



Modern Slavery Act and Human Trafficking Statement

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, 2018 and sets out the steps BMJ has taken to prevent modern slavery and human trafficking from occurring in our business operations and in our supply chains.

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 of being "transparent, open and trusted".

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 global healthcare knowledge provider with a vision for a healthier world. We share knowledge and expertise to improve healthcare outcomes. For a full list of our products and services, please visit bmj.com/company/.

We publish one of the world's most cited general medical journals, The BMJ, alongside 70 specialty journals.

We also produce e-learning modules, events and clinical decision support tools that help healthcare professionals improve the quality of healthcare delivery.

The BMJ's website (bmj.com) attracts 2 million unique visitors each month, 75% from outside the UK. It has 18.2 million page views per year.

4. A global brand

BMJ has more than 5.5 million users worldwide: clinicians, nurses, students, academic institutions, hospitals, ministries of health, patients, commercial companies, governments and healthcare organisations.

We publish in 14 languages and produce specialist publications for 19 countries, including the United States, India, Brazil, Australia, New Zealand, China, and the Middle East.

The company's total revenue in 2018 was over £81 million, with more than half of revenues coming from outside the UK, and about 70% coming from digital products and services.

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) and Beijing (China).

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. (via contractual control)

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. Implementation of BMJ's Anti-Slavery and Human Trafficking Policy.
2. The continued 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 continued 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;
 - A review of the purchase of imports identified as "high risk"; and
 - Issuing a questionnaire for completion by material, high risk suppliers, to ensure their practices are of an acceptable standard.
4. Ensuring 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

March 20th, 2019