



Achilles Group Limited

United Nations Global Compact Communication on Progress

Statement of continued support by Jay Katzen, Chief Executive Officer

I am pleased once again to confirm and renew the ongoing support and commitment of Achilles to the UN Global Compact initiative. Achilles has supported the UN Global Compact for 17 years and continues to align strategy and business operations with the 10 principles for human rights, labour standards, environment, and anti-corruption.

Achilles is a global supply chain risk management company, providing supplier information services worldwide to supply chain intensive industries, helping them to improve sustainability standards and business performance. We collect, validate, analyse and maintain essential supplier information so that our customers can be aware of any risks present within their supply chain and implement measures to protect their business, people, environment and profit.

We are continually making improvements within our business and are conscious of the increasingly important role that Achilles plays in encouraging and assisting our customers to adopt the UN Global compact principles within their own business practices. It is an ongoing objective of Achilles to raise awareness, promote and advance these principles within our sphere of influence, as we continue to develop all the services that we offer.

A handwritten signature in black ink, appearing to read 'Jay Katzen', with a long horizontal line extending to the right.

Jay Katzen
CEO
4 April 2022

Description of actions and outcomes:

Human rights

***Principle 1 & 2:** Businesses should support and respect the protection of internationally proclaimed human rights; and make sure that they are not complicit in human rights abuses.*

Achilles is a committed ethical and equal opportunities employer, ensuring human rights are upheld and that we are not complicit in any human rights abuses. We have in place several global company policies including equal opportunities, health & safety, flexible working, compassionate leave, maternity & parental leave, and grievance, together with the systems and documentation that support the implementation of these policies. Company policies are communicated to employees when they join Achilles and are accessible on the Achilles Group SharePoint site, with communications to employees whenever policies are updated. We encourage all our stakeholders to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices.

Through our business relationships, Achilles helps customers to monitor issues relating to human rights throughout their own supply chains and therefore engage in responsible procurement practices. We maintain a series of audit and assessment programmes which have been developed based on internationally recognised human rights standards. Throughout the period there has been continued collaboration on areas such as modern slavery and conflict minerals with charities and thought leaders recognised for their work in preventing human rights violations.

Labour Standards

***Principles 3 - 6:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.*

Achilles are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects this commitment to act ethically and with integrity by adopting effective systems and controls to ensure that any forms of forced and compulsory labour are not taking place. We support the abolition of

child labour and ensure that we do not employ child workers by requiring verification of age in the recruitment process across all our operating business units. An online training course on modern slavery is due to be undertaken by employees globally during 2022 to raise further awareness within our organisation.

To identify and mitigate any risks in our supply chain Achilles endeavours to have detailed knowledge of its suppliers and their operations and practices. We have recently launched a project to create a supplier database using our own business portal, where our supplier data will be validated and standardised to improve visibility and support future procurement decisions. As part of this process, we will be asking suppliers to endorse the Achilles Code of Conduct which covers areas including Human Rights & Modern Slavery, Health & Safety and Anti-Bribery. To ensure that our contractors comply with our values we have in place a rigorous supply chain compliance programme. Within Achilles Audit Services this includes a requirement for our audit service suppliers to operate in line with the Achilles Auditor Code of Practice which includes Achilles Conflict of Interest, Unethical Incentives and Professional Conduct statements.

The nature of our business means that we can work closely with customers to help them eliminate any forms of abuse from their supply chains. The Achilles Ethical Business Working Group was formed in 2021, a collaboration of leading UK construction and infrastructure companies committed to improving labour standards. Following on from this the Achilles Ethical Business Programme was launched in March 2022, a single standard through which to assess ethical employment practices, supported by Unseen, the anti-slavery charity. The Ethical Business Programme will help customers to identify, investigate and improve employment conditions within their supply chain. Achilles continues to deliver Ethical Sourcing audits on behalf of customers to help identify any issues of concern in this area. Using data captured during these surveys, Achilles has contributed to a series of whitepapers and presentations for organisations including Unseen UK and the Independent Anti-Slavery Commissioner.

Achilles recognises the right to freedom of association and collective bargaining by working constructively with trades unions wherever they represent our employees and complying with local legislation. An employee's rights, responsibilities, compensation and benefits are clearly stated in a contract of employment. Employee representatives are consulted regularly on a range of matters affecting employees and considerable value is placed on employee communication and engagement with a culture where feedback is embraced. In March 2022, the Achilles entity in Chile successfully

negotiated a new Collective Bargaining Agreement with the Trade Unions. Employee engagement surveys and working groups have also been used as a tool to promote a transparent and collaborative employment culture. The latest employee engagement survey took place in May 2021 and the target for the People Insights Survey this year is to achieve a minimum of 70% employee engagement. Employees are regularly kept informed via companywide updates, bulletins and newsletters, regional town hall briefings and quarterly global town hall briefings lead by the CEO and these have continued regularly during the pandemic when communication has been more important than ever. Employee interaction at all levels takes place on the Achilles social networking Yammer site.

