



Anti-Slavery and Human Trafficking Statement

Introduction

This statement sets out Bertram Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 January 2019 to 31 December 2019.

Bertram Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We take a zero-tolerance approach to non-ethical practices and are committed to preventing slavery and human trafficking in its corporate activities, and to imposing those same high standards on its supply chains.

Bertram Group's Role in the Supply Chain

Bertram Group combines a number of recognised brands in print and digital bookselling across four customer focused business units;

- Bertrams Books – a trusted wholesale trade supplier to bookstores large and small, high street retailers and supermarkets, as well as online retailers worldwide;
- Dawson Library Services - comprising of Dawson Books and Bertram Library Services, Dawson Library Services sell academic print and digital books and provide bibliographic services to institutions across the globe;
- Erasmus & Houtschild – Erasmus are a major supplier of academic books throughout Europe and the Americas, and Houtschild are specialists in the supply of English and foreign-language European books and journals;
- Wordery – our direct to consumer retail website;
- Education Umbrella – our specialist provider of books into primary and secondary school settings

The division serves over 8,200 customers in approximately 100 countries, with over 200,000 in stock titles and access to over a further ten million consumer and twenty million academic titles.

The organisation currently operates from the following countries:

- UK (Bertrams Books, Dawson Library Services, Wordery & Education Umbrella)
- France (Dawson Library Services)
- Netherlands (Erasmus & Houtschild)

Policies

As part of our commitment to combating modern slavery, we have a number of policies within our organisation including:

- Equal Opportunities and Dignity at Work;
- Whistleblowing Policy; and
- Agency Workers Regulations Policy.

We ensure that our suppliers are aware of our key policies and encourage them to adhere to the same high standards. These policies have been developed and adopted by Bertram Group in order to ensure that we conduct all business in an honest and ethical manner.

Due Diligence

As part of Bertram Group's efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we will periodically undertake supplier audits, whether conducted internally or through external agencies together with checking supplier references with external third parties in order to combat any modern slavery risk.

Our procedures are designed to establish, assess and monitor areas of potential risk of slavery and human trafficking occurring in our businesses and their respective supply chains; put in place measures as appropriate to reduce this risk and provide adequate protection for whistle-blowers.

Risk and Compliance

Bertram Group periodically evaluates and reviews the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by means of a risk assessment exercise conducted by senior management within each business division.

Given the nature of the goods being acquired and the identity of those suppliers we do not consider that the Organisation's businesses operate in high risk sectors or locations. That said, before we commence dealing with a new supplier we look to audit their practices, policies and procedures with an increasing focus on the suppliers' ethical trading standards. Accordingly, we seek to ensure that all our suppliers adhere to our ethical standards and anti-slavery policies and enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will seek to terminate our relationship with the relevant supplier.

Training

Where appropriate, we look to educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through such education programmes and ad-hoc monitoring of suppliers, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking statement (or any other Company policy). We are pleased that our employees understand the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Concluding Remarks

This statement has been approved by the Bertram Group Board of Executive Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Bertram Group's modern slavery and human trafficking statement for the current financial year in which it is written.

A handwritten signature in black ink, appearing to read "Clare Davey". The signature is fluid and cursive, with the first name "Clare" and last name "Davey" clearly distinguishable.

Clare Davey
Chief HR Officer
March 2019