

## BLOOMSBURY PUBLISHING PLC (“BLOOMSBURY”)

### Annual Modern Slavery and Human Trafficking Statement for the financial year ending 29 February 2020

#### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Bloomsbury’s statement on slavery and human trafficking for the financial year ending 29 February 2020.

#### Structure and business

Bloomsbury is an entrepreneurial, independent, worldwide publisher with offices in London, Oxford, New York, Sydney and New Delhi. Bloomsbury publishes books and other media for general readers, children, students, teachers, researchers and professionals. Bloomsbury publishes in English across trade and academic markets around the world and recently entered the Chinese domestic market through a Beijing-based joint venture.

Bloomsbury is organised as two worldwide publishing divisions:

- the Non-Consumer Division: comprising Academic & Professional, Special Interest and Education sub-divisions; and
- the Consumer Division: comprising Adult Trade (fiction, non-fiction and cookery) and Children’s Trade (fiction, non-fiction, picture books, pre-school titles and activity books) sub-divisions.

Bloomsbury is listed on the London Stock Exchange and a member of the FTSE SmallCap, with over 700 employees worldwide.

#### Supply chains

Bloomsbury’s main supply chains include:

1. Printers
2. Distributors
3. Third-party editorial, design, typesetting and conversion suppliers
4. Outsourced sales services

#### Policies on slavery and human trafficking

Bloomsbury has zero tolerance of slavery and human trafficking. We fully support the Modern Slavery Act 2015, and our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The policy is available to view at:

[https://www.bloomsbury-ir.co.uk/docs/librariesprovider16/archives/governance/anti\\_slavery\\_policy.pdf](https://www.bloomsbury-ir.co.uk/docs/librariesprovider16/archives/governance/anti_slavery_policy.pdf)

Bloomsbury’s Whistleblower Policy enables employees, other categories of workers and third parties to have any concerns relating to the Group confidentially addressed. For information about Bloomsbury’s Whistleblower Policy, please see below under the heading **Reporting a concern**.

Bloomsbury is committed to complying with employment and other legislation applicable to the locations in which it employs people, ensuring the human rights of individuals are protected. Bloomsbury has a diverse workforce and follows a policy that no employee or other person receives more or less favourable treatment

on the grounds of gender, sexual orientation, colour, race or ethnic origin, nationality, religion, disability or age.

### **Managing risk and due diligence processes in relation to slavery and human trafficking**

To ensure there is no slavery and human trafficking in its own business, Bloomsbury senior management are in close contact with the management teams around the world and regularly visit local Bloomsbury offices.

Bloomsbury's greatest risk of exposure to slavery and human trafficking is through its supply chain. Some of the suppliers Bloomsbury works with are located in areas assessed as having a higher prevalence of modern slavery and human trafficking, including China and India.

In order to ensure our suppliers operate to the highest standards, Bloomsbury selects high-quality suppliers with good reputations within the industry, and will not knowingly engage with a business involved in slavery or human trafficking.

Bloomsbury incorporates anti-slavery and human trafficking clauses in contracts with key suppliers including printers and pre-press third parties worldwide. Bloomsbury also holds on file certifications from key suppliers that they uphold all relevant laws regarding employment practice in the areas in which they operate. Finally, senior Bloomsbury employees visit key printers and pre-press suppliers worldwide on a regular basis to inspect working conditions at first hand. Should concerns arise, Bloomsbury would seek to resolve them in the first instance; failure to reach a resolution could result in the termination of our business dealings with the relevant organisation.

Detailed due diligence is also carried out before engaging in joint ventures or acquisitions.

Given the restrictions on global travel following the coronavirus pandemic, and in keeping with Bloomsbury's ongoing commitment to reducing its carbon footprint, Bloomsbury shall be adjusting its supplier audit process as follows in 2021 to compensate for the lack of first-hand observations:

- Requirement for increased frequency of written certifications regarding anti-slavery and human trafficking from supplier base, incorporating deeper questioning
- Requirement for the submission of virtual factory tours on spot request.

Bloomsbury will also be joining the Book Chain Project in order to drive a more sustainable supply chain across the industry.

### **Reporting a concern**

Everyone at Bloomsbury has a responsibility to be aware of the risk of modern slavery and human trafficking abuses in our business and supply chain. In most cases, employees are encouraged to discuss concerns with their line managers or Divisional Managing Director. However, where the normal channels may not be appropriate, Bloomsbury's Whistleblower policy enables employees, other categories of workers and third parties to raise any form of wrong doing and/or malpractice relating to the Group confidentially in the knowledge that they will be taken seriously and dealt with in an appropriate and professional manner. The policy is available to view at:

[https://www.bloomsbury-ir.co.uk/docs/librariesprovider16/archives/governance/whistleblower\\_policy.pdf](https://www.bloomsbury-ir.co.uk/docs/librariesprovider16/archives/governance/whistleblower_policy.pdf)

## **Effectiveness in combatting slavery and human trafficking**

Bloomsbury's management is not aware of any slavery or human trafficking in its own business or in its supply chains. The Board continues to work with management to ensure the business is effective in combatting slavery. In the last 12 months:

- No slavery or human trafficking issues have been identified;
- No reports were made under the Anti-Slavery and Human Trafficking policy or under the Whistleblower policy with respect to modern slavery and human trafficking; and
- No remedial actions were required in the last 12 months.

## **Communication**

To ensure the identification of modern slavery and human trafficking in our supply chains and our business, employees are reminded annually of Bloomsbury's Anti-Slavery and Human Trafficking policy.

This statement was approved by the Board on 31 August 2020.

**NIGEL NEWTON**  
**Chief Executive**