This statement has been published in accordance with the UK's Modern Slavery Act 2015. It sets out the steps Intertek Group plc and other relevant group companies ("Intertek") have taken during the year ended 31 December 2020 to prevent modern slavery and human trafficking in our business operations and supply chains.
INTRODUCTION

Modern slavery is an abhorrent crime that affects the most vulnerable amongst us, including migrants, informal workers and women and children in poverty.

As the largest social compliance audit company globally, we are committed to eradicating modern slavery in our own business, ensuring our supply chain operates responsibly and to improving the lives of workers and respecting human rights.

Although Covid-19 has significantly disrupted businesses and supply chains globally in 2020, it has not diminished the risk or the impact of modern slavery. This year, we have worked with our clients and with our partners to help them continue to combat the risks of modern slavery and to create a safe and fair environment for all workers, using technology-enabled solutions in additional to traditional social compliance audits to shine a light on these issues despite the difficulties caused by the pandemic.

This is Intertek’s fifth statement on our efforts to prevent modern slavery in line with Section 54 of the Modern Slavery Act 2015.

This statement was approved by the Intertek Group plc Board of Directors on 25 February 2021.

André Lacroix
Chief Executive Officer
25 February 2021
1. OUR MODERN SLAVERY FOCUS IN 2020

1.1 Our 2020 focus areas

In 2020 our key focus areas have included:

- ensuring continuity of our efforts to combat modern slavery throughout the Covid-19 pandemic, including by using technology and innovation to deliver robust remote social compliance, working condition and ethical audits across our clients’ supply chains
- continuing our partnerships and collaborations to leverage the insights from our audits to support the global agenda of combatting modern slavery and forced labour; and
- assessing ourselves against our own Total Sustainability Assurance corporate certification standards, which include requirements on governance, policies and processes to address working conditions and modern slavery risks in our own operations and our supply chains, so that we can benchmark our own progress and identify any areas for improvement.

1.2 The impact of Covid-19

The Covid-19 pandemic has caused significant disruption to global supply chains. Unfortunately, it has not disrupted the risk of modern slavery and the most vulnerable people in our societies continue to be at risk of exploitation, forced labour and other human rights abuses.

Indeed, Covid-19 has led to new modern slavery risks. In response to the pandemic, the supply chains of some industries – including healthcare and protective equipment, food, warehousing and logistics and transportation – have scaled up rapidly, with expedited hiring processes that mean some of the customary checks that prevent modern slavery abuses may have been less thorough or not have happened. There is the risk that some employers may have pressured their workers to work despite having Covid-19 or being at high risk of infection, or without the appropriate personal protective equipment they need to work safely. The risks faced by migrant workers have been amplified by the pandemic: many have found themselves stranded by travel or quarantine restrictions, while the financial pressures on businesses that have struggled have increased the risk of wage theft or the wrongful withholding or deductions of wages. Covid-19 has also disproportionately affected women – and particularly lower-income women – who have been forced to balance work with childcare and other pressures.

Supporting our clients with technology-enabled modern slavery assessments

In response to the pandemic, we have partnered with several organisations to develop a technology-enabled, remote approach to assessing our clients’ supply chains. Using this technology allowed us to obtain visibility into working conditions where travel or onsite visits were restricted. This has helped our clients to understand the changing forced labour risks that the pandemic was causing and gave them the ability to react to that.

Keeping our own people safe

Throughout the pandemic, we have regularly updated our Covid health, safety and wellbeing policy in order to protect our people. Our policy includes social distancing, the use of face masks and hygiene and control measures. Our HSE and Compliance functions carry out unannounced remote audits across our operations to ensure that the policy is being properly implemented and all our people are being protected. Our inspectors and auditors who visit client sites as part of their work are also covered by our policy, and we have given them a “stop work” authority so that they cannot be pressured by third parties to work in a way which is less safe than our policy.

2. BUSINESS OVERVIEW: OUR OPERATIONS AND SUPPLY CHAINS

2.1 Our operations

Intertek is a leading Total Quality Assurance provider to industries worldwide. Our network of more than 1,000 laboratories and offices, and over 43,000 people in more than 100 countries, delivers innovative and bespoke Assurance, Testing, Inspection and Certification solutions for our customers’ operations and supply chains. Our businesses and operations fall under three global divisions: Products, Trade and Resources.

The majority of our services are carried out in our laboratories and offices, though our inspectors and auditors carry out field work at client sites or other sites in our clients’ supply chains. Although the Intertek group is managed through a divisional structure of global businesses, our most material geographic footprint is in China (including Hong Kong), the United Kingdom and the United States.

