

Policy statement on the human rights strategy

Our commitment

As a self-publishing platform, we are the central link between publishers, booksellers and online retailers and we provide one of the most modern logistics services in the book industry with the largest range of titles on the European book market.

Sustainability, climate protection and the responsibility to respect and promote fundamental human rights are issues of crucial importance for the development of our society and are therefore a matter of course for us. We therefore feel obliged to help shape the future with this in mind.

Books on Demand GmbH is therefore fully committed to acting in a lawful, environmentally and socially responsible manner. This includes, in particular, respecting, protecting and complying with internationally recognized human rights and environmental standards and agreements, as well as the rights protected therein:

- UN Guiding Principles on Business and Human Rights,
- International Bill of Human Rights,
- United Nations Universal Declaration of Human Rights,
- International Covenant on Civil and Political Rights (UN Civil Pact),
- International Covenant on Economic, Social and Cultural Rights (UN Social Covenant),
- Core labor standards of the International Labor Organization (ILO) on labor and social standards,
- Minamata Convention on Mercury,
- Stockholm Convention on Persistent Organic Pollutants (POP Convention) and
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

We uphold this expectation towards our employees, business partners, suppliers, service providers and customers alike and strive to continuously improve our business activities as well as our products, services and supply chains in this regard. We therefore also ask our suppliers to actively contribute to this.

Our engagement

Books on Demand has established a comprehensive risk management system to identify risks and violations of human rights and human rights-related environmental aspects in its own companies and in the supply chain and to counteract identified risks and violations with appropriate measures. Our risk management is anchored in all areas of the group and is monitored and managed by the central compliance team. The persons responsible for monitoring the risk management act impartially and independently and are not bound by any instructions.

Risks are assessed and updated annually, as well as when the risk situation changes. In doing so, we rely on:

- Reports, resources and key figures from databases/sources of recognized international organizations (to determine country and industry risks),
- Media reports,
- Information from management surveys,
- Specific risk-related internal evaluations, surveys and risk assessments,

- Surveys of relevant stakeholders,
- Information and reports that reach us through our whistleblower system, and
- Information and documents that we receive as part of supplier self-disclosure questionnaires.

Nous We identify and assess supplier and service provider-related risks on an ongoing basis with the help of our supplier due diligence system (currently Integrity Next) as part of the supplier selection and evaluation process. If a risk is identified at a (potential) supplier, further information and documents (e.g. certificates or evidence of existing processes or guidelines) on the sustainability and human rights performance of the company in question are obtained using supplier self-disclosure questionnaires and are included in the risk assessment.

If the analysis identifies risks that are to be prioritized in accordance with the principle of appropriateness, appropriate preventive measures are defined and taken. In the event of a violation of relevant human rights or environmental protection rights, remedial measures are immediately defined and implemented to end the violation or minimize the extent of the violation.

The entire risk management system, including the risk analysis and the measures implemented, is reviewed annually and on an ad hoc basis for effectiveness, and is adapted and continuously developed to ensure its effectiveness and appropriateness in accordance with the Libri human rights strategy.

We continuously document our efforts in this regard. The results of the risk analyses are incorporated into the corporate decision-making processes and form the basis for our sustainability and human rights strategy, which we report on annually on our corporate website. We regularly inform all key internal stakeholders about relevant activities, incidents and risks.

Our focus

In 2023, a comprehensive initial risk analysis was carried out in our group. The derived country and industry risks, which are based on reports, resources and key figures from databases/sources of recognized international organizations, were supplemented and enriched by the results of a comprehensive internal risk survey with managers and experts. Individual risks with specific country or sector-related relevance were identified, which are monitored on an ongoing basis by means of regular evaluations and assessments in order to gain early knowledge of potential risk-related circumstances and initiate appropriate countermeasures.

A comprehensive abstract risk analysis has also already been carried out in the area of the supply chain using our supplier due diligence system (currently Integrity Next). We are currently continuing our efforts to drive forward the concretization of risks at suppliers with an increased risk exposure. To this end, we obtain supplier self-assessments and thus gain additional information on the sustainability and human rights performance of our suppliers. The results are included in the supplier-specific risk assessment and serve as the basis for weighting and prioritizing identified risks. These form the basis for further risk- and supplier-specific preventive or remedial measures.

Notwithstanding specific measures still to be taken in this regard, we have already taken general measures to ensure a minimum level of prevention. For example, the training of relevant employee groups, the establishment of reporting and cooperation obligations when identifying relevant risks and violations, as well as the incorporation of our expectations towards our suppliers in our Supplier Code of Conduct and our General Terms and Conditions of Purchase.

Our whistleblower system

Books on Demand provides all internal and external parties with a channel for reporting human rights and environmental violations. This whistleblower system offers all affected parties a secure way to report violations anonymously and in multiple languages. The whistleblower system can be accessed via the following links: <https://sicher-melden.de/BoD>

Further information on our whistleblower system can be found in the rules of procedure on our homepage.

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