



Modern Slavery and Human Trafficking Updated Statement 2019

Inspectorate International Limited
Statement date: 20 April 2020



**BUREAU
VERITAS**

Contents – by section

Introduction	1
Structure of the Company	2
At Risk Countries	3
Our Business	4
Update to 31ST March 2020	5
Management focus	6
Supply Chain	7
What’s Next	8

1. Introduction / Statement by the Board

The **Modern Slavery Act 2015** (the Act) requires all UK companies with an annual turnover exceeding £36M to publish a statement setting out their position in relation to the eradication of modern slavery and the steps it takes and is planning to take to ensure that Modern Slavery does not feature in its supply chain.

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 by the then Home Secretary Theresa May as encompassing “slavery, servitude, forced and compulsory labour and human trafficking.”

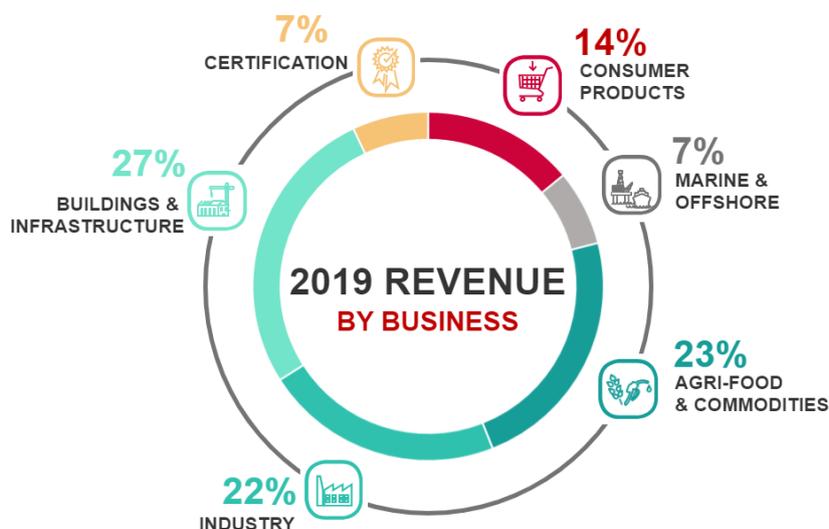
This statement sets out the Company’s actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement is an update covering the period 1st January 2019 – 31st March 2020.

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.

This policy statement has received unanimous endorsement from the executive management, and the Board of Directors of the Company who will review and update the Statement annually. The Company 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 awareness has been raised by circulating communications to senior management with contributory responsibilities to ensure development of this statement.

The day-to-day responsibility for the Policy statement, i.e. implementing and monitoring, as well as queries, audits and internal systems and procedures to ensure it is effective in combatting modern slavery, is handled by the Legal Risk & Compliance Department in conjunction with the Operational Management teams and Human Resource department.

2. Structure of the Bureau Veritas Group



The **Bureau Veritas** 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.

The Company was acquired by Bureau Veritas in 2010 and our ultimate parent Company is Bureau Veritas SA with its corporate head office in Paris France. With capabilities in an extensive range of commodities, the Company provides independent inspection, sampling and testing services 24 hours a day, 365 days of the year

As a trusted partner, Bureau Veritas group including all its affiliated companies and subsidiaries including the Company offer innovative solutions that go beyond simple compliance with regulations and standards, reducing risk, improving performance and promoting sustainable development.

One set of core values are shared across the Bureau Veritas group covering integrity and ethics, independent and impartial counsel and validation, customer focus and safety at work.

Bureau Veritas is recognized and accredited by major national and international organizations and employs in excess of 75,000 people worldwide in 140 countries.

The Bureau Veritas group utilise 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 a leading company within the Commodity division and is now part of the South West Europe Operating group.

The Company has Subsidiaries in the following countries for clarity it is considered the subsidiaries unlike branches fall outside the scope of the Statement. In due course this may be reviewed to ensure best practice is applied across the subsidiary structure.

India
Italy
Malaysia
Malta
Qatar
Saudi Arabia
Singapore

Note – the Russian subsidiary was subject to an intra-group transfer in 2018.

The Company has Branches in the following countries:-

Bangladesh – formal registered branch without direct employees
Kuwait - formal sponsorship arrangement, employees managed from UAE
United Arab Emirates: Jebel Ali, Fujairah – formal registered branches

As branches these are considered part of the Company and fall within the scope of the Statement, work has commenced to apply similar assurance processes in each as applied within the Company.

3. At Risk Countries

The Company has utilised third party resources to identify ‘at risk’ countries to focus on in more detail in the future, in particular to mitigate any risk associated with Modern Slavery.

According to the Global Slavery Index:

<https://www.globalslaveryindex.org/findings/?gclid=CMTliLLD4NMcFWK37QodYLwLQQ>

- Bangladesh ranks as the fourth highest country for the absolute number of people in modern slavery.
- It is noted that the UAE branches employ foreign nationals, primarily from India and the Philippines. A review of activities, policies and procedures has been undertaken within the UAE branches as part of this program.

Notwithstanding India is outside the scope of the Statement it is recognised that India ranks as the fourth highest country for the estimated proportion of population in modern slavery and is a country with the highest absolute number of people in modern slavery; and

We are alert to the possibility that there may also be Modern Slavery risks in several other countries in which we operate and this will be monitored over time.

