

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement has been produced in accordance with the Modern Slavery Act 2015 under UK law in relation to the financial year ending 31<sup>st</sup> December 2019.

It sets out steps taken by us, Acquia Ltd. and its group of companies (collectively referred to as **Acquia**), to prevent slavery, servitude, forced labour and human trafficking (collectively referred to as **Modern Slavery**) of any kind within our business and supply chains.

Acquia has a zero tolerance approach to Modern Slavery. All members of our staff are expected to report any concerns, however small they may seem, which will be investigated and, where appropriate, acted upon.

### **Our business and supply chains**

Acquia is one of the leading open source digital experience providers, with offices in Australia, Japan, Europe, and North America. Our services empower the world's most ambitious brands.

In terms of our supply chains, as a digital services provider, we engage highly skilled and specialist suppliers to support our digital products and services.

### **Our Modern Slavery policies and controls**

We operate the following policies and controls to prevent Modern Slavery within our business and supply chains:

- **Recruitment policy** – we use only specified and reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.
- **Whistleblowing policy** – we encourage all members of our staff to report any concerns related to the direct activities, or the supply chains of, our business. Our whistleblowing procedure is designed to encourage and make it easy for members of staff to make disclosures, without fear of retaliation. All disclosures will be fully investigated and appropriate remedial action will be taken.
- **Employee code of conduct** – this code makes clear to employees the actions and behaviour expected of them when representing our business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Supplier/Procurement code of conduct** – we vet all of our suppliers before we do business with them. We only engage well established and reputable suppliers who share our commitment to acting ethically and with integrity.

- **Staff training** - we provide training to our staff to ensure that they understand and are fully aware of the above policies and controls, including our zero tolerance approach.

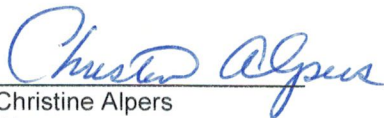
#### **Our assessment of the risk of Modern Slavery and ongoing initiatives**

We consider that the overall risk of exposure within our business and supply chains to Modern Slavery is low, particularly given: the highly skilled nature of the work undertaken by our staff and suppliers, our industry sector and the jurisdictions in which we do business.

Nonetheless, we acknowledge our responsibility to remain alert to the risks, which are not static, and are committed to ongoing and proactive efforts to ensure that our policies and controls remain effective. We therefore commit to the following initiatives:

- Continue to build upon initiatives to raise awareness levels of our staff;
- Review staff training programmes and levels of staff training;
- Continue to build upon supplier checks, due diligence and auditing processes; and
- Develop key performance indicators to assess the effectiveness of the measures we have taken.

This statement is pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's Slavery and Human Trafficking Statement for the financial year ending 31<sup>st</sup> December 2019. This statement was approved by the board of directors of Acquia Ltd. on 31<sup>st</sup> December 2019.



Christine Alpers  
Director  
for and on behalf of Acquia Ltd.

General Counsel  
for and on behalf of Acquia