



## **INTRODUCTION**

At Achilles, 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. 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 seek to have the right policies, processes and procedures in place. We cannot be complacent 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. I am proud of who we are at Achilles and the contribution Achilles makes to the principles that underpin the Modern Slavery Act.

This statement sets out the steps that we have taken to ensure that slavery and human trafficking is not taking place in our suppliers or any part of our business.

## **MEANING OF SLAVERY AND HUMAN TRAFFICKING**

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO) particularly relating to forced or compulsory labour.

### **Our Commitment to Human Rights**

Achilles aims to ensure the highest level of ethical conduct, which includes aspiring to the 10 principles of the UN Global Compact, including human rights, as expressed through the Global Code of Conduct. The Code includes our commitment to:

- follow high standards of ethical conduct around the world;
- work with customers, suppliers and subcontractors that live up to Achilles core ethical standards; and
- act lawfully, ethically and in the public interest.

As part of Achilles's supply of services, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Achilles is committed to ensuring, as far as is reasonably practical, that there is no modern slavery or human trafficking within its business. For some of its Communities, Achilles applies its supply chain risk analytics tools to identify suppliers with a higher risk profile in respect of modern slavery and other human rights abuses.

Such services are aimed at ensuring there is no modern slavery concealed in our buyer customers' high risk supply chains. Our audit teams also undertake field inspections for selected buyer customers to work back

through the supply chain to confirm that sub-contractors are compliant with the Buyer defined community requirements.

We do this by capturing relevant information about a customer's suppliers and then evaluating the risks of slavery in that particular 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 buyers, these supplier responses are then validated through on-site audits. In Chile, for example, our auditors have assessed workers' pay and hours worked to ensure compliance with legal requirements of that country.

On site audits are performed using Achilles' supplier risk profile and specific buyer compliance criteria. We work in partnership with the supplier to complete the audit and to develop an improvement plan to address any gaps in compliance identified during the audit. Our goal when working with a supplier on an improvement plan is for the supplier to successfully address our findings.

Achilles also provides a conflict minerals solution for our buyer customers, whereby we will (i) contact suppliers that are potentially using materials at risk of containing conflict minerals, (ii) collect relevant data from such suppliers; and (iii) based on such data, identify key risks in the supply chain which are then escalated to the buyer customer for detailed follow up action direct with the supplier.

Achilles Group Holdings Limited is the parent company of the Achilles group of companies (Group). The Group has over 900 employees worldwide and operate in Europe, Asia, the Middle East, Africa, 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.

## **OUR SUPPLIERS**

In the financial year ended 30 April 2017 Achilles received a variety of goods and services from third party suppliers. The top categories of the Groups 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
- Cleaning and other facilities management suppliers

As part of our commitment to identify and mitigate the risk of modern slavery within our business and amongst our suppliers, in 2017 we will conduct an internal review of our key suppliers and top strategic suppliers to assess the risk of these to our business.

Our review will be focussed on the following four key areas:

- The goods or services that they provide;
- Whether the goods or services are manufactured or provided off-shore;
- Whether the supplier is based in a country that has a high prevalence of modern slavery or human rights violations; and
- Whether the goods or services supplied are carried out in an industry that could employ low skilled or migrant workers, where the supplier is based in the UK.

#### **OUR POLICIES**

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 anywhere in our supply chains.

To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. Within Achilles Audit Services this consists of: notifying our audit service supplier 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.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk in our supply chain 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
- Monitor potential risk areas in our supply chains
- Follow up with suppliers who have a higher risk profile
- Monitor compliance with an agreed action plan
- Protect whistle blowers

#### **TRAINING**

When necessary we provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and conflicts of interest. Our auditors have developed a program for auditing to ensure that the responsible business agenda of our customers is embedded and measured on an ongoing basis, including compliance with relevant policies addressing modern slavery and human rights.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We 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:

- Effective use of the Recruitment and Selection Policy and Procedure.
- Use of labour monitoring and payroll systems.

In relation to our own employment practices, we monitor and review:

- Employee engagement scores;
- Issues raised under our Whistleblowing & Grievances policies; and
- Number of security incidents.

We encourage anyone involved with our business, including employees, contractors, suppliers and customers to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices.

## FURTHER STEPS

Achilles is a strong advocate of the Living Wage and strongly supports fair pay at work. In the current financial year, we will pursue Living Wage accreditation and consider how we can incorporate this important element in the fight against modern slavery into the service we offer to our customers.

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 April 2018. The board of directors the Company has approved this statement to be signed by Don Robert as it's designate director at its board meeting on 8 June 2017 and the information in this statement is accurate as of that date.

Signed for and on behalf of Achilles Holdco Limited and all companies in the Achilles group of companies.



**Don Robert**  
Chairman