

## BLOOMSBURY PUBLISHING PLC (“BLOOMSBURY”)

### Annual Modern Slavery and Human Trafficking Statement for the financial year ending 29 February 2024

#### 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 29 February 2024. 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, Santa Barbara, Sydney and New Delhi and a joint venture in China. Bloomsbury combines academic, educational, general fiction and non-fiction publishing for the general reader, children, students, teachers, libraries, 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 and Children’s sub-divisions.

Bloomsbury is listed on the London Stock Exchange and as at 29 February 2024, a member of the FTSE SmallCap, with 1,012 employees worldwide. Bloomsbury has subsequently joined the FTSE 250. Annual revenue in the year ending 29 February 2024 was £342.7m.

#### 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. Senior Bloomsbury employees also 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.

Bloomsbury is an active member of the Book Chain Project (the "BCP"), which is a collaborative project run by Carnstone involving over 500 print suppliers and 400 paper manufacturers. The BCP's tools help publishers make informed buying decisions for book production. In addition to the BCP's forest sourcing and chemicals and materials strand, the BCP gathers and analyses data on suppliers through their labour and environment strand. Publishers are then able to collaborate on specific issues that are important to the industry. As a member, Bloomsbury attends relevant sessions organised by the BCP, which are also attended by representatives from across the industry.

In order to mitigate the risk of human rights violations within the forestry sector, Bloomsbury is committed to ensuring that the paper that is used by Bloomsbury is responsibly sourced. A keystone of Bloomsbury's global print purchasing strategy is the requirement for Forestry Stewardship Council (FSC) paper - a stipulation in all print and/or paper orders. Bloomsbury works closely with suppliers to understand the impact of the paper that is used.

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 29 August 2024. A copy of this statement has been signed by a Director of the Company.

**NIGEL NEWTON**  
Chief Executive