

The background of the cover is a dark blue, slightly blurred photograph of two hands shaking in a firm grip. One hand is wearing a dark suit sleeve and a white shirt cuff. The other hand is lighter-skinned. In the top right corner, there is a white rectangular area with a teal-colored triangular shape pointing downwards from its bottom edge. The title 'Business Partner Code of Conduct' is written in a dark blue, sans-serif font within the white area.

Business Partner Code of Conduct

SPRINGER NATURE

Contents

Working Together as Business Partners.	3
Springer Nature's Approach to Sustainability and Social Responsibility	4
Springer Nature's approach to Business Conduct	6
Supply Chain Management and Compliance with this Code.	7

Dinah Spence

Group Compliance Officer
Governance, Risk & Compliance

Springer Nature
The Campus, 4 Crinan Street,
London N1 9XW, UK
T +44 207 843 3694
M +44 7540 920 962
dinah.spence@springernature.com
www.springernature.com

Version of May 2016

Working Together as Business Partners

Springer Nature is a leading global research, educational and professional publisher, home to an array of respected and trusted brands providing quality content through a range of innovative products and services. We are the world's largest academic book publisher, publisher of the world's highest impact journals and a pioneer in the field of open research.

Our company was formed in 2015 through the merger of Nature Publishing Group, Palgrave Macmillan, Macmillan Education and Springer Science+Business Media. We work in over 50 countries and are represented by third parties in many more.

When we are working together, Springer Nature expects each of our suppliers, sub-contractors, sales representatives, agents and other intermediaries ("Business Partners") to adhere to the same standards that we set ourselves. This Business Partner Code of Conduct ("Code") sets out the basic requirements Business Partners are expected to meet. By adopting this Code, you join us in reaffirming our commitments to respect the laws and regulations that impact our business and to act in a sustainable and socially responsible way. You also confirm that you will take steps to require compliance with these standards within your own supply chain (i.e. your own suppliers, agents, subcontractors and other business partners).

You are a highly valued Business Partner – it is important that you understand how the issues set out in this Code affect you in your business with Springer Nature. If you have any questions regarding this Code please speak to your usual business contact or alternatively you can reach us by using our "[speak-up](#)" system. Please see the final page of this Code for details on how to do this.

Thank you for your support and we look forward to a long and profitable period working together with Springer Nature.



Springer Nature's Approach to Sustainability and Social Responsibility

Child Labor

Prevention of Forced Labor

Fair Pay and Conditions

Freedom of Association and the Right to Collective Bargaining

Respect, Diversity, Discrimination and Harassment

Health and Safety

Environmental Protection

Springer Nature's goal as a corporate citizen is to not only comply with the laws, rules and regulations that relate to social and governance commitments and to the environment, but often to exceed them. We follow the UN Global Compact and the OECD Guidelines for Multinational Enterprises and the standards issued by the International Labour Organisation (ILO) – and we expect our Business Partners to do the same.

We consider sustainability and social responsibility to be an essential part of the way we work and they are among the principal factors we will take into account in our procurement decisions, together with cost, quality and reliability.

Our Business Partners are required to meet all legal standards and are encouraged to exceed them in the areas of human rights, labor conditions, health and safety, anti-corruption and environmental protection. Business Partners are also expected to take steps to ensure compliance with these standards within their own supply chains.

Child Labor

No Springer Nature Business Partner may (directly or indirectly) employ children who are under the country in question's minimum age threshold for completion of compulsory schooling. Business Partners are expected to take active steps to ensure that children under the relevant compulsory school age are not employed in their supply chains.

Workers under 18 years of age should never be required to perform work likely to be hazardous to their physical health or to interfere with their education or mental, social, spiritual or moral development.

Prevention of Forced Labor

Springer Nature prohibits any form of violence or coercion against workers and we expect our Business Partners to ensure that there is no kind of forced labor, indentured labor or involuntary prison labor in their organizations or supply chains.

All work shall be voluntary and workers shall be permitted to leave their employment upon reasonable notice being given. As a condition of employment, workers must not be required to hand over government-issued identification (e.g. passports or work permits), or to pay any kind of fee or take a loan against which wages will be deducted.

