



MODERN SLAVERY STATEMENT 2025

A handwritten signature in white ink that reads 'Paul'.

This statement is approved by the DK Executive Board
Paul Kelly, CEO, May 2026



This Modern Slavery Statement is published in accordance with the UK Modern Slavery Act 2015 and sets out the steps taken by DK during the year ending 31st December 2025 to prevent modern slavery in our business operations and supply chain. This statement includes information about:

- Our supply chain policies and contractual controls which define and communicate our commitment to ethical, responsible sourcing.
- Our activities during 2025 which uphold these policies and demonstrate our resolve to continually evolve our supply chain monitoring practices.
- Our collaborative approach to tackling modern slavery issues, working in partnership with our sister company, industry bodies including Book Chain Project, Ethical Supply Chain Program (ESCP) and the Forest Stewardship Council (FSC ®).

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INTRODUCTION

Modern slavery a serious global issue affecting all sectors and regions. It is an umbrella term covering a number of exploitative human rights offenses, including forced or compulsory labor, child labor, debt bondage, domestic servitude, human trafficking, and workplace abuse.

DK has a zero tolerance approach to modern slavery in all forms, and is committed to respecting, protecting and upholding the rights of workers, to ensuring fair labour within our business and our supply chains, and to acting with integrity in all business dealings. This commitment is upheld through company policies, processes and the regular review of our business practices to ensure that we can effectively prevent and remediate any negative impacts.

During 2025, we continued to prioritise actions that promote ethical business practices, monitoring the efficacy of our due diligence policies, and taking further steps to identify instances of subcontracting and outsourcing. We continued to work closely with our global suppliers and to collaborate with industry partners.



OUR BUSINESS

DK is a global publisher of internationally bestselling authors and illustrators across fiction, non-fiction, adult and children’s publishing. We have been pioneering ways to bring knowledge and adventure to people around the world for over 50 years. DK is part of the Penguin Random House division of Bertelsmann.

Our Divisions and Imprints

DK Children’s

DK Children’s creates innovative, inspiring books for young readers of all ages. Blending creativity with trusted expertise. Our award-winning non-fiction list is at the heart of what we do, featuring incredible authors, world-leading experts and consultants who bring fascinating subjects to life with accuracy and passion. From playful board books to bold non-fiction and fiction, we are redefining children’s publishing through creativity, diversity and a passion for storytelling.

Through our imprint **DK flip**, we bring the same excellence to children’s and YA fiction, publishing across Chapter Books, Middle Grade, Teen, Graphic, and YA. Our diverse fiction list includes romance, comedy, fantasy, and historical fiction. DK flip is also serving as the home of our exciting LEGO® fiction list.

DK+

DK+ is your destination for fan-based publishing, from LEGO® to Warhammer, Star Wars to Taylor Swift. We create beautifully crafted books for fans of all ages, working in partnership with over 40 world-class brands and IPs. Our books bring fandoms to life with passion, creativity, and expertise.

DK Living

DK Living publishes beautifully illustrated books that spark discovery in cooking, gardening, science, art, and more. Our **DK RED** imprint champions bold narrative non-fiction, and our new Paper Sailor imprint will focus on original, covetable books. With bestselling titles, global ambition, and a passionate team, we’re redefining adult publishing.



In 2025 we had –

39,126,704 million books printed

3,836 book titles **45** languages

that we published in **720+**

colleagues based worldwide

with offices in **London, New**

York, Toronto, Indianapolis,

Delhi, Melbourne, Munich,

Madrid, Beijing, and Jiangmen



DK Life blends ambition and innovation to grow our impact across gardening, food, health, home, and narrative non-fiction. With standout names like Mary Berry and Rhiannon Lambert, plus bold new ventures like Paper Sailor and DK RED, we're expanding globally and reaching readers in fresh, exciting ways.

DK Knowledge makes complex ideas accessible through beautifully designed books on science, history, and natural history. Collaborating with global experts and prestigious partners like the Smithsonian, we create captivating, giftable titles that educate and inspire readers worldwide.

For over 30 years, **DK Travel** has crafted bestselling guidebooks with iconic maps and visuals that make exploring easy and fun. Expanding beyond guides, we now publish gift, themed, and narrative travel books through DK RED, inviting authors to join us on this exciting journey.

DK Alpha is a New York Times bestselling creator-led imprint connecting platform-driven authors with growing audiences. Focusing on US-based lifestyle and non-fiction, it champions creators from podcasts to TikTok, boasting 14 bestsellers, including three #1 titles like An Unapologetic Cookbook and Safe and Sound.

