

Macmillan Publishers International Limited

Introduction

Macmillan Publishers International Limited (“MPIL”) is a part of the Macmillan publishing group of companies (“Macmillan”). Pursuant to s.54 of the Modern Slavery Act 2015, this statement constitutes MPIL’s slavery and human trafficking statement (“Modern Slavery Statement”) for the financial year ending 31 December 2020. It reflects practices and policies in place across the Macmillan publishing group of companies. For further transparency this statement will be uploaded to the Home Office’s Modern Slavery Statement Registry after publication.

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour, and human trafficking (“Modern Slavery”). Macmillan prohibits Modern Slavery in our organisation and our supply chain.

Our Business

MPIL’s businesses include trade book publishing and book distribution services. The Macmillan publishing group of businesses produce printed and electronic trade and educational books, digital educational and assessment products, educational response devices and provide publishing and distribution services. Macmillan has just under 3,000 employees in North America, Asia, Europe, the UK, Hong Kong, South Africa and Australia. You can view our current global employee footprint in the map below.



Our Supply Chains

Our supply chains include print production, logistics and distribution services, manufacturers of our educational response devices and some book-related components, IT and other office equipment suppliers, professional services, travel-related services, office cleaning, and other office facilities services.

Our Policies on Modern Slavery

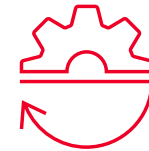
The **Macmillan Code of Conduct** reflects our commitment to acting ethically and with integrity in all our business relationships.

Our opposition to Modern Slavery is reaffirmed in the **Macmillan Code of Ethics for Business Partners**

(the “Code for Business Partners”).

It requires our vendors, suppliers, agents, and other business partners to conduct business ethically, honestly and with integrity. The Code requires that all workers be treated with dignity and respect and prohibits using any form of slavery, servitude, forced or compulsory labour, bonded labour, human trafficking, violence, or coercion against labourers. Compliance with applicable minimum age and child

labour laws is also specifically required. Various Macmillan businesses participate in professional and other organisations that require detailed commitments from suppliers with respect to health and safety, labour standards, wages, discrimination and the environment. Such organisations include The Book Chain Project in the UK, a collaboration of leading publishers who have worked together since 2003 to drive social and environmental responsibility in product supply chains. We expect all our product suppliers in this part of our supply chain to commit to working towards the standards set out in The Book Chain Project **Supplier Code of Conduct.**



Due Diligence Processes

As part of our commitment to identifying and mitigating the risk of Modern Slavery in our supply chains, we have implemented a group-wide Supplier Information Management tool to enable us to assess our supply partners in respect of Modern Slavery and other risks. This review process which was originally implemented in 2019, monitors and assesses our supply chain risk based on; product or service group, spend, adverse media, sanctions and watchlists, PEPs and other focused risk areas such as health and safety and Modern Slavery. In addition to an initial background screen, the tool continuously monitors third parties to stay on top of any potential changes in third-party profiles and activity that may alter

initial assessments of risk levels. Through a series of group-wide workshops Macmillan has informed various staff in finance, procurement and production areas about the risks that Macmillan seeks to identify and mitigate through the process. This due diligence process also provides us an opportunity to remind suppliers of our values and ethical standards. New suppliers in high-risk categories of MPIL are only appointed after an initial assessment has been performed. We have created an internal procedure to ensure that payments cannot be made with suppliers who have not been approved.

Separately, MPIL production staff periodically visit our suppliers and conduct onsite reviews. During these

visits, Macmillan management will review things like the factory's working conditions, production equipment and machinery, assess the supplier's warehouse and material inventory, how suppliers are conducting their production workflows and how the staff are generally interacting with each other. The management also review the structural state of the factory to ensure that all the necessary signals and warnings are in place, that the grounds are clean and well maintained and that the facilities are in a good condition.



Supplier Adherence to Our Values and Ethics

Our Code for Business Partners forms part of our standard contract with suppliers. They are required to confirm that no part of their business operations contradicts this policy. As we onboard suppliers to our Supplier Information Management tool, we ask that they affirm compliance to the Code for Business Partners or an equivalent set of principles. In 2021, we intend to review our agreements with current suppliers to ensure that all of our suppliers have a contractual obligation to comply with the Code for Business Partners or an equivalent set of principles.

Training

In 2019 we rolled out training on the risks of Modern Slavery to our procurement and production staff in the UK, and others who work with vendors. We also offered complimentary training to all our key printers on topics including; Anti-Corruption, Reporting for Third Parties, Confidential Information and Human Trafficking, available in seven languages. 20 business partners requested access to the training.

In 2021, we intend to again offer complimentary training to our business partners and urge those suppliers who have joined The Book Chain to participate in the training that the organisation makes available for members.

Whistleblowing

Macmillan has in place whistleblowing procedures in order that violations of our Code of Conduct or Code for Business Partners can be reported. In 2020, we hosted a speak-up awareness campaign for our UK employees. Issues can be raised internally or the online facility “**Speak Up**” can be used anonymously or with a reporter’s name to report issues. Retaliation against those raising a good-faith concern is strictly prohibited.



Performance Indicators

In 2018 we submitted our own Modern Slavery Statement for an independent review to understand any gaps in our processes. We learnt that improvements should be made in the area of reporting priorities and actions taken to reduce risk in of modern slavery in our supply chain.

In 2021 we aim to review our end-to-end due-diligence process with a view to strengthening the checks and measures we have in place. We will continue to monitor Modern Slavery risk, including by considering information received from our business partners and through our due diligence processes, Speak Up reports, training programmes and our professional organisation partners.

COVID-19

Publication of our Modern Slavery Statement for the financial year ending 31 December 2019 was delayed slightly as MPIL responded to effects of the coronavirus, including in respect of its customers and employees. Although we were liaising with suppliers to evaluate and respond to challenges faced in light of the virus throughout 2020, our Modern Slavery policies, procedures and compliance steps (as described above) remained in place throughout the Covid-19 pandemic.



Approval

This Modern Slavery Statement has been approved by the Board of Directors of Macmillan Publishers International Limited for the financial year ending 31 December 2020 at a board meeting on Monday 28 June 2021.

A handwritten signature in black ink, consisting of stylized initials and a surname, written over a horizontal dotted line.

Director for and on behalf of Macmillan Publishers International Limited

