
ACHILLES 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 2025.

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 525 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, transparent 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 appropriate policies, processes and procedures in place, and we continually seek to improve our own business operations, in order to expose and eliminate human rights abuses in 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' supply chains. We do this by aligning our services to internationally recognised due diligence processes. Our risk-based verification process involves (i) an on-going assessment of our customers' major suppliers using the information provided; (ii) determining a risk profile for the supplier (based on several indices including those set out by the International Labour Organisation and Global Slavery Index); and (iii) undertaking a more detailed evaluation of the higher-risk suppliers.

For a significant number of our buyer customers, the supplier responses are then validated through an on-site or a remote audit to assess the rights of workers within the supply chain. We continue to work closely with our customers who utilise our Ethical Business Programme, this programme has formed a key aspect of the Scape Modern Slavery Strategic Partnership which aims to tackle modern slavery and labour exploitation, strengthening the construction sector's approach to minimising the risk of modern slavery and drive opportunities for change.

OUR SUPPLY CHAIN AND STRUCTURE

In the financial year ended 30th April 2025, Achilles received a variety of goods and services from third party suppliers. Our top categories of procurement spend continue 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

We do not consider that our relationships with any of our suppliers give rise to material risks of slavery or human trafficking.

POLICIES AND TRAINING

Our affirmation to Anti-Slavery is reflected within the Achilles Human Rights Policy which 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 continue to partner with anti-slavery charity Unseen in addition to providing support to the Centre for Social Justice and the University of Nottingham Rights Lab, a world-leading modern slavery research unit committed to ending slavery.

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. An online annual Modern Slavery training course is issued to all employees, providing information on how to identify signs of slavery in the supply chain and how to raise and report any concerns.

ACTIONS 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 chain
- Mitigate the risk of slavery and human trafficking occurring in our supply chain
- Follow up with suppliers who have a higher risk profile
- Protect whistle blowers.

Strategic suppliers engaged by Achilles have completed an Achilles pre-qualification questionnaire to identify the robustness of procedures and levels of compliance with internationally recognised standards. In addition to the online questionnaire, 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. An ongoing review of Achilles' supply chain is conducted on an annual basis where information contained within our database is flagged as having expired.

Within Achilles Audit Services, 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 25th September 2025.

Signed by:

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Director