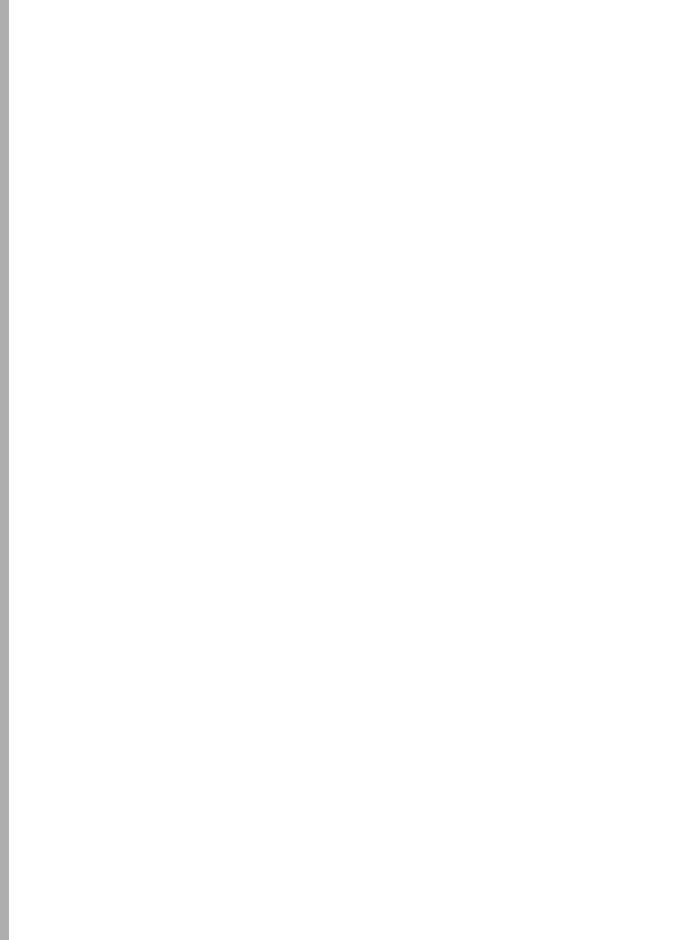


Macmillan Publishers International Limited

Introduction

This statement provides an update on the actions we have taken (and continue to take) as a business to monitor and prevent slavery and human trafficking from occurring in our own operations and supply chain. At Macmillan Publishers International Limited (MPIL), we recognise our responsibility towards our employees, partners, and the broader communities in which we operate. We are devoted to addressing these matters and adhering to the principles of the UK Modern Slavery Act 2015.

Beyond detailing the actions carried out in 2024, this statement outlines the measures planned for 2025 to reduce the risks of modern slavery and human trafficking in our supply chains. For added transparency, this statement will be uploaded to the Home Office's Modern Slavery Statement Registry after its release.



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 mandates all workers to 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 must participate in the Book Chain Project, which aims to enhance supply chains for books by providing publishers with the necessary tools to make informed purchasing decisions. Since its inception in 2016, the project has unified 28 publishing companies to collectively improve sustainability in their supply chains.

All employees have annual mandatory 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.

Due Diligence Processes

As part of our commitment to identifying and mitigating the risk of Modern Slavery in our supply chains, we use a group-wide Third-Party Risk Management (TPRM) platform to enable us to assess our supply partners in respect of Modern Slavery and other risks. This review process monitors and assesses our supply chain risk based on; product or service group, 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 by our Compliance Officer.

In 2024, our commitment to eradicating modern slavery from our supply chain has led to the establishment of a Business Partner Steering Group, designed to strengthen our collaboration with our printing business partners. This initiative involves the systematic request and analysis of audits from our partners, which allows us to maintain a transparent and compliant production environment. By closely monitoring these audits, we ensure that any compliance concerns are promptly addressed through targeted

remediation efforts and follow-up audits. This proactive approach not only enables us to uphold our ethical standards but also fosters a collaborative atmosphere with our partners, ensuring a shared commitment to combating modern slavery at every stage of production.

In 2025, we will be taking steps to update our third-party due diligence programme by exploring options to upgrade our TPRM platform and reiterating to the group the risks areas that Macmillan.

Supplier Adherence to Our Values and Ethics

Our Code of Ethics 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. We continuously 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 2024 there were no potential violations of the Macmillan Code of Ethics for Business Partners.

We will maintain vigilant monitoring of Modern Slavery risks by incorporating insights from our business partners, utilising our due diligence processes, and reviewing reports and concerns raised through EthicsPoint, our anonymous reporting system, as

well as engaging with the broader business, training programmes and communications.

A handwritten signature in dark ink, appearing to be 'Lara Borlenghi', written in a cursive style.

Lara Borlenghi

Director for and on behalf of Macmillan
Publishers International Limited