Modern Slavery & Human Trafficking Statement

Year ending 2023
This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the steps Sage has taken during year ending December 2023 to mitigate modern slavery risks in our business operations and our supply chain.

- Introduction
- Governance and structure
- Policies
- Supply chain management
- Risk assessment and due diligence
- Training and collaboration
- Continuous improvement
Introduction

The Modern Slavery Act (2015) requires companies to publish an annual statement that outlines the actions undertaken during the financial year to address and mitigate any forms of modern slavery within their business activities and supply chains.

Modern slavery is a serious and growing crime with its prevalence increasing due to growing armed conflicts, the impacts of climate change, and the removal of women's rights. These issues lead to some of the most vulnerable people being trapped in situations where their freedoms are removed.

While low-skilled and seasonal workers, such as in manufacturing and agriculture, are often the areas at greatest risk of modern slavery, it can happen anywhere and continues to be difficult to detect; therefore, everyone has a responsibility to be vigilant and address and eliminate this crime where it occurs.

Modern slavery encompasses many forms of slavery, including:

- Human trafficking: Use of violence, threats, or coercion to transport, recruit, or harbor to exploit for purposes such as prostitution, labor, and criminality.
- Forced labor: Any work or services people are forced to do against their will, usually under threat of punishment.
- Child slavery: When a child is exploited for someone else’s gain.
- Restriction of movements: Controlling accommodation, bank accounts, and transport.
- Debt bondage: People trapped in poverty who borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

We have three overarching values that are embedded into every aspect of how we do business.

Take Responsibility
We act with integrity and always hold ourselves accountable.

Value People
We actively pursue ideas and actions that enhance diversity and address social inequality.

Seek Progress
We are committed to driving positive change, both within Sage and for society.

Sage has zero tolerance for all forms of modern slavery and human trafficking within our business and supply chains.
Sage is a global academic publisher of books, journals, and library resources with a growing range of technologies to enable discovery, access, and engagement. We believe that research and education are critical in shaping society.

Our mission is **building bridges to knowledge** by supporting the development of ideas through the research process to scholarship that is certified, taught, and applied.

The company has remained independent since it was founded by Sara Miller McCune in 1965. Sara guaranteed Sage's ongoing independence by transferring her shares to an independent trust, charged with maintaining Sage's independence and mission indefinitely.

Sage publishes over 1,400 journals on behalf of 400+ societies and more than 500 books every year, as well as digital products covering business, humanities, social sciences, science, technology, and medicine. These high-quality educational resources support instructors in preparing the citizens, policymakers, educators, and researchers of the future.

Sage employs over 2000 people globally, who are all directly employed, paid a living wage, and are not considered vulnerable to modern slavery or human trafficking.

This statement covers Sage Publications and all its subsidiaries.
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<thead>
<tr>
<th>Policies</th>
<th>Description</th>
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<tbody>
<tr>
<td><strong>Dignity at Work Policy</strong></td>
<td>Commits to providing working environments that are free from harassment and bullying to ensure that everyone is treated, and treats others, with dignity and respect. It covers all staff including temporary employees, consultants, contractors, agency workers, and interns.</td>
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<tr>
<td><strong>Employee Code of Conduct</strong></td>
<td>Sets out the expectations of all our employees and the high standards of behavior that are consistent with our values as a company and ensure a positive working environment.</td>
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<tr>
<td><strong>Equal Opportunities Policy</strong></td>
<td>This policy ensures all individuals are treated equally and fairly regardless of age, disability, gender identity, marriage and partnership status, pregnancy and maternity, race, religion and belief, sex or sexual orientation.</td>
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<tr>
<td><strong>Sage Employee Handbook</strong></td>
<td>Includes details of the company’s whistleblowing policy, and how to access the 24-hour Employee Assistance Program helpline and Employee Support Groups.</td>
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<tr>
<td><strong>Whistleblowing Policy</strong></td>
<td>We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards.</td>
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Supply chain management

Managing and monitoring a global supply chain for risks of modern slavery continues to be challenging. This is due to the number of suppliers involved, their global remit, and the diversity of processes involved in the production of physical products, from the sourcing of raw materials to manufacturing and distribution. However, we continue to take full responsibility for the circumstances under which our goods and services are procured and for mitigating environmental and ethical risks.

In 2023, we built on our previous supply chain mapping exercises to develop more focused and targeted due diligence on those areas of our supply chain where the greatest potential risk of modern slavery issues exist.

We use the standard ‘tier’ approach to map and identify risks, which enables us to target, monitor, and develop prioritized activities.

The highest risks are in the production of printed products. Sage doesn’t purchase raw materials directly, e.g., pulp or paper. Our tier one printers purchase on our behalf; therefore, we work closely with them to gain a greater understanding of the suppliers and processes further down the supply chain. Our approach is to combine ethical audits with environmental risk assessments as these issues are often interlinked.

