

## **BLOOMSBURY PUBLISHING PLC (“BLOOMSBURY”)**

### **Anti-Slavery and Human Trafficking Policy**

The Bloomsbury Board expects high standards of ethical behaviour and financial probity in all business dealings of Bloomsbury and its subsidiary companies (the “Group”) and in the business dealing carried out on behalf of the Group. The Board acknowledges that the reputation of the Group with its employees, trading partners and in the wider community depends on achieving these high standards.

The Board has zero tolerance of slavery and human trafficking and requires that the management implements proportionate risk based procedures that protect the reputation of the Group and ensure that the Group meets its obligations under the Modern Slavery Act 2015.

The Group prohibits in its business and its supply chains the abuse of people including

- ❖ slavery, servitude and forced or compulsory labour;
- ❖ trafficking people for exploitation (as in the Modern Slavery Act 2015 Section 3 ); and
- ❖ aiding, abetting, counselling or procuring the above

The Group’s approach includes:

- ❖ A Group wide anti-slavery and human trafficking culture led by the Bloomsbury Board;
- ❖ Risk assessment by senior management and proportionate actions to reduce the risk of abuse of people in suppliers selected and used by Bloomsbury;
- ❖ Awareness and appropriate training of employees to recognise and avoid abuse of people;
- ❖ Implementation of anti-slavery and human trafficking terms of employment for the Group’s employees;
- ❖ Avoiding doing business with others who the Group considers have not adequately committed themselves to anti-slavery and human trafficking;
- ❖ Access for employees to guidance on abuse of people through the Group Company Secretary;
- ❖ A Group Business Protection (Whistle Blower) policy that encourages employees to report any occurrence of known wrong doing to the Group Company Secretary, Chief Executive or Senior Independent Director;
- ❖ Rigorous investigation of any instances of alleged abuse of people; and
- ❖ Robust action against any individual(s) or parties involved in abuse of people including assisting the police and other appropriate authorities with any resultant prosecution.

Approved by the Board on 8 December 2015