



# Modern Slavery Act and Human Trafficking Statement

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## 1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 with respect to BMJ's financial year ending December 31, 2016 and sets out the steps BMJ has taken to prevent modern slavery and human trafficking from occurring in our business operations or within our supply chain.

## 2. BMJ's commitment & values

We have a zero tolerance approach to modern slavery and human trafficking in our business and in our supply chains and in issuing this statement, we seek to be open and transparent as to our position and the steps we have taken which aligns with BMJ values, in particular our value "*Being transparent and open creates trust*".

### ***Being transparent and open creates trust***

*We encourage open debate, comment, criticism and correction. We declare our own interests and the interests of those who work with us. We will explain our decisions.*

Our values are intrinsic in giving us the focus and direction we need to deliver solutions that improve health outcomes and feed into everything we do.

## 3. Who we are & what we do

BMJ is a healthcare knowledge provider that aims to advance healthcare worldwide by sharing knowledge and expertise to improve experiences and outcomes. For a full list of our products and services, please visit [bmj.com/company/](http://bmj.com/company/).

Along with our world renowned flagship title, The BMJ, we also offer over 60 specialty journals and a world-leading collection of digital professional development resources.

From individual clinicians to major healthcare providers, our unique digital tools help them with clinical decision support, clinical data interpretation and quality improvement of healthcare delivery.

The BMJ's website (bmj.com) attracts 1.2 million unique visitors each month, 60% from outside the UK.

#### **4. A global brand**

BMJ has more than 6.2 million users worldwide, including clinicians, nurses and students, academic institutions, hospitals and ministries of health, patients, commercial companies, governments and healthcare organisations.

We embrace the needs of the global community, whilst continuing to build on our rich heritage of integrity, innovation and commitment to improving patient outcomes.

During 2016 BMJ published in 11 languages, and produced specialist publications for 19 countries, including the United States, India, Brazil, Australia, New Zealand, China, and the Middle East.

In 2016, the company's total revenue was over £77 million, with more than half of revenues coming from outside the UK.

#### **5. Organisational structure**

From the UK, we have expanded across Europe, Africa, Asia and the Americas with seven offices worldwide.

In addition to our London office, we have offices in Cardiff, New Jersey (USA), Mumbai and Noida (India), Beijing (China) and Singapore.

The following companies form part of the Group:

- BMJ Publishing Group Limited
- BMJ Publishing Inc. (Incorporated and registered in California, USA)
- BMJ Group India Private Limited (incorporated in India)
- Medelect Limited (not trading)
- BMJ (Beijing) Medical Science and Technology Co., Ltd
- Ying Yi Hui Tong (Beijing) Information Technology Co., Ltd.

#### **6. Our supply chains**

Whilst we consider the sector we operate to be low risk, we remain alert to the risks in our business and supply chains. We regularly deal with suppliers based in India and China, both of which are considered high risk locations. We will take all steps we deem necessary to detect and eliminate any incidence of slavery in our supply chains, with particular focus on high risk areas. In the event any such incident arises, we will take remedial actions as we deem appropriate.

Our principal supply chains are global and include:

- Technology services, including provision of cloud storage and websites;
- Online publication platform providers;
- Venues for events and conferences;
- Editorial services;
- Provision of printing, delivery and related services;
- Scientific and medical societies; and
- Intermediaries reselling content.

## 7. Our policy on slavery and the due diligence process

Our Anti-Slavery and Human Trafficking Policy reflects our top-level commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place anywhere in our business and supply chains.

The key steps undertaken to prevent modern slavery and human trafficking from occurring in our business and supply chains are as follows:

1. The development and implementation of BMJ's Anti-Slavery and Human Trafficking Policy.
2. The identification and assessment of the most critical areas of risk across the business and recording those risks together with any mitigating actions in a risk register. This forms part of BMJ's ongoing Enterprise Risk Management process. This process ensures risks are reviewed regularly and the key risks are reported to the Executive Committee and Board.
3. The identification and assessment of potential risk areas in our supply chains which includes the following:
  - A review of all suppliers to identify and prioritise those which are considered high risk based on industry sector and geography;
  - A review of individual key suppliers and assessment of any potential risk of slavery and human trafficking being present. This involves reference to our knowledge of the supplier's geographic location, the sector it operates in and any other relevant factors. Information for this exercise is sourced both from within BMJ and from external sources; and
  - Issuing a questionnaire for completion by material, high risk suppliers, to ensure their practices are of an acceptable standard.
4. Updating BMJ's Whistleblowing Policy to ensure our employees have access to an independent whistleblowing helpline to report all suspicions of modern slavery or

human trafficking. If such a report is made, we will investigate the concerns raised and take steps we deem appropriate in the circumstances.

5. The provision of training to staff to provide them with a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business via online training for staff as appropriate.

6. Amending our supplier contracts to include obligations on our suppliers to comply with the Modern Slavery Act 2015 and BMJ's Anti-Slavery and Human Trafficking Policy. In the event that a supplier breaches those obligations, we will take steps which may include terminating such supplier's contract with BMJ.

## **8. Looking ahead**

We will continue with the approach we have taken to combating modern slavery and human trafficking so far, which includes:

- Continuing to review our procurement process and the processes outlined above;
- Monitoring outcomes of the processes outlined above to ensure they are proving to be effective;
- Taking any steps should we discover or be alerted to an incident of modern slavery or human trafficking in our business or supply chains as appropriate, including investigation and remedial steps;
- Further developing training for our employees as appropriate;
- Continuing to require our suppliers to commit to complying with the Modern Slavery Act 2015 and BMJ's Anti-Slavery and Human Trafficking Policy.

This statement was approved by the Board of BMJ Publishing Group Limited.

Signed

Peter Ashman

CEO, BMJ Publishing Group Limited

[Date]