

## **MPIL MODERN SLAVERY STATEMENT 2019**

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"). It reflects practices and policies in place across the Macmillan publishing group of companies.

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). We do not tolerate Modern Slavery in our organisation or in 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, South Africa and Australia.

### **OUR SUPPLY CHAINS**

Our supply chains include print production, logistics and distribution services, manufacturers of our educational response device and some book-related components, IT and other office equipment suppliers, professional services from lawyers, accountants, computer staff and other advisors, 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. It provides that our vendors, suppliers, agents and other business partners must conduct business ethically, honestly and with integrity. The current Code requires that all workers are treated with dignity and respect and prohibits using any form of slavery, servitude, forced or compulsory labour, bonded labour or human trafficking or 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 recently implemented a group-wide Supplier Information Management tool to enable us to assess our supply partners in respect of Modern Slavery and other risks. In implementing this review process, Macmillan has informed various staff in finance and procurement areas about the risks that Macmillan seeks to identify and mitigate. This new 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 a risk assessment has been performed. Separately, we have developed and implemented an observation checklist for business staff to use on supplier visits to review onsite conditions periodically.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Our Code of Ethics for Business Partners forms part of our contract with all suppliers and 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, each is provided a link to the Code of Ethics and required to affirm compliance to the Code or an equivalent set of principles,

## **TRAINING**

In 2019 we will have training on the risks of Modern Slavery available for our procurement staff and others who work with vendors. We will also ask our business partners whether they provide training to their staff and suppliers, offer training to our business partners and urge those suppliers who have joined The Book Chain to take the training that organisation makes available for members.

## **WHISTLEBLOWING**

Macmillan has in place whistleblowing procedures in order that violations of our Code of Conduct or Code of Ethics for Business Partners can be reported. Issues can be raised internally or the online facility "Speak Up" can be used to anonymously or with a reporter's name to report issues. Retaliation against those raising a good-faith concern is strictly prohibited.

## **PERFORMANCE INDICATORS**

We will continue to monitor Modern Slavery risk, including by considering information received through our new due diligence processes, Speak Up reports, training programs and our professional organization partners.

## **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 2018.

A handwritten signature in black ink, appearing to be 'M. R.', is written over a horizontal dashed line. The signature is fluid and cursive.

Director for and on behalf of Macmillan Publishers International Limited