Achilles is a global organisation operating in over 15 countries with employees representing a diverse range of nationalities and cultures. We are committed to treating all employees equally, regardless of their sex, race, sexual orientation, age, marital status, ethnic origin, disability, religion, belief or any other grounds of discrimination prohibited by legislation. Employee wellbeing, equality, diversity and inclusivity are now regularly reported at Board meetings, with data being monitored on a quarterly basis, and an internal working group is being set up to focus specifically on diversity and inclusion within the business. Our Equal Opportunities Policy applies to the recruitment and selection process, training, conditions of work, and salary and remuneration. All managers and employees have a responsibility to ensure that the Equal Opportunities Policy is adhered to and any case of alleged discrimination will be reviewed in line with the procedure outlined in the Achilles Grievance Policy. We monitor and review employee engagement scores, any issues that are raised under our Whistleblowing & Grievances policies and any security incidents. During the period Achilles have not been subject to any investigations, legal cases or incidents involving employee discrimination.

Environment

***Principles 7 - 9:** Businesses should support a precautionary approach to environmental challenges; undertake initiatives to promote greater environmental responsibility; and encourage the development and diffusion of environmentally friendly technologies.*

As set out in our 2021 Environment & Sustainability Policy Statement, Achilles commits to do all that is reasonable to minimise the impact placed on the environment as a result of our business activities and seeks to reduce the burden placed on the environment through sustainable business practices. As a business, Achilles UK operations are certificated to ISO 14064-1:2006. Key Performance Indicators for Achilles now include incorporate carbon monitoring across all territories and in 2022 we began to report our carbon emissions across 90% of our business. Environmental data is tracked on a

quarterly basis with an annual carbon reduction target of 5% set for 2023. Employees are encouraged to consider the environmental impact of their work and environmental awareness is included within the online training programme completed as part of an employee's induction process.

Achilles has an environmental impact through our work within supply chain communities to support carbon reduction. Achilles is a license partner of Toitu Carbon Reduce, offering ISO 14064-1:2006 certification to organisations providing them with the ability to measure and develop strategies to reduce their carbon footprint.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Achilles operate a zero-tolerance approach to bribery and corruption, as reflected in our Anti-Bribery Policy. Compliance with this policy is mandatory with acknowledgement required from employees as part of their induction programme. The policy is reviewed and updated as required, the last revision being in April 2021, and is available for employees to access on the Achilles Group SharePoint site. Anti-Bribery training is provided to employees across the Group, with a refresher course due to be made available during the year. Achilles is committed to conducting business in an honest and ethical manner acting professionally, fairly and with integrity in all our business dealings and relationships, implementing and enforcing effective systems to counter bribery and corruption. We comply with all laws relevant to countering bribery and corruption in the jurisdictions in which we operate including the Bribery Act 2010 in the UK. Management at all levels are responsible for ensuring those reporting to them understand and comply with the Anti-Bribery policy and any breach will be treated as a disciplinary offence.

As outlined in the Anti-Bribery Policy, the giving and acceptance of gifts and hospitality is permitted if certain requirements are met and must be approved by or declared to an employee's line manager or a member of the Executive team. A member of the Executive team must declare or seek approval from the CEO. If there is a suspected breach of this policy this should be reported in accordance with the Whistleblowing Policy and Achilles aims to encourage openness and support in relation to genuine concerns, reported in good faith.

Some of the business and financial controls that are in place to help mitigate the risk of any forms of corruption and bribery are documented in the Achilles Global Schedule of Authorisations, outlining those who have the authority to commit Achilles financially and the approvals required to complete

various transactions and sign contracts and legal documents. During the period Achilles have not been involved in any investigations, legal cases or incidents involving bribery, corruption, or extortion.

In relation to our business partners, and as referred to earlier, independent third-party auditors within Achilles Audit Services must comply with our standards of ethical conduct and corporate governance as outlined in our Conflict of Interest, Unethical Incentives & Professional Conduct Statements. Employees or contractors may not offer nor accept from any source any inducements, bribes or incentives that may influence their judgement or the results of an audit or assessment. Any gifts or offers of entertainment that are presented at any time must be declared and logged in a register that will be maintained and made available to any interested party at any time.

Finally, our customer audits include sections on bribery and involve a review of documented policies and processes to ensure that suppliers are legally compliant.

For further information please contact enquiries@achilles.com or refer to our website www.achilles.com