Modern Slavery Act Transparency Statement

The Modern Slavery Act 2015 came into effect in October 2015. Every organisation carrying on a business in the UK with a total annual turnover of £36m or more is required to produce a slavery and human trafficking statement for each financial year of the organisation. This law is designed to increase the amount of information made available by manufacturers and retailers on their efforts to eliminate slavery and human trafficking in its supply chains, allowing customers to make more informed choices regarding the products they buy and the companies they choose to support.

This statement is made on behalf of Ingram Content Group UK Ltd. ("ICG UK"). ICG UK adopts a "zero tolerance" policy toward human trafficking and slavery in its supply chain. We are committed to upholding human and labour rights by ensuring that every worker has safe and fair working conditions. Our efforts to ensure that slavery and human trafficking are not used in the supply of materials used to manufacture our products are set out in this statement.

Our organisational structure and our business

ICG UK specialises in the printing and distribution of "on demand" books. Different from traditional book printers, our services allow titles to be printed as few as one book at a time to meet the demands of the market. A range of formats are available including hardcover, trade paperback and ebook and, as part of our on-demand printing capabilities, we also provide short-run and galley printing.

Our staff

We strive to ensure a fair and ethical workplace for all our staff. We prohibit the use of all forms of forced labour and any form of human trafficking.

We ensure compliance with all applicable employment legislation relating to employee recruitment and terms and conditions, including right to work evidence and that no UK staff are paid less than the living wage. Our employees may terminate employment by giving the required contractual notice.

Our supply chains

Our key supplies are printing paper which we obtain from suppliers in North America, Europe and the United Kingdom. We also obtain our inks from well-established companies within the United Kingdom.

Our policies in relation to slavery and human trafficking

ICG UK has adopted a Code of Ethics (the "Code") which applies throughout the organisation. This sets out our commitment to maintaining the trust of our associates, customers, and the communities in which we work by strongly supporting an open and honest culture where our business practices are above reproach.

The Code sets out ICG UK's commitment to strictly complying with each and every law, rule or regulation governing its business and implores all associates of the business to be responsible for understanding the legal and regulatory environment which affects their work. It also provides a route through which concerns can be raised through official channels.

Particularly the Code sets out ICG UK's standards for dealings with suppliers and customers and sets out our expectations that human trafficking or any other form of forced, prison, bonded or any other involuntary labour will not be tolerated.

Due diligence

We require all ICG UK direct manufacturing component suppliers to certify that they will adhere to all terms and conditions of the Supplier Code of Conduct, which prohibits the use of forced labour and requires compliance with the Modern Slavery Act 2015.The Supplier Code of Conduct is in line with domestic and international standards, conventions and laws regarding the use of all forms of forced labour in the supply of its materials to ICG UK.

Assessing and managing risk

Upon each supplier agreeing to the Supplier Code of Conduct, ICG UK will, within its ability, monitor each supplier's continued compliance with the certification. The supplier agrees to notify us of any human rights issues discovered in any annual assessments or other procedures. ICG UK will independently evaluate, upon receiving complaints, the information provided to us to ensure our policies regarding slavery and human-trafficking are followed by our suppliers.

ICG UK's policy is to thoroughly investigate known violations involving any form of forced labor, slavery, and human trafficking of our suppliers' employees. Our legal compliance team and procurement department will work together with senior leadership to provide assurances that our suppliers comply with obligations at least as outlined in our Supplier Code of Conduct. ICG UK's internal procedures allow for evaluation of new and existing supplier relationships where we have notice, or suspicion, of any non-compliance. Our focus is on remedying and executing prompt direction for the protection of human rights as well as excluding new suppliers from our supply chain who fail to meet our Supplier Code of Conduct.

Training

ICG UK associates must agree to follow our ethical business practices, provided for in our Code, which informs them of our zero-tolerance policy relating to human trafficking and slavery. Internal education, including annual training on these topics, is ongoing for those who interact with our supply chain and for those required to monitor adherence of our Supplier Code of Conduct.

Looking ahead

We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking to target areas of our business if we become aware there is a potential risk of modern slavery. Our legal function is responsible for checking and testing the success of our commitments, and will work to ensure we meet our expectations.

This statement is given on behalf of ICG UK for the financial year ending 31 December 2024. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.



Signed on behalf of Ingram Content Group UK Ltd.