BLOOMSBURY PUBLISHING PLC ("BLOOMSBURY")

Annual Modern Slavery and Human Trafficking Statement for the financial year ending 28 February 2022

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 28 February 2022.

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 and general fiction and non-fiction publishing for the general reader, children, students, teachers, 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 Trade (fiction, non-fiction and cookery) and Children's Trade (fiction, non-fiction, picture books, pre-school titles and activity books) sub-divisions.

Bloomsbury is listed on the London Stock Exchange and a member of the FTSE SmallCap, with over 914 employees worldwide.

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

Bloomsbury's Whistleblower Policy enables employees, other categories of workers and third parties to have any concerns relating to the Group in confidence. 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

To guard against slavery and human trafficking in its own business, Bloomsbury senior management are in close contact with the management teams and key staff from our international offices and, subject to pandemic-related closures, regularly visit local Bloomsbury offices.

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. Bloomsbury also holds on file certifications from key suppliers that they uphold all relevant laws regarding employment practice in the areas in which they operate. Finally, senior Bloomsbury employees visit key printers and pre-press suppliers worldwide on a regular basis to inspect working conditions at first hand, subject to pandemic-related closures. 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.

Given the restrictions on global travel throughout the coronavirus pandemic, and in keeping with Bloomsbury's ongoing commitment to reduce its carbon footprint, Bloomsbury adjusted its supplier review process as follows in 2021/2022 to compensate for the lack of first-hand observations:

- Requirement for increased frequency of written certifications regarding anti-slavery and human trafficking from supplier base, incorporating deeper questioning
- Requirement for the submission of virtual factory tours on spot request.

Bloomsbury has also joined the Book Chain Project in order to drive a more ethical and sustainable supply chain across the industry. During the year, Bloomsbury attended a number of relevant Book Chain Project sessions organised by Carnstone, which were also attended by representatives from across the industry.

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 our supply chain and appropriately managed risks associated with slavery and human trafficking.

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_policy.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.

Training and awareness

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 and will receive human trafficking and modern slavery awareness training during the year.

This statement was approved by the Board on 30 August 2022.

NIGEL NEWTON
Chief Executive