INTERTEK GROUP PLC INTERTEK'S MODERN SLAVERY ACT STATEMENT 2022

for an ever better world



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 2022 to prevent modern slavery and human trafficking in our business operations and supply chains.

INTer Total Quality. Assured

INTERTEK'S MODERN SLAVERY ACT **STATEMENT 2022**



Intertek continues to be a force for good bringing quality safety and sustainability to life

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. As the largest social compliance audit company globally, we are also proudly committed to support our clients' goals of eradicating modern slavery, ensuring their supply chains operate responsibly, respecting human rights and improving the lives of workers.

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. Our 2022 Modern Slavery Act Statement outlines the steps we are taking in our own business, in our supply chain and through partnerships and advocacy to avert modern slavery and human trafficking.

This is Intertek's seventh 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 23 February 2023.

André Lacroix **Chief Executive Officer** 23 February 2023

Purpose

Bringing quality, safety and sustainability to life for an Ever Better World.

Vision

Our Vision is to be the world's most trusted partner for Quality Assurance.

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.

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1. OUR MODERN SLAVERY FOCUS IN 2022

In 2022 our key focus areas have included:

- continuing our partnerships and collaborations to leverage the insights from our audits to support the global agenda of combatting modern slavery and forced labour;
- 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; 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.

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 43,500 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



Our services



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



Globally connected

1,000 +	3,000	100,000+
Laboratories and offices	Auditors	Audits
43,500	100 +	100
Employees	Countries	Languages

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 in certain jurisdictions or geographies.

2.3 Our partnerships and collaborations

Collaborating with external partners is an important 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 and Initiative for Compliance and Sustainability. 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 2022, 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.

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. Driving our regional strategies includes liaising with HR colleagues, who maintain best-in-class internal
 labour and human rights practices, 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 Beyond Net Zero Steering 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:



4.1 Our policies

Policy	Explanation	Day-to-day responsibility	Governance & oversight	Policy approval
Modern Slavery Policy	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.	The Group General Counsel has overall day-to-day 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 and procedures to ensure they are effective in countering modern slavery.	Group Ethics, Compliance & Risk Committee	Board of Directors
Labour and Human Rights Policy (including our policy on forced labour and child labour)	In this policy, we confirm our commitment to the United Nation's Convention on Human Rights and the International Labour Organisation's eight core conventions on fundamental human rights (non- discrimination; forced labour; child labour; freedom of association and collective bargaining; harassment; working hours; benefits and wages; leave; and employee contracts and letters).	Day-to-day responsibility for this policy is shared between the Group Executive Vice President, Human Resources and the Group General Counsel. The responsibility for monitoring compliance with this policy is shared between our Compliance, HR and Internal Audit functions.	Group People Risk Committee; Group Ethics, Compliance & Risk Committee	Board of Directors
Code of Ethics	Our Code of Ethics (which also includes a section on Labour and Human Rights) sets out the principles and rules that govern our business conduct. It helps anyone representing Intertek to understand what is expected of them and ensures that we always act responsibly and with integrity. The rules govern how we treat our employees and behave in the workplace, and our social and corporate responsibilities.	As with our Modern Slavery Policy, the Group General Counsel has overall responsibility for ensuring that all those under our control comply with this policy and 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 and procedures to ensure they are effective in supporting the highest standards of ethical conduct.	Group Ethics, Compliance & Risk Committee	Board of Directors



4.2 Our controls

Control type	Description of control
Controls on our own business and operations	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).
Controls on our suppliers of goods and services and other business partners	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 subcontractors, 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.
Controls on our recruitment processes and people matters	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.

4.3 Our assurance/audit programmes

Assurance/audit type	Description of assurance/audit
Assurance/audits on our own operations	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.
Assurance/audits on our supply chain	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. Our assurance over our suppliers' working condition / modern slavery policies and procedures is currently obtained by due diligence and supplier self-assessment questionnaires.
Total Sustainability Assurance	Intertek's Total Sustainability Assurance (TSA) programme is an independently audited corporate certification that helps our clients to define what it means to be a truly sustainable organisation and to assess themselves against best practice. To demonstrate that we hold ourselves to the same standards to which we audit our clients, we have assessed ourselves against our own 10 TSA Standards. Our "People & Culture" standard includes requirements in relation to the mitigation of modern slavery risks in both our own operations and our supply chains. More detail can be found in the Sustainability Report section of our Annual Report & Accounts 2022.

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 certain countries, 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.

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 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 now have 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.

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.

Supplier category	Due diligence process
Contractors and sub- contractors	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. Our local compliance officers perform due diligence on sub-contractors to check that they have signed Intertek's Code of Ethics.
Field-based contractors and sub-contractors	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&S training or other on-boarding process. The employees of any contractor or sub-contractor have access to our whistleblowing Hotline.
Other suppliers	We have adopted our Intertek Sustainable Procurement Policy and Supplier Code of Conduct and this establishes common expectations for all our suppliers on a broad range of issues including human rights and labour 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. We apply a due diligence process that asks for specific information relating to compliance with Modern Slavery, and related policies. In addition, our minimum internal controls
	require that any contract with a supplier of goods or services with a value of £100,000 or more per year must be reviewed by Group Compliance, which must carry out a risk assessment (including of modern slavery risks) and obtain a signed Code of Ethics from the supplier before the contract can be entered into.

To strengthen our supplier sustainability programme, we began in 2022 to take a more integrated approach to managing supplier sustainability by including risk assessments throughout the supplier life cycle and incorporating sustainability criteria at procurement category level.

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. During 2022, 91 (2021: 112) non-compliance issues were reported through the whistleblowing hotline and other routes. All were investigated, but there were no modern slavery issues raised.

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 September 2019, we launched Corporate Total Sustainability Assurance Certification ('TSA'), an assurance programme that audits and certifies the quality of processes in place in a corporation. Our ten TSA Corporate Certification Standards demonstrate actionable, comparable, consistent and reliable disclosures and provide assurance beyond ESG disclosures and recognise that truly sustainable solutions must address the important operational aspects of every company, to cover environment, products, processes, facilities, assets, systems, corporate policies and stakeholder engagement.

To embed the requirements of all ten standards and review our progress, we carried out a self-assessment for each Standard followed by a gap assessment audit of our corporate head office, and a selection of operational sites that are representative of the mix of business lines and activities within our operations.

Our work on modern slavery, forced labour and respect for human rights was covered as part of our People & Culture standard. The audit team comprised subject matter experts from our Business Assurance business line, who benchmarked our sustainability programmes against the requirements of each Standard. Performance is benchmarked against requirements and based on maturity. On completion of the benchmarking step the audit team reported their findings and assurance on the extent to which corporate sustainability processes are in place, effective and meeting the intent of the standard.

As a purpose-led organisation, we continue to measure ourselves against the same high standards to which we certify our clients and remain committed to the continued implementation and review of the outcomes of the audit against our own TSA standards.

10. OUR FUTURE PLANS

We intend to increase our supply chain monitoring further this year including a wider roll out of our supplier sustainability programme to audit our suppliers for risks including modern slavery, forced labour and unfair working conditions.



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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 and RCG-Moody International Limited, all of which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) regulations 2015. The Intertek Group Modern Slavery Policy applies to all our businesses and employees across the world.