

# Modern Slavery Statement 2023

**This statement has been published in accordance with the UK’s Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. It sets out the steps Intertek Group plc and other relevant group companies (“Intertek”) have taken during the year ended 31 December 2023 to prevent modern slavery and human trafficking in our business operations and supply chains.**





# Introduction

At Intertek, we work together to make the world a better and safer place for everyone. Our culture is built around strong values that guide our behaviours and our decision-making every single day.

We do not tolerate any form of forced labour, child labour, slavery, human trafficking, physical punishment or other abuse in our own operations and supply chain.

Modern slavery is an abhorrent crime that continues to affect the most vulnerable amongst us, including migrants, informal workers and women and children in poverty. This statement outlines the steps Intertek have taken to identify, assess and mitigate modern slavery risks in our own business, in our supply chain and through partnerships and advocacy to avert modern slavery and human trafficking.

This is Intertek's eighth statement on our efforts to prevent modern slavery in line with Section 54 of the UK Modern Slavery Act 2015 and fourth statement in line with Part 2 – section 11 of the Australia Modern Slavery Act 2018. This statement relates to the financial year ended 31 December 2023 and was approved by the Intertek Group plc Board of Directors on 29 February 2024.

**André Lacroix**

Chief Executive Officer

29 February 2024

## Intertek's Purpose, Vision and Values

### Our Purpose

Bringing quality, safety and sustainability to life.

### Our Vision

To be the world's most trusted partner for Quality Assurance.

### Our Values

- We are a global family that values diversity.
- We always do the right thing, with precision, pace and passion.
- We trust each other and have fun winning together.
- We own and shape our future.
- We create sustainable growth. For All.

This statement sets out the steps taken by Intertek Group plc, Intertek Holdings Limited, Intertek Inspection Services UK Limited, Intertek International Limited, Intertek Nominees Limited, Intertek Overseas Holdings Limited, Intertek Testing Services Holdings Limited, Intertek UK Holdings Limited, Intertek USD Finance Ltd, ITS Testing Services (UK) Limited, Moody International (Holdings) Limited, RCG-Moody International Limited, Intertek Australia Holdings Pty Ltd, Intertek Testing Services (Australia) Pty. Ltd and SAI Global Pty Limited, all of which fall within the scope of section 54(2) of the UK Modern Slavery Act 2015, the Modern Slavery Act 2015 (Transparency in Supply Chains) regulations 2015 and/or Part 2 – section 11 of the Australian Modern Slavery Act 2018. The Intertek Group Modern Slavery Policy applies to all our businesses and employees across the world.



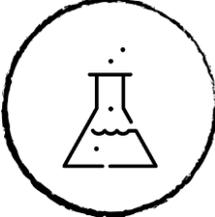
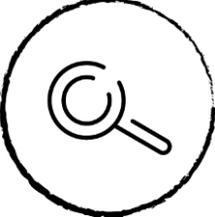
# Our Business

Intertek is a leading Total Quality Assurance provider to industries worldwide. Intertek Group plc is a public limited company registered in the UK and listed on the London Stock Exchange; it is the ultimate parent company of the Intertek group of companies which comprises 449 entities. Our network of more than 1,000 laboratories and offices, and over 44,000 people in more than 100 countries, delivers innovative and bespoke Assurance, Testing, Inspection and Certification solutions for our customers' operations and supply chains. Most of our business is conducted in our laboratories and offices, though our inspectors and auditors conduct field work at client sites and other sites in our clients' supply chains.

As a provider of professional services globally, our own supply chain is primarily associated with the goods and services delivered to our laboratories and offices. These include security, maintenance, cleaning and catering services and the supply of office and laboratory equipment. We selectively ask for the operational support of contractors and sub-contractors to perform certain types of activities in certain jurisdictions or geographies.

We do not make things ourselves, so we do not own any factories or manufacturing facilities.

