



**MODERN
SLAVERY ACT
STATEMENT**

DECEMBER 2023

SPRINGER NATURE GROUP

CONTENTS

INTRODUCTION

- 1 / SUPPLY CHAIN RISK**
- 2 / POLICIES AND CONTRACTUAL COMMITMENTS**
- 3 / OUR CURRENT SUPPLY CHAIN MANAGEMENT PROCESSES**
- 4 / KEY PERFORMANCE INDICATORS**

INTRODUCTION

This is Springer Nature’s eighth Modern Slavery Statement. It outlines the steps taken to assess the risks of modern slavery and human trafficking in our businesses and supply chains and how to prevent it. Springer Nature is committed to respecting human rights and ensuring processes are in place within our businesses and supply chains to combat this issue wherever we operate.

In addition to summarising actions taken in 2023, this statement also outlines the steps to be taken toward mitigating the risk of modern slavery and human trafficking in our supply chains in 2024.

OUR BUSINESS

Springer Nature is a leading research, educational and professional publisher, providing quality content to our communities through a range of innovative platforms, products and services. We operate across 6 continents, from more than 150 offices and warehouses and in more than 180 markets. We have c.9,000 full time employees.

WE OPERATE ACROSS

6 continents



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1/ SUPPLY CHAIN RISK

We create both print and online academic/ educational content at Springer Nature. We work with suppliers from all over the world, mainly in these core areas: production (which includes most printing services and all typesetting services), editorial, information technology, marketing,

travel, professional services, and facilities. Most of our supplier spend is managed centrally, but some offices outside our corporate headquarters have some buying responsibilities, such as local printing and logistics for our Education division.



TELL ME MORE

We assess the kinds of goods/ services we buy for modern slavery and human trafficking risks as follows:

- 1. The type of goods/services** – identifying those where modern slavery and human trafficking vulnerabilities have been reported to be more prevalent.

Examples include 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.

- 2. The countries these goods/ services are sourced from** – using slavery and trafficking risk indices to identify countries with a higher risk of modern slavery and human trafficking.
- 3. The annual Group spend with these suppliers** – suppliers of these goods/services, with an annual spend of at least €100,000, as well as relevant in-house activities, are monitored at Group level. Where the annual spend threshold is not reached, local offices are encouraged to carry out monitoring activities locally.

2/ POLICIES AND CONTRACTUAL COMMITMENTS

POLICIES AND CONTRACTUAL COMMITMENTS

Springer Nature's Code of Conduct and Business Partner Code of Conduct provide the rules and limits of behaviour for how we interact with each other as colleagues, suppliers, and customers. We share a common aspiration to have a positive impact on society. 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 require our business partners to follow our Business Partner Code, and we include this in our standard contract templates. If the supplier wants a different arrangement (e.g. because the supplier has their own internal Code of Conduct with similar commitments) we will review each situation individually.

2023 SUMMARY

We updated our supplier due diligence in 2023 to meet the requirements of the German Supply Chain Due Diligence Act and EU Corporate Sustainability Reporting Directive. This includes more attention to environmental impacts, human rights and also diversity, equity and inclusion. We also tested a wider supplier audit scope to reflect these same requirements.

Our Business Partner Code of Conduct is part of our standard contract terms for suppliers. As of 31 December 2023, 95% of suppliers who are actively managed in our current labour standards programme have agreed to follow the standards in the Business Partner Code of Conduct. The 5% who have not made this commitment are under review.

2024 ACTIONS

In 2024, we are expanding our supplier due diligence and audit scope to cover reporting requirements under the German Supply Chain Due Diligence Act. We will also monitor completion of the expanded due diligence questionnaires by all in-scope suppliers to meet new reporting requirements – including under the EU Corporate Sustainability Reporting Directive.

¹ Whether our standards or equivalent standards

3/ OUR CURRENT SUPPLY CHAIN MANAGEMENT PROCESSES

Springer Nature conducts due diligence questionnaires and audits of its key suppliers, provides training to its staff, and reports to the Board on key performance indicators and Speak Up reports related to human rights, modern slavery and human trafficking issues in its supply chain.

