



Modern Slavery
Act Statement
at 31 December 2017

SPRINGER NATURE

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Springer Nature during 2017 to assess the risk of and prevent modern slavery and human trafficking in its businesses and supply chains. It specifically identifies changes from the Statement issued for the year ending 31st December 2016.

Supply chain risk

Over 2017 our risk profile did not alter significantly compared to our previous statement. As we outline in our [2017 Responsible Business report](#), we assess our supply chain risk annually, reviewing the types of goods and services provided, the location they are provided from and the estimated annual level of spend. The types of suppliers managed in our programme include printers (who also supply paper), providers of warehouse and logistics services, typesetters, manufacturers and agency labour providers (e.g. security, catering, cleaning, call centre and maintenance services).

Following a pilot in 2016, in 2017 we developed an online platform which allows staff purchasing goods and services to identify whether a third party presents a risk of modern slavery or human trafficking. These Business Partners are subject to the same controls as before (due diligence questionnaires and audit), but the new platform should allow greater transparency of our supply base globally. The new platform was tested in 2017 and will be implemented globally in 2018.

■ Structure and business

In 2017 there was no material change in Springer Nature's business activities that would impact on our modern slavery risk. Please see our previous Statement [here](#) and our [website](#) for a summary of our structure and business.

■ Policies and contractual commitments

There have been no significant changes in our policies and contractual commitments in 2017. Sustainability and social responsibility remain key to the way we work and are among the principal factors considered during procurement decisions.

Due diligence and audit

Over 2017 we continued our risk-based due diligence and audit programme, which was piloted in 2016. This is a three-year rotation programme based on risk level. This means that not all in-scope Business Partners are required to complete an activity each year, but all will be reviewed at least once every three years.

Number of Business Partners who:	2016 (pilot year)	2017
Were audited by an independent third party	3	8
Provided comparable audit reports	0	1
Were audited by in-house staff	3	0
Completed due diligence questionnaires	31	118
Had no action due (per programme schedule)	N/A	23
Had action due but did not yet complete it	N/A	11
Total in scope for active management	37	161

We use a third party with local subject matter expertise (SGS) as our primary audit providers, with trained staff also conducting on-site reviews as needed. Audits follow the Sedex Members Ethical Trade Audit (2-Pillar) scope. Operations teams conduct spot checks during site visits and, with support from the Governance, Risk and Compliance function, are responsible for following up with the Business Partner on any actions.

Audits include a review of any on-site sub-contracting. Audit and questionnaire findings are analysed by the Governance, Risk & Compliance team, with high-risk findings presented to the Business Partner Risk Management Steering Committee. We work with Business Partners to continuously improve, with action plan follow up presented to the Steering Committee.

In 2017 on-site audits identified:
38 areas for improvement related to health, safety and the environment. Many of these were lower risk, however examples of more urgent items which have now been rectified include: <ul style="list-style-type: none"> • Providing handrails on emergency escape stairwells • Providing an eyewash station in a chemical transfer area • Providing the correct PPE when working with chemicals
10 areas for improvement related to fair pay and conditions, including: <ul style="list-style-type: none"> • Helping one Business Partner pay the correct rate of overtime • Working with Business Partners to manage working hours which exceeded 60 per week during peak production periods
5 instances where Business Partners required support to monitor labour standards in their on-site sub-contractors
1 instance where we helped a Business Partner provide migrant workers with contracts in their own language
1 instance where we worked with a Business Partner to provide employees with signed copies of their employment contracts



■ Training and awareness

Springer Nature employees are trained annually on our Code of Conduct. In 2017 targeted training on the risks of modern slavery and human trafficking was completed by 120 key staff in the procurement and operations teams. Training on ethical trading/supply chain risk management (to include the risks of modern slavery and human trafficking) will be included in our all-staff 2018 Code of Conduct training curriculum.

Key Performance Indicators

	2017
Control landscape	
% of suppliers who have completed requested activities	93%
Data gathering	
% of requested audits completed	80%
<i>Two audits could not be completed in the requested timeframe due to changes in the business relationships</i>	
% of due diligence questionnaires completed within required timeframe	93%
Audit results	
% of actions closed out within the required timeframe	65%
Training	
# of staff trained	120
<i>Tailored training provided to key procurement/operations staff</i>	
Commitment to our Business Partner Code (or equivalent)	
% of actively managed suppliers who have confirmed commitment	94%
Speak Up reports relating to Labour Standards	
# of Speak Up reports	1
<i>A question was raised about consecutive leave allowance internally at Springer Nature - this was investigated and clarified. There was no indication of modern slavery or human trafficking.</i>	

Future actions

We will continue to work with our Business Partners and advance our programme over 2018, standardising our rating system for any actions identified and setting clear improvement targets.

This statement was approved by the Springer Nature Management Board on 22 May 2018.



Martin Mos
Chief Operating Officer