



# Modern Slavery and Human Trafficking Act Statement

**INSPECTORATE INTERNATIONAL LIMITED  
DECEMBER 2023**



**BUREAU  
VERITAS**

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## 1. Introduction

This Statement updates the position of Inspectorate International Limited company registration number 0638315 in respect to the requirements of the **Modern Slavery Act 2015** (the Act) as at 31 DECEMBER 2023

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### **The Modern Slavery Act and Human Trafficking Statement – Inspectorate International Limited (the Company)**

Modern Slavery is defined in the Government’s Modern Slavery Strategy published in November 2014 encompassing “slavery, servitude, forced and compulsory labour and human trafficking” leading to the 2015 Act.

This statement sets out the changes in the Company’s structure and the relevance to the potential modern slavery risks related to its business and the steps taken aimed at ensuring no slavery or human trafficking in its own business and its supply chains. This statement is an update covering the period up to 31 December 2023.

As part of the global Commodities industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking to ensure full compliance with the Act.

The Company, an Affiliate within the Bureau Veritas S.A Group, is committed to preventing slavery and human trafficking in its corporate activities, and to ensure its supply chains are free from slavery and human trafficking. General company and employee awareness is underpinned by the robust Group policy and procedures mandated for each Affiliate to follow.

This policy statement has received endorsement from the Directors and Management of the Company.

The day-to-day responsibility for the Policy statement and its implementation and monitoring is managed in conjunction by senior Operational Management and respective Human Resource teams.

## 2. The Company and Bureau Veritas Group

The **Bureau Veritas** Group (the Group) is a global leader in Testing, Inspection and Certification (TIC), delivering high quality services to help clients meet the growing challenges of quality, safety, environmental protection and social responsibility.

As a trusted partner, the Group offers innovative solutions that go beyond simple compliance with regulations and standards, reducing risk, improving performance, and promoting sustainable development.

The Company is an affiliated company within the Bureau Veritas SA Group with its corporate head office in Paris France. The Company provides testing inspection services across an extensive range of commodities as one company in the Commodities Division of the Group.

One set of core values are shared across the Group covers integrity and ethics, independent and impartial counsel and validation, customer focus and safety at work.

The Group is recognized and accredited by major national and international organizations and employs in excess of 84,000 people worldwide in 140 countries across a network of laboratories, strategically located in key trading locations around the world, to provide precision analytical testing to both internationally recognised standards and customer-specific methodologies specific to Oil & Petrochemicals, Metals & Minerals and Agri-Commodities & Fertilizer sectors.

The Company with an annual turnover in excess of the threshold of £36m is required by law to provide this annual Statement attesting to its recognition of its obligations in respect of the Modern Slavery Act 2015.

The Company is administered from the UK and its UK activities are exclusively serviced through an outsource arrangement with its direct parent company, Bureau Veritas Commodity Services Limited. Its overseas activities are managed and reported through branches in Bangladesh – non-revenue based activity outsourced management Kuwait, UAE (Jebel Ali and Fujairah) with an employee population of 335.

For the purposes of this Statement the branch activities are considered part of the obligations of the Company. However, subsidiaries in the following countries are considered outside the scope of the Act and this Statement. This is constantly under review as a matter of good governance.

- India
- Malaysia
- Qatar
- Saudi Arabia
- Singapore

A UK based Co-ordination team remains in place through the outsourced arrangement with its immediate parent company as mentioned previously. This Co-ordination team manage the international business activities in the name of and on behalf of the Company.

### 3. At Risk Countries

- According to the Global Slavery Index, Bangladesh ranks as the fourth highest country for the absolute number of people in modern slavery; through an outsourced agency the non-revenue activity of this branch is managed by a small team with the Company maintaining full control and oversight of all matters relating to human rights and employee welfare.
- The Middle East branches employ foreign nationals from up to 20 different countries. A review of activities, policies and procedures has been undertaken within these branches as part of this program resulting in a new initiative “Worker Welfare Management Plan and Human Rights Policy” being introduced.
- We are alert to the possibility that there may also be Modern Slavery risks in several other countries in which the Group operate, and through Group policies and procedures this is being monitored.

Furthermore, as in previous years a key focus of this Statement is the Middle East branch activities of the Company and as such a specific due diligence exercise has been undertaken. This has been based on key parameters relevant to the requirements of seeking assurances of compliance with best practice in the fair and safe treatment of the branch employees together with all suppliers to this specific business. An agreed upon set of procedures was followed to cover all the key points identified. As in prior years the Regional Directors and senior management of the branches have reaffirmed the position providing self-declaration-based assurances covering the various predefined key criteria in the knowledge that such reaffirmation is subject to internal audit at any time.