## Our services

<p><b>Assurance</b></p> 	<p><b>Testing</b></p> 	<p><b>Inspection</b></p> 	<p><b>Certification</b></p> 
<p>Enabling our customers to identify and mitigate intrinsic risk in their operations, their supply and distribution chains and quality management systems.</p>	<p>Evaluating how our customers' products and services meet and exceed quality, safety, sustainability, and performance standards.</p>	<p>Validating the specifications, value and safety of our customers' raw materials, products, and assets.</p>	<p>Formally confirming that our customers' products and services meet all trusted external and internal standards.</p>

## Operating across five divisions

<p><b>Consumer Products</b></p>	<p><b>Corporate Assurance</b></p>	<p><b>Health and Safety</b></p>	<p><b>Industry and Infrastructure</b></p>	<p><b>World of Energy</b></p>
<p>Our Consumer Products division focuses on the ATIC solutions we offer to our clients to develop and sell better, safer, and more sustainable products.</p>	<p>Our Corporate Assurance division focuses on the industry agnostic Assurance solutions we offer to our clients to make their value chains more sustainable and more resilient.</p>	<p>Our Health and Safety division focuses on the ATIC solutions we offer to our clients to make sure we all enjoy a healthier and safer life.</p>	<p>Our Industry and Infrastructure division focuses on the ATIC solutions our clients need to develop and build better, safer, and greener infrastructure.</p>	<p>Our World of Energy division focuses on the ATIC solutions we offer to our clients to develop better and greener fuels as well as renewables.</p>



# Our Governance Structure

We believe that everyone is entitled to basic rights and freedoms, whoever they are and wherever they live. We work to make sure our policies, governance and due diligence processes take account of human rights risks so that we can properly manage and mitigate them. This is based upon three pillars:

1. Our commitment to fair labour and human rights, both in our own operations and in the communities in which we operate.

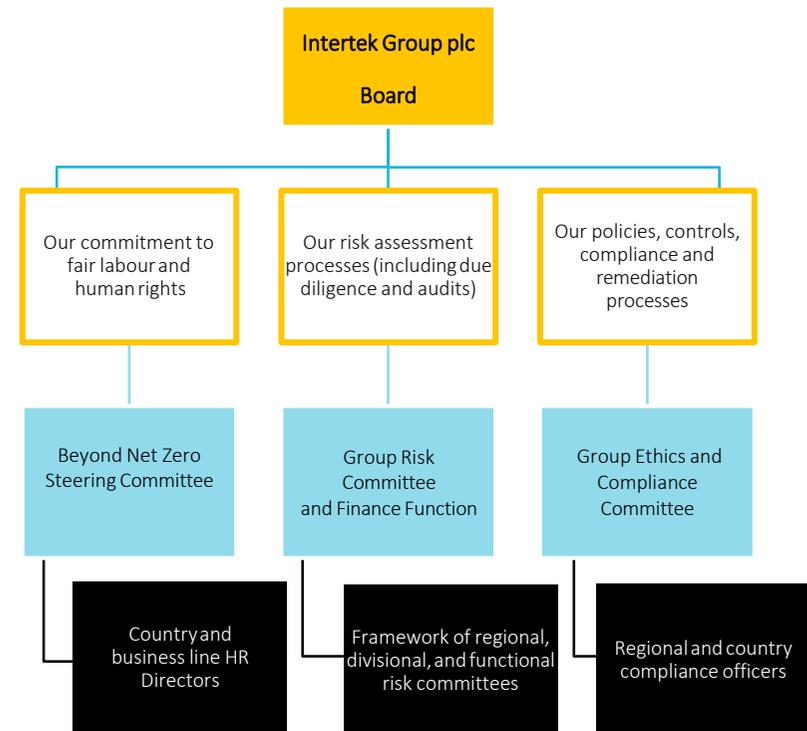
The Intertek Group plc Board is responsible for overseeing Intertek’s approach to sustainability. Our executive-led Beyond Net Zero Steering Committee’s remit is to oversee and monitor our policies, practices and progress against our commitments and targets. Day-to-day responsibility is shared between the HR and Compliance. Accountability for ensuring our policies comply with our legal and ethical obligations sits with Group Executive Vice President Human Resources and the Group General Counsel. Accordingly, HR and Compliance are responsible for monitoring that all those under our control comply with them.

2. Our modern slavery risk assessment process.

The Group Finance Risk Committee is accountable for our risk assessment process, including the process for due diligence and audit of suppliers. The Finance function conduct due diligence on new suppliers, assess the risks and identify mitigation plans. Our framework of regional, divisional, and functional risk committees provide feedback to our Finance team on any changes to the regional risk profile.