Canelo

Founded in 2015 and now an imprint of DK, Canelo is a dynamic publisher of fiction and non-fiction. With acclaimed imprints like Canelo Crime, Hera Books, and August Books, we publish thrillers, inclusive fiction, romance, and more. Leveraging DK's global reach, Canelo continues to grow and support our talented authors.



OUR SUPPLY CHAIN

DK is a content publishing organisation procuring services globally from a wide variety of providers. DK’s direct workforce primarily consists of highly skilled employees based mainly in office facilities. Our books, audio and digital content are largely created in house. Physical products are manufactured by third party vendors prior to transportation, storage and distribution.

We are actively committed to ensuring that our products are responsibly and ethically sourced without any infringement to human rights or local laws. Our long established ethical supply chain protocols provide a clear framework for taking iterative steps to ensure the protection of these rights and laws.

The Production team manages the DK product supply chain. The Head of Operational Compliance and Sustainability and the Head of Print Procurement work closely with this team to ensure that ethical compliance is incorporated into our procurement strategy with equal weight to commercial criteria.

Our global product supply chain is complex. We aim to build strong, respectful, long-term relationships with our suppliers, resulting in a robust and resilient supply chain. We map our suppliers using a tier system to help us identify and understand the flow of materials and manufacturing stages that go into producing our products. This system helps us to establish transparency of our supply chain, and is fundamental to ensure we can effectively focus our monitoring and mitigation activities.

Supply Chain Tier	Responsible for	Mapping status
One	Finished book products such as conventional and novelty books. Incorporates all locations where products are printed, bound or otherwise assembled.	Fully mapped.
Two	Outsourcers and subcontractors to the Tier One vendor; completing additional processes that can’t be completed by the Tier One vendor. This may include applying cover finishes, or assembling components used in finished products such as CDs & sound chips.	Fully mapped.
Three	Components utilised by the Tier One or Tier Two vendors that will be used to make finished products. Will include locations processing raw materials to produce components such as paper or textile mills, ink & varnish manufacturers.	Partially mapped. We have now mapped all paper and paperboard mills. In addition we’ve mapped ink and adhesive suppliers for our core printers.
Four	Raw Materials; incorporates sites where the raw materials used for components are grown or created such as forests and plantations, man-made fibres or substances, etc.	Partially mapped. We are making progress and have mapped pulp and forest sources of our core paper and paper boards.

*Mapping refers to the process of gathering comprehensive supplier data to understand the end to end processes involved in the delivery of goods and services across the supply chain.



SUPPLY CHAIN STATISTICS

45 Tier One operational suppliers (i.e. manufacturers, freight, repro, safety testing houses, etc.) of which 35 were print manufacturers operating in over 18 countries

48 countries that goods were delivered to

Our **top 10** manufacturing suppliers represent **84%** of our total spend



OUR POLICIES

The principles of sustained fair labour are embedded within our organisation and that of our parent company, Bertelsmann. We believe all workers have a right to fair working conditions and a safe environment as set out in the International Labour Organisation (ILO) conventions, the Universal Declaration of Human Rights and the UN Global Compact (of which Bertelsmann is a signatory).

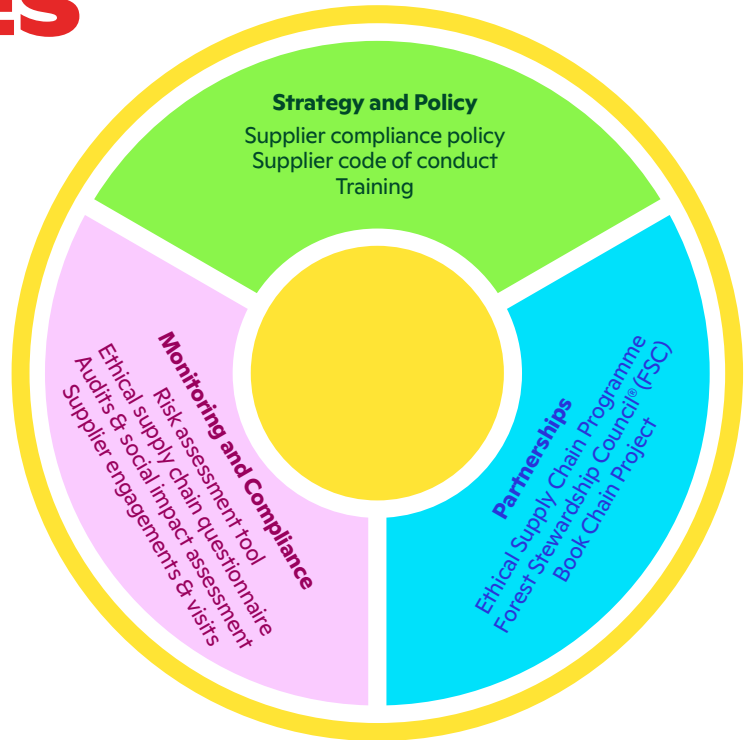
We have implemented a number of policies and contractual controls that define and communicate our commitment to acting ethically and with integrity. These include:

