



# Modern Slavery and Human Trafficking Statement 2018

Inspectorate International Limited  
Version 6 26032018



**INSPECTORATE**

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## 1. Introduction / Statement by the Board

The **Modern Slavery Act 2015** 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.

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

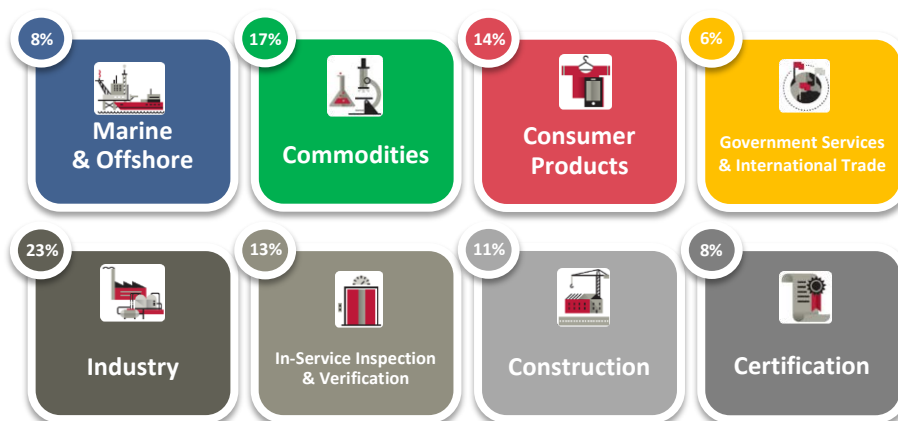
This statement sets out the Company’s actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> January 2016 – 31<sup>st</sup> December 2017.

As part of the Commodities industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

This policy statement has received unanimous endorsement from the executive management, and the Board of Directors of the Company who will review and update it annually. The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. General Company awareness has been raised by circulating an email to senior management reporting progress in the 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.

## 2. Structure of the Company



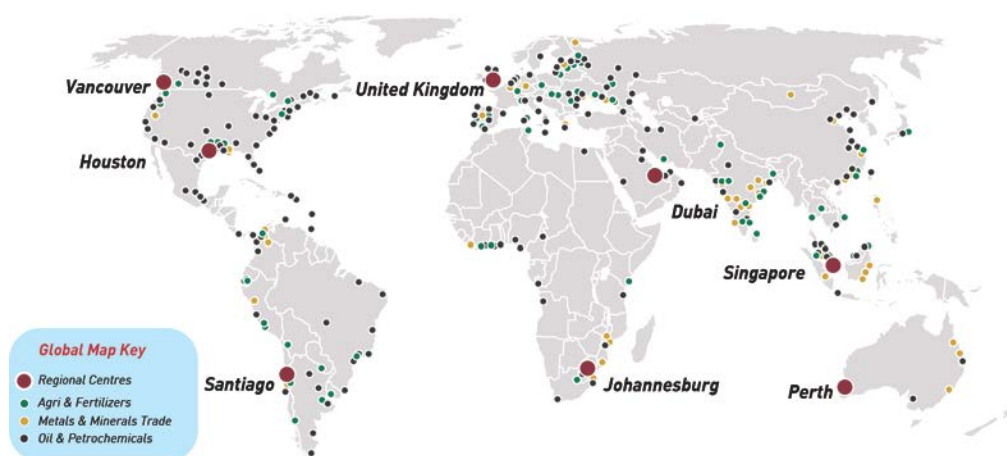
The **Bureau Veritas** Group is a global leader in Testing, Inspection and Certification (TIC), delivering high quality services to help clients meet the growing challenges of quality, safety, environmental protection and social responsibility.

The Company was acquired by Bureau Veritas in 2010 and our ultimate parent Company is Bureau Veritas SA. Bureau Veritas SA has its head office in 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 offers innovative solutions that go beyond simple compliance with regulations and standards, reducing risk, improving performance and promoting sustainable development.

Bureau Veritas core values include integrity and ethics, 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 67,000 people worldwide in 140 countries.



The Company utilises 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 has an annual turnover in excess of £36M.

**The Company has Subsidiaries in the following countries:**

<b>India</b>
<b>Italy</b>
<b>Malaysia</b>
<b>Malta</b>
<b>Qatar</b>
<b>Russia</b>
<b>Saudi Arabia</b>
<b>Singapore</b>

**The Company has Branches in the following countries:-**

<b>Bangladesh</b>
<b>Kuwait</b>
<b>United Arab Emirates</b>

### **3. At Risk Countries**

ILL has looked at third party resources to identify ‘at risk’ countries which the Company may 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>

- India ranks as the fourth highest country for the estimated proportion of population in modern slavery;
- India is the country with the highest absolute number of people in modern slavery; and
- Bangladesh ranks as the fourth highest country for the absolute number of people in modern slavery.

We are alert to the possibility that there may also be Modern Slavery risks in several other countries in which we operate.

## 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 cooperate 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. 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 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.

## 6. Supply Chain Overview

The Company operates a policy covering procurement practices.

Going forward we plan to conduct due diligence as part of a 'Know your suppliers' exercise to ensure awareness that our suppliers have never been convicted of offences relating to modern slavery.

### 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*

Based on a materiality threshold of £100,000 spend or above, we have focussed on 60 suppliers in this statement of which 27 are unrelated parties to the Company (and are our main focus), the other 35 suppliers are group affiliated.

## 7. 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.

The Company also intends to build on this statement and its commitment to the legislation by looking at the following areas over the next 12 months:-

- Guidance to employees on Modern Slavery
- Staff Training
- Awareness raising programme
- Risk Assessment
- Steps taken to mitigate the risk in at-risk countries
- Conflict Minerals
- Supplier adherence to our Code on Human Trafficking
- Supplier due Diligence Process
- Ethical purchasing/procurement codes
- Monitoring/Audits and Compliance

## 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 the financial year ending 31st December 2017.**

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**Director's signature**  
**Inspectorate International Limited**  
**Date**

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

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