3. Our policies, controls, compliance and remediation process

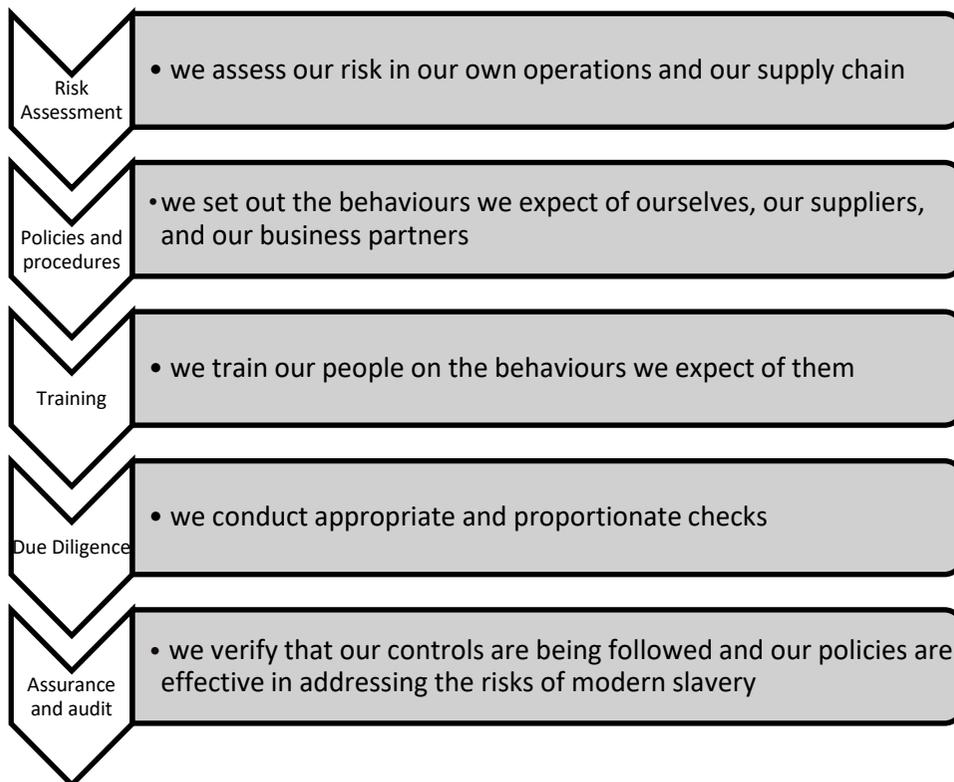
Our Group Ethics and Compliance Committee provides oversight of modern slavery issues, demonstrates a robust anti-slavery stance at the highest level, and sets a “tone from the top” zero-tolerance approach to modern slavery in our business and supply chains. Reported modern slavery allegations are investigated by our Compliance function. This function is independent of our operational business and reports directly to the Group General Counsel.





# Our Control Environment

To create a control environment which can be effective in addressing the risk of modern slavery in our operations and in our supply chain, we have a tiered approach:



## Our Risk Assessment

We are committed to reducing the risk of modern slavery in our operations and in our supply chains. We are doing this by discussing within our risk committees and seeking input from experts to understand our risks and opportunities to combat modern slavery, assessing where the risks are in our business and supply chains.

## Global assessment

We have assessed modern slavery risk from the perspective of the nationalities most at risk, the locations where modern slavery is most prevalent and the industries of higher risk, in order to understand Intertek's own risk profile considering these factors.

We are aware that people from countries in Southeast Asia (such as Myanmar, Cambodia and Laos), those from Sub-Saharan Africa (like Eritrea, Burundi and DRC) and South Asia (for example Bangladesh, Nepal and Pakistan) are most vulnerable to becoming caught in modern slavery. The drivers are economic vulnerability and poverty, political instability, inadequate legal protections, due to conflicts and displacement of peoples driven by the same factors. On a personal level a lack of education and high levels of debt can also lead people into a modern slavery situation.

Modern slavery is most likely to be found in conflict zones, in some of the wealthier Gulf states and where there is high demand for cheap labour, such as countries with large manufacturing or agricultural sectors such as China, India and Brazil.

The sectors where modern slavery is most prevalent are those industries such as agriculture, including farming and fishing, construction, manufacture and domestic work.

