

headline

Headline Publishing Ethical and Environmental Policy 2015

Headline Publishing is part of Hachette UK, one of the largest and most diverse publishing groups in the UK, and also has offices and companies overseas in Ireland, Australia, New Zealand, India, Hong Kong and the Middle East.

Our environmental policy is part of a broad range of social responsibility policies that include a focus on working conditions at our own sites and those of suppliers, a responsible attitude to our suppliers, equal opportunities and charitable giving. Headline Publishing creates a workplace that supports its workforce, allowing individuals to take responsibility for both their working environment and wider social and environmental concerns. Our initiatives come from the passion of our staff to protect and improve the environment wherever possible.

Our view is that care for the environment goes hand in hand with our work as publishers. We continually develop and revise our sustainable publishing model to satisfy our ambitions, and encourage and empower everyone who works at Hachette to be aware of how the work we do affects wider society. We work closely with authors to bring their work to an audience in the best way possible. The pride we take in our books dictates our commitment to sustainable business practices.

The area in which we believe we can make the biggest difference is in the sourcing and conservation of paper, board and packaging. Our use of these materials should not destroy or degrade ancient forest habitats that are home to people, animals, birds and plants and we positively reject irresponsible logging. As one of the largest publishers in the UK, with sister companies all over the world and with extensive contact with other like-minded publishers, we believe that through a combined effort we can make a real difference to the impact of our businesses on the environment.

The following statement of detail was issued following consultation with Greenpeace and the WWF, for whose help we are grateful.

Paper Purchasing

Hachette has invested heavily in technology to support our digital publishing, but books printed on paper remain the major part of our business. We are committed to using timber from legal, sustainable and well-managed sources, and we support initiatives and forestry management schemes that promote this. The ability of our

suppliers to deliver to these standards is a core requirement of our general responsible sourcing policy.

Compliance

We expect our paper suppliers to declare to us the sources of the paper used in printing our books.

Our environmental principles dictate that we do not procure fibre or paper coming from wood that has been:

- illegally harvested
- logged in protected areas or areas currently undergoing official processes of designation for protection, unless the logging is clearly in line with national conservation regulations
- harvested in forests where High Conservation Value has been defined by the High Conservation Value Resource Network (HCVRN) and duly interpreted through balance stakeholders processes are threatened by logging
- sourced from areas undergoing conversion from forest or other wooded ecosystems to plantation or non-forest uses, unless such conversion is justified on grounds of net social and environmental gain
- harvested in violation of traditional rights or civil rights

In compliance with Regulation (EU) 995/2010, Headline Publishing is a 'trader' of paper products under article 5.

Headline Publishing operate in compliance with EU Timber Regulations 995/2010 Headline Publishing do not import any timber products into the EU market and therefore are classified as a TRADER.

As a Trader Headline Publishing will be able to produce documented records detailing the following: List of all suppliers, list of all products purchased from those suppliers and customers to whom those products were sold.

Proof of Due Diligence on all products will be the responsibility of Headline Publishing suppliers/printers and documentation can be obtained upon request through their supply chain.

The documentation requested from the supplier/printer shall include the following;

- Country of harvest and/or sub-national region where the timber was harvested (including consideration of the prevalence of armed conflict)
- Trade name and type of product as well as the common name of tree species and, where applicable, its full scientific name
- All suppliers within the supply chain and
- The forest management unit of the supply origin

- Documents or other reliable information indicating compliance of those timber and timber products with activities referred to by the term controversial sources.

Headline Publishing purchases paper through its approved suppliers and printers who are certified by FSC or PEFC (or both).

The paper supply chain risk has been deemed as low (Negligible) risk.

Wherever we can, we use paper mills, printers and other suppliers who have gained or who have applied for EMS ISO 14001 accreditation. ISO 14001 is an internationally accepted standard that sets out effective Environmental Management Systems recognising a commitment to effective management of waste, careful use of energy and ensuring recycling processes are in line with government standards.

Certification

We support the Forest Stewardship Council (FSC®), the leading international forest management certification association. The FSC® has undertaken remarkable work to establish 'chain of custody' from forest to pulp to paper so that publishers can reliably establish the true source of their papers.

The HUK group has FSC® certification - ***show certificate*** - more information downloaded here.

The Programme for the Endorsement of Forest Certification Schemes (PEFC) provides a framework for the mutual recognition of different national and regional certification schemes. In addition to our FSC® certification, we also hold PEFC certification, which is confirmed on the PEFC website.

We give preference to post-consumer recycled fibre and we work hard to ensure that any virgin fibre used is certified by FSC®. We work closely with our suppliers to know the source of all the paper we use in the manufacture of our books and to increase the availability of commercially viable and attractive papers that maximise post-consumer recycled content.

Hachette UK is a founding member of PREPS (Publishers' Database for Responsible Environmental Paper Sourcing), which provides robust and transparent means of differentiating between the environmental credentials of a very wide variety of types of paper.