4. Our Business

Working from the world’s major ports and mining and refining locations, our aim is to minimize commercial risk by accurately and swiftly determining the physical properties of materials through supervision of weighing (including draft survey), sampling, pre-shipment, load and discharge inspection. The Company employs a combination of experience and cutting-edge technology to report on elemental levels and chemical properties. The Company has a global network of offices which co-operate closely with each other and work to internationally-recognized standards such as ISO and ASTM and we can mobilize our teams within a few hours if necessary.



5. Update 2019 to March 2020

Management focus for the past period has been on the Middle Est and the company branches in UAE and Kuwait managed centrally from the Dubai based corporate management team. The Country Director and Human Resource Manager were instructed to undertake an internal review of local policies and procedures covering both employment and use of suppliers and subcontractors. A self-declaration assurance approach was adopted with regional management making a declaration covering the various predefined key criteria in the knowledge that such declaration is subject to internal audit. The project was conducted under the control of the director with responsibility for legal and compliance on behalf of the board of directors.

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

The diverse population of employee nationalities can be seen in the following table. The percentage of female employees in UAE represents approx. 14% of the total number of employees.

Area	No. of Employees	No. of Men	No. of Women	Nationality	Employees With Full Time Contracts
Dubai	149	123	26	Maltese, Great Britain, India, Philippines, Sri Lanka, Kenya, Pakistan, Russia, South African, Iraq, Jordan	149
Fujairah	99	90	9	Great Britain, Georgia, India, Philippines, Sri Lanka, Kenya, Pakistan, Latvia, Russia, South African	99
Kuwait	18	18	0	India, Philippines & Egypt	18

The board considered the Middle East submissions and concluded that the procedures in place were compatible and with intent of the Slavery Act and commensurate with the requirements of good practice.

6. Management Focus

Responsibility for the Company's anti-slavery initiative is as follows:-

Policies

Slavery and human trafficking are abuses of an individual's freedoms and rights and as such go against our core values. We respect an individual's right to equal opportunity, freedom of association and collective bargaining. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:-

Bureau Veritas Code of Ethics

The Bureau Veritas Group Code of Ethics has been fully adopted by the Company. The [core values](#), which are the foundation of the Bureau Veritas Code of Ethics are listed below, and were the focal point of the work carried out by our profession in 2003, under the leadership of the TIC Council formerly known as the International Federation of Inspection Agencies (IFIA). This led to the drafting of the first Code of Ethics of Bureau Veritas, published in October 2003. All Bureau Veritas employees must ensure that their day-to-day decisions are taken in compliance with the requirements of the Code of Ethics. Bureau Veritas suppliers are also required to act in compliance with our Code of Ethics when dealing with Bureau Veritas, or acting in its name.

"Integrity and Ethics"

"Impartiality and Independence"

"Respect for all individuals"

"Social and environmental responsibility"

These values are an expression of how Bureau Veritas expect our people to behave and sets the standard that we expect all our supply chain partners to meet. [Click here to view the document.](#)

The Code of Ethics is supported by a comprehensive schedule of Policies covering many ethical and compliance issues.

Bureau Veritas Whistleblowing Policy

The Company supports a policy of encouraging our people to "speak out" if they witness anything that happens within our business that they believe goes against our [Code of Ethics](#). This is supported by an external Alert line run by Expolink enabling people to report issues online, via e-mail or by telephone, giving their name or not as they choose.



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.

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. [Click here to view the document.](#)

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.

The Company is a member of the [IBE \(Institute of Business Ethics\)](#).

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.

The Metals & Minerals Division of the Company has also been accredited with the 'Investing in Integrity' Charter Mark.

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7. Supply Chain Overview

The Company operates a policy covering procurement practices.

During 2018 the Company commenced due diligence as part of a 'Know your suppliers' exercise to ensure awareness that our suppliers (i) recognise the Company has a Modern Slavery Act statement and (ii) that suppliers themselves seek to acknowledge and implement best practices within their own businesses.

Sub-Contractors

Under our Code of Ethics (**Policy No. 415 – Subcontractors**), 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, as part of our contract with suppliers, we will approach our suppliers 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 any 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 Company procures a wide range of goods and services via a diverse and varied global supply chain of over 600 suppliers including:-

- *Property related services (maintenance and repairs)*
- *Facilities management services*
- *Communications and IT equipment Services*
- *Temporary/Agency Staff*
- *Recruitment Agencies*
- *Various professional Services and Consultancy*
- *Sub-Contracting Services*
- *Office Equipment and supplies*
- *Utilities*
- *Health & Safety Equipment*
- *Chemicals*

8. What Next?

The Company will keep its processes under review with its procurement team, and will look again at the supply chain approach in light of the Modern Slavery Act.

Following from the Company's statement in 2018 the Company has demonstrated its commitment to complying with the Modern Slavery Act by:

- Implementing a HR initiative aimed at ensuring the Company itself remains transparent; this involved a questionnaire relating to employees, completed internally and subject to internal and external audit for assurance purposes;
- Implementing a supplier initiative, involving questionnaires being sent to all suppliers with a £36 million turnover, aimed at ensuring that all suppliers adhere to the Act and adhere to our code on Modern Slavery as mentioned in the previous section.

The Company also intends to build on this statement and its commitment to the legislation by looking at other areas over the next 12 months and reviewing the 2018 report covering the main business activities in the UK.

Board Member 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 for period ending 31st March 2020.

Inspectorate International Limited

Date: 20th April 2020

We hope you find this report informative and welcome your input and views which can be sent to

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