

Bonnier Books UK Modern Slavery Statement 2023

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1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It explains the processes of **Bonnier Books UK ("BBUK")** to prevent modern slavery and human trafficking within its business operations and supply chains.

This statement reports on the progress that we have made in 2023, in addition to projects that we have been working on to safeguard fair labour practices in our supply chain.

2. Definition of modern slavery

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

3. Organizational structure

BBUK (including both Bonnier Books UK Limited & Igloo Books Limited) is part of Bonnier Books AB ("BBAB") – owned by the Swedish media company, Bonnier Group. Originating from Stockholm, BBAB is currently active in Sweden, Finland, Denmark, Norway, UK, Germany and Poland. BBUK forms part of BBAB's overall book publishing activities, ranging from traditional and digital first publishing, to digital subscription services.

4. Bonnier Books UK statement

As outlined above, BBUK follows the governance strategy of BBAB that embodies its core values:

- freedom of speech
- power of the individual
- commitment of a family-owned business
- a passion for books.

Our commitment to the Modern Slavery Act of 2015 forms an essential part of our values and we work to combat any issues within our supply chain by reviewing our business practices regularly and closely collaborating with our manufacturing partners. We understand modern slavery is a global challenge which is constantly evolving; however, we strive to achieve the highest ethical standards, incorporating integrity and transparency into all our business operations. We challenge ourselves to achieve improvements through sound policies, with the aim of preventing modern slavery occurring in our supply chain.

5. BBUK's policies and governance

BBUK incorporates the four core values into three governing documents for ethical business relations.

- Book Chain Project Code of Conduct
- Code of Business Ethics
- Production Sustainability Commitments & Implementation.

More information on these policies can be found [here](#).

6. Due Diligence & Monitoring Risk

Production Support Portal (PSP)

BBAB developed and released the PSP portal in 2023 as a tool to monitor compliance with the code of conduct and company policies across all global direct suppliers used within the BBAB group. The portal allows members to share social audits, corrective action plans and other valid certification held by the suppliers. In addition, all top-tier suppliers, with a spend over a certain value are asked to complete biennial environmental & social questionnaires, where the details and sustainability assessment are recorded in the PSP. These records enable us to work closely with our suppliers to improve their performance and safeguard compliance with our policies and procedures.

Bonnier Books UK Limited currently has 39 live print suppliers, 8 of which are top tier suppliers with significant spend. 5 of our top tier suppliers are in China, a high-risk location. In other high-risk areas of India and Malaysia we have 4 and 1 suppliers respectively.

Igloo Books Limited currently has 23 active print suppliers, 6 of which are top tier suppliers with significant spend. All 6 top tier suppliers are based in China. China is the only high-risk country that Igloo Books Limited uses for book production.

All suppliers in high-risk countries are audited annually and any corrective action is monitored through the PSP and through the Book Chain Project (BCP).