DUE DILIGENCE

All in-scope partners are required to complete a due diligence questionnaire covering the topics of human rights, modern slavery and human trafficking and update it at least once every three years, according to the risk profile of the supplier. The questionnaire covers topics such as:

- Responsibility for, and compliance with, working hours, pay, and age legislation.
- Verification of proof of age.
- The use of agencies to recruit employees.
- Any monetary deposits required of employees.
- Responsibility for the management and monitoring of human rights, slavery and human trafficking risks in their own supply chain.

- Access to potable water and safe sanitary facilities.
- Means for employees to provide collective feedback regarding working conditions.
- Responsibility for questions related to diversity, equity and inclusion.

AUDITS

Since we began our supply chain management audit programme in 2016, we have undertaken audits of key suppliers working with specialist international audit firms. In addition, where appropriate, these audits are conducted in parallel with commercial audits undertaken by the internal audit team.

# OF BUSINESS PARTNERS WHO:	2021	2022	2023
Were audited by an independent third party	14	14	15
Provided comparable audit reports	8	2	6
Completed due diligence questionnaires	33	53	32
Audit or questionnaire due but not yet completed	30	15	9
No audit or questionnaire due (per programme schedule)	81	60	62
Total in scope for active management	166	140	126¹

¹ The number of business partners in scope for active management is based on the prior year's spend level. This number has decreased since 2020, as there was a lower spend level due to the COVID-19 pandemic.

2023 AUDIT FINDINGS

Our supplier audit program found 11 high-priority issues. Most of them were in the 'working conditions and 'health and safety' categories and involved excessive working hours, fire drills not done, storage of hazardous waste in and open area, blocked emergency exits and unmarked aisles. At the time this report was published, four of these actions are still open. They are from two audits that were reported on in November 2023. Two actions are due for completion by 31st March 2024 and the other two are still being discussed to agree a deadline for closure.

3/ OUR CURRENT SUPPLY CHAIN MANAGEMENT PROCESSES (CONTINUED)

TRAINING AND AWARENESS

In 2023 our all staff e-learning training included a 'Human Rights in our supply chain' module, focusing on sustainable business in our supply chain including the risk of modern slavery.

New employees also undertake this course as part of their induction training.

2023 SPEAK UP REPORTS

There were two Speak Up reports received in 2023 regarding supplier adherence to our Business Partner Code, one related to a concern about a child attending our office with a member of cleaning staff in the Netherlands. We made enquiries of the cleaning company which confirmed that it was a one-time incident where the cleaner did not have childcare and the child did not perform any work.

The second report related to a concern that the working hours of employees of a supplier in India was excessive. As a result, the supplier was added to the 2024 audit programme. The audit was conducted in early March 2024 and it corroborated the speak up report. We are addressing this with the supplier.



4/ KEY PERFORMANCE INDICATORS

KEY PERFORMANCE INDICATORS – A SNAPSHOT OF THE STATUS AS AT 31ST DECEMBER 2023

	2021	2022	2023
CONTROL LANDSCAPE			
% of suppliers who had completed the requested activities (audits, due diligence questionnaires)	81%	78%	84%
DATA GATHERING			
% of requested audits completed	88%	94%	91%
% of due diligence questionnaires completed within the required time frame (calendar year)	55%	80%	78%
AUDIT RESULTS			
% of actions closed out within the required timeframe	85%	92%	71% ²
TRAINING ON MODERN SLAVERY AND LABOUR STANDARDS AND SUPPLY CHAIN MANAGEMENT			
# of staff trained	717	1,590	8666 ³
COMMITMENT TO OUR BUSINESS PARTNER CODE (OR EQUIVALENT)			
% of actively managed suppliers who have confirmed commitment	99%	99%	95% ⁴
SPEAK UP REPORTS RELATING TO LABOUR STANDARDS IN OUR SUPPLY CHAIN			
# of Speak Up reports	0	2	2

² The follow up process for action closure will be reviewed in 2024.

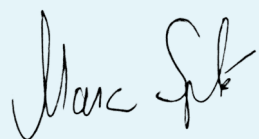
³ This reflects a Human Rights in our Supplier Chain e-learning which was assigned to all staff as part of the mandatory e-learning programme in 2023.

⁴ The number of actively managed suppliers will be re-based in 2024 as we roll out extended diligence scope to reflect the requirements of the German Supply Chain Due Diligence Act.





THANK YOU



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April 2024

This statement was approved by the Springer Nature Board, April 2024

SPRINGER NATURE GROUP