## Intertek's Risk Profile

The highly-skilled nature of our people (laboratory, office, inspector or auditor) means we do not perceive a systemically high modern slavery risk in our own operations. However, we must remain vigilant to the use of modern slavery in higher risk areas such as security, office cleaning and catering services.

We are conscious that many of our customers have a higher modern slavery risk that we do. Our support for our clients to manage that risk is not part of this statement.

Our risk assessment process has raised the following specific issues:

- we have a number of seasonal workers in higher-risk countries, including a few migrant workers in certain countries. We are aware that such workers are at increased risk of abuses (such as excessive working hours and withholding of salaries) with reduced access to legal protections. We believe that our on-boarding, training, monitoring and reporting processes adequately mitigate the increased risk to these workers.

- we deploy inspectors to ports and terminals around the world to attend the discharge of cargo vessels. Weather conditions and delays in berthing can mean that our inspectors are required to spend hours waiting for a vessel to arrive in order to perform their duties. There can be pressure placed on inspectors not to take rest times so that discharge can proceed as quickly as possible and demurrage fees can be avoided. We are aware that this can lead to a risk that working time restrictions can be breached. We believe that our training of inspectors, our close monitoring of their working time and our technology-enabled scheduling solutions mitigates this risk.



# Our Control Environment (continued)

## Our Policies

Our policies set expectations of how we – and everyone who works on our behalf – will work to prevent modern slavery. Intertek’s policies and codes are based on, and fully respect, the International Bill of Human Rights, the International Labour Organisation’s declaration on Fundamental Principles and Rights at Work, and the Children’s Rights and Business Principles.

Policies relevant to modern slavery and human trafficking:

Intertek Code of Ethics

Modern Slavery Policy

Labour and Human Rights Policy

Intertek Sustainable Procurement Policy

## Our Process

We have established a robust system of procedures to identify and prevent any potential risks of modern slavery. The following outlines the key processes we have implemented to support this effort.

Processes in our own business and operations include:

- Supplier due diligence process.
- Onboarding processes for contractors and subcontractors.
- process for reporting issues related to modern slavery.
- Assigned responsibility for monitoring, and overseeing relevant processes at the local/country, regional, and group levels to ensure their effective implementation.
- Breaches of our policies (including Modern Slavery-related policies) result in appropriate actions, including termination of contracts and reports to the relevant authorities, as appropriate.

Processes on our suppliers of goods and services and other business partners include:

- Performance of due diligence on suppliers.
- Supplier onboarding process includes communication of the expectation to comply with our policies and agreements, including our Modern Slavery Policy, Code of Ethics and Labour and Human Rights Policy.
- Requirement that potential suppliers explain their engagement with matters related to modern slavery.
- Use of standard contracts containing terms that mandate compliance with our policies.
- Re-enforcement of Our Code of Ethics with our business partners, including contractors, sub-contractors, and suppliers, who are required to commit to its principles before we enter into contracts with them.

Processes in our recruitment and people matters include:

- Controls on our recruitment processes.
- Policies on workplace diversity, inclusion, freedom from discrimination, and fair labour.
- Controls are monitored and overseen by our Group People Risk Committee.
- Conduct of due diligence on prospective employees and recruitment agencies to ensure compliance with our policies.
- Ensuring all our employees are of legal age to work in our global teams.
- Other measures to prevent modern slavery or slavery-like practices within our workforce.

## Our Training

Training on modern slavery risk is part of our Core Mandatory Controls applicable globally to all employees.

Training is provided to all employees as part of our annual and new-joiner training on our Code of Ethics (including our Labour and Human Rights policy). Understanding of the training is tested using an online training system and completion of the test is certified and recorded. When completing the training, all employees are required to confirm their understanding that any breaches of the Group’s Code of Ethics (including our Labour and Human Rights Policy) will result in disciplinary action that may include summary dismissal of the employee concerned.

We also train our key agents, intermediaries, consultants, contractors, and sub-contractors on our Code of Ethics to upskill those parties, increase their awareness of modern slavery issues and support them to implement similar policies with their own suppliers.

Additionally, in November 2023, one of our in-house Subject Matter Experts conducted specialist training sessions on modern slavery risk, our legal obligations, Intertek’s own risk profile, how to spot modern slavery risk, and what our responsibilities are. The training was delivered live to over 100 personnel, key to the management and mitigation of modern slavery risk in the organisation. These individuals are in procurement, finance, HR, and Legal, Risk and Compliance globally. The training sessions provided a vital opportunity to ask questions, and a recording of the training was made available for those who missed the live sessions.