Fair Pay and Conditions

As a minimum, Springer Nature expects our Business Partners to pay their employees at least in accordance with national laws and regulations, including with regard to minimum wage, overtime wages, piece rates and any legally mandated benefits.





Springer Nature expects our Business Partners to respect applicable local laws regarding maximum working time. Other than in exceptional circumstances, we also expect our Business Partners to restrict their employees' working week to 60 hours including overtime (which shall be voluntary). Employees shall be permitted to take at least one day off in every seven day period.

Freedom of Association and the Right to Collective Bargaining

Springer Nature recognizes the importance of open communication and engagement between workers and managers regarding working conditions. We expect our Business Partners to respect any legal rights of their employees to freely associate, organize and bargain collectively without fear of harassment, intimidation, penalty, intimidation or reprisal.

Respect, Diversity, Discrimination and Harassment

At Springer Nature 'respect' and 'diversity' are important values that we promote throughout our own organization and our supply chain. We expect our Business Partners to promote equal opportunities and equal treatment regarding hiring, remuneration, access to training, promotion, termination or retirement and to provide a workplace free from any form of unlawful discrimination, bullying or harassment.

Unless actively required under local law, no discrimination will be tolerated regarding gender, age, religion, race, caste, social background, disability, ethnic or national origin, nationality, membership in workers' organizations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status or any other factors.

Health and Safety

Springer Nature expects our Business Partners to fully comply with applicable laws, regulations and standards governing health and safety at work. Our Business Partners shall ensure, at a minimum, reasonable access to free potable (drinking) water and sanitary facilities, fire safety, emergency preparedness and response and industrial hygiene equipment, adequate lighting and ventilation and machine safeguarding in the work place and in any dormitory or canteen facilities provided to workers.

Our Business Partners are expected to train employees for the purpose of preventing work-related accidents and occupational illness and to implement policies, standards, procedures, and contingency measures to identify potential risks and prevent occupational illness and work-related accidents occurring.

Environmental Protection

Springer Nature is committed to conducting our business in an environmentally responsible manner and to minimizing our environmental impact. Our Business Partners are expected to use natural resources responsibly and to comply with all applicable laws, regulations and standards to protect the environment.

Business Partners who produce waste, air emissions or wastewater discharges are expected to have systems in place to ensure safe handling, movement, storage, recycling, reuse and management and to measure and control any

activities which have the potential to adversely impact human or environmental health, including mitigation of accidental spills or release.

Business Partners are also expected to undertake initiatives to improve their own impact on the environment and to promote greater environmental responsibility in their supply chains – including, as applicable, the development of climate-friendly products and processes to reduce power consumption use of finite natural resources and production of greenhouse gas emissions.

Springer Nature's approach to Business Conduct

Objective Decisions and
Avoiding Conflicts of Interest

Political Donations, Charitable
Donations and Sponsorship

Dealing with Governments
and NGOs

Facilitation Payments

Fair Competition

Intellectual Property, Confidential
Information and Privacy Rights

Financial Integrity and
Record-keeping

Springer Nature's policy is to conduct business in an honest and ethical way, free of corrupt practices, acts of bribery, anti-competitive behavior or conflicts of interests. We require our Business Partners to adopt the same standards for themselves and their supply chains.

Under no circumstances may a Business Partner, anyone in their supply chain do anything on Springer Nature's behalf that we would not do directly.

Objective Decisions and Avoiding Conflicts of Interest

Springer Nature expects our Business Partners' decisions to be based on objective criteria, avoiding any potential conflict of interest. In particular, our Business Partners are expected to ensure that their employees, subcontractors and agents do not offer, promise or provide any advantages to any Springer Nature employees or related parties with the aim of securing any form of preferential treatment in their business transactions with us.

We also expect our Business Partners to refrain from asking Springer Nature employees or related parties for any inappropriate advantages.

No Business Partner may, under any circumstances, offer, promise or provide any Springer Nature employee or member of their family with any personal benefit, kick-back, favor, cash, gratuity etc. whether directly or indirectly. Any invitations or gifts extended to Springer Nature employees or related parties must be reasonable and appropriate, i.e. they must be of low financial value, not regularly occurring and reflect ordinary local business custom.

Political Donations, Charitable Donations and Sponsorship

Our Business Partners are not authorized to make any type of political contribution, charitable donation or sponsorship on behalf of Springer Nature.

