



## **MODERN SLAVERY STATEMENT**

### **INTRODUCTION**

This statement is made pursuant to the Commonwealth *Modern Slavery Act 2018* and constitutes Macmillan's slavery statement for the financial year ending 30 June 2021. For the purposes of this statement, Macmillan refers to reporting entities Pan Macmillan Australia Pty Ltd and Macmillan Publishers Australia Pty Ltd.

The Macmillan Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships.

Our opposition to Modern Slavery is reaffirmed in the Macmillan Code of Ethics for Business Partners. It provides that our vendors, suppliers, agents and other business partners must conduct business ethically, honestly and with integrity. The Code requires that all workers are treated with dignity and respect and prohibits using any form of slavery, servitude, forced or compulsory labour, bonded labour or human trafficking or violence or coercion against labourers. Compliance with applicable minimum age and child labour laws is also specifically required.

Macmillan participates in professional and other organisations that require detailed commitments from suppliers with respect to health and safety, labour standards, wages, discrimination and the environment. Such organisations include The Book Chain Project in the UK, a collaboration of leading publishers who have worked together since 2003 to drive social and environmental responsibility in product supply chains. We expect all our product suppliers in this part of Macmillan's supply chain to commit to working towards the standards set out in The Book Chain Project's Code of Conduct.

### **DUE DILIGENCE PROCESSES**

As part of our commitment to identifying and mitigating the risk of Modern Slavery in our supply chains, Macmillan has recently implemented a group-wide Supplier Information Management tool to enable us to assess our supply partners in respect of Modern Slavery and other risks. In implementing this review process, Macmillan has informed various staff in finance and procurement areas about the risks that Macmillan seeks to identify and mitigate. This new due diligence process also provides us an opportunity to remind suppliers of our values and ethical standards. Once the tool is fully implemented, new suppliers will only be appointed after a risk assessment has been performed. Separately, we have developed and implemented an observation checklist for business staff to use on supplier visits to review onsite conditions periodically.

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Our Code of Ethics for Business Partners forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. As we on board suppliers to our Supplier Information Management tool, each is provided a link to the Code of Ethics and required to affirm compliance to the Code or an equivalent set of principles.

## **TRAINING**

Macmillan has implemented enterprise-wide induction and refresher ethics and compliance training across our group that covers aligned our code of conduct, and issues such as fraud and ethical behaviour, health and safety, discrimination, anti-bribery and anti-corruption and privacy. As part of our training governance framework we monitor, and report on our mandatory training completion rates. In 2020, we had training on preventing human trafficking available for our procurement staff and others who work with vendors. In the UK, those suppliers who have joined The Book Chain are urged to take the training that organisation makes available for members.

## **WHISTLEBLOWING**

Macmillan has in place whistleblowing procedures in order that violations of our Code of Conduct or Code of Ethics for Business Partners can be reported. Issues can be raised internally or the online facility "Speak Up" can be used with the reporter's name or anonymously to report issues. Retaliation against those raising a good-faith concern is strictly prohibited.

## **PERFORMANCE INDICATORS**

We will continue to monitor Modern Slavery risk, including by considering information received through our new due diligence processes, our Speak Up reports and our training program.

This statement was approved by the Board of Pan Macmillan Australia Pty Ltd and Macmillan Publishers Australia Pty Ltd on 8 June 2022.



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Ross Gibb  
Managing Director  
**Pan Macmillan Australia Pty Ltd**  
**Macmillan Publishers Australia Pty Ltd**  
8 June 2022