# Wiley Australia Modern Slavery Statement 1 May 2023 – 30 April 2024

This Statement has been issued by Wiley Publishing Australia Pty Ltd ("Wiley Australia") on behalf of itself and its subsidiaries in accordance with the *Modern Slavery Act 2018 (Cth)* for the Financial year between 1 May 2023 to 30 April 2024.

Wiley Australia is a reporting entity under the provisions of section 5(1) of the *Modern Slavery Act 2018 (Cth).* Wiley Australia's ultimate parent company is John Wiley & Sons Inc which is registered in the State of New York, USA.

Wiley Australia's board of directors are responsible for the management of Wiley Australia. The legal entities covered by this statement ("Wiley Australia Group") are:

- John Wiley & Sons Australia, Ltd ACN: 009 673 081
- Wiley Publishing Australia Pty Ltd ACN: 085 710 952

Wiley Australia Group's activities to prevent and identify modern slavery in its supply chains are integrated into the global compliance program and operations of the global business of John Wiley & Sons Inc and subsidiaries. The Modern Slavery Statement issued by John Wiley & Sons Inc is attached to this statement and contains details of the programs and implementation activities undertaken across the global Wiley organisation, which includes activities relating to suppliers engaged by the Wiley Australia Group. The Wiley Australia Group was consulted as part of preparing this global statement.

This statement is authorised by Wiley Australia's board of directors and signed by a responsible member of the entity.

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Chris Gray Director Wiley Publishing Australia Pty Ltd

# JOHN WILEY & SONS INC and subsidiaries

#### Modern Slavery Statement 2024

## INTRODUCTION

This Statement sets out the actions taken by John Wiley & Sons Inc and its global subsidiaries, including its UK and Australian subsidiaries (collectively "Wiley").

Wiley recognizes that modern slavery is a global concern, and we are taking steps to ensure that we have practices in place to combat slavery and human trafficking.

## **OUR ORGANIZATION**

Wiley (NYSE: WLY) is one of the world's largest publishers and a trusted leader in research and learning. Our industry-leading content, services, platforms, and knowledge networks are tailored to meet the evolving needs of our customers and partners, including researchers, students, instructors, professionals, institutions, and corporations. We empower knowledge-seekers to transform today's biggest obstacles into tomorrow's brightest opportunities. For more than two centuries, Wiley has been delivering on its timeless mission to unlock human potential. Visit us at Wiley.com. Follow us on Facebook, Twitter, LinkedIn and Instagram.

#### **OUR BUSINESS AND SUPPLY CHAINS**

Our business operates in the research and learning markets, delivering a range of solutions across publishing and knowledge services.

In the research market, we enable people to share, use, and advance knowledge to help solve the greatest challenges we face as a society. Nearly half the world's research content flows through our online platforms. We contribute a high volume of scholarship across our portfolio of nearly 2,000 academic journals. Our dedication to open access means more people than ever have access to life-changing research, leveling the playing field and increasing the speed of scientific discovery.

In the learning market, we partner with educators and institutions around the world to find learner-centric, engaging, and accessible ways to teach new skills and make knowledge sharing easy. Higher education institutions, corporations, and learners turn to Wiley for adaptive courseware, high-impact content and curricula, and professional development learning experiences. We help organizations by improving how they hire, engage, connect, and lead their people.

Our supply chain includes: printing services, composition services, transportation and warehouse services, Business Process Outsourcing services, facilities management and office supplies, travel, paper, and technology.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our <u>Business Conduct and Ethics Policy</u> reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chain.

To ensure those in our supply chain and contractors comply with our values we have in place a <u>Vendor Code of Conduct</u>. Additionally, Wiley has a dedicated internal department ("Global Sourcing") which manages major vendors and key supply chains on a global basis for Wiley and its subsidiaries. The Global Sourcing department manages supply chain risk, including incidents of Modern Slavery by actively monitoring adverse

media coverage for Tier 1 and Tier 2 suppliers through a third-party system. Tier 1 and Tier 2 vendors are defined as vendors with strategic value and vendors with high spend, respectively.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Global Sourcing has added the role of "Director of Compliance and ESG" to more closely manage Wiley vendors. This role is focused closely on monitoring and improving internal and external compliance and risk in Wiley's supply chain. Global Sourcing monitors and addresses vendor risk in partnership with internal Legal, Finance, Technology, and ESG groups.

