



INTRODUCTION FROM THE CHAIRMAN

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain.

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

In addition to its own supply chain, the nature of Achilles' business means that it works closely with buyer members of its communities to help eliminate these abuses from their supply chains. We are proud of the work we have done with our buyer members to help them ensure that slavery and human trafficking are not concealed in their supply chains.

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.

We recognise that forced labour as a form of slavery includes debt bondage and the restriction of a person's freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker's identity papers.

ACHILLES ETHICAL COMPLIANCE ANALYTICS

As part of its services to buyer customers, Achilles applies its supply chain risk analytics tools to identify suppliers with a higher risk profile in respect of modern slavery. Such services are aimed at ensuring there is no modern slavery concealed in our buyer customers' supply chains. Our audit teams also undertake field inspections for our buyer customers to work back through the supply chain to confirm that sub-contractors are compliant with the standards adopted by our buyer customers.

We do this by capturing relevant information about the performance of a customer's supply chain 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 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.

Achilles Holdco Limited is the parent company of the Achilles group of companies (Group). The Group has over 1,000 employees worldwide and operate in the EU, Eastern Europe, Asia, the Middle East, Africa, and Latin America.

OUR SUPPLY CHAINS

Our supply chains include:

- Qualified independent third party supply chain auditors providing on-site audit services
- Professional services providers
- IT contractors
- Cleaning and other facilities management suppliers

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are 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 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, underpinned by periodic audit by Achilles to validate compliance with these standards. 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.

During 2016 we will undertake a risk analysis of our supply chain and follow up with on-site audits of our suppliers where the supplier questionnaire identifies a higher risk profile.

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 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.
- Completion of audits conducted by internal and external auditors.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

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

We will consider whether targeted training should be developed for suppliers where we identify an elevated risk of slavery or human trafficking. This training will include elements of slavery and human trafficking, awareness building, expectation setting, best practice sharing self-assessment and developing action plans.

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 2017.



Don Robert
Chairman
Achilles Holdco Limited