Our sectors

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<thead>
<tr>
<th>Products</th>
<th>Trade</th>
<th>Resources</th>
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<tr>
<td>Ensuring the quality and safety of physical components and products, and risk assessment of operating processes and quality management systems.</td>
<td>Protecting the value and quality of products during custody-transfer, storage and transportation: via analytical assessment, inspection and technical services.</td>
<td>Optimising the use of assets in oil, gas, nuclear and power industries and minimising risk in their supply chains through technical inspection, asset integrity management, analytical testing and ongoing training services.</td>
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As a provider of professional services, 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 and/or in certain jurisdictions or geographies.

Collaborating with external partners is an important element of our approach to assessing and mitigating human rights risks in our own supply chains. We work with multiple responsible sourcing and human rights-based associations and industry groups. These include Sedex, amfori, ICS, WRAP, SLCP and RBA. On their members behalf we carry out thousands of working conditions and human rights-based assessments globally within complex supply chains. Via this work we are exposed to the risks that workers can experience, which provides us with constantly updated data, insights and intelligence on many human rights subjects including modern slavery and forced labour. The following are some examples of how we have worked with our partners in 2020 to highlight modern slavery issues.

**Sedex Members Ethical Trade Audits (SMETA)**

In 2020, we continued our work with Sedex to carry out thousands of assessments around the world under their Members Ethical Trade Audits (SMETA) programme. Intertek is one of the largest providers of SMETA, where brands and retailers seek to partner with participating suppliers to ensure ethical trading and corporate social responsibility. Intertek conducts on-site SMETA audits at factories around the world to assess how labour, health and safety, environmental and business ethics standards are being met. Sedex members are then allowed to store, share and report on this information in a secure, online database in an effort to improve working conditions in the global supply chain.

**APSCA (Association of Professional Social Compliance Auditors)**

Intertek is a founding member of APSCA, which was formed to ensure that social and human rights audits are independent, professional and credible as a means to find and stop modern slavery abuses. In 2020 we increased our pool of auditors who are registered and certified to the APSCA requirements, helping to ensure that only skilled auditors execute audits on issues of social and human rights.

**Working with the UK apparel industry**

In 2020 we developed several forced-labour based webinars focusing on the human rights risk within the UK apparel sector. Collaborative partners on this webinar series included the ETI (Ethical Trading Initiative) and the ALP (Association of Labour Providers). The series highlighted and discussed the root causes of worker exploitation in some parts of the UK apparel sector and recommended best practices for brands and retailers.
3. OUR GOVERNANCE STRUCTURE AND STRATEGY FOR MODERN SLAVERY

3.1 Our governance structure for modern slavery

Our governance structure is core to our strategy for modern slavery and is based upon three pillars: our sustainability agenda, which includes our commitment to fair labour and human rights both in our own operations and in the communities in which we operate; our modern slavery risk assessment process (which include our processes for due diligence and audit of suppliers); and processes for ensuring we comply with our policies and controls, with remediation actions taken as required.

3.2 Our strategy for modern slavery

- **Combating modern slavery through our sustainability agenda:** There is a network of Sustainability Champions across our major countries and business lines to develop global connectivity across our sustainability activities. Their specific goals include maintaining best-in-class internal labour and human rights practices and liaising with HR colleagues regarding social sustainability metrics improvements. This gives us a network of dedicated colleagues with localised knowledge, language skills and contacts who can both assess our modern slavery risk and promote our zero-tolerance agenda internally, or externally through the work we do in the communities in which we operate. The work done by our Sustainability Champions is reviewed within our Sustainability Operating Committee. The committee has met regularly during the year and is chaired by the Group CEO and reports annually to the Board.

- **Assessing our modern slavery risk:** we assess risks and identify mitigation plans across our operations and supply chains using a framework of regional, divisional and functional risk committees which report to the Group Risk Committee. These risk committees review the risks arising in their area of operations on a quarterly basis: any modern slavery risk which is identified, together with any applicable risk mitigation plan, will be reported to the Board as part of the quarterly report by the Group Risk Committee. Where our Compliance function carries out due diligence on, or an audit of, a supplier and concludes that there is a significant potential modern slavery risk, Group Risk Committee approval is required in order to proceed (and such approval will be contingent on a proper mitigation of the potential risk, such as increased contractual protections, site visits, interviews, etc.).

