



JONES & BARTLETT LEARNING

25 Mall Road | Burlington, MA | 01803 | 978-443-5000 | www.jblearning.com

Jones & Bartlett Learning's Supply Chains Report

1) Introduction

Pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), Jones & Bartlett Learning LLC ("JBL") has prepared this report (the "**Report**") pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended December 31, 2023 (the "**Reporting Period**").

This Report describes the steps taken to enhance transparency in our supply chains by outlining the steps taken during the 2023 financial year to prevent and reduce the risk that forced labour or child labour ("**Modern Slavery**") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

2) Our Company Structure, Activity and Supply Chains

a) Structure

JBL is a privately-owned entity with principal offices in Burlington, Massachusetts, USA. JBL is a wholly-owned subsidiary of Ascend Learning, LLC, a privately-owned learning and assessment company with principal offices in Burlington, Massachusetts, United States ("Ascend Learning"). JBL is an LLC, whose governing body consists of a sole manager. Ascend Learning has direct oversight of JBL and provides JBL with corporate policies and practices.

a) Activities

JBL is a leading provider of instructional, assessment, and learning-performance management solutions for the secondary, post-secondary, and professional markets. JBL's comprehensive print and digital solutions combine authoritative content with innovative technology to help educators teach more effectively and students learn more efficiently.

For more than 30 years, JBL's commitment to personalized service has allowed it to develop high quality learning solutions across a broad range of fields, including nursing, public health, health administration, health professions, computer science, and more.

JBL's print solutions include physical textbooks that are shipped throughout the world, including into Canada.

b) Supply Chains



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To meet its business objectives with respect to its textbook business, JBL contracts with third-party printers, paper suppliers, and fulfillment service providers. These third parties are located within the United States.

For example, one of JBL's primary printing contractors, LSC Communications US, LLC ("**LSC**") has its principal place of business in Chicago, IL. The location of all services performed by LSC for JBL is in its facility located in Kendallville, Indiana. LSC must seek prior written consent to provide services from a facility other than the Kendallville location.

JBL also contracts with Lindenmeyr Book Publishing Papers ("**Lindenmeyr**") located in Purchase, NY, who acts as a paper supplier. Lindenmeyr sources its paper through Billerud, a global paper industry supplier. Billerud publishes an extensive report on its responsible supply chain strategy and its high demands on indirect and direct material and fiber suppliers, [here](#). Billerud mills the paper supplied to Lindenmeyr for use in JBL textbooks at its mill located in Escanaba, MI.

Finally, JBL utilizes PBD Worldwide Fulfillment Services ("**PBD**") as its fulfillment and distribution vendor. PBD's principal place of business is located in Alpharetta, GA and the PBD warehouse utilized for the shipment of JBL textbooks is located in Chicago, IL. JBL's contract with PBD provides that PBD, as an employer, "shall comply, to the extent applicable, with all federal, state and local laws, including without limitation, laws regarding non-discrimination, equal employment opportunity, affirmative action, hiring practices and occupational safety health concerns."

2) Policies and Due Diligence

a) Integrity, Ethical Business Dealings and Compliance with Laws

JBL is committed to acting with integrity and in compliance with the law in all of its business dealings. All employees associated with the JBL business are expected to act honestly and to maintain the highest standards of ethics and business conduct at all times.

Accordingly, all employees and representatives are expected to comply with all applicable governmental laws, rules and regulations. The Company's Chief Executive Officer, Chief Financial Officer, General Counsel and Chief Compliance Officer have established and maintain mechanisms to monitor JBL's compliance with all applicable federal, state, local and foreign statutes, rules, regulations and administrative procedures, and identify, report and correct detected deviations.