Dealing with Governments and NGOs

Springer Nature strictly observes the laws, rules and regulations that govern the acquisition of goods and services by any governmental entity or Non-Governmental Organization ("NGO"). Any Business Partner engaged by Springer Nature in connection with such activity must do likewise.



Activities which may be reasonable and appropriate when dealing with private customers (e.g. entertainment, hospitality etc.) may be improper and illegal when dealing with Governments or NGOs. Our Business Partners are expected to ensure that all employees who interact with Governments or NGOs are aware of these restrictions, rules and regulations and abide by them.

Facilitation Payments

Springer Nature's Business Partners are not authorized to offer or make any kind of "grease", "expedition", "facilitation" or any other payment made personally to a government official or any other person to speed up or facilitate a routine government action or process, even though in some countries it may be customary to do so.

Fair Competition

We expect our Business Partners to always compete fairly and to comply with applicable antitrust laws and regulations. Our Business Partners must not enter into agreements with competitors that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

Intellectual Property, Confidential Information and Privacy Rights

Our Business Partners are expected to respect intellectual property rights, data privacy standards and to safeguard any personal or confidential information received from us. Production and transfer of content, technology or know-how must be done in a manner that protects intellectual property rights.

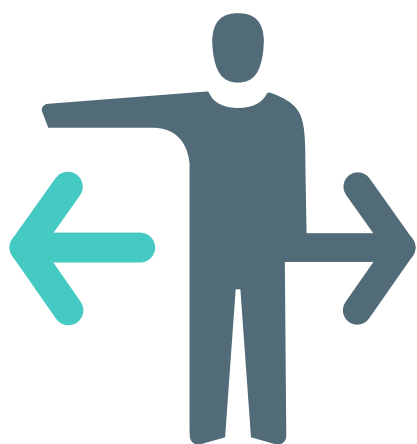
No reproduction, distribution, transfer or sharing of copyrighted or confidential materials may be undertaken by a Business Partner except according to the terms of the agreement with us.

Financial Integrity and Record-keeping

All records relating to dealings with Springer Nature must be accurate, transparent, kept in accordance with applicable law and made available to Springer Nature on request in connection with the exercise of any audit right we may have in our agreement.

Supply Chain Management and Compliance with this Code

Springer Nature expects our Business Partners to communicate the principles set out in this Code to their employees, agents, subcontractors and other business partners and to actively encourage them to comply with the standards set out in this Code regarding the protection of human rights, labor conditions, health and safety, anti-corruption and environmental protection when fulfilling their contractual obligations.



Compliance with this Code
Raising a Concern
Useful References



Where our agreement includes an audit right, our Business Partners must ensure that this right is also included in agreements with the third parties they manage in our supply chain.

Compliance with this Code

Compliance with this Code is in addition to, not in lieu of, our Business Partners' obligations under local law, where local laws are less restrictive than this Code Business Partners must comply with the Code, even if the conduct would otherwise be legal. If local law is more restrictive than this Code Business Partners must, at a minimum, comply with the applicable law.

In the event that a Business Partner is suspected of violating any of the principles set out in this Business Partner Code of Conduct, Springer Nature reserves the right to request that all relevant information be disclosed and/or to terminate business in accordance with our contractual rights.

Raising a Concern

We expect our Business Partners to take immediate action to raise any concerns regarding non-compliance with this Code. This includes the conduct of a Springer Nature employee that they believe in good faith to be non-compliant with this Code. Concerns should be raised via Business Partners' normal business contact or via our confidential speak-up system, which can be found [here](#).

Business Partners must also keep Springer Nature informed of any corrective action plans implemented following the identification of the concern.

Useful References

United Nations Global Compact
www.unglobalcompact.org

Universal Declaration of Human Rights
www.un.org/en/rights

International Labour Standards (ILO)
www.ilo.org/global/standards/lang--len/index.htm

OHSAS 18001 Health & Safety Standard
www.ohsas-18001-occupational-health-and-safety.com

International Organization for Standardization (ISO)
www.iso.org

OECD Guidelines for Multi-national Enterprises
mneguidelines.oecd.org/responsible-business-conduct-matters.htm