While we consider FSC® certification to be the highest available standard, if we are unable to use it we apply other standards to ensure that our paper sourcing complies with our environmental principles, using PREPS Grade 3 as the minimum for more than 99% of our titles.

PREPS Grade 3 confirms that either:

- all material comes from a low-risk source, as defined by the Country Forest Risk Tool, and does not originate from within a WWF-defined Ecoregion4, *or*
- all material is verified by either FSC® or PEFC but the paper, which is acquired from the printer, is not certified, *or*
- it is a PEFC certified paper with material originating from low-risk uncertified sources

Reporting

This table records books published in 2014 by the different publishing companies in the Hachette UK group and the total percentage that were printed on FSC® certified paper.

Company	# of Titles	Printed on FSC®	PEFC	PREPS Grade 3
Little, Brown	676	98%		2%
Orion	882	95%		5%
Headline	378	84%		16%
Hodder & Stoughton	766	88%		12%
Hachette Children's	1099	50%*		50%
Total Trade Books**	3801	80%		
Octopus	695	10%*	10%	75%
Hodder Education	257	21%*	46.5%	32.5%
HUK Total	4753	66.5%		

In 2014, 80% of the books published by the *trade** publishing companies in Hachette UK were printed on FSC®, and 66.5% of Hachette UK's total output was printed on FSC® paper.

* *trade* means adult and children's general fiction and non-fiction publishing.

We are actively limiting our use of paper in the office by reducing the amount of photocopying and printing. We remain committed to using recycled and FSC®-certified paper for photocopying, business correspondence and marketing materials within all our offices, with 99% of our office paper coming from FSC® certified suppliers.

Paper Purchasing: Hachette UK's Objectives

We are committed to increase the proportion of credibly certified and post-consumer recycled fibre we use.

Our aim is that by 2019 80% of our total output will be printed on FSC®

Reduction of Emissions

We take environmental issues and good practice very seriously at our distribution centres. Bookpoint and Littlehampton Book Services have EMS ISO 14001 accreditation, and were among the first Distributor recipients of the BIC Supply Chain Excellence Award. This award, which replaced the e4books scheme, widened the parameters beyond the traditional supply chain for books.

Our offices in London are designed to reflect our care for the environment. The building has been built to achieve a BREEAM excellent rating and also an EPC B rating. The waste streams have been designed so that zero waste goes to landfill; the air-conditioning system is programmed so that it does not run outside normal working hours (7pm to 7am weekdays, and all day on Saturdays and Sundays) to reduce energy consumption; and the lighting-control software switches the lights off outside normal working hours unless triggered by movement sensors. When triggered, only the bank of lights controlled by the movement sensor will switch on.

Ethical Trading

Hachette UK is also a founding member of Prelims (Publishers Resolution for Ethical International Manufacturing Standards). This publishing initiative has now been widely adopted by publishers throughout the UK and has espoused the code of conduct used by the International Council of Toy Industries. It is a practical, thorough and fair system of monitoring conditions and treatment of workers in factories outside the EU and we aim to only use suppliers who have passed the audit or who are working with us to gain accreditation.

In addition, Hachette Children's Group ensures that all books with play value have been tested and have passed the European Safety Standard EN71.

Recycling

We recycle as much paper, packaging and other waste as possible. Our UK warehouses recycle well over 90% of their waste. Both Hachette warehouses (Bookpoint and Littlehampton Book Services) have their own shredding and baling machines to reduce the number of truck miles used in transporting waste paper to recyclers.

Statement of Business Ethics

We pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation. We condemn corruption in all its forms and will not tolerate it in our business or in those we do business with.

Our Employee Handbook and Code of Conduct sets out what we expect of our staff, how they should behave and what they should do if confronted with corruption.

The code is for the benefit of staff as much as for the company. The potential harm done by bribery, both to the company and to individual members of staff, is long term. If convicted of a bribery offence, the company would risk a significant fine and suffer lasting reputational damage. If an individual is convicted of a bribery offence, they could personally face up to ten years in prison.

In accordance with the requirements of anti-bribery legislation, the company will:

- maintain its current good and ethical practices
- meet all relevant anti-bribery and corruption legislation and regulation appropriate to the business
- assess and keep under review its activities, especially in jurisdictions deemed to be risky, and act on any areas that may pose risk
- will set objectives and targets to respond to these risky areas and periodically review progress
- ensure all employees are made and kept aware of our policy and its objectives
- ensure relevant staff, especially those operating in identified sectors or jurisdictions, will be trained

The Chief Executive Officer is ultimately responsible for preventing bribery and corruption within the company. The CEO ensures that the company's policy is maintained and that adequate resources are made available for its effective

implementation. Responsibility for ensuring that the specific arrangements defined in the policy are understood and implemented is delegated to Divisional Finance Directors.

This policy is reviewed and updated annually.

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