

Hachette UK Group

Anti-Slavery and Human Trafficking transparency statement

INTRODUCTION FROM THE GROUP CHIEF EXECUTIVE, TIM HELY HUTCHINSON

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 corruption in all its forms and modern forms of slavery such as forced or compulsory labour or human trafficking. We will not tolerate it in our business or in any business we work with.

OUR BUSINESS AND ORGANISATION'S STRUCTURE

Hachette UK is a leading UK publishing group, with approximately 1600 employees based in the UK. The group consists of several publishing-divisions comprising over 50 individual imprints. The publishing divisions are: Headline Publishing Group, Hodder & Stoughton, Hachette Children's Group, Hodder Education Group, John Murray, Quercus, Little, Brown Book Group, Orion Publishing Group, and Octopus Publishing Group. Hachette UK is owned by Hachette Livre, the world's third largest trade and educational publisher.

Our distribution centres Bookpoint and Littlehampton Book Services provide distribution services for all our companies and for many third party UK publishing clients.

OUR SUPPLY CHAINS

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

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 Statement of Business Ethics reflects our commitment to acting ethically and with integrity in all our business relationships. We expect the same standards from our contractors and suppliers and will include clauses prohibiting the use of forced, compulsory or trafficked labour by our suppliers in relevant contracts.

PRELIMS: Sharing labour and environmental audits

The Publishers Resolution for Ethical International Manufacturing Standards (PRELIMS) is a collaboration of 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.

PRELIMS 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 PRELIMS 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 participates in PRELIMS and require most of its printers to register if they are not recognised already. New suppliers will be trained, independently audited to the international standards and either certified as complying or issued with a Corrective Action Plan. In case of the latter Hachette will work with the printer in question to improve standards and achieve compliance with the required standards. Audits are carried out every two years.

ACTIONS HACHETTE UK HAS TAKEN IN 2016

- We conducted a risk assessment to assess the areas of risk of modern slavery in our business. We concluded that most of our business is at low risk. The main areas of greater risk are:
 - Colour print 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
- We have updated our Statement of Business Ethics to incorporate our policy on Modern Slavery.
- We have updated our due diligence checklist for new suppliers to include also Modern Slavery risks.
- We have agreed a new clause to be included in our printer and other relevant contracts to deal with modern slavery and an updated Supplier Code to be signed by relevant suppliers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we will:

- assess and keep under review our activities, especially in areas and jurisdictions deemed to be risky, and act on any areas that may pose risk.
- set objectives and targets to respond to these risky areas, mitigate the risk of slavery and human trafficking occurring in our supply chains, and periodically and progressively audit and review progress.
- ensure employees are made and kept aware of our policy and its objectives.
- ensure relevant staff in production teams, especially those operating in identified areas or jurisdictions, are trained.

To ensure supplier adherence to our values:

We have updated our Supplier Code, which is being rolled out to relevant suppliers in risky areas. During our next financial year we will be ensuring that our suppliers sign the code as part of new contracts where relevant.

LOOKING AHEAD

- We will conduct due diligence when appointing new suppliers.
- We will set targets to ensure relevant new suppliers or those suppliers not yet audited sign our Supplier Code as set out above.
- We will incorporate appropriate provisions in relevant agreements with relevant suppliers and monitor and audit compliance by suppliers
- We will provide training to our staff and others as required to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

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 2016.

This statement was approved by the boards of the companies in the Hachette UK Group, namely Hachette UK Ltd, Little, Brown Book Group Limited, Octopus Publishing Group Limited, The Orion Publishing Group Limited and their subsidiaries.



Mr Tim Hely Hutchinson
Chief Executive Officer and Director
Hachette UK Limited

Date: 18 July 2017