

# Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Achilles Slavery and Human Trafficking Statement for the financial year ending 30<sup>th</sup> April 2019.

Achilles is committed to improving all business practices to ensure that slavery and human trafficking is not taking place anywhere within our business or within our supply chain.

## About Achilles

Achilles Group Holdings Limited is the parent company of the Achilles group of companies (“Achilles”). Achilles has over 600 employees worldwide and operates in Europe, Asia, the Middle East, the US and Latin America.

Achilles creates and manages a global network of collaborative industry communities, allowing trading partners to share high quality, structured, real-time data. Using cloud-based technology, we act as an independent partner providing validated data and analytics to enable buyers to manage supply chain risk, and suppliers to increase market reach in their sector.

At Achilles, we are committed to the sustainability and performance of the businesses that we work with. We collect and validate supplier data and mitigate risks globally. This data-driven insight builds more secure, sustainable, better performing supply chains and we pride ourselves on being a responsible business committed to acting with integrity for our customers, our people, and the suppliers and buyers we serve throughout the world.

## Our commitment

We abhor slavery and human trafficking and are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain.

We aim to have the right policies, processes and procedures in place and we are always looking to improve both in our own business and to help our customers expose and eliminate human rights abuses in their supply chains.

## Helping our customers identify supply chain risks

Achilles’ supplier registration and assurance services aim to ensure that there is no modern slavery concealed in our customers’ high-risk supply chains. We do this by capturing relevant information about a customer’s suppliers and then evaluating the risks of slavery in that supply chain. Our verification process involves an on-going assessment of major suppliers and using the information provided to determine a risk profile of suppliers which then leads to a more detailed review having considered higher risks based on their location, foreign worker population and other risk factors.

For a significant number of our buyer customers, these supplier responses are then validated through on-site audits. Achilles now undertakes audits which assess the rights of workers within the supply chain. As a business we are actively pursuing the development of these Labour Practice Audits as a means of reducing the potential for forced or child labour.

## Our supply chain and structure

In the financial year ended 30<sup>th</sup> April 2019, Achilles received a variety of goods and services from third party suppliers. Our analysis of our suppliers indicates that the top categories of procurement spend comprises of:

- Contractors including qualified independent third-party supply chain auditors providing on-site audit services
- Travel costs and services (particularly with airlines, hotels and other travel service providers)
- IT and telecom equipment and services
- Office rental and other facilities management suppliers

Based on our analysis we do not consider that our relationships with these suppliers give rise to material risks of slavery or human trafficking.

## Polices and training

Our Anti-Slavery and Human Trafficking Policy reflects Achilles' 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 chain.

Where necessary we provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and conflicts of interest.

## Action to Address Modern Slavery

We endeavour to have detailed knowledge of our suppliers, their operations and practices. We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Follow up with suppliers who have a higher risk profile
- Protect whistle blowers.

Within Achilles Audit Services this consists of notifying our audit service provider of the requirements of the Achilles Conflict of Interest, Unethical Incentives and Professional Conduct statements. Individual auditors are also required to adhere to the same professional standards as Achilles auditors and are required to undertake the same classroom, field-based training and on-going monitoring as Achilles auditors to ensure compliance with Achilles codes of conduct, and standards. Monitoring of auditor training and acceptance of the aforementioned statements is maintained by the Audit Services Department.

Achilles is a strong advocate of the Living Wage and strongly supports fair pay at work. All directly employed staff are paid above the Living Wage, and Achilles has committed to paying the Living Wage to all regular third party contracted staff from 1<sup>st</sup> May 2019.

Approved by the Board of Directors of Achilles Group Holdings Limited on 1 May 2019.



**Jay Katzen**  
Director and CEO