



INTRODUCTION

Aquent LLC is committed to ensuring that our employment practices are ethical and respectable across all of our offices worldwide.

We have been in business since 1986 and have always adhered to our Code of Business Ethics which states that it is Aquent's policy to conduct its affairs in accordance with the highest ethical business practices and to comply with all applicable laws and regulations worldwide.

Whistleblowing is also addressed within this code, and managers and supervisors of Aquent have the duty to create and maintain an environment where each employee feels responsible for and comfortable with complying with this Code and reporting actual or suspected violations of it, without fear of retribution or retaliation.

We naturally have in place a Code of Business Ethics, Code of Conduct and grievance procedures, and all are available to staff via our intranet.

We check the right to work of all our talent in all locations.

To specifically address our commitment, we are continuing to put systems in place to ensure that no slavery or human trafficking is taking place within our supply chain.

ORGANISATION'S STRUCTURE

We are a global provider of staffing services in the creative, digital and marketing arenas. The company has more than 750 internal employees worldwide and operates in the USA, UK, Netherlands, Australia, Japan, France and Canada.

Our parent company is TRI Ventures Inc., which has its head office in Boston, USA.

OUR BUSINESS

Our headquarters are located in Boston, Massachusetts, USA. Our business is organised into separate offices in 43 locations worldwide. Offices are comprised of business managers, office managers and recruitment staff. Our HQ houses our senior management team along with finance, IT, HR and support services.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. Our Code of Business Ethics also addresses whistleblowing.

OUR SUPPLY CHAINS

Our supply chains include among others: umbrella companies; managed service providers; payroll companies; software/IT companies; professional services; office supply companies; office facilities companies, cleaning and catering companies.

All new suppliers and existing suppliers at renewal of contract are required to complete a questionnaire detailing their modern slavery and human trafficking eradication practices, and this will determine our ability to continue working with that organisation.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we continue to put systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

To accomplish the above,

- We posted an Anti-Slavery Policy and Statement on our corporate website.
- We added a Modern Slavery questionnaire to our vendor vetting process which we have rolled out in five countries.
- We announced reporting methods for employees to report on this and other ethics concerns.
- We conducted the first annual review of the policy and controls related to Modern Slavery.

SUPPLIER ADHERENCE TO OUR VALUES [AND ETHICS]

To ensure all those in our supply chain and contractors comply with our values, we have put in place controls and procedures to detect and prevent modern slavery. We take a risk based approach to addressing concerns that may arise in our supply chain. We expect our suppliers to ensure that they too have effective controls and procedures to ensure that modern slavery is not taking place in their business and supply chains. We have an Anti-Slavery and Human Trafficking Policy in place. Our Ethics team, which consists of representatives from our Senior Management, HR and Legal departments, is responsible for maintaining, reviewing and updating the Anti-Slavery and Human Trafficking Policy.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our staff at on-boarding and are developing training to provide to global employees who are responsible for sourcing, procuring and contracting with suppliers.

FURTHER STEPS

This statement is made in compliance with the Modern Slavery Act 2015 and will be reviewed and updated annually.

Signed on behalf of Class A Member, TRI Ventures, Inc.

By:



John Chuang, President