Global Sourcing has in place systems and processes to:

- Identify and assess potential risk areas in our supply chain.
- Report and escalate concerns regarding modern slavery in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Monitor potential risk areas in our supply chain.

Global Sourcing will continue to work with suppliers to review actions that they have taken to address modern slavery in their supply chain.

Wiley has various whistleblowing channels in place for employees and third parties to report concerns about modern slavery in the supply chain. One such channel is a hotline run by an independent third party that can be used to file confidential and anonymous reports 24 hours a day/seven days a week from anywhere in the world. Wiley also has policies in place that prohibit retaliation against whistleblowers.

#### **IDENTIFICATION OF RISKS IN THE SUPPLY CHAIN**

Global Sourcing has taken steps to improve its approach to assessing supply chain risks. Risk is monitored based on distinct categories. These categories include Regulatory & Legal, Environmental & Social, Financial, and Operational risk. Additional considerations include vendor geographic risk, product & services, and annual spend. Using this matrixed approach, the team identifies risk relating to Tier 1 and Tier 2 vendors. Once an issue is identified, Global Sourcing escalates the issue within the organization and initiates a supplier improvement process. We understand that the following areas give rise to the highest modern slavery risks: outsourcing of services to third parties around the world.

# COMPLIANCE ACTIONS THAT WILEY HAS CONDUCTED RELATING TO MODERN SLAVERY

Wiley imposes contractual obligations on our vendors to ensure compliance with the UK *Modern Slavery Act (2015)* and the Australian *Modern Slavery Act (2018)* ("Modern Slavery Legislation"). In addition, Global Sourcing manages supply chain risk, including incidents of Modern Slavery, by actively monitoring adverse media for Tier 1 and Tier 2 suppliers through a third-party system. Finally, we aim to ensure that we have the right to audit our suppliers and the right to terminate contracts with key vendors if we find breaches.

Global Sourcing has proactively contacted major vendors to attest to the Wiley Code of Vendor Conduct and to attest that they have no knowledge of a violation or potential violations of Modern Slavery Legislation or forced labor in their operations. Global Sourcing is approaching this attestation in a phased manner and has contacted 'Tier 1 and select Tier 2' vendors to confirm compliance. Attestations have been received from Vendors who represent 72% of the spend managed by Global Sourcing. We plan to continue to extend this program to ensure additional vendors from our vendor categories attest to the <u>Vendor Code of Conduct</u> and compliance with Modern Slavery Legislation before engagement.

#### TRAINING AND REPORTING

As part of our initiative to identify and mitigate risk, in addition to the mandatory ethics training for Wiley employees which is conducted annually, Global Sourcing

staff based in the UK are all members of the Chartered Institute of Procurement of Supply (CIPS) and undertake an annual accreditation in ethical procurement and supply which specifically covers modern slavery training. US Global Sourcing team members are currently enrolled in Certified Procurement Operations training via the Next Level Purchasing Association (NLPA), plus supplemental training relating to Ethical Sourcing accreditation is also required.

Wiley engages directly with its workforce to promote the company's policies and has set up a mechanism to safely report violations of the <u>Business Conduct and Ethics Policy</u> relating to the businesses that Wiley operates. Workers can report a violation of the <u>Business Conduct and Ethics Policy</u> through a host of reporting channels, including the whistleblowing hotline that is maintained by an independent third party that is described above. Other reporting channels include reporting concerns to a manager or company management, reporting concerns to corporate functions, such as the People Organization, Internal Audit, or Legal, or contacting the Compliance & Ethics function directly or through the whistleblowing hotline.

# **COLLABORATIVE APPROACH**

We take a collaborative approach to compliance and ensure that compliance is embedded across the organization. This includes working with colleagues globally, across subsidiaries and departments. Global Sourcing works with representatives from the following departments to identify, manage and ensure clear communication on risks:

- Legal
- Audit and compliance
- Organization
- Technology

These Departments are all tasked to prompt, recognize and action risks of Modern Slavery across Wiley.

This statement has been prepared with input from global subsidiaries. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2024.