

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 30th April 2022.

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

Aurora II Topco Limited is the parent company of the Achilles group of companies (“Achilles”). Achilles has approximately 590 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 networks, 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.

For a significant number of our buyer customers, these supplier responses are then validated through on-site or remote audits, assessing the rights of workers within the supply chain. We continue to actively develop the scope of these audits: in March 2022 we launched the Achilles Ethical Business Programme, a single standard through which we can assess ethical employment practices that is supported by the anti-slavery charity Unseen.

Our supply chain and structure

In the financial year ended 30th April 2022, Achilles received a variety of goods and services from third party suppliers. Our annual review and analysis of our suppliers indicates that the top categories of procurement spend continued to comprise of:

- Contractors, including qualified independent third-party supply chain auditors providing audit services

- Professional advisers
- Technology and telecommunications equipment, software and services
- Office rental and facilities management suppliers

Following our analysis, we do not consider that our relationships with any of our 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. We have a partnership with anti-slavery charity Unseen through which we collaborate in anti-slavery working groups and share insights identified through the Achilles audit services.

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. In the last financial year an online Modern Slavery training course was issued for all employees to complete, providing Achilles staff with information on how to identify signs of slavery in the supply chain and how to raise and report any concerns.

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.

During this last financial year, Achilles launched a project to onboard its own suppliers to the Achilles supplier management platform enabling us to improve supply chain visibility and our future procurement decisions. As part of this process, suppliers to Achilles are asked to comply with the Achilles Supplier Code of Conduct, covering areas such as Modern Slavery, Health & Safety and Anti-Bribery.

Within Achilles' Audit business, Achilles notifies its third-party audit service providers of the requirements of the Achilles Conflict of Interest, Unethical Incentives and Professional Conduct statements contained within the Auditor Code of Practice. Individual auditors are also required to adhere to the same professional standards as Achilles-employed auditors, i.e., undertake the same classroom, field-based training and on-going monitoring to ensure compliance with Achilles codes of conduct and audit 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 and regular third party contracted staff are paid on or above the Living Wage.

Approved by the Board of Directors of Aurora II Topco Limited on 22nd September 2022.



Paul Stanley
Director and CEO