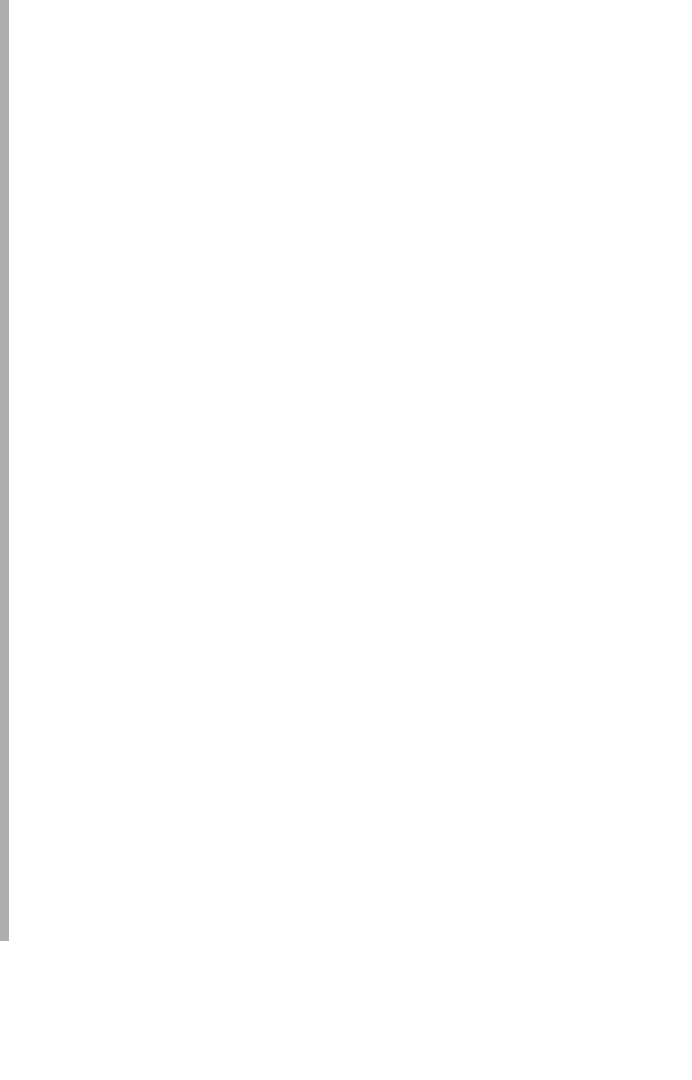


# Macmillan Publishers International Limited

## **Introduction**

At Macmillan Publishers International Limited (“MPIL”), we understand the responsibility we carry towards our employees, partners, and the wider communities we operate in. We are committed to tackling these issues and upholding the principles of the UK Modern Slavery Act 2015.

In addition to summarising actions taken in 2023, this statement also outlines the steps to be taken toward mitigating the risks of modern slavery and human trafficking in our supply chains in 2024. For further transparency this statement will be uploaded to the Home Office’s Modern Slavery Statement Registry after publication.



## **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”)**. This Code requires our vendors, suppliers, agents, and other business partners to conduct business ethically, honestly and with integrity. It 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.

To ensure a collaborative approach, our risk areas are aligned with industry standards. For example, all suppliers are required to sign up to the Book Chain Project, which strives to build better supply chains for books by providing publishers with the tools they require to make informed buying decisions. The project, which has been in operation since 2016, bringing together 28 publishing companies to work collectively to enhance sustainability in their supply chains.

All employees have annual training on our Code of Conduct, which includes modules on supply chain management and modern slavery/labour standards. We include contractual commitments to follow our Code of Ethics for Business Partners in our standard contracts. If the supplier requests a variation

(the supplier may have their own internal Code of Conduct with equivalent commitments) this will be considered on a case-by-case basis.

In 2024, we will commit to revise our Business Partner Code of Ethics to align with best practices globally. This revision will reflect our evolving commitments to maintaining high ethical standards, corporate responsibility, and our core values of honesty, integrity and respect for human rights.

## **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. 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. Our internal procedure ensures that payments cannot be made with suppliers who have not been approved.

In 2023, we conducted a review of this process and will take steps in 2024 to update our third-party due diligence programme by exploring options to upgrade our Third-Party Risk Management (TPRM) platform and reiterating to the group the risks areas that Macmillan.

## **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. We pledged to review our agreements with current suppliers and ensure that they have a contractual obligation to comply with the Code for Business Partners or an equivalent set of principles.

## **Whistleblowing**

Macmillan has in place whistleblowing procedures in order that violations of our Code of Conduct or Code for Business Partners can be reported. Issues or concerns can be raised internally or our online platform **'EthicsPoint'** can be used anonymously or with a reporter's name. Retaliation against those raising a good-faith concern is strictly prohibited. In 2023 there were no potential violations of the Macmillan Code of Ethics for Business Partners.

We will continue to monitor Modern Slavery risk, by considering information received from our business partners and through our due diligence processes, reports and concerns raised through EthicsPoint our anonymous reporting system, and the wider business, training programmes and our professional

organisation partners.



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**Lara Borlenghi**

Director for and on behalf of Macmillan  
Publishers International Limited