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 2019 to prevent modern slavery and human trafficking in our business operations and supply chains.
INTRODUCTION

At Intertek our purpose is to make the world a better and safer place by bringing quality, safety and sustainability to life.

Sustainability is at the heart of our business. For us, sustainability goes beyond Corporate Social Responsibility and environmental activities and means that we hold ourselves to operating with the utmost integrity and accountability world-wide. It includes making sure that the work we do at Intertek positively impacts everyone’s lives today – and the lives of those that will follow. It means we are committed to ensuring that those who work for us and in our supply chains are free from modern slavery, forced labour or other human rights abuses.

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.

In addition to the work we are doing in our own operations and supply chains, we are proud that our network of specialist ethical and compliance auditors across the world helps our clients to combat their own risks of modern slavery and to create a safe and fair environment for all those working in and for their businesses. The work we do, and the insights, data and intelligence it gives us, allow us to be heavily involved in shining a light on issues of modern slavery.

Throughout 2019, we have continued to build on the work we do to combat the risks of modern slavery - in both our own and our clients’ operations and supply chains.

This is Intertek’s fourth 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 27 February 2020.

André Lacroix
Chief Executive Officer
27 February 2020
1. **OUR MODERN SLAVERY FOCUS IN 2019**

   In 2019 our key focus areas have included:
   - leveraging the insights from our social compliance, working condition and ethical audits to support the global agenda of combatting modern slavery and forced labour; and
   - developing our own corporate assurance programme for modern slavery – an assurance programme which we can use at every level of our organisation to identify, mitigate and remediate modern slavery risks in our operations and supply chain and which will allow us to benchmark our progress against clear KPIs.

2. **BUSINESS OVERVIEW**

   2.1 **Our operations**

   Intertek has more than 46,000 employees in 1,000 laboratory and office locations in over 100 countries.

   The services we provide include assurance, testing, inspection and certification, and 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.

   2.2 **Our supply chains**

   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.

   2.3 **Our partnerships and collaborations**

   Collaborating with external partners is an important element of our approach to combating human rights risks in our supply chains.

   We work with multiple global social and ethical compliance associations, trade bodies and industry groups and carry out working condition and fair labour audits under industry programmes such as amfori, ICS, RBA, SA8000, WRAP and SMETA (Sedex). This provides us with constantly updated data, insights and intelligence on modern slavery and forced labour issues which we use both to support our clients and to inform our approach in our own operations and supply chains. The following are some examples of how we have worked with our partners in 2019 to shine a light on modern slavery issues in global supply chains.

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

   In 2019, we continued our work with Sedex to carry out audits 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.

   **Mekong Club**

   We work closely with The Mekong Club, who are a membership-based non-profit organization in Asia that works with companies who want to take active steps to identify potential risk and eradicate modern slavery from their business. In May 2019, Intertek and the Mekong Club announced the launch of the Risk Assessment Matrix (RAM) which is supported by data from Intertek’s WCA programme. This unique tool uses a series of standardized indicators to provide details of the labour violations associated with supply chain processes by product, tier, and geographical region and is designed to help companies prioritize their actions to identify, address and investigate forced labour risk within their supply chains. The RAM is currently based on the analysis of 70,000 data points and 14,000 audits on more than 10,000 factories in 54 countries and 405 regions.

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:** in 2017 we established 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. In 2019 we re-shaped this committee to add further focus to our sustainability priorities. The committee has met regularly during the year: it reports to the Group CEO and 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:

<table>
<thead>
<tr>
<th>Policies</th>
<th>Controls</th>
<th>Assurance/Audit</th>
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<tbody>
<tr>
<td>- we set out the behaviours we expect of ourselves, our suppliers and our business partners</td>
<td>- we set out how our policies must be complied with, and who in our organisation is responsible for controlling, monitoring and overseeing compliance with them</td>
<td>- we verify that our controls are being followed and our policies are effective in addressing the risks of modern slavery</td>
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</table>

4.1 Our policies

<table>
<thead>
<tr>
<th>Policy</th>
<th>Explanation</th>
<th>Day-to-day responsibility</th>
<th>Governance &amp; oversight</th>
<th>Policy approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Modern Slavery Policy</td>
<td>This policy requires us to communicate our expectations relating to preventing modern slavery to our suppliers, and to take actions including termination of contracts if those expectations are not met.</td>
<td>The Group-General Counsel has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Our Compliance function has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems.</td>
<td>Group Ethics, Compliance &amp; Risk Committee</td>
<td>Board of Directors</td>
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</table>
### 4.2 Our controls

<table>
<thead>
<tr>
<th>Control type</th>
<th>Description of control</th>
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</thead>
<tbody>
<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 level, respectively).</td>
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<tr>
<td>Controls on our suppliers of goods and services and other business partners</td>
<td>We ask our suppliers to use our standard agreements for the supply of goods and services. These contain contractual 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. 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>
</tr>
<tr>
<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 conduct due diligence on prospective employees) and our policies on workplace diversity, inclusion, freedom from discrimination and fair labor. 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>
</tr>
</tbody>
</table>

### 4.3 Our assurance/audit programmes

<table>
<thead>
<tr>
<th>Assurance/audit type</th>
<th>Description of assurance/audit</th>
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</thead>
<tbody>
<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 unannounced site audits.</td>
</tr>
<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. We have not found an effective way to do this in 2019 and it remains a work in progress.

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 qualifications, expertise and technology 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); 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 focussed 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 of our operations. We adopt a risk-based and tiered approach to the level of due diligence we perform.

<table>
<thead>
<tr>
<th>Supplier category</th>
<th>Due diligence process</th>
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<tbody>
<tr>
<td>Contractors and sub-contractors</td>
<td>We selectively contract or sub-contract certain of our services to other laboratories, auditors or inspectors. As a professional services company, it is important that we can assure ourselves of the quality management and other processes of any party on whom we rely to provide any part of our professional services. We continue to have a robust process in place to ensure that all contractors and sub-contractors agree to adhere to our Code of Ethics, and background checks and risk assessments are performed on them, before we agree to work with them. Our internal controls require formal commercial agreements with the appropriate legal protections for Intertek, its business ethics and its reputation.</td>
</tr>
<tr>
<td>Field-based contractors and sub-contractors</td>
<td>Where our contractors and sub-contractors are auditors or inspectors, these can either be corporate entities with their own workforce, or individuals. As audits and inspections are performed in the field (that is, at client sites or sites in the client’s supply chains) the conditions in which auditors and inspectors work (including working hours, pay and accommodation at sites which can, in certain geographies, be remote) are more difficult for us to monitor and assess. We are aware that a contract with, or audit of, an auditor or inspection company provides only a limited view of the conditions in which its employees work, and we try to ensure we have direct contact with its employees as part of our H&amp;S training or other on-boarding process. The employees of any contractor</td>
</tr>
</tbody>
</table>

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 of 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; 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.

We are assessing ourselves against our own standards. Our work on modern slavery, forced labour and respect for human rights will be covered as part of our People & Culture standard, and our Corporate Sustainability Certification process will allow us to track progress against our goals.

10. OUR FUTURE PLANS

We will be publishing and implementing our new Intertek Sustainability Procurement Policy and Supplier Code of Conduct during 2020. This will establish common expectations for all of 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.