

Bonnier Books UK Modern Slavery Statement 2024

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1. Introduction

This statement as approved by the Co-CEO of the **Bonnier Books UK group (“BBUK”)** on 30th June 2025 has been published in accordance with the Modern Slavery Act 2015. It explains the practices we have undertaken to prevent and mitigate forced labour, child labour and human trafficking occurring within our business operations and supply chains and the progress we have made during 2024.

Our commitment to the Modern Slavery Act 2015 forms an essential part of our values and we work to combat any issues within our supply chain by reviewing our business practices regularly and collaborating with our manufacturing partners. We understand modern slavery is a global challenge which is constantly evolving; however, we strive to achieve the highest ethical standards, incorporating integrity and transparency into all our business operations. We challenge ourselves to achieve improvements through sound policies and purchasing processes, with the aim of preventing modern slavery occurring in our supply chain.

“Modern Slavery” is defined as the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

2. Organisational Structure, Business and Supply Chains

BBUK (including Bonnier Books UK Limited and Igloo Books Limited) is part of the **Bonnier Books Publishing Group (“Bonnier Books”)** – owned by the Swedish media company, Bonnier Group. BBUK forms part of Bonnier Books’ overall book publishing and retail activities, ranging from traditional and digital first publishing, to bookstore chains, paperback retailers, and digital subscription services.

BBUK employs 364 employees across the UK, America and Europe, with 143 employed directly by Igloo Books Ltd. In 2025, we are implementing a corporate Modern Slavery Policy to strengthen our existing Modern Slavery procedures.

In 2024, BBUK produced 25,347,629 books across 54 suppliers.

BBUK produces a variety of trade and children’s books; some of which contain novelty plus parts. All suppliers involved with the manufacturing of books and plus parts must go through the BBUK onboarding process. This is to ensure suppliers align with our values and due diligence checks to

ensure there is no risk of modern slavery occurring in their extended supply chain. All suppliers are required to sign the code of conduct and the agreement form from our compliance manual. 100% of the suppliers we work with in high-risk countries (assessed by Bonnier Books' Production Support Portal ("PSP")) must annually undertake a BSCI or SMETA audit in order to work with us, with evidence of any non-conformities resolved.

3. BBUK Policies and Governance

The governance strategy of Bonnier Books embodies its core values: freedom of speech; power of the individual; commitment of a family-owned business; and a passion for books.

BBUK uses the policies below to manage and outline ethical expectations of our business relationships with suppliers.

The Book Chain Project's Supplier Code of Conduct

This document is created as the publishing industry standard Code of Conduct by The Book Chain Project and outlines 13 labour and environmental principles manufacturers of books are expected to uphold when signing the document. The code of conduct is written in line with internationally recognised standards and laws, including the ILO conventions, UN declaration of Human Rights and ETI base code.

Bonnier Books' Code of Business Ethics

This policy embodies the key standards of business conduct and ethics that all internal and external stakeholders must follow. Standards included relate to anti-corruption, trade sanctions, support of fair competition, confidentiality, human rights and whistleblowing.

Production Sustainability Commitments & Implementation

This policy defines three key Bonnier Books policies: Environmental, Materials and Labour & Human Rights and how our suppliers can implement them.

More information on these policies can be found [here](#).

BBUK Compliance Manual

Towards the end of 2024, BBUK created a Supplier Compliance Manual that outlines all environmental and social values we expect our suppliers to uphold in addition to our code of conducts and SLA's. This compliance manual was circulated to all main print suppliers at the end of December 2024 and all suppliers must sign the agreement form within it. In 2025, a version will be adapted for suppliers of novelty plus parts and shared with them to assist them with understanding and achieving our social and environmental requirements and to prevent the risk of modern slavery occurring in extended supply chains.

4. Due Diligence & Risk Mitigation

At BBUK, we utilise two separate web platforms to undertake our due diligence on labour and human rights within our product supply chains: The Book Chain Project (BCP) and Bonnier Books PSP.

Bonnier Books Production Support Portal ("PSP")

The PSP is a tool developed by Bonnier Books to store and manage compliance information, including social audits, relevant legislation, and the compliance status of suppliers. All companies within the Bonnier Books group have access to the portal and can review and update information related to the compliance and audit status of suppliers from both high-risk and low-risk countries.

The Book Chain Project ("BCP")

BBUK is one of 27 publishers that work closely with the BCP on supply chain management. It is an online tool that connects publishers with print suppliers and paper mills to undertake due diligence on Forest Sourcing, Chemical & Materials, and Labour & Environment.

BCP contains a country risk analysis tool, which grades a country as low or high risk in relation to the risk of exploitation of labour rights and health and safety. To mitigate the risks of exploitation in our supply chain, all suppliers must sign the BCP code of Conduct with the knowledge that breaches of the code of conduct will result in a cease of trading. Our suppliers that are in high-risk countries must also annually undertake a BSCI or SMETA audit with any non-conformities resolved with a corrective action plan.

Paper Mill Traceability

Our print suppliers are responsible for sourcing the paper used to produce our books, however the Book Chain Project developed a Labour Standards Questionnaire for paper mills to complete on the platform to help publishers review labour standards and practices at this level of the supply chain. Unfortunately, not all mills completed questionnaires in 2024, so further collaboration work with the Book Chain Project is required in 2025 to be able to accurately monitor and evaluate the risks of modern slavery at mill level. BCP are exploring the ability to visit mills again.

Monitoring of Suppliers

In 2024, we created a comprehensive Compliance Manual to be shared with existing suppliers and any new suppliers. The Compliance Manual outlined social, environmental and legal requirements to hold all suppliers accountable to the same standards. We also took the opportunity to update our onboarding factory profile form which we resent to all existing print suppliers at the end of 2024. This allowed us to review the practices and sites our suppliers were using and to ensure they were accountable for labour rights if they used any outsourcing processes in the manufacturing of our products.

We also recently started to compare a supplier's new audit against their previous audit to identify if non-conformities were repeating. We are now tracking non-conformities and their resolutions via corrective action plans to ensure suppliers are operating transparently and in line with our values. All audits and corrective action plans are uploaded to our PSP for easy access to the wider Bonnier Books Publishing Group.

Annually, BBUK's Production Director aims to visit the key supplier factories in high-risk countries to establish first-hand that there is no modern slavery occurring. In 2024, 5 supplier sites across India and China were visited by the BBUK Production Director, Bonnier Books' Production Director and Bonnier Books' CSR Manager. In addition to this, Igloo Books Ltd hire a QC Manager based in China to regularly QC check the bulk productions at **all** supplier factories in China and who will escalate any labour concerns to the Igloo Production Director.

5. Training on Modern Slavery

Our Modern Slavery Statement is available on our websites and Intranet site. All staff involved in production are educated on our Supplier Code of Conduct and Production Sustainability Commitments & Implementation, as they work closely with suppliers in high-risk areas.

In 2025, we aim to extend our training on Modern Slavery to the wider business, in line with our new Modern Slavery Policy we are implementing.

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Jonathan Perdoni
Director, on behalf of BBUK Board.

Approval Date: 30th June 2025

Financial Year End Date: 31st December 2024