- Code of conduct for employees and suppliers:
- [Bertelsmann Colleague Code of Conduct](#)
 - [Bertelsmann Supplier Code of Conduct](#)

- Speak up channels policy for reporting concerns about unethical practices
- [Speak Up Guidelines](#)
 - [Bertelsmann Speak Up System](#)

- Supplier onboarding and due diligence procedures:
- [Supplier Compliance Policy](#)
 - [Manufacturing Subcontracting and Outsourcing Guidelines](#)

All business partners are required to implement and comply with our Supplier Code of Conduct. The code sets out mandatory minimum requirements for our partners in their business relationship



with DK, and includes stipulations regarding the prevention of modern slavery. Our Supplier Compliance Policy sets out our commitment to ensure that all our products are made without infringement of human rights or local laws, and to ensure good working practices are embedded throughout our supply chain. It provides a framework by which suppliers can demonstrate their commitment to the principles of fair labour and it also ensures that we are monitoring suppliers against a set criteria, both in advance of them being selected as a supplier and regularly thereafter. All suppliers are required to comply with the principles of this policy. Our due diligence process ensures that we regularly monitor adherence to the policy (see Audits and Internal Assessments). Key social compliance points of this policy include:



- **Suppliers in higher risk locations must participate in an ethical audit every 12 months.**
- **Suppliers in lower risk locations must participate in an ethical audit every 24 months.**
- **All manufacturing suppliers are required to hold the following certification:**
- **FSC Chain of Custody certification**
- **ISO 9001 certification**
- **ISO 14001 environmental management system, or equivalent**

In addition, we ask key manufacturing suppliers to sign a Manufacturing Agreement which includes specific obligations for suppliers to comply with the Modern Slavery Act.

We recognise that procurement behaviours can have a direct impact on a supplier’s ability to meet and maintain ethical standards for labour and working conditions. We actively work with our suppliers to continuously improve our purchasing practices, with a view to limiting any negative human rights impacts resulting from how we buy our products. This includes transparency, cooperation and forward planning with our suppliers.

DK places high regard on the ethical and legally compliant conduct of the company

and its employees, with each other and with our business partners. Our Equal Opportunities and Dignity at Work policies demonstrate our commitment to providing equitable opportunities and to avoiding discrimination. At DK, we strive for equal opportunity for everyone; we treat people how they wish to be treated; we make an effort to understand other perspectives and don’t take our own as a given; we want to create a workplace culture where everyone feels valued and is only evaluated on skills and contribution; and we believe that people are at their best when they can be their authentic selves at work.

Within our directly managed operations, our colleague **Code of Conduct** underscores our commitment to full compliance with all relevant laws and regulations, outlining binding minimum standards for responsible behaviour toward business partners and the public, as well as for our behaviour within the company. Everyone at DK must adhere to the principles laid out in this Code.

Our parent company has established a confidential ‘speak-up’ system for raising concerns and reporting suspected misconduct without fear of retaliation. This system is available to employees of Bertelsmann companies as well as for third parties to raise concerns about potential misconduct. Guidance on this system is available to download in 10 languages here:

- **[Speak-up Channels: Raise Concerns and Report Violations](#)**



Our Facilities team has established a risk assessment process that is incorporated into vendor selection for all new and renewed facilities managed contracts; these include the companies and workers that clean our buildings and that offer waste management services. Through this process a scoring matrix has been created that assesses risk, and higher risk suppliers' compliance documentation is reviewed. Each year, the facilities team conducts a scoring matrix of our current facilities suppliers, as well as offering continued support and training to assist them in moderating modern slavery issues effectively; they identified no indicators or risks of modern slavery within our facilities suppliers during the calendar year 2025.

Our recruitment processes include identity checks on applicants which verify their right to work and are based on the employer pays principle. DK is a Living Wage Employer. DK has a union agreement covering the business and recognizes both NUJ and Unite unions.



