

Hachette UK Group

Anti-Slavery and Human Trafficking transparency statement

INTRODUCTION FROM THE GROUP CHIEF EXECUTIVE

We are proud of our reputation for acting fairly and ethically wherever we do business. This reputation is built on our company values, the values of our employees, and our collective commitment to acting with integrity throughout our organisation. We wholeheartedly condemn modern forms of slavery, such as forced or compulsory labour or human trafficking, and we will not tolerate it in our business or in any business we work with.

OUR BUSINESS AND ORGANISATION'S STRUCTURE

Hachette UK is the UK's second-largest publishing group, with approximately 1,700 people based in the UK. Its mission is to make it easy for everyone to discover new worlds of ideas, learning, entertainment, and opportunity.

The group consists of 11 publishing divisions, including: Headline Publishing Group; Hodder & Stoughton; Hachette Children's Group; Hodder Education Group; John Murray Press; Quercus; Little, Brown Book Group; Orion Publishing Group; Octopus Publishing Group; Storyfire Ltd (trading as Bookouture) and Paperblanks. Collectively, these divisions are made up of over 60 individual imprints.

Hachette UK is owned by Hachette Livre, one of the world's largest trade and educational publishers, which is part of the Lagardère group.

DISTRIBUTION

Our Didcot-based distribution centre, the Hely Hutchinson Centre (HHC), provides distribution services for all our companies and several third-party UK publishing clients. The Hely Hutchinson Centre (HHC), which opened in August 2018, is one of the most advanced distribution centres in Europe, shipping more than 60 million books globally each year. Approximately 360 people work at our Didcot site in warehouse operations, customer services, IT, finance, and HR.

OUR SUPPLY CHAINS

Our supply chains relate mainly to print production, typesetting, ebook conversion, warehousing and distribution services, but also include suppliers providing creative, marketing and advertising services, general professional advisers, and IT and office facilities services.

We evaluate the areas of risk of modern slavery and human trafficking in our business based on the following criteria:

- (i) The types of goods/services we purchase where modern slavery and human trafficking vulnerabilities have been reported to be more prevalent.
- (ii) The countries these goods/services are sourced from using slavery and trafficking risk indices to identify countries with a higher risk of modern slavery and human trafficking.
- (iii) The annual Hachette UK group spend with these suppliers.

We have concluded that the main areas of greater risk are:

- Colour print, e-book conversion and book production services in Eastern Europe, China, India and the Middle East
- Office facility services such as cleaning and catering
- Use of agency workers in warehouses and distribution centres

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery or human trafficking, wherever we encounter it, by implementing and enforcing effective systems and controls in our business and our supply chains.

Our Responsible Supplier Charter and the Lagardère Group Code of Ethics reflect our commitment to acting ethically and with integrity in all our business relationships. The Responsible Supplier Charter expects our suppliers and indirectly their partners and subcontractors to comply with our core principles in the areas of human rights, labour standards, the environment, anti-corruption, and generally to conduct their activities in a manner contributing to the broader objective of sustainable development from a social, environmental and economic perspective.

AUDITS & ASSESSMENT

Hachette UK participates in The Book Chain Project. This is a collaboration between UK and US publishers who have been working together for over a decade to develop a common process to assess labour and environmental standards in the printing facilities that produce our products.

The Book Chain Project shares a publishing industry Code of Conduct for suppliers, ensuring that all sites meet their recognised standards, based on existing laws and recognised codes, for labour and environmental practices. Publishers may also accept other comparable standards through The Book Chain Project tool, for example, the ICTI Care Process or SMETA audits. Suppliers can share their audit results with multiple publishers, saving them time and money by avoiding duplication.

Hachette UK requires most of its paper, print, bind and toy suppliers to register, if they are not recognised already including, in the case of toy manufacturers, by Sedex or the ICTI Toy Program. All registered suppliers are required to self-audit using approved standards on a 12-monthly basis and certify as in compliance or issued with a Corrective Action Plan. In the event of a Corrective Action Plan, Hachette UK will work with the printer in question to improve standards and achieve compliance with the required standards.

Hachette UK also requires high-risk suppliers to complete an annual assessment questionnaire. If any non-compliances are disclosed, Hachette UK will work with the supplier to implement corrective actions. We expect suppliers to resolve non-compliances within an agreed timeframe. This process is managed through an online platform operated by EcoVardis.

2021 ACTIONS

The impact of the COVID-19 pandemic has continued to be felt by Hachette UK and we have had to adapt to the challenges it has presented. In 2021, we concentrated on requiring:

- all our key suppliers to commit to our Responsible Supplier Charter, which incorporates our policy on modern slavery and human trafficking;
- all new paper, print, bind and toy suppliers to register with the Book Chain Project;

- all our high-risk suppliers to complete an annual assessment questionnaire which includes the suppliers' approach to Modern Slavery compliance; and
- all agency workers in our distribution and warehouse operations to be engaged via a limited number of reputable recruitment agencies.

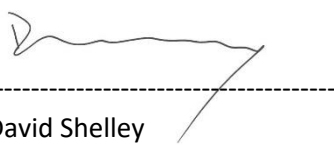
ONGOING DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk and ensure supplier adherence to our values, we will:

- assess and keep under review our activities, especially in areas and jurisdictions deemed to be high risk, and act on any areas that may pose risk;
- ensure all relevant decision-makers within the company and all relevant staff in production, facilities and distribution are trained, including to raise awareness of the signs of modern slavery and human trafficking and provide information on how to raise complaints within the company;
- conduct due diligence when appointing new suppliers including the introduction of a new Responsible Supplier questionnaire;
- incorporate appropriate compliance undertakings in agreements with high-risk suppliers and monitor compliance by the suppliers; and
- set objectives and targets to mitigate the risk of slavery in the supply chain to include (i) onsite inspections for relevant suppliers (ii) inclusion of compliance undertakings in agreements with relevant suppliers and (iii) acceptance of our Responsible Supplier Charter.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2021.

This statement was approved by the management board of the Hachette UK Group.



David Shelley
Chief Executive Officer and Director
Hachette UK Group

Date: 21 June 2022