

## BLOOMSBURY PUBLISHING PLC (“BLOOMSBURY”)

### Annual Modern Slavery and Human Trafficking Statement for the financial year ending 28 February 2023

#### 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 28 February 2023. References to “Bloomsbury” in the statement are to Bloomsbury Publishing Plc and all its wholly owned subsidiaries.

#### Structure and business

Bloomsbury is an independent, international publisher with offices in London, Oxford, New York, Sydney and New Delhi and a joint venture in China. Bloomsbury combines academic, educational and general fiction and non-fiction publishing for the general reader, children, students, teachers, researchers and professionals. Bloomsbury publishes in English across trade and academic markets around the world.

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 979 employees worldwide. Annual revenue in the year ending February 2023 was £264m.

#### 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 identity, 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**

Bloomsbury senior management are in close contact with the management teams and key staff from our international offices and regularly visit local Bloomsbury offices. This helps senior management ensure there is no slavery and human trafficking in its own business,

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.

Bloomsbury's key suppliers also publish annual statements on slavery and human trafficking, and have policies and codes of ethics in place which they require third parties to adhere to.

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

In the year to February 2023, most pandemic-related travel restrictions in affected territories were lifted, allowing Bloomsbury's supplier review process to revert to pre-pandemic policy. As a consequence, in-person visits and first-hand inspections became possible again. Therefore, over the course of that year Bloomsbury relied less on the pandemic-related process of being able to call for written certifications regarding anti-slavery and human trafficking from its supplier base and the submission of virtual factory tours on request. Where remaining travel restrictions presented obstacles to such visits, recourse remained to these earlier measures.

Bloomsbury has joined the Book Chain Project in order to drive a more sustainable supply chain across the industry, including participation in the BCP's Labour and Environment workstream, which articulates participating publishers' expectations in terms of their suppliers' labour standards, as well as providing tools for risk assessment, briefings, and policy updates. As a member, Bloomsbury regularly attends relevant Book Chain Project sessions organised by Carnstone, which are also attended by representatives from across the industry.

Finally, to the degree that it is feasible, Bloomsbury has geo-mapped its Tier 1 and 2 supplier base to obtain as full a picture as possible of its supply chain and appropriately manage risks associated with slavery and human trafficking. Bloomsbury regularly reviews its global supplier base. As part of that process, specific attention is focussed on current and prospective suppliers' verifiable commitment to and current social responsibility policies and practices.

## **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\\_policyb89c5cba-cb34-4f4e-a226-0f59b631636b.pdf](https://www.bloomsbury-ir.co.uk/docs/librariesprovider16/archives/governance/whistleblower_policyb89c5cba-cb34-4f4e-a226-0f59b631636b.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 2023. A copy of this statement has been signed by a Director of the Company.

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