
SPRINGER NATURE MODERN SLAVERY ACT STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Springer Nature Group during the year ending 31st December 2016 to assess the risk of and prevent Modern Slavery and human trafficking in its businesses and supply chains.

1. About us

The Springer Nature Group was created in May 2015 by the merger of Springer Science+Business Media and Macmillan Science and Education. Bringing together these dynamic publishing houses – each with over 150 years of history and with complementary geographic footprints and brand portfolios – has created a company which now employs c. 13,000 staff in offices in over 50 countries with an annual turnover of c. €1.5bn.

We have three main businesses. Our combined RESEARCH businesses include the world's largest academic book publisher, the publisher of the world's highest impact journals and a pioneer in the field of open research. Our commitment to EDUCATION is second to none - we operate in five key areas: language learning; schools' curriculum and Spanish curriculum; higher education and training and support. Our PROFESSIONAL business is one of the leading professional information providers in Europe and includes Springer Healthcare, a leading medical communications and education provider and our professional publishing businesses and brands in the areas of medicine, transport, business and engineering.

Our Code of Conduct and our Business Partner Code of Conduct address the standards we expect of ourselves and of the third parties who work with us. Our goal as a corporate citizen is to not only comply with the laws, rules and regulations that relate to social and governance commitments and to the environment, but often to exceed them. We follow the UN Global Compact and the OECD Guidelines for Multinational Enterprises and the standards issued by the International Labour Organisation (ILO) – and we expect our Business Partners to do the same.

We consider sustainability and social responsibility to be an essential part of the way we work and they are among the principal factors we will take into account in our procurement decisions, together with cost, quality and reliability. Our Business Partners are required to meet all legal standards and are encouraged to exceed them in the areas of human rights, labour conditions, health and safety, anti-corruption and environmental protection.

2. Assessment of risk of Modern Slavery in Springer Nature's supply chain (production and sales)

We produce both printed and online educational/academic resources, including books, journals and database access.

Our production supply chain is global and consists of 50,000+ individual suppliers, with the majority of our expenditure being managed centrally. However, local offices do maintain certain responsibilities (e.g. local print-runs). We also have two subsidiaries in India which specialise in software solutions, research analysis and pre-media work – together these companies employ c. 4,000 of Springer Nature's employees.

Our production suppliers range from highly qualified academics acting as authors and peer-reviewers to pre-press typesetters and the paper suppliers and printers we use to produce our

end products. Production services are not seasonal and do not rely on seasonal work. The majority of our production expenditure is with Business Partners based in the US, Europe, South East Asia, China and India.

Our sales supply chain includes sales agents, third party bookshops and resellers. The academic year has an impact on our sales supply chain and occasionally seasonal workers are used (e.g. sales representatives are hired for the sales season).

Assessment of Modern Slavery Risk

We take a risk based approach to supply chain management and consider our biggest exposure to Modern Slavery to be in our paper and print suppliers, particularly those located in South East Asia, China and India – and potentially in our own sub-contractors in those regions. We do not consider there is a significant exposure in Springer Nature itself or our sales supply chain.

3. Policies and contractual commitments

In May 2016 we reaffirmed the individual commitments of Springer Science+Business Media and Macmillan Science and Education and issued our own Code of Conduct for the Springer Nature Group and the Springer Nature Business Partner Code of Conduct. We expect our Business Partners to meet these standards and to take steps to ensure compliance with them within their own supply chains.

Development and implementation of our Group policies are overseen by our Group Compliance Officer, who reports operationally to Springer Nature’s Chief Financial Officer and semi-annually to the Management Board and to the Audit and Compliance Committee of our Supervisory Board.

We also offer a “Speak-Up” system via which employees or Business Partners can raise any concern which they consider non-compliant with our standards. The system is available 24:7 on the Springer Nature [website](#) and is monitored by the Compliance team who are responsible for ensuring that all reports are fully investigated and for reporting to the Springer Nature Board on appropriate remedial actions.

As a newly merged entity, we are reviewing our supply chain and applying a risk-based approach as set out above, we are reviewing, updating and renewing our contracts with our Business Partners. We have consolidated the Springer Science+Business Media and Macmillan Science and Education standard supplier contractual terms regarding Ethical Business. As part of this process, 40+ Business Partners have already been presented with and formally committed to abide by the Springer Nature Business Partner Code of Conduct. This process will continue throughout 2017.

4. Due diligence and audit

In order to obtain information regarding actual and potential risk of instances of Modern Slavery, we have built on existing processes designed to assess Anti-bribery and Corruption risks and have piloted a broader due diligence questionnaire incorporating human rights risk areas to 31 suppliers.

Additionally, we have conducted a pilot of a variety of audit processes including on-site visits by suitably qualified employees, independent certification consultants and a combination of the two. We used our Business Partner Code of Conduct and the Ethical Trading Initiative Base Code requirements as our benchmarks in these assessments and included a review of sub-contractors

working on supplier sites. We also considered comparable labour and environmental standard audit reports shared via the publishing sector initiative, the [Book Chain Project](#).

We are now assessing the results of our due diligence and audit pilot to determine appropriate and risk-based processes for 2017.

5. Effectiveness in ensuring that slavery and human trafficking is not taking place measured against performance indicators

Key performance indicators will be confirmed in 2017. They will likely include:

- Data gathering - numbers of audits and questionnaires
- Audit results (both first time audits and improvements from previous audits based on corrective action plans)
- Training for key staff
- Commitment by our suppliers to the Springer Nature Business Partner Code of Conduct (or equivalent)
- Any speak up reports related to Modern Slavery/trafficking

6. Training and awareness raising

Springer Nature employees are trained annually on our Code of Conduct and face-to-face training specifically on the risks of Modern Slavery and human trafficking has been provided to key executives in the procurement and operations teams. We also plan to offer training on ethical trading/supply chain risk management (to include the risks of Modern Slavery and human trafficking) in our 2017 Code of Conduct training curriculum.

Approved by the Springer Nature Board.



Martin Mos – Chief Operating Officer