The self-declaration declaration is held for future reference. In summary the Directors are satisfied that the Middle East procedures comply with both good practice and the essence of the Slavery Act.

### 4. Management Focus

In addition to the local initiatives the Company and its branches are subject to mandatory Group policies and procedures consistent with the Modern Slavery Act focus and intentions. Slavery and human trafficking are abuses of an individual’s freedoms and rights and as such go against the Group core values. We respect an individual’s right to equal opportunity, freedom of association and collective bargaining. We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include: -

- (1) **Bureau Veritas Code of Ethics** - has been adopted fully, the Code was refreshed and made available to all employees and business partners and updated on the Group website. Suppliers are required to act in compliance with this Code when dealing with the Group or acting its name noting the values of “Integrity and Ethics, Impartiality and Independence, Respect for all individuals and with Social and environmental responsibility”.

**Most relevant policies reflect the basic recognition of associations and rights of collective bargaining, eliminations of discrimination, support to diversity and inclusion, providing a safe and secure workplace and more specific to this statement prevention of human trafficking and forced labour together with prevention of child labour.**

## **(2) Bureau Veritas Whistleblowing Policy**

The Company supports a policy of encouraging our people to “speak out” if they witness anything contrary to the Group standards and Code of Ethics either through a management line or confidentially through an Alert line enabling people to report issues online, via e-mail or by telephone, giving their name or not as they may prefer.

## **(3) HR Policies**

The Company has formal, written HR Policies including a Bullying and Harassment Policy and the Whistleblowing Policy referred to above. These policies ensure that an individual can raise a concern, in good faith, that modern slavery of whatever form is or may be taking place in any part of the Company’s own business or in any of its supply chains without suffering detrimental treatment as a result. This is the case even if the employee turns out to be mistaken. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Employees have several avenues open to them if they believe they have suffered such treatment. These include the external Alert Line (mentioned above), a relevant Line Manager, HR or the Legal Risk & Compliance Department. If the matter is not remedied, the employee concerned can raise the matter using the Company’s formal Grievance Procedure (available from HR).

The Company is committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. The overall responsibility for the policy lies with Management; however, all staff are required to comply with the policy and to act in accordance with its objectives so as to ensure everyone is treated with the dignity and respect they deserve.

All HR Policies are available to employees through HR and all new employees receive a full set of these policies with their Contract of Employment.

## **(4) Corporate CSR Policy**

The Company seeks to minimise any harm caused by its operations and to work with stakeholder needs in mind. We strive to be a responsible corporate citizen and a good employer.

## **(5) Procurement Policy**

The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of our Code of Ethics and the guidelines outlined in our Procurement Policy which is available to staff via our internal Intranet. The policy is based upon the general principle of maintaining the highest standards of integrity in our business relations with our suppliers. Suppliers are required to sign a declaration to confirm that they have read and understood our Code of Ethics.

## **(6) Sub-Contractors and Vendors**

Under our Code of Ethics when the Company is involved in large-scale or complex projects, or where it does not have sufficient resources internally, the Company may require a subcontractor, either a third entity or another Bureau Veritas legal entity, to provide some portion of the work or services which Bureau Veritas has agreed to perform under its contract with a client.

Subcontractors and their employees are not Bureau Veritas Employees. Subcontractors should act as independent, competent, honest and impartial bodies whatever the client or the circumstances and the services to be supplied. We therefore avoid dealing with prospective subcontractors which we know are involved in bribery, are incompetent, do not have a property license or accreditation, or do not have sufficient creditworthiness. We are endeavouring to ensure that all our Subcontractors declare compliance with our Health & Safety requirements on an annual basis.

The Bureau Veritas Group Code of Ethics has been fully adopted by the Company and forms part of our contract with all suppliers and sub-contractors, and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, we have adopted a Vendor Approval procedure to confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- Our UK based suppliers pay their employees at least the national minimum wage/national living wage (as appropriate)
- Our international suppliers pay their employees prevailing minimum wage applicable within their country of operations.
- The Company may terminate the contract at any time should any instance of modern slavery come to light.

**The parent of the Company is a member of the Institute of Business Ethics**

**The IBE was established in 1986 to promote high standards of business behaviour based on ethical values. The IBE raises public awareness of the importance of doing business ethically. The IBE help Companies strengthen their ethical culture through the sharing of knowledge and good practice.**

## **5. Board Approval**

**This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This Statement has been approved by the Directors of the Company on 19 June 2024.**

**David Lappage**

**Director**

Legal Administration, Risk & Compliance

Inspectorate International Limited

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