

MODERN SLAVERY STATEMENT

1. Organisation

This statement applies to Cengage Learning (EMEA) Ltd (referred to in this statement as "the Organisation"). The Organisation is part of the Cengage group of companies ("Cengage") and serves customers within Europe, Middle East and Africa ("EMEA"). It is a subsidiary of Cengage Learning UK Holdings Ltd and its ultimate parent company is Cengage Learning Holdings II Inc. ("CLII") based in Delaware, USA.

In addition to its businesses in the USA, Cengage is a leading international provider in the global market for course materials across EMEA, Asia, Australia and Latin America. Cengage employs about 5,000 employees globally.

The labour supplied to the Organisation in pursuance of its operation is carried out mainly from the head office in Andover, however, there are sales, editorial and marketing staff based in various countries across EMEA.

2. Business

Cengage Learning (EMEA) Ltd serves the higher education, vocational, library reference, and English Language Teaching ("ELT") markets within the EMEA region. Individual markets are generally defined by country, each with unique customer needs, distribution channels and sales strategies. Our products cover a range of learning materials, both print and electronic, such as text books and digital products that support the learner, tutor and academic researchers. The Organisation sells these products to , academic institutions and via third party resellers as well as directly to students.

3. Definitions

Pursuant to s.54 of the Modern Slavery Act 2015, this statement constitutes the Organisation's slavery and human trafficking statement.

The Organisation considers that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or to have restriction placed on freedom of movement.

4. Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation across EMEA and in many cases exceeds those minimums in relation to its employees.

5. Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to logistics and distribution services, print production, IT and other office equipment suppliers, professional services from lawyers, accountants, computer services and other advisors, office cleaning and other facilities services.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it is taking steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

The organisation is committed to establishing practices and processes to identify and mitigate the risk of modern slavery in our supply chains.

6. Due Diligence

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking do not take place in its organisation in relation to employment and is developing plans to review controls over its suppliers in relation to slavery and human trafficking.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have been involved with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation will take the following steps to ensure that modern slavery is not taking place:

- continually review recruitment processes and practices;
- review supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- put measures in place to identify and assess the potential risks in its supply chains;
- create action plans to address the risk to modern slavery;
- put in place relevant training for staff on modern slavery, specifically our procurement staff and others who work with vendors.

7. Key performance indicators

The Organisation will monitor Modern Slavery risk, including considering reports from due diligence processes set up and training, to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

8. Policies

The Cengage Global *Code of Business Conduct and Ethics* affirms our strong commitment to the highest standards of legal and ethical conduct in our business practices. The Code applies to all officers, directors and employees of Cengage and we also expect that those with whom we do business will adhere to the standards set forth in our Code.

The Code contains details on how to report concerns and violations of the Code.

We also have a range of policies setting out the highest standards of conduct and ethics in the areas of recruitment, anti-discrimination, harassment and equal opportunities. Staff are trained in these areas.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Date of approval: 29 March 2019

Signed:



Print name: David Rae

Job Title: Finance Director & COO, Cengage Learning (EMEA) Ltd

Date: 29 March 2019