

Modern Slavery and Human Trafficking Statement

Bloomsbury Publishing Plc (“Bloomsbury”)

Annual Statement for the Financial Year Ending 28 February 2025

1. 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 2025. It also supports reporting requirements under the Australian Modern Slavery Act 2018 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. It covers the activities of Bloomsbury Publishing Plc and all its wholly owned subsidiaries.

2. Organisational Structure and Supply Chains

Bloomsbury is an independent, international publisher with offices in London, Oxford, New York, Santa Barbara, Sydney, New Delhi and a joint venture in China. We operate across academic, professional, special interest, educational, adult, and children’s publishing sectors.

Our primary supply chains involve print production, distribution, outsourced editorial and typesetting, and sales representation. Suppliers are based in the UK, Europe, India, China, and North America. To the degree that it is feasible, we have mapped Tier 1 and 2 suppliers and are working towards deeper insight into labour recruitment practices across these tiers.

3. Policies on Modern Slavery, Forced Labour and Child Labour

Bloomsbury has a zero-tolerance approach to modern slavery, forced labour, and child labour. Our core policies include:

- Anti-Slavery and Human Trafficking Policy
- Whistleblower Policy
- Ethical Employment Practices and Terms of Employment
- FSC Paper Procurement and Environmental Sourcing
- Commitments to Equality, Diversity and Inclusion

We are strengthening implementation by embedding our policies into supplier contracts, assessing their policies where available, and developing clearer routes for enforcement and internal awareness. We aim to align further with international standards such as the UN Guiding Principles and ILO conventions.

4. Risk Management and Governance

We recognise higher modern slavery risks in parts of our supply chain, particularly in China and India. We assess risks through:

- Country risk profiles
- Direct engagement and visits by senior staff
- Supplier reputation and performance
- Participation in industry-wide initiatives such as FSC, the Book Chain Project and ICTI certification in China:

Bloomsbury is an active member of the Book Chain Project (the “BCP”), which is a collaborative project run by Carnstone involving over 500 print suppliers and 400 paper manufacturers. The BCP’s tools help publishers make informed buying decisions for book production. In addition to the BCP’s forest sourcing and chemicals and materials strand, the BCP gathers and analyses data on suppliers through their labour and environment strand. Publishers are then able to collaborate on specific issues that are important to the industry. As a member, Bloomsbury attends relevant sessions organised by the BCP, which are also attended by representatives from across the industry.

In order to mitigate the risk of human rights violations within the forestry sector, Bloomsbury is committed to ensuring that the paper that is used by Bloomsbury is responsibly sourced. A keystone of Bloomsbury’s global print purchasing strategy is the requirement for Forestry Stewardship Council (FSC) paper - a stipulation in all print and/or paper orders. Bloomsbury works closely with suppliers to understand the impact of the paper that is used. We have strong internal governance and have assigned clear accountability at executive level to our Group Director of People and Engagement. At operational levels our Group Director of Production and Heads of Production maintain modern slavery oversight with our suppliers in print production.

Bloomsbury is a member of the ICTI Ethical Toy Program (ICTI ETP), a leading initiative focused on improving working conditions in the toy and packaging supply chains, particularly in China and other manufacturing hubs. ICTI ETP provides independent audits, supplier risk assessments, and grievance mechanisms to help member companies identify and address labour risks. Our membership contributes to more ethical sourcing and better oversight in high-risk regions of our supply chain.

5. Due Diligence and Remediation

Due diligence measures include supplier audits, embedding anti-slavery clauses in contracts, and using independent tools for assessment. Detailed due diligence is also carried out before engaging in joint ventures or acquisitions.

In 2025, we joined the EcoVadis sustainability ratings platform to gather structured ESG data from suppliers.

Bloomsbury’s Whistleblower Policy provides a confidential reporting route for employees, workers and third parties to raise any form of wrongdoing or malpractice, including concerns related to modern slavery. Reports can be submitted anonymously via the hotline, and any report will be investigated thoroughly with oversight from the General Counsel and

Company Secretary or other designated senior leaders. This grievance mechanism forms a key part of our due diligence and remediation framework

We have not identified any incidents of modern slavery.

6. Training

Staff are reminded annually of our Anti-Slavery Policy. We recognise the need to expand training to be role-specific, particularly for procurement and supply chain staff, and to explore supplier and third-party training options in future years.

7. Measuring Effectiveness

We are in the early stages of developing effectiveness measures. The EcoVadis platform will support future KPIs. We aim to implement outcome-focused performance measures and track supplier improvements year-on-year.

8. Additional Information and Continuous Improvement

In the last year, we:

- Joined the EcoVadis platform
- Maintained membership of the Book Chain Project
- Maintained membership of ICTI in China
- Completed Tier 1 and 2 supplier mapping
- Made no recorded instances of modern slavery

Areas for development include:

- Publishing a Supplier Code of Conduct
- Extending training through development of Skillcast Learning Management System

This statement was approved by the Board of Directors on 27 August 2025 and signed by a Director on their behalf.

Nigel Newton
Chief Executive