Our regional and divisional risk committees also engaged in a discussion on the specific modern slavery risks in their region and how to identify and deal with them in Q4 of 2023. This ensured that this risk is kept front of mind for our senior leadership teams and that they fully understand the risk and our obligations and tools for mitigation.



# Our Control Environment (continued)

## Our Due Diligence

We understand the need to be continually aware of our supply chain partners and their own suppliers. To prioritise our activities, we have adopted a risk-based approach on the risk assessments of suppliers, focusing as follows:

- on new suppliers or suppliers whose contracts are renewing;
- where estimated spend is at least £100k (or equivalent);
- where suppliers are in higher-risk geographies;
- on supplier categories we believe are higher risk (for example, recruitment agencies or garment suppliers).

Our strategic procurement aims include:

- (1) managing our supply risk / de-risking our supply base; and
- (2) maintaining high ethical standards in the supply chain.

As a result of the due diligence and risk assessments we carry out on our professional services contractors and sub-contractors to ensure they have the appropriate accreditations, qualifications and expertise to perform the services in our highly technical industry, we believe this part of our supply chain has a relatively low risk. From our review of our procurement categories, we believe that the highest risks in our supply chain will be:

- direct risks relating to laboratory coats, other items of clothing and personal protective equipment;

- indirect risks – that is, risks relating to the manufacturing or sourcing of components and/or raw materials used in our testing equipment (and technology ranging from simple petroleum sampling kits to electromagnetic chambers) and our information technology (ranging from laptops and phones to equipment in our regional data centres).

We have transparency and understanding of the risks around the suppliers of support services to our laboratories and offices, such as cleaners, maintenance, and security. We have mapped our supply chains and are in the process of prioritising the top suppliers by spend and/or perceived risk: our insights into the modern slavery risks inherent in our smaller suppliers' operations remains limited.

## Our Assurance / Audit Programs

Intertek has an established assurance program that covers audits and risk management measures. We are committed to continuously improving our assurance programs to meet and exceed industry standards and best practices.

Our audit program includes assurance and audits on our operations and supplier audits. We identify and mitigate potential risks through these measures and take concrete actions.

## ASSURANCE/AUDIT

Assurance/audits of our own operations

We conduct an annual management self-assessment, which confirms compliance with our Core Mandatory Controls including those relating to human rights and modern slavery. In addition, our Compliance function conducts announced and unannounced site audits, while Internal Audit typically performs announced audits. As part of our ongoing efforts, we also plan to conduct Workplace Conditions Assessment (WCA) Audits on our sites and operations using a risk-based approach.

Assurance/audits on our supply chain

For our accredited Certification bodies, laboratory contractors and sub-contractors, the relevant accreditation body conducts a formal audit process, including on-site visits, at regular intervals.

Supplier Audits

Intertek's Workplace Conditions Assessment (WCA) program is to identify issues within our supply chain and improve labour conditions in our global supply chain. The program comprehensively assesses workplace conditions, including labour practices, health and safety, and environmental management. It includes on-site audits, worker interviews, and document reviews to identify and address potential risks and areas for improvement. The WCA program also provides training and capacity building for suppliers to enhance their understanding of labour standards and compliance requirements. Through the WCA program, Intertek aims to promote responsible business practices and help our suppliers set and achieve sustainability and social compliance goals.

# Collaborations

## Our partnerships and collaborations

Collaborating with external partners is an essential element of our approach to assessing and mitigating human rights risks within our own supply chains.

We work with multiple responsible sourcing and human rights-based associations, collaborative programmes, and industry groups. These include Sedex, Amfori, Ethical Trading Initiative, Responsible Business Alliance, Initiative for Compliance and Sustainability, and Trace for Good. Membership and engagement with these business partners allows us to make informed decisions about risk within our own supply chain. Equally, it allows us to leverage our insights from the thousands of social audits that we undertake each year to highlight the risks of modern slavery, forced labour and other human rights issues globally.