RISK ASSESSMENT AND MANAGEMENT

We regularly assess the risk of modern slavery within our operations and supply chains.

Within our product supply chain, we monitor and assess supplier risk using internationally recognised risk indices to help us identify and focus our priority activities. Our risk assessment is aligned with publishing industry standards, and we utilise the Book Chain Project (BCP) Labour and Environmental Risk Tool, which has been developed to support the assessment and segmentation of suppliers within the publishing supply chain. The tool assesses country level and supplier level risks for environmental, labour rights and health and safety using a number of publicly available risk indices including the Global Rights Index, Human Development Index and the Trafficking in Persons Index. Additionally, we consider:

- **Implementation of worker rights at factory level**
- **Location of a supplier or factory**
- **Probability of migrant labour in the workforce**
- **Supplier spend**
- **Product type (printing, binding, components, paper, technology, etc.)**

– **Overall visibility of supplier’s sourcing methods**

– **Supplier’s environmental and sustainability standards**

Suppliers assessed as a higher risk priority using these criteria are required to participate in a more stringent due diligence programme, which includes undertaking an annual ethical audit. During 2025, 60% of our Tier One print supplier plants were considered higher risk priorities and were subjected to additional due diligence monitoring. We monitor global socio-cultural developments and ensure that our assessments appropriately reflect new risks as they arise.

Audits and internal assessments

Higher risk priority suppliers must annually disclose a full audit report for review and maintain transparency and integrity throughout this process. Our preference is for Ethical Supply Chain Program audits (see Partnerships for further details), but we will also recognise and accept audits from the SEDEX SMETA framework for new suppliers during the on-boarding process. When reviewing an ethical audit, we perform an internal Fair Labour Assessment (FLA) which categorises any non-compliances by severity, informing our own responsive action plan. We expect suppliers to resolve

²Book Chain Project Labour and Environment risk tool for publishers: <https://bookchainproject.com/resource?resource=340>



non-compliances within a timeframe agreed with the audit body by providing and following a corrective action plan. During 2025, through this process, our suppliers addressed a wide variety of subjects including: improvements to the way that working times are monitored, machinery safeguard modernisation, designated emergency personnel and fire safety training, suppliers are expected to show continuous improvement. Where a supplier is unable to fully implement a corrective action plan on major non-compliances within the allotted time frame, we will cease our relationship with that supplier until the issue has been verifiably resolved.

We perform FLAs on 100% of all prospective manufacturing suppliers, and then perform them annually for incumbent priority suppliers, reviewing audits at all plant locations. In 2025, we performed a total of 42 unique FLAs, of which 6 were prospective new suppliers. To understand how effective our policy and approach is in combating modern slavery and human trafficking within our supply chain, we continue to monitor the number of non-compliances, or observations that imply or demonstrate potential for modern slavery and take action accordingly.

Beyond audit

We recognise that auditing is an important part of human rights due diligence but, in isolation, is ineffective at reducing risks to workers or motivating suppliers to improve. We actively support a number of beyond audit activities, that help build capacity,

promote accountability and support better conditions, with a particular focus on worker well-being. During 2025 we continued to support the ESCP Family-Friendly Program, through which factories are empowered to create their own family-friendly policies and provide facilities that promote a positive family-work balance. Each factory entering the Family-Friendly Factory program undertakes an initial needs assessment from which a bespoke program of policies, facilities and activities will be suggested to address these needs. DK actively supports this program through the donation of children's books in regionally appropriate languages.

Supplier site visits

As part of our ongoing supply chain monitoring, we endeavour, where possible, to perform site visits of the manufacturing plant. Site visits form a key part of our assessment, which, in addition to audit reports and finance checks, allows us to develop a more in depth assessment of the supplier's management systems and the culture of the organisation. We are committed to continually 'spot checking' existing suppliers through site visits. During 2025, we undertook seven site visits, of which 43% were at suppliers in higher risk locations.



OUR GOVERNANCE STRUCTURE

DK has adopted a governance-led approach to modern slavery, appointing the Head of Operational Compliance and Sustainability (HoOCS), to oversee adherence to the UK Modern Slavery Act 2015. Reporting directly into the Chief Operating Officer (COO) and forming part of the global operational leadership team, the HoOCS sets and implements policies to mitigate risks of modern slavery within our supply chain.

