

BLOOMSBURY PUBLISHING PLC (“BLOOMSBURY”)

Anti-Bribery Policy

The Bloomsbury Board expects high standards of ethical behaviour and financial probity in all business dealings of Bloomsbury and its subsidiary companies (the “Group”) and in the business dealing carried out on behalf of the Group. The Board acknowledges that the reputation of the Group with its employees, trading partners and in the wider community depends on achieving these high standards.

The Board has zero tolerance of bribery and requires that the management implements proportionate risk based procedures that protect the reputation of the Group and ensure that the Group meets its obligations under the Bribery Act 2010.

The Group prohibits the offering, giving, solicitation or acceptance of any bribe, whether pecuniary or otherwise:

- ❖ *by or on behalf of* the Group, its officers and employees;
- ❖ *to or from* any private or public person, official, body or corporation wherever they are situated
- ❖ *in order to* gain any commercial, financial, contractual or regulatory advantage for the Group or any other party in a way which is improper.

The Group prohibits any inducement resulting in a personal gain or advantage to the recipient (or any person or body associated with them) which is intended to influence them to take action which may not be solely in the interests of the Group or of the person or body employing them or whom they represent.

The following practices are not prohibited providing they are proper in all respects, customary in a particular market, proportionate and adequately recorded:

- ❖ normal and appropriate hospitality
- ❖ the use of any recognised fast-track process which is available to all on payment of a fee
- ❖ the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only
- ❖ the giving of a ceremonial gift on a festival or at another special time

The Group’s anti-bribery approach includes:

- ❖ A Group wide anti-bribery culture led by the Bloomsbury Board;
- ❖ Risk assessment by senior management and proportionate actions to reduce the risk of bribery;
- ❖ Awareness and appropriate training of employees to recognise and avoid bribery of or by themselves or others;
- ❖ The Group’s terms of employment include anti-bribery provisions for bribery and consequences;
- ❖ Avoiding doing business with others who the Group considers have not adequately committed themselves to anti-bribery;
- ❖ Access for employees to guidance on bribery through the Group Company Secretary;
- ❖ A Group Business Protection (Whistle Blower) policy that encourages employees to report any occurrence of known or suspected bribery to the Group Company Secretary, Chief Executive or Senior Independent Director;
- ❖ Rigorous investigation of any instances of alleged bribery; and
- ❖ Robust action against any individual(s) or parties involved in bribery including assisting the police and other appropriate authorities with any resultant prosecution.

Approved by the Board

Updated January 2012