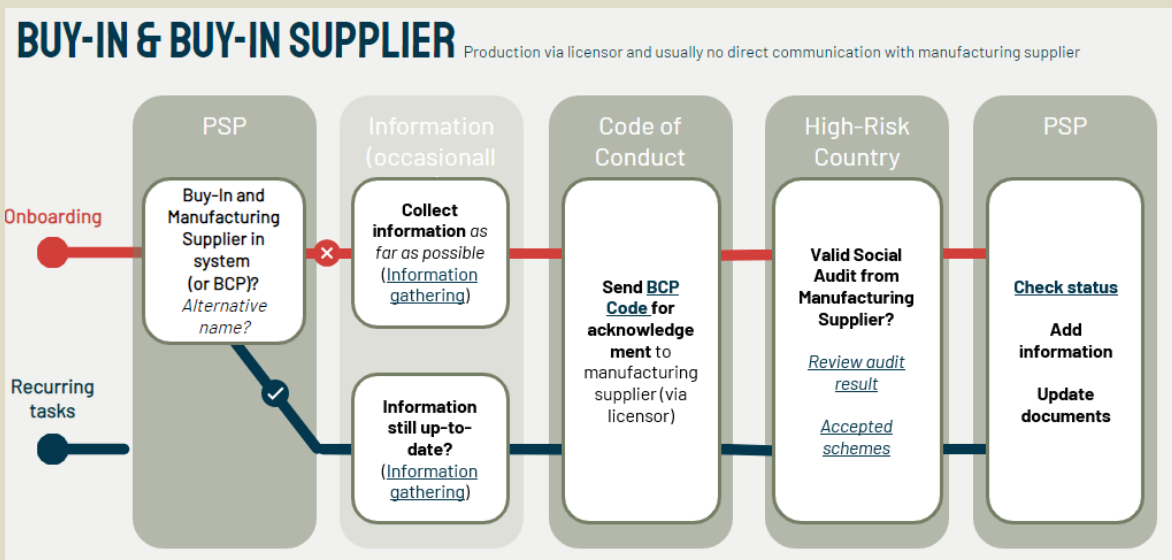
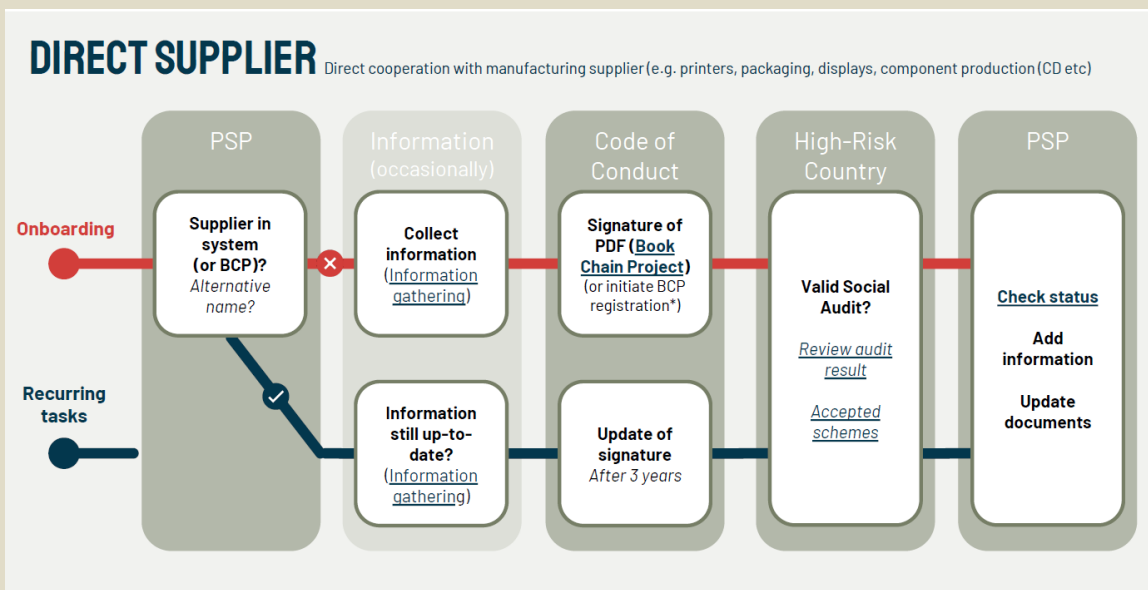
Supplier Management

In 2023 we expanded and improved our supplier management and onboarding processes, rolling out new guidance to the BBUK group. We now have an enhanced risk assessment approach that extends to printers supplying products to us via third party publishers, along with other subcontractors. If there is any doubt about a supplier's ability to comply with modern slavery then print orders will not be issued, regardless of the country risk.