JBL's commitment to acting with integrity and complying with the law is supported by its adherence to the Ascend Learning:

- Code of Business Conduct and Ethics
- Reporting of Illegal or Unethical Behavior Policy
- Anonymous Reporting Line
- Employee Handbook



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Consistent with its commitment to acting with integrity and in accordance with applicable law, JBL supports the prevention and elimination of Modern Slavery.

i) *Code of Business Conduct and Ethics*

The first layer of JBL's compliance framework is the Ascend Learning Code of Business Conduct and Ethics (the "**Code**"). The Code explains the fundamental values and standards of behavior that are expected in all aspects of its business. It provides employees with clear guidelines for ethical business conduct related to interactions with customers, fellow team members, vendors, partners and the public. To demonstrate their commitment to the shared values and standards described in the Code, all employees must certify annually that they have reviewed and follow the Code. In addition, all employees must also take an online Ethics training course upon joining the company, and every year thereafter.

ii) *Anonymous Reporting Line*

The second layer of JBL's compliance framework is a robust open-reporting culture. It includes, among other channels, a confidential and anonymous channel for reporting non-compliance with the Code or other perceived violations of company policy or applicable law. This confidential and anonymous reporting line is administered by an independent third-party firm.

iii) *Enterprise Risk Management*

The third layer of the framework is the Ascend Learning Enterprise Risk Management ("**ERM**") process. The ERM process is designed to assist all areas of the business in identifying risk and managing appropriate levels of risk tolerance using a systematic approach that includes methodology and tools for evaluating, measuring and monitoring all material risks, which may include, among others, workplace health & safety and regulatory compliance risks.

The results of the ERM program comprise part of the data used to identify existing and emerging risks for the business, prioritize risk management activities and develop risk-based remediation plans. As such, we expect this robust ERM processes to identify Modern Slavery risks that may arise within the company's supply chains.

b) Monitoring and Notification

JBL is committed to avoiding Modern Slavery in its supply chains and operations. Accordingly, the company's risk management procedures and internal controls processes include measures intended to promote timely notification of our Chief Compliance Officer and/or General Counsel should there arise changes to the supply chains or operations, or other circumstances, that could create an increased risk of Modern Slavery.

c) Contractual Terms

As a result of its ongoing monitoring and assessment of potential risks involving Modern Slavery with respect to its operations and supply chains, JBL expects over time to further strengthen applicable



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contractual language in relevant supplier and third party contracts in relation to compliance by such third parties with applicable laws and regulations directed at Modern Slavery.

3) Potential Risks in Our Operations and Supply Chains

In 2023, JBL took no specific steps directed at preventing and reducing the risk of Modern Slavery. However, following the December 20, 2023, release of the Governmental Guidance ("**Guidance**"), JBL prioritized a review and consideration of the Act and Guidance.

Based upon the nature and location of the business, and that of its direct partners, JBL considers there to be limited risk of Modern Slavery occurring in JBL's supply chains as described in this Report. Geographically, JBL, and its employees and partners are located in the United States, which according to the [Global Slavery Index](#), has a low prevalence of Modern Slavery, a low risk of vulnerability to Modern Slavery, and comparatively robust governmental oversight of the issue.

JBL is not aware of any instances of Modern Slavery in JBL's operations or supply chains during the Reporting Period. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

4) Training

All JBL employees are required to complete a comprehensive online Ethics training program when they are hired and then annually, every year thereafter. This comprehensive training covers, among other areas, ethical decision making, conflicts of interest, the importance of due diligence when interacting with third-parties (including vendors), and the importance of reporting compliance concerns when observed.

5) Measuring Effectiveness

As JBL continues to evaluate compliance measures designed to prevent and reduce the risk of Modern Slavery, it intends to consider, where appropriate, implementing additional measures to assess the effectiveness of all relevant policies and processes.



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6) Approval and Attestation

This Report has been approved by JBL pursuant to subparagraph 11(4)(a) of the Act. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as the Chief Executive Officer and Sole Manager of JBL.

I have the authority to bind Jones & Bartlett Learning, LLC.

Greg Sebasky
Chief Executive Officer
May 30, 2024