Our Supplier Compliance Policy and Supplier Code of Conduct are integrated into our commercial purchasing strategy, ensuring all suppliers are vetted and approved prior to placing work with them. A central operational database blocks unapproved suppliers and tracks ongoing compliance. The Head of Purchasing leads our commercial purchasing strategy and supplier relationships, supported by the Production teams who address ethical criteria early in supplier engagement. This fosters a culture where ethical principles are central to supplier partnerships.

In addition, DK's Integrity and Compliance Officer oversees business compliance, risk assessments, and corporate guidelines, including anti-corruption measures and the Bertelsmann Supplier Code of Conduct.



PARTNERSHIPS

Ethical Supply Chain Program

DK has recognised the Ethical Supply Chain Program (ESCP, previously known as the ICTI Ethical Toy Program: www.ethicalsupplychain.org) since 2008, and has been a full buyer member since 2017.

ESCP provides us with a range of tools and resources that help us to manage ethical risks at the factories we source from. Importantly, membership provides us with improved access to and transparency of real time audit findings, allowing us to act quickly should non-compliances be identified. ESCP certification includes detailed criteria for manufacturers to ensure that no forced, child, involuntary or prison labour is used, no recruitment fees are charged, and all overtime is voluntary. It provides capability building and training programs, factory education, peer-to-peer learning, worker wellbeing programmes and a worker helpline which supports workers and drives continual improvements at the factory level. In addition, membership provides us access to ESCP's expert special investigation team, working on-the-ground to solve problems and engaging factory management.

The ESCP Worker Helpline, established in 2010, fosters positive and productive exchanges between factory management and workers. The purpose of the Helpline is to inform, educate and empower workers so they can effectively manage work-related

issues; also acting as a confidential grievance mechanism when required. The Helpline bridges communication between factory workers and management and provides an effective labour dispute mechanism for workers within the ESCP. During 2025, the Helpline supported 25 workers from eight different DK suppliers, on a number of issues including factory rules and policies, leave arrangement, working hours and resignation support.

Book Chain Project

The Book Chain Project (BCP) is a collaboration of leading publishers, led by SLR Consulting, that have been working together to drive social and environmental responsibility in members' product supply chains.

BCP provides a number of tools for the publishing industry. These include:

- **Code of Conduct**⁴: articulating standards of labour practice and environmental performance. Based on internationally recognised standards, codes and laws, including the ILO Conventions, the UN Declaration for Human Rights and the ETI Base Code, the code is reviewed and updated regularly. Recent updates provide further guidance and expectations on the topic of recruitment of migrant workers, with the key principle that employers should pay the cost of any recruitment fees.

⁴Book Chain Project Supplier Code of Conduct: <https://bookchainproject.com/viewResource?resource=353>

⁵Book Chain Project Labour and Environment Risk tool for publishers: <https://bookchainproject.com/viewResource?resource=340>



– **Labour and Environment Risk Tool⁵:**

which assess both country level and supplier level risk for environmental, labour and health and safety risks.

– **Labour Standards questionnaire:**

an annual self-assessment questionnaire that assesses site-level performance on labour-related topics, including management systems, employee composition, recruitment processes, labour practices, and health and safety.

In addition, BCP is developing a grievance mechanism which was tested during 2025 with suppliers based in the UK, Italy and Malaysia. A formal launch of this new tool is anticipated for 2026.

As a founding participant of BCP, DK supports and recognises the BCP Supplier Code of Conduct, and actively participates in their beyond audit programmes.

Forest Stewardship Council®

DK is a FSC® certified publisher (FSC® C018179) in the category of Books and Printed Material and have held the FSC Chain of Custody certification since 2006.

FSC promotes environmentally appropriate, socially beneficial, and economically viable management of the world's forests. It has an extensive due diligence process in place to ensure that slavery and human trafficking is not part of the production process, and a number of policies and standards which provide the basis of auditable

requirements for achieving FSC certification. FSC's core labour requirements include the effective abolition of child labour, elimination of all forms of forced or compulsory labour, the elimination of discrimination in respect of employment and occupation, respect of freedom of association and the effective recognition of the right to collective bargaining. This is in addition to existing mandatory requirements relating to the protection of worker's rights established under the separate forest management certification process. Ensuring that we utilise FSC certified materials therefore provides an additional layer of due diligence within our supply chain. Since January 2021, 100% of the paper and board materials used in our products are FSC Mix certified, or 100% post consumer waste recycled.



TRAINING

We encourage our suppliers to participate in training that supports awareness of socially responsible business practices. During 2025, the BCP team ran a series of training sessions, designed to drive continuous improvement across the supply chain. These sessions were open to printers, mills and publishers on topics such as preparation for compliance with the EU Deforestation Regulation, and how to complete the new Labour Standards questionnaire.

