

Introduction

This statement sets the policies and actions of EBSCO Information Services (EBSCO) supporting our efforts to ensure that neither slavery or human trafficking is taking place in our supply chains or any part of our business.

EBSCO recognizes that it has a responsibility to take a zero-tolerance approach to slavery and human trafficking. Our company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

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Company Structure and Supply Chain Overview

EBSCO is a provider of subscription and information services to libraries and organizations worldwide. Our business has three primary components:

- 1. Subscription and book agent services, where EBSCO functions as an intermediary between publishers and organizations who purchase content produced by publishers.
- 2. Reselling of published content that is packaged for sale to academic, corporate, medical, and government institutions worldwide.
- 3. Development of software as a service, which is sold to academic, corporate, medical, and government institutions worldwide.

In both the agent and reseller roles, the EBSCO supply chain involves content producers, publishers, support service providers, and the purchasers of content. Most publications supplied in both scenarios come from large commercial organizations in Europe or North America, or from smaller academic organizations who consume content from writers seeking to be published. Due to the nature of our products and services, we believe the opportunity for involvement of slave labor or human trafficking violations is minimal.

Internal Compliance

EBSCO follows the trade laws and applicable laws of countries in which we operate, including restrictions on exports and on doing business with certain people, companies, or countries. Our internal policies continue to be compliant with current human rights and employment law legislation and are regularly reviewed and amended in accordance with any statutory changes. Employees are trained on our Code of Conduct, which addresses our commitment to the United Nations Universal Declaration of Human Rights. Individuals are encouraged to report any suspected human trafficking or modern slavery internally to a trusted manager, our hotline, or to relevant external agencies.

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Supply Chain and Due Diligence

EBSCO continues to only use suppliers that are trusted and compliant with employment law and human rights legislation. Our Supplier Code of Conduct specifically prohibits forced labor, child labor, and human trafficking. Suppliers are expected to cascade similar expectations through their own supply chains.

EBSCO has audit rights in some of its supply contracts, which permit us to audit supplier compliance with certain contract terms, although those assessment methodologies do not currently include an intentional focus on human trafficking and slavery. As our program grows, we intend to include certifications and audit requirements related to our Supplier Code of Conduct, including compliance with laws on human trafficking and slavery, in our contracts with suppliers across our global supply chain. As part of our developing supply chain diligence program, we are now considering additional steps to help us monitor our supply chain, including audits of suppliers flagged through our processes and procedures.

Monitoring and Reporting

We monitor our operations, our partners, and our suppliers for potential violations and take action if violations occur, up to and including termination of employment or contract. Employees, suppliers, contractors, or others can report any incidents or concerns using EBSCO's reporting system available at **ebscointegrity.com**.

Approval

This statement is made by EBSCO International, Inc. pursuant to its legal reporting requirements. It has been approved by the EBSCO International, Inc. board of directors, who will review and update it annually.

Allen Powell, Director

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