The new process adds clarity to previous ways of working and covers the following:



See the typical workflows below:



The Book Chain (BCP)

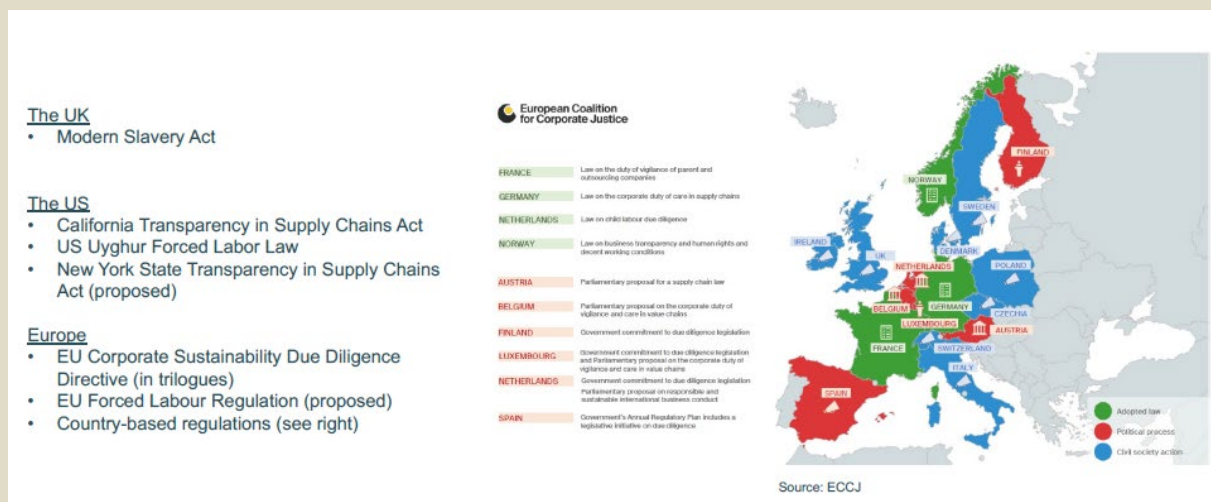
BBUK and other publishers work closely with BCP on new and emerging Human Rights Due Diligence legislation. This has included implementing an effective grievance management system to provide safe and secure channels for complaint reporting.

Grievance Mechanisms

Setting up a mechanism through the BCP means we and other publishers can respond to legislation. A pilot scheme was put in place February 2024 and will be reported on next year.

Human rights legislation is growing and, with customers across the globe, we must be part of the 'know and show' due diligence model, where businesses will have to demonstrate they know the potential human rights impacts (in their business and value chains) and show how they're mitigating them.

Legislation is growing in the following areas:



Mill traceability (due diligence)

Discussions at BCP meetings meant that there was acknowledgement that more visibility of labour standards and human rights at the mill level is required. This is being partially addressed with a new Labour Standards Questionnaire (LSQ) created by BCP, however we are also interested in how we can ensure we're getting enough information on human rights from mills. This will be an ongoing topic of discussion throughout 2024.

Mitigating risks in our supply chains

We use tools like the BCP Country Guides and the Transparency International Corruption Index to help us identify high risk areas regarding labour standards. The country guides assess geographic risk based on key corruption, governance, environmental and human rights indices - providing a high or low risk category. Data at BBAB level is routinely shared, to highlight any emerging issues. The country risk is updated annually and integrated into the PSP.

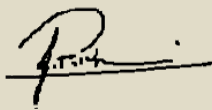
With divisions that represent trade and mass-market, three quarters of BBUK's print spend is in China and the Far East. Our risk tools identified the following areas as high risk: China, South Africa, Malaysia, and India. China represents our largest manufacturing base, but we also produce to a lesser extent in Malaysia, India and South Africa. We hold a signed Code of Conducts for all suppliers in these countries and request annual-social audits from them. These



are accessible to all BBUK production staff via the PSP. Key factory sites in China were visited in 2023 by the BBUK Trade production director who will visit again in September 2024.

7. Staff training

Our Modern Slavery Statement is available on our websites and intranet site, and it is also included in the annual BBUK CSR presentation. Additionally, all staff involved in procurement are made aware of our Code of Conduct and Production Sustainability Commitments & Implementation as they are an integral part of our Supplier Approval Procedure. A quarterly Newsletter is also sent to the UK Group that provides updates as well as links to our policies and procedures. In 2024 to 2025, extensive training for all staff, managed by the central CSR department, is being planned to enhance overall understanding of relevant legislation and issues.



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Bonnier Books UK

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