

# MODERN SLAVERY ACT STATEMENT

At 31 December 2018

*This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Springer Nature 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 2017.*

## Supply chain risk

At Springer Nature we produce both printed and online educational/academic resources. In order to do this, we count on the support of suppliers across the globe, principally in the following core areas: production (including all printing services and the majority of our typesetting services), editorial, information technology, marketing, travel, professional services and facilities. We also have a subsidiary engaged in pre-publication services in India.

In 2018 we purchased goods or services from more than 50,000 suppliers, with the majority of our spend being handled centrally. Offices outside our corporate headquarters generally retain some purchasing responsibilities, such as local printing and logistics for our Education division, which is captured in our group supply chain labour standards programme. We have evaluated the types of services representing a higher level of risk in terms of modern slavery and human trafficking. Suppliers of these services, with an annual spend of at least €100,000, as well as relevant in-house activities, are monitored at Group level. This includes services such as the provision of security personnel, catering and cleaning services, call centre and relevant staffing agency support, driving and certain logistics services, warehousing, maintenance and construction, direct manufacturing (including of toys/promotional items, CDs, USBs and paper), printing and pre-press providers.

Where the annual spend threshold is not reached, local offices are encouraged to carry out monitoring activities locally.

### OUR BUSINESS

Springer Nature is a leading

Research  
Education &  
Professional  
publisher



We operate

Across

**6**

continents



From more than

**150**

offices &  
warehouses



In more than

**180**

markets



We have circa

**13,000**

employees in  
more than  
50 countries



## Policies and contractual commitments

Springer Nature's [Code of Conduct](#) and [Business Partner Code of Conduct](#) are essential frameworks that set out the guidelines and boundaries of behaviour for how we treat each other as colleagues, suppliers and customers. We have a collective desire to have a positive impact on society and 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. All employees are trained on our Code of Conduct annually. Business Partners are required to confirm adherence to the standards set out in our Business Partner Code of Conduct as part of the Group's due diligence process and the Business Partner Code of Conduct is included in our standard contract language for suppliers. 90% of Partners being actively managed in our labour standards programme had already committed to follow the standards in the Business Partner Code of Conduct by the end of 2018. This process will continue as new partners are engaged and existing contracts renewed.

## Due diligence and audits

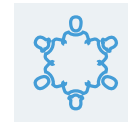
We require all in-scope partners to complete a due diligence questionnaire covering the topics of modern slavery and human trafficking before we work together. This is updated at least once every three years, based on risk level. This process is now managed through our online due diligence platform, which launched in 2018.

Our audit programme began in 2016. Since then we have undertaken 49 audits of key suppliers against the [SMETA 2-Pillar framework](#), covering labour standards, health and safety and additional elements including the environment. Audits are undertaken with the support of SGS, an international specialist audit firm, and also, where appropriate, by trained in-house staff. Since 2017 we developed a standardised action rating system, helping us to focus our attention on areas which are highest risk and require our greatest support.

Number of Business Partners who:	2016 (pilot year)	2017	2018
Were audited by an independent third party	3	8	21 <sup>1</sup>
Provided comparable audit reports	0	8	10
Were audited by in-house staff	3	0	1
Completed due diligence questionnaires	31	118	23
Had no action due (per programme schedule)	N/A	23	105
Had action due but did not yet complete this	N/A	11 <sup>2</sup>	12 <sup>3</sup>
<b>Total in scope for active management</b>	<b>37</b>	<b>161</b>	<b>172</b>

### OUR SHARED VALUES

At Springer Nature we have a collective desire to have a positive impact on society – including in our supply chain. Our corporate shared values are to be:



#### Proactive Partners

Putting our customers at the heart of all we do, responding to their current needs and anticipating future opportunities.



#### Quality Champions

Committed to delivering the highest possible standards in content, customer experience, technology and delivery.



#### Industry Pioneers

Through influence and innovation, shaping the future of publishing for our communities and for society.

<sup>1</sup> Plus 1 subsidiary organisation of Springer Nature which was audited in 2018.

<sup>2</sup> Of the 11 actions not completed in 2017, all have been completed as at the date of publication of this Statement (alternatively the Business Partner is no longer in scope for active management).

<sup>3</sup> 2 audits and 10 questionnaires pending completion at year end.

## In 2018 our on-site audits identified:

2 areas for improvement related to lack of **age verification** processes (1 for a supplier's direct employees, 1 for a supplier's on-site sub-contracted employees). These were dealt with as at year end.

*While there were no indications of child labour identified by the auditors, age verification processes are required to ensure suppliers can be confident there is no child labour in their workforce.*

29 actions identified as 'high' importance in the **areas of fair pay and conditions** – of these 20 were already dealt with as at year end, including supporting suppliers to ensure security guards get at least 1 day off per week, obtaining a commitment to pay the correct overtime wages and to issue payslips to employees.

37 actions identified as 'high' importance in the areas of **health and safety** – of these 29 were already dealt with as at year end, including supporting suppliers to make sure emergency exits are lit and accessible, that drinking water is tested and proven to be hygienic, that appropriate guards are put in place on dangerous machinery, that emergency drills are completed, evacuation plans displayed, evacuation space kept clear of cars/motorbikes, fire alarms installed and that emergency exit doors open in the correct direction.

1 action identified related to gender inequality (under the category '**respect, diversity, discrimination and harassment**'), relating to shift timetables and local legal requirements. To avoid having to remove women from the workforce to comply with local legislation, the supplier adjusted the shift timetable to allow women to carry on working within the legally permitted shift times per day, but also raised this gender inequality concern with local authorities.

## Training and awareness

Springer Nature employees are trained annually on our Code of Conduct. In addition, 161 staff have now been trained on modern slavery risks. A further 238 staff from relevant teams were provided with in-person training on Springer Nature's due diligence platform (which includes reviewing questionnaire answers related to labour standards risks).

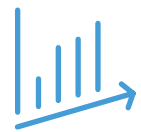
Springer Nature also aims to increase awareness of human rights, and broader ethical standards issues, through its interaction with its suppliers. We do this directly through our Business Partner Code of Conduct, as well as through discussing audit findings and supporting with follow up of agreed actions, and together with our peers as part of the activities of the [Book Chain Project](#).

## Key Performance Indicators

A snapshot of the status as at 31st December 2018		
	2017	2018
<b>Control landscape</b>		
% of suppliers who have completed requested activities	93%	93%*
<b>Data gathering</b>		
% of requested audits completed <i>Two audits were pending for operational reasons as at 31<sup>st</sup> December 2018.</i>	80%	94%*
% of due diligence questionnaires completed within the required timeframe (calendar year) <i>This decrease was due to technical issues which delayed the roll-out of our new due diligence platform.</i>	93%	70%*
<b>Audit results</b>		
% of actions closed out within the required timeframe	65%	79%
<b>Training</b>		
# of staff trained	120	279
<b>Commitment to our Business Partner Code (or equivalent)</b>		
% of actively managed suppliers who have confirmed commitment	94%	90%**
<b>Speak Up reports relating to Labour Standards<sup>1</sup> in our supply chain</b>		
# of Speak Up reports <i>The Speak Up reports raised in 2018 were received from a subsidiary company and investigated and clarified through an on-site audit by SGS. There was no indication of modern slavery or human trafficking.</i>	1	8

### Evaluating effectiveness

Monitoring the progress of our programme year-on-year.



\*100% complete at end April 2019

\*\*97% complete at end April 2019

<sup>1</sup>Within the SMETA 2-Pillar scope

This statement was approved by the  
Springer Nature Management Board on 08 May 2019

Martin Mos  
Chief Operating Officer