All DK employees are required to participate in Bertelsmann Code of Conduct training when joining the business as part of their induction. The Code sets out our commitment to the highest standards of integrity, ethics and social responsibility and helps colleagues understand our ethical stance and how it should be applied in our daily business activities. This training also provides information on our confidential whistleblowing policy. Employees are expected to report any concerns, including those related to human rights violations, to the Ethics and Compliance team who will investigate all allegations and take appropriate action. During 2025, 87 colleagues participated in the Code of Conduct training, representing a mixture of new starters and incumbents taking a refresher course.

Compulsory Ethical Supply Chain training takes place as part of the induction process for all new colleagues working in our

Production teams. This training covers modern slavery risks and the steps that we take as part of our due diligence process to mitigate and eliminate such risk. We had no new starters to the Production team during 2025. Periodic refresher training is planned for all incumbent production colleagues. In addition, every year the updated Modern Slavery Statement is shared with every employee via our internal intranet.



APPENDIX

Year	Activity
2016	Manufacturing Agreements updated to include specific clauses relating to the prevention and mitigation of Modern Slavery Risks.
	Risk Assessments updated to identify categories and services that have a higher risk of Modern Slavery.
2017	Published DK's first annual Modern Slavery Statement in April.
	Created and rolled out our Supplier Code of Conduct setting our mandatory minimum requirements and incorporating stipulations related to the prevention of Modern Slavery.
	Joined ICTI Ethical Toy Programme as brand members. The ETP certification includes detailed criteria to ensure that no forced, child, involuntary or prison labour is used, no recruitment fees are charged, and all overtime is voluntary.
	Adopted Book Chain Project's country risk tool to support the assessment of geographic risk.
2018	Updated our internal Fair Labour Assessment metrics and our non-compliance handling processes.
	Introduced our Ethical Supply Chain questionnaire for suppliers in 'lower risk' regions (as defined by the Book Chain geographic risk tool).
	Group Legal Director appointed as the DK Integrity and Compliance Officer with responsibility for overseeing corporate compliance, risk assessments and implementation of relevant corporate guidelines.
2019	The Facilities team initiated an updated annual process for modern slavery risk monitoring which includes data gathering and risk assessment and which has been incorporated into all new and renewed facilities managed contracts.
	DK refreshed its Equal Opportunities and Dignity at Work policies during January, rolling this out to all staff in line management positions and providing training.
	New corporate compliance guidelines rolled out by the DK Integrity and Compliance Officer.
	Manufacturing outsourcing and subcontracting guidelines created and rolled out across our operational supply chain, providing greater transparency of our Tier 2 suppliers.
	Book Chain Project reviewed and updated the Forced Labour element of the Supplier Code of Conduct, providing further guidance and expectations on the topic of recruitment of migrant workers, with the key principle that employers should pay the cost of any recruitment fees.
2020	Supported Book Chain Project responsible recruitment activities, working with our Malaysian supplier base to implement recommendations.
	Manufacturing Labour Policy reviewed and audit acceptance criteria updated to specify that announced audits will no longer be acceptable.
2021	Manufacturing supplier agreement updated to strengthen clauses on subcontracting and outsourcing.
	Updated our internal Fair Labour Assessment grading system to strengthen our response to issues associated with migrant labour recruitment.
	Adopted revised Bertelsmann Code of Conduct which introduces a user-friendly "Speak-up" system for the confidential reporting of compliance issues.
2022	New Supplier Compliance Policy created and rolled out.
	participated in the ICTI Ethical Toy Programme Social Impact Assessment (now ESCP).
	Supported the ICTI (now ESCP) Gender Equality Pilot Programme nominating 3 manufacturing sites.
2023	3 suppliers completed the Ethical Supply Chain Gender Equality pilot programme.
	Book Chain Project reviewed the Supplier Code of Conduct, updating the methodology to include 4 new internationally recognised indices, to further strengthen the efficacy of the tool.
	Book Chain Project launched a new risk tool for use by manufacturing suppliers. The tool allows suppliers to further assess the inherent labour and environment risks within their own supply chains.
2024	Book Chain Project Labour and Environment Risk Tool for Publishers was updated in March 2024.
	Introduced the Bertelsmann Supplier Code of Conduct to our suppliers, superseding the Penguin Random House Code of Conduct.
2025	The Book Chain Project developed a grievance mechanism trialled in three countries.
	Supported ESCP Family Friendly Spaces through a donation of books.