- **Ensuring compliance with our policies and controls on modern slavery, and taking remediation action:** our Group Ethics, Compliance & Risk Committee has oversight of any breach of our policies or controls (including our Modern Slavery Policy, Labour and Human Rights Policy and our controls around suppliers). Any breach which is reported – using our third-party whistleblowing Hotline or any other communication channel – is escalated (subject to any perceived conflicts of interest) immediately to the Group Ethics, Compliance & Risk Committee, which therefore 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. Any reported modern slavery allegation is investigated by our Compliance function. This function is independent of our operational business and reports directly to our Group General Counsel. Any issue which is reported and found to be substantiated would be followed by appropriate sanctions in line with our zero-tolerance approach (including disciplinary measures, termination of contract and reporting to the authorities, as relevant).

4. OUR MODERN SLAVERY POLICIES, CONTROLS AND ASSURANCE/AUDIT

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 three-tiered approach:
4.2 Our controls

<table>
<thead>
<tr>
<th>Control type</th>
<th>Description of control</th>
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<tr>
<td>Controls on our own business and operations</td>
<td>We have a minimum internal controls framework of financial, operational and compliance controls which apply across all our operations. There are controls which mandate compliance with our policies relating to modern slavery, reporting of any issues, supplier due diligence, on-boarding of contractors and sub-contractors, etc. The controls specify who is responsible for controlling, monitoring and overseeing them (typically at the local/country, regional and group levels, respectively).</td>
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<tr>
<td>Controls on our suppliers of goods and services and other business partners</td>
<td>We perform due diligence on our suppliers and expect them to use our standard agreements for the supply of goods and services. Our due diligence process asks potential suppliers to explain their own level of engagement with matters relating to Modern Slavery and Labour and Human Rights, and our standard contracts contain terms which require our suppliers to comply with Intertek’s policies, including our Modern Slavery Policy, Code of Ethics and Labour and Human Rights Policy. Suppliers which breach our policies face appropriate actions, including termination of contracts. Whilst we know that such contractual terms do not guarantee compliance in practice, we believe they are an important way of setting our expectations, defining acceptable practices and using commercial incentives to promote the right behaviours. We reinforce our Code of Ethics with our business partners, who include contractors, sub-contractors and suppliers. Certain business partners, including sub-contractors, are given a copy of our Code of Ethics and required to commit to its principles, including the principles of our Labour and Human Rights Policy, before we contract with them.</td>
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<td>Controls on our recruitment processes and people matters</td>
<td>Our minimum internal controls framework includes controls relating to our recruitment processes (including how we use recruitment agencies; how we do due diligence on prospective employees) and our policies on workplace diversity, inclusion, freedom from discrimination and fair labour. These controls are established, monitored and overseen by our Group People Risk Committee. They are key ways in which we prevent the risk of child labour (that is, all our employees are of legal age to work in our global teams) and modern slavery or slavery-like practices in our workforce.</td>
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4.3 Our assurance/audit programmes

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<th>Assurance/audit type</th>
<th>Description of assurance/audit</th>
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<tr>
<td>Assurance/audits on our own operations</td>
<td>Assurance that our internal policies and controls are being followed, and that following them is effective in addressing the risks of modern slavery, is provided by an annual management self-certification, and by the programme of audits carried out by our Internal Audit and Compliance functions. The audits performed by Internal Audit are typically announced. The Compliance function typically carries out announced and unannounced site audits.</td>
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<tr>
<td>Assurance/audits on our supply chain</td>
<td>Where our contractors and sub-contractors are accredited laboratories, there is a formal audit process (which includes on-site visits) which is carried out at regular intervals by the applicable accreditation body or bodies. Although we seek to include audit rights in our contracts with suppliers, and although we do exercise our audit rights, we do not have an established supplier working condition / modern slavery audit programme for our own suppliers: this is something we intend to improve as we increase our understanding of our own supply chain.</td>
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5. OUR ASSESSMENT AND MANAGEMENT OF MODERN SLAVERY RISK

5.1 How we have assessed and managed the modern slavery risk in our own operations

We assess the modern slavery risk in our own operations primarily as part of the risk identification and mitigation process which is carried out within our framework of divisional, regional and functional risk committees. These committees – and particularly the divisional and regional committees – review and assess the risk environment in their operations as part of their quarterly meetings. They use risk data (including whistleblowing Hotline reports, labour complaints, input and advice from the subject matter experts in our own social compliance business, operational learnings and desktop research from our HR and Risk functions and external information on the prevalence of modern slavery) to assess modern slavery risk throughout the year. Our own work gives us a valuable insight into the modern slavery risk “heat map”, and we work closely with social compliance organisations, trade bodies and industry groups which further broadens our understanding.

Some of the countries in which we operate have a higher modern slavery risk. A consequence of performing social compliance audits for our clients in countries with a higher risk of modern slavery is also that we have operations in those countries. We are aware that Pakistan and Cambodia are among the countries with the highest estimated prevalence of modern slavery by proportion of their population. We also operate in Thailand, Vietnam and Malaysia.