[APSCA \(Association of Professional Social Compliance Auditors\)](#)



Intertek is a founding member of APSCA, which was formed to ensure that social and human rights-based audits are independent, professional, and credible. In 2023, we further increased our pool of auditors who are registered and certified to the APSCA requirements, helping to ensure that only skilled, qualified, and competent auditors undertake social audits.

## Consultation within the Group

We are steadfast in our commitment to prevent and address modern slavery within our operations and supply chains. As a collective of companies within the Intertek Group, we have instituted regional and divisional risk committees which supervise our adherence to the Modern Slavery Acts and advise on the formulation of this statement. The risk committees within our group are responsible for overseeing more than one company. These committees report to the Group Risk Committee. Comprising senior managers from diverse functions and regions, the risk committees possess the authority and responsibility to identify, evaluate, and mitigate risks associated with modern slavery. They also contribute to and review the content and format of this statement, ensuring it accurately represents the actions and progress of each company they oversee. Through the effective use of our risk committees, we strive to cultivate a culture of transparency, accountability, and ongoing enhancement throughout the group.

## Reporting and investigation of concerns

One mechanism we use to monitor compliance with, and measure the effectiveness of, our modern slavery requirements is by encouraging employees and those who work with us to report any concerns about suspected non-compliance through our independent, third-party whistleblowing Hotline.

Integrity and compliance reports (including modern slavery allegations) received through our Hotline are investigated by our Compliance function, which is independent of our operational businesses. Unless there is a conflict of interest, all reports are also notified to our Group Ethics, Compliance and Risk Committees which include our Group CEO, Group EVP for HR, and Group General Counsel, and which provide monitoring, oversight, and support in ensuring that appropriate remediation actions are taken. We take any allegations that human rights are not being respected within any part of our business or supply chain extremely seriously, with a zero-tolerance approach.

Our processes require that any report of modern slavery, however communicated to us, would be escalated to our Group CEO and to the Group Ethics, Compliance & Risk Committees; would be investigated by our Compliance function; and would typically result in an investigation being concluded and (if substantiated) remediation actions being proposed and implemented within 7 – 14 days.

## Compliance Hotline

Intertek's Compliance Hotline enables confidential reporting of suspected misconduct or breaches of the Code of Ethics.

<https://www.intertek.com/about/compliance-hotline/>



# Our Progress This Year

## KPIs

Modern Slavery is a complex risk and often hidden. We use the following performance indicators to monitor and report on the effectiveness of our policies and procedures in this area.

Key performance indicator	Reason for KPI	2022	2023
Number of concerns identified with suppliers which indicate potential forced labour.	By monitoring the number of issues identified, we can better adapt our policies and procedures.	0	0
Percentage of eligible employees who completed the Code of Ethics training	By monitoring completion, we can track our colleagues understanding of our Code, which includes modern slavery.	96.8%	97.6%
Number of reports to the Compliance Hotline related to modern slavery concerns	By monitoring the number of issues identified, we can better adapt our policies and controls.	0	0

As part of our commitment to transparency and accountability, we will regularly review and report on our progress towards compliance with the Modern Slavery Acts and eradicating modern slavery from our supply chain. We will also seek input from our stakeholders and external experts to ensure our efforts align with best practices and international standards. We are taking practical steps to achieve our objectives while continuously improving our efforts. We believe this issue requires a collaborative effort, and we are committed to working with our suppliers, partners, and stakeholders to impact society positively.

2023 Focus Areas	Progress
Giving our people the tools and training they need to mitigate and manage modern slavery risk in our own organisation and making it clear to them the expectation to be vigilant and report potential modern slavery risk indicators.	Specific live training provided to key personnel from in-house subject matter experts, with an opportunity for questions.  Modern Slavery discussion in regional, functional and business line risk committees.  Empowering the global HR community with on the ground coverage in the regions. This community will be the eyes and ears of the organisation. Whereas procurement is responsible for the due diligence and contractual clause processes.
Deepening our engagement with our suppliers and our understanding of how our suppliers address the modern slavery risks in their own operations and supply chains.	Further adoption and implementation of Intertek Sustainability Procurement Policy and Supplier Code of Conduct to establish common expectations for suppliers on human rights and labour issues, including modern slavery.  Additional Modern Slavery Committees set up, for example in Australia, to disseminate information and assist further role out.  Continued collaboration between functions.
Aligned reporting	This statement been published in accordance with the UK's Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

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