deception for the purpose of exploitation.
- **Forced Labour:** Work or service that people are coerced to perform against their will under the threat of some form of punishment.
- **Exploitation:** Taking unfair advantage of a person's vulnerability for personal or commercial gain, including in situations of employment or voluntary work.

4. Policy Statement

TRN has a zero-tolerance approach to modern slavery and human trafficking in any form. We are committed to:

- Conducting our business in a way that respects human rights and dignity.
- Implementing and enforcing robust procedures to ensure that any form of modern slavery or human trafficking is identified, prevented, and, where necessary, remediated.
- Complying fully with all relevant legislation, including the Modern Slavery Act 2015.

5. Our Approach to Risk Assessment and Management

- **Risk Assessment:** TRN will carry out periodic risk assessments to identify and evaluate potential areas of risk within our operations and supply chain where modern slavery or human trafficking could occur. This includes a review of our relationships with suppliers, subcontractors, and other business partners.
- **Due Diligence:** We will apply appropriate due diligence processes to assess and monitor our suppliers and partners. This includes contractual clauses that require adherence to all applicable laws regarding modern slavery and human trafficking, as well as periodic audits.
- **Remediation:** Where issues are identified, TRN is committed to taking immediate and appropriate remedial action, including working with relevant authorities and stakeholders.

6. Responsibilities

- **Board of Directors:** The Board is responsible for approving this policy and ensuring that appropriate resources are made available for its implementation.
- **Management:** Management at all levels is responsible for integrating this policy into business practices and ensuring that all employees and contractors are aware of its contents.
- **Designated Modern Slavery Compliance Officer:** TRN has appointed a designated Modern Slavery Compliance Officer who is responsible for overseeing the implementation of this policy, providing training, and acting as a point of contact for any queries or concerns regarding modern slavery and human trafficking. The Compliance Officer will also ensure regular reviews of the policy and its implementation.

7. Training and Awareness

TRN is committed to providing appropriate training to all staff to ensure that they understand the risks of modern slavery and human trafficking in our business and supply chains, and how to identify and report any concerns. This training will be included as part of our induction programme and be provided on an ongoing basis.

8. Reporting Concerns

- **Internal Reporting:** Any employee, contractor, or stakeholder who suspects that modern slavery or human trafficking may be taking place in any part of TRN's operations or supply chain is encouraged to report their concerns immediately. Reports can be made confidentially to the Designated Modern Slavery Compliance Officer, through our established whistleblowing channels.
- **No Retaliation:** TRN will not tolerate any form of retaliation against anyone raising concerns in good faith. All reports will be treated confidentially and investigated thoroughly.

9. Record Keeping and Monitoring

- **Documentation:** TRN will maintain appropriate records of risk assessments, due diligence activities, training sessions, and any reports or investigations related to modern slavery and human trafficking.
- **Monitoring and Review:** The effectiveness of this policy will be regularly reviewed by senior management and the Board of Directors. Any improvements or amendments required will be implemented promptly. This review will include an assessment of emerging risks and legislative changes.

10. Compliance with the Modern Slavery Act 2015

TRN recognises its obligations under the Modern Slavery Act 2015. This policy is designed to ensure compliance with the Act, and TRN will produce an annual Modern Slavery Statement that details the steps taken during the year to prevent modern slavery and human trafficking within our operations and supply chain.

11. Policy Review

This policy will be reviewed at least annually or more frequently if necessary to reflect changes in our business operations, supply chain, or legal requirements. Any amendments will be approved by the Board of Directors and communicated to all relevant parties.

12. Conclusion

TRN is fully committed to ensuring that modern slavery and human trafficking have no place in our business. Through rigorous risk assessment, diligent supplier management, robust training, and an unwavering commitment to ethical practices, we aim to contribute to the global fight against modern slavery.