The area that has higher potential risks of modern slavery is at the forest level. The issues can include illegal harvesting, which often results in the violation of the human rights of workers, or forced evictions of Indigenous communities, such as harassment, threats, and intimidation to remove them from land.

<table>
<thead>
<tr>
<th>Tier one: Printers</th>
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<tbody>
<tr>
<td>Direct relationship</td>
</tr>
<tr>
<td>Produce finished product</td>
</tr>
<tr>
<td>Locations: 26 printers across Europe, the USA, and India</td>
</tr>
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<td>Risk level: Medium – Low</td>
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<tr>
<th>Tier two: Paper mills</th>
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<tbody>
<tr>
<td>Indirect relationship</td>
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<tr>
<td>Manufacture paper</td>
</tr>
<tr>
<td>Locations: 65 Mills across 21 countries globally</td>
</tr>
<tr>
<td>Risk level: Medium - Low</td>
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</tbody>
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<table>
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<tr>
<th>Tier three: Forest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indirect relationship</td>
</tr>
<tr>
<td>Source raw material from forest to mills</td>
</tr>
<tr>
<td>Locations: Global</td>
</tr>
<tr>
<td>Risk level: Medium – High</td>
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</table>
In 2023, we reviewed our due diligence processes. While we know that social and environmental audits have limitations, they provide insights and greater transparency across the supply chain.

We are members of the Book Chain Project, which provides independent data and information about the paper supply chain.

Working with our global printers, we carried out a data and information exercise, gathered via the following tools:

- A sustainability questionnaire
- Paper audit
- Suppliers’ membership of the Book Chain Project
- Completion of independent environmental and ethical audits e.g., SMETA

90% of our global printers, who were in scope, completed our requests for the above information in 2023.

The information and data submitted by our printers in 2023 provided the following insights:

- Approximately 30% of our printers have up-to-date independent ethical audits, such as SMETA, which we were able to access.
- 49 mills across 20 countries were used to source paper for our printed products.
- Approximately 106 different paper brands were used across all products (books, journals, and marketing materials).
- Paper was derived from around 190 tree species globally, and of these:
  - Three paper mills based in India, China, and Brazil had red flags for potential labor rights.
  - Six paper mills had red flags for potential deforestation risks.

Our high-level goals for all our printed products are:

- 100% of all paper brands hold FSC certification.
- Zero paper brands have red flags of deforestation or labor risks.
- 100% of all paper brands are available for review via the Book Chain Project.
- 100% of all mills and printers are members of Book Chain and complete environmental and labor assessments.

Forest Stewardship Council (FSC)

Paper that holds FSC certification ensures the forest is managed sustainably and protects the well-being of workers and local communities. Therefore, providing assurances that pulp is sourced from environmentally and socially responsible managed forests.

We continue to develop our program to monitor, manage, and reduce environmental and labor risks to enable more sustainable and ethical sourcing decisions.
**Training and collaboration**

**Training**

Sage actively encourages continuous learning and development for all its employees.

The onboarding process includes participating in a series of comprehensive training sessions, including our Employee Code of Conduct, which sets out our commitment to the highest standards of integrity, ethics, and social responsibility. The training also includes modules that cover ethical stances and how they should be applied in our daily business activities.

Modern slavery training is targeted towards those working with supply chains that have a higher potential risk of modern slavery.

We continue to highlight educational material and tools for all employees to support a greater understanding of responsible business practices, including modern slavery and human trafficking issues.

**Collaboration**

The Book Chain Project

This collaborative initiative involves leading global publishers, print suppliers, and paper manufacturers. Membership supports a better understanding of responsible paper supply chains through an online platform and databases that hold technical specifications and details of the pulps and forest sources of the papers they use. Additionally, the platform provides dedicated tools, training, and talks on ethical and labor issues.

The Publishing Industry

We are members of industry groups including the Publishers Association Sustainability Taskforce and STM’s Social Responsibility Committee. These groups provide forums for sharing information and ideas on how we can collectively address both environmental and ethical issues across the publishing industry.
Continuous improvement

Driving positive change
Continue to review and develop our auditing and due diligence, focusing on actions that reduce potential risks.

Adopt sourcing principles to ensure all printed products are ethically and environmental sourced.

Working in collaboration
We work closely with our key suppliers to identify risky areas of the supply chain, develop collaborative processes, policies, and standards that mitigate those risks, and phase out products that do not meet agreed-upon standards.

Deforestation risks
The EU Directive for Deforestation requires companies to conduct due diligence on their value chain to ensure goods do not result from recent deforestation or breaches of local environmental and social laws.

We expect this regulation to align with and support our ongoing program to mitigate modern slavery and increase ethical and environmental approaches to sourcing materials.
This statement has been approved by Sage Publications Ltd Board.

Name: Mark Walford
Job Title: vice president, rights and business development
Date 26th June, 2024
INDEPENDENT SINCE 1965