

MACMILLAN STATEMENT AGAINST FORCED LABOR AND CHILD LABOR IN SUPPLY CHAINS

1. Introduction

At Macmillan Holdings, LLC ("Macmillan Holdings"), we understand the responsibility we carry towards our employees, partners, and the wider communities in which we operate. We are committed to tackling these issues and upholding the principles of the Fighting Against Forced Labor and Child Labor in Supply Chains Act (the "Act"). In accordance with the Act, this report for the fiscal year ending December 31, 2023 outlines the measures taken by Macmillan Holdings and its subsidiaries (collectively, "Macmillan") in the 2023 fiscal year and the 2024 fiscal year to date to prevent and combat forced labor and child labor in supply chains. In addition to summarizing actions taken in 2023 and 2024, this statement also outlines the steps to be taken toward mitigating the risks of modern slavery and human trafficking in our supply chains in 2025.

2. Structure, Activities and Supply Chain

Macmillan's businesses include trade and educational book publishing and book distribution services. Macmillan produces printed and electronic trade and educational books, digital educational and assessment products, educational response devices, and provides publishing and distribution services.

Our supply chains include print production, logistics and distribution services, manufacturers of our educational response devices and some book-related components, IT and other office equipment suppliers, professional services, travel-related services, office cleaning, and other office facilities services.

3. Policies, Governance and Due Diligence Process in Relation to Forced Labor and Child Labor

The [Macmillan Code of Conduct](#) reflects our commitment to acting ethically and with integrity in all our business relationships. Our opposition to forced and child labor is reaffirmed in the [Macmillan Code of Ethics for Business Partners \(the "Code for Business Partners"\)](#). The Code for Business Partners requires our vendors, suppliers, agents, and other business partners to conduct business ethically, honestly and with integrity. It requires that all workers be treated with dignity and respect and prohibits using any form of slavery, servitude, forced or compulsory labor, bonded labor, human trafficking, violence, or coercion against laborers. Compliance with applicable minimum age and child labor laws is also specifically required.

Macmillan employees have annual training on our Code of Conduct, which, for employees who interact with vendors, includes a module on supply chain management. We include contractual commitments to follow our Code of Ethics for Business Partners in our standard contracts where appropriate. If the supplier requests a variation (the supplier may have their own internal Code of Conduct with equivalent commitments) this will be considered on a case-by-case basis.

In 2025, we plan a full review of our Code of Ethics for Business Partners, reflecting our evolving commitments to maintaining high ethical standards, corporate responsibility, and our core values of honesty, integrity, and respect for human rights.

Due Diligence Processes

As part of our commitment to identifying and mitigating the risk of modern slavery and forced labor in our supply chains, we have implemented a group-wide Supplier Information Management tool to enable us to assess our supply partners in respect of Modern Slavery and other risks. This review process, which has been in place since 2019, monitors and assesses our supply chain risk based on: product or service group, spend, adverse media, sanctions and watchlists, PEPs and other focused risk areas such as health and safety and modern slavery. In addition to an initial background screen, the tool continuously monitors third parties to stay on top of any potential changes in third-party profiles and activity that may alter initial assessments of risk levels. This due diligence process also provides us an opportunity to remind suppliers of our values and ethical standards. New suppliers in high-risk categories of Macmillan are only appointed after an initial assessment has been performed.

In 2023, we conducted a review of this process and will take steps in 2025 to improve our third-party due diligence program by exploring options to upgrade our Third-Party Risk Management (TPRM) platform and reiterating to the group the risk areas that Macmillan seeks to identify and mitigate through the process.

Training

In 2023 and 2024, employees were assigned a mandatory Ethics & Compliance Refresher e-learning training that, for employees who interact with vendors, included a supply chain management module. All new employees are also required to attend an Ethics & Compliance training session that covers supply chain management risks.

Whistleblowing

Macmillan has in place whistleblowing procedures so that violations of our Code of Conduct and Code for Business Partners can be reported. Issues or concerns can be raised internally, and our online platform '[EthicsPoint](#)' can be used either anonymously or with a reporter's name. Retaliation against those raising a good-faith concern is strictly prohibited. In 2023 and 2024 to date there were no potential violations of the Macmillan Code of Ethics for Business Partners.

We will continue to monitor forced labor and modern slavery risk by considering information received from our business partners and through our due diligence processes, reports and concerns raised through EthicsPoint and the wider business, training programs, and our professional organization partners.

4. Assessment of the risks of forced labor or child labor being used

The process of identifying the risks of forced labor or child labor being used in supply chains has been a consistent part of Macmillan's compliance program since its inception. Our vendor due diligence process is the most extensive for our high-risk vendors, allowing for the identification and mitigation of risks. In addition to its Code of Ethics for Business Partners, and its third-party due diligence process, described above, Macmillan (through third parties) periodically receives audit results of supply-chain members and, where appropriate, takes remedial action.

5. Measures taken to remedy any use of forced labor or child labor

In 2023 and 2024 to date, no cases of forced labor or child labor were identified or reported.

Macmillan takes seriously any allegations, disclosures or discoveries of forced labor or work involving children in supply chains, and will investigate any such allegations as soon as possible. In such a case, Macmillan will apply any appropriate corrective measure to remediate the identified risk.

6. Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in the activities

In 2023 and 2024 to date, no cases of forced labor or child labor were identified or reported, requiring no corrective measures in this area.

7. Training for employees on forced labor and child labor

Macmillan makes sure to keep itself abreast of the latest legislative developments that may impact its operations. In 2023 and 2024, employees were assigned a mandatory Ethics & Compliance Refresher e-learning training that, for employees who interact with vendors, included a supply chain management module. New employees are also required to attend an Ethics & Compliance training session that covers supply chain management risks.

8. Governance and assessment of the effectiveness of efforts to prevent the use of forced labor or child labor in business and supply chains

Macmillan's Ethics & Compliance group, assisted by various members of management and in consultation with its Liaison Network, periodically reviews the material risks related to its operations and activities and oversees the measures, systems and controls in place to manage and monitor risks and opportunities, including forced labor and child labor. In light of this, Macmillan will proactively monitor and as needed adjust its processes and controls and measure the effectiveness of its efforts.

9. Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, and on behalf of Macmillan Holdings, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and after exercising reasonable due diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the abovementioned reporting year.

APPROVAL

DocuSigned by:


F6CC320A540244E

Jonathan Yaged
CEO and Member of the Board
For and on behalf of Macmillan Holdings, LLC