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, our risk assessment process has raised the following issues:

- we have a number of seasonal workers in higher-risk countries, including a number of migrant workers in Qatar, and 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.
- in our 2018 statement we said that we would include the risk of forced labour linked to forced marriages in our modern slavery risk assessments. This remains a work in progress and we intend to include in future modern slavery training.

5.2 How we have assessed and managed the modern slavery risk in our supply chain

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.

5.3 Our supply chain risk assessment

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 coasts, 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); and
- “brand” risks: we use branded promotional items and material for marketing purposes, which carry a potentially increased reputational risk.

We still have work to do to get greater 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 but have prioritised the top suppliers by spend and/or perceived risk: our insights into the modern slavery risks inherent in our smaller suppliers’ operations remains limited. We have not performed any audits of our own suppliers which are specifically focused on working conditions and modern slavery, and this is something we will look to address in future. We are still working, as advised by the subject matter experts in our own social compliance business, to build a focus on the risks of forced marriage and child labour into our supply chain risk assessments.

6. DUE DILIGENCE OF SUPPLY CHAIN AND SUPPLIERS

Due diligence on our suppliers is required as part of the minimum internal controls framework which applies across all our operations. We adopt a risk-based and tiered approach to the level of due diligence we perform.
7. MODERN SLAVERY TRAINING

Modern slavery training is provided to all our 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 use training on our Code of Ethics given by our Group Compliance function to key agents, intermediaries, consultants, contractors and sub-contractors to upskill those parties, increase their awareness of modern slavery issues and support them to implement similar policies with their own suppliers.

8. REPORTING A BREACH OF OUR POLICIES; INVESTIGATION & REMEDIATION

We provide an independent, third-party whistleblowing Hotline, which is aimed primarily at our employees but is also open to any person who works within our supply chain. The Hotline can be used to report any ethical, integrity or compliance issue — which includes human rights violations such as modern slavery.

All reports received through our Hotline are fully investigated by our Compliance function, which is independent of our operational businesses. Unless there is a conflict of interest, all reports are also notified immediately to our Group Ethics, Compliance & Risk Committee which includes our Group CEO, Group EVP for HR and Group General Counsel, and which provides 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. All our employees are expected to report any modern slavery concerns, using the appropriate reporting channels, and management are expected to act upon those concerns immediately.

Our processes require that any report of modern slavery, however communicated to us: would be escalated immediately to our Group CEO and to the Group Ethics, Compliance & Risk Committee; 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.

9. EFFECTIVENESS / KPIS

Like many companies, we track KPIS relating to modern slavery including: completion of our Code of Ethics training by our employees; any investigations undertaken into reports of modern slavery and remediation actions taken in response; and our progress towards the UN Sustainable Development Goals. However, we are an industry leader in modern slavery risk assessment for our clients. We know that tracking the above KPIS is not sufficient to prevent modern slavery.

We welcome the great efforts being made to establish KPIS by industry bodies and regulators, but we are aware that these KPIS are more targeted at supplier factories than larger organisations. Although we provide modern slavery risk assessments to our clients — and we believe our WCA programme and supply chain risk management tools are among the most effective ways of identifying and mitigating modern slavery risk at all points of the supply and distribution chains — our work has also been focused on the risks of modern slavery at operational sites rather than on helping our corporate clients to assess and measure the effectiveness of their modern slavery risk management approach.

Corporate Sustainability Certification

In our 2017 Modern Slavery Statement, we said that we would expand our WCA programme to become a holistic corporate risk assurance programme, which we would first test on our own operations and supply chain as a proof of concept to establish robust KPIS and effectiveness measures which can be used by any corporation.

In September 2019, we launched Corporate Sustainability Certification, an assurance programme that audits and certifies the quality of processes in place in a corporation based on 10 Intertek proprietary standards. These standards benchmark the end-to-end approach of any company on all aspects of its corporate activities.

During 2020, we carried out a pre-assessment audit against all 10 standards. Our work on modern slavery, forced labour and respect for human rights are covered as part of our People & Culture standard, and the certification process is due to conclude during 2021 which will allow us to track progress against our goals.
10. OUR FUTURE PLANS

We have adopted our new Intertek Sustainability Procurement Policy and Supplier Code of Conduct and will continue to implement this across the wider group. This establishes common expectations for all our suppliers on a broad range of issues including human rights and labour, and within that, matters such as working hours and wages, terms of employment, slavery, human trafficking and forced labour, child labour and no discrimination and respect for workers.

While our Group Compliance function assesses our top suppliers for modern slavery risks when we contract with them, we intend to take a more active approach to monitoring our suppliers including by conducting audits.