



MODERN SLAVERY ACT STATEMENT

DECEMBER 2022

SPRINGER NATURE GROUP

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INTRODUCTION

This is Springer Nature's seventh 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 2022, this statement also outlines the steps to be taken toward mitigating the risks of modern slavery and human trafficking in our supply chains in 2023.

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



IN MORE THAN

180 markets



WE HAVE

c.9,000 full time employees



1/ SUPPLY CHAIN RISK

At Springer Nature we produce both printed and online educational/academic resources. 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.

The vast majority of our spend is handled centrally, although some offices outside of our corporate headquarters generally retain some purchasing responsibilities, such as local printing and logistics for our Education division.

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We evaluate the types of goods/ services we purchase in relation to modern slavery and human trafficking risks based on the following criteria:

- 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, CONTRACTUAL COMMITMENTS, 2022 SUMMARY AND 2023 ACTIONS

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 have annual training on our Code of Conduct, which includes regular modules on supply chain management and modern slavery/labour standards. We include contractual commitments to follow our Business Partner Code in our standard contracts. If the supplier requests a variation (e.g. because the supplier has their own internal Code of Conduct with equivalent commitments) this will be considered on a case by case basis.

2022 SUMMARY

In 2022, we returned to on-site auditing, having established a remote process during the pandemic. As a result of lockdowns in various locations, we were unable to complete our audit programme as planned in 2020 and 2021. We therefore had a backlog of audits from these years which we brought forward to 2022. In 2022 we completed all but one of the audits in scope (including the backlog from the pandemic).

In May 2022, we launched an updated Business Partner Code of Conduct to cover changes in legislation and future expected legislative and regulatory changes. We have included reference to the UN Sustainable Development Goals (SDGs) and they now feature prominently in our Business Partner Code. We also launched an updated 'Supply Chain Management' training module as part of our all-staff annual Values and Conduct e-Learning programme.

Compliance with our Business Partner Code of Conduct is included in our standard contract terms for suppliers. As of 31 December 2022, 99% of Business Partners being actively managed in our current labour standards programme have committed to following the standards in the Business Partner Code of Conduct¹. The 1% have been flagged in our due diligence process and are under review.

2023 ACTIONS

Over 2023 we will expand our supplier due diligence to reflect the German Supply Chain Act and EU Corporate Sustainability Reporting Directive. This will include further focus on environmental impacts and human rights and also diversity, equity and inclusion.

We will also focus on ensuring that all in scope suppliers have completed their due diligence questionnaires.

¹ Whether our standards or equivalent standards

3/ OUR CURRENT SUPPLY CHAIN MANAGEMENT PROCESSES

DUE DILIGENCE

All in-scope partners are required to complete a due diligence questionnaire covering the topics of 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.
- Management of the risks of slavery and human trafficking in their own supply chain.

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, audits are undertaken by trained in-house staff.

# OF BUSINESS PARTNERS WHO:	2020	2021	2022
Were audited by an independent third party	4	14	14
Provided comparable audit reports	9	8	2
Were audited by in-house staff	1	0	0
Completed due diligence questionnaires	43	33	53
Audit or questionnaire due but not yet completed	55	30	15
No audit or questionnaire due (per programme schedule)	85	81	60
Total in scope for active management	196	166	140²

² '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.'

2022 AUDIT FINDINGS

There were eighteen audit findings identified as high priority. These mainly came under the 'health and safety' and 'safe and hygienic working conditions' category and included fire drills not conducted, access to aisles and stairways not kept clear and inadequate numbers of safety officers. At the time of publication of this report, four of these actions remain open. These findings relate to an audit that took place in the last week of December 2022 and these are still under discussion to agree a time frame for closure.

3/ OUR CURRENT SUPPLY CHAIN MANAGEMENT PROCESSES (CONTINUED)

TRAINING AND AWARENESS

In 2022 our all staff e-learning training included a supply chain management module, focusing on sustainable business in our supply chain including the risk of modern slavery.

New employees also undertake a module on Modern Slavery as part of their induction training.

2023 SPEAK UP REPORTS

There were two relevant Speak Up reports in 2023, one related to a concern that outsourced cleaning staff in Mexico were not being paid overtime. As a result, this supplier was added to the audit programme.

The other report came from India and related to a concern that staff employed in a canteen were underpaid. The canteen staff are employed by a supplier to the landlord of the building (which is in multiple occupancy as an office). We instructed local management to refer their concerns to the landlord and to ensure these were addressed appropriately.



**NEW EMPLOYEES
WERE TRAINED ON
MODERN SLAVERY
RISKS IN 2022**

4/ KEY PERFORMANCE INDICATORS

KEY PERFORMANCE INDICATORS – A SNAPSHOT OF THE STATUS AS AT 31ST DECEMBER 2021

	2019	2020 ³	2021	2022
CONTROL LANDSCAPE				
% of suppliers who had completed the requested activities (audits, due diligence questionnaires)	99%	74%	81%	82%
DATA GATHERING				
% of requested audits completed	99%	39%	88%	94%
% of due diligence questionnaires completed within the required time frame (calendar year)	100%	45%	55%	80%
AUDIT RESULTS				
% of actions closed out within the required timeframe	64%	NA ⁴	85%	92%
TRAINING ON MODERN SLAVERY AND LABOUR STANDARDS AND SUPPLY CHAIN MANAGEMENT				
# of staff trained	214	8798 ⁵	717	10,545 ⁶
COMMITMENT TO OUR BUSINESS PARTNER CODE (OR EQUIVALENT)				
% of actively managed suppliers who have confirmed commitment	93%	97%	99%	99%
SPEAK UP REPORTS RELATING TO LABOUR STANDARDS IN OUR SUPPLY CHAIN				
# of Speak Up reports	4	0	0	2

³ 2020 KPIs are impacted by a combination of suppliers in lockdown restricting our ability to do in-person audit and other COVID-19 restrictions

⁴ Due to Covid-19, all audits were conducted in the last quarter of 2020 and as reports are received in 2021, there are no actions due for 2020.

⁵ This increase is due to the Modern Slavery & Child Labour e-learning being assigned to all staff as part of the mandatory e-learning programme in 2020.

⁶ This increase is due to all staff being assigned a Sustainable Business: Supply Chain Management e-learning module in 2022.





THANK YOU



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SPRINGER NATURE GROUP