

## **USBORNE PUBLISHING LIMITED**

### **Annual Modern Slavery and Human Trafficking Statement for financial year 25/26**

Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation. As a business, we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

Our commitment includes taking steps to counter modern slavery and human trafficking, in our own organisation, in the agencies we use to hire staff and in our direct and indirect suppliers, wherever they are located. We have taken significant measures in this regard throughout our supply chains and will continue to improve our approach to these matters.

#### **Our Business and Supply Chains**

Usborne Publishing Ltd designs, creates and produces non-fiction books and toys for children. Our supply chain spans the UK, the Middle East, India, south-east Asia and China and includes printers and repro houses.

#### **Our Policies on Modern Slavery and Human Trafficking**

We have zero tolerance of modern slavery and human trafficking within our own business.

**Recruitment Policy** - All our staff recruitment is in line with our Equal Opportunities Policy, the Equality Act 2010 and all other relevant employment legislation.

**Temporary Workers and Contractors** - We only use reputable employment agencies whom we believe will take steps to safeguard against modern slavery and human trafficking taking place within their organisations. Directly retained contractors are provided with a written contract of services, and we comply with our legal obligations in relation to these appointments.

**Staff** - The Company provides every employee with a written contract of employment, and we make sure that everyone who works for us has actively chosen to do so and is not being coerced or controlled in any way. We pay every employee in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

**Whistleblowing and Grievances** – Employees and workers are protected from any detrimental treatment as a result of reporting any genuine concerns, raised in good faith regarding modern slavery or human trafficking or associated concerns through our Whistleblowing and Grievance Procedures. This applies, even if after investigation, they are found to be mistaken. These procedures are detailed in our Staff Handbook and accessible easily.

## **The checks we carry out in relation to modern slavery and human trafficking in our business and supply chains:**

Both our management and our staff carefully follow our internal recruitment guidelines and staff handbook to ensure that good practice is followed throughout our recruitment process.

We are also committed to ensuring there is no modern slavery and human trafficking in our supply chains and require our suppliers to support this commitment in relation to their own employees, partners and suppliers. You can read more about how we do this, along with how we ensure the protection of labour standards and human rights, as stipulated by the International Labor Organization (ILO) and the Universal Declaration of Human Rights (UDHR), in our Supplier's Code of Conduct: <https://usborne.com/media/wysiwyg/Suppliers Code of Conduct 2024.pdf>.

***Supply Chain Policy*** - To ensure that all those in our supply chain comply with our values on human rights, we expect them to adhere to our Supplier's Code of Conduct (see link above). This means that they agree to uphold these commitments, and we have a programme in place to check periodically that they continue to do so.

***Procurement Policy*** - When entering into a contract with a new supplier or renewing contracts with existing suppliers, we ensure that each supplier has a valid audit covering the requirements of our Supplier's Code of Conduct. In addition to audits and compliance-driven approaches, we also investigate working conditions (our production and buying teams visit suppliers on a regular basis), including any evidence of modern slavery and human trafficking. If a supplier does not meet the standards stipulated in our Supplier's Code of Conduct or if an audit reveals any deficiencies, we will formally ask the supplier to develop and submit a Corrective Action Plan (CAP). Suppliers should correct and improve areas of deficiencies within 90 days of the audit. The CAP should outline the steps the supplier will take to resolve the issue(s), address the root cause and include an expected time of completion. Our procurement procedures are designed to help achieve this.

## **Risk Assessment**

We assess and tackle the risk of any modern slavery and human trafficking that might arise in our supply chains by carrying out the checks, audits and visits we mention in relation to our Supply Chain Policy and our Procurement Policy. Such checks include an ongoing assessment of modern slavery and human trafficking risks and meeting changing expectations. As part of our commitment, we keep our approach to tackling these issues under regular review. We recognise that certain countries and sectors pose higher risks of modern slavery, and we review these risks annually and adjust our mitigation strategy accordingly.

## **Measuring Effectiveness**

We can monitor how effective our Supply Chain Policy and our Procurement Policy are in ensuring that modern slavery and human trafficking are not taking place via the checks, audits and visits we carry out in relation to these Policies. Our suppliers are all ICTI or SMETA accredited, and we check these accreditations annually.

## **Staff Training and Awareness**

Usborne implements regular training on modern slavery and human trafficking for all staff who are

actively involved in procurement processes, particularly those staff in procurement, HR and overseas supplier engagement. Our training includes how to identify warning signs, escalate concerns and understand contractual obligations with suppliers.

This statement will regularly be reviewed by the Directors of the company to ensure its continuing effectiveness and relevance to the company's activities.

**Signed**

NICOLA USBORNE

---

**Nicola Usborne, Director**

**Date** 22<sup>nd</sup> July 2026

*(Original statement signed; signature not published here for reasons of security)*

This statement was approved by Usborne's Board of Directors on 22<sup>nd</sup> July 2026