

BUSINESS PARTNER CODE OF CONDUCT



GOVERNANCE

SPRINGER NATURE

CONTENTS

- INTRODUCTION / WORKING TOGETHER AS BUSINESS PARTNERS
- 1 / ENVIRONMENTAL RESPONSIBILITY
- 2 / SOCIAL RESPONSIBILITY
- 3 / GOVERNANCE
- 4 / SUPPLY CHAIN MANAGEMENT AND COMPLIANCE WITH THIS CODE



INTRODUCTION / WORKING TOGETHER AS BUSINESS PARTNERS

Springer Nature is one of the leading publishers of research in the world. Through our brands, trusted for more than 180 years, we provide technology-enabled products, platforms and services that help researchers to uncover new ideas and share their discoveries, health professionals to stay at the forefront of medical science and educators to advance learning. Our mission is to be part of progress by enabling millions of researchers, educators, learners and health professionals to access, trust and make sense of the latest insights and discoveries – every day.

We are a global company with offices in over 40 countries worldwide and 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 for ourselves. This Business Partner Code of Conduct (“Code”) sets out the basic requirements that Business Partners are expected to meet.

The UN’s sustainable development goals (SDGs) are one way we consider the potential

impacts of our business – both positive and negative – and how we manage them. We encourage you to read Springer Nature’s Annual Report, which describes our approach to sustainability, the standards to which we hold ourselves and our Business Partners, and the policies and actions we take in response. This report is available on the Springer Nature website and is updated each year.

COMMITMENT BY OUR BUSINESS PARTNERS

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, ethical 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) and that you commit to gradually implementing more advanced practices in these areas.

We audit major suppliers so that we can better understand their environmental, social and governance practices. Please note – where our

agreement with you includes an audit clause, you must ensure that the right to audit is also included in agreements with any third parties in the supply chain you use to provide goods and services to us.

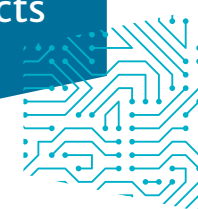
You are a highly valued Business Partner of Springer Nature. It is important that you understand how the issues set out in this Code affect you when working with Springer Nature. If you have any questions regarding this Code, please speak to your usual business contact or alternatively reach our Governance, Risk & Compliance team 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 working together as Business Partners.

DINAH SPENCE

Chief Risk & Compliance Officer
Springer Nature

The UN’s sustainable development goals (SDGs) are one way we consider the potential impacts of our business



SPRINGER NATURE'S APPROACH TO ENVIRONMENTAL RESPONSIBILITY

1



1/ SPRINGER NATURE'S APPROACH TO ENVIRONMENTAL RESPONSIBILITY

Springer Nature's goal as a responsible business is to not only comply with the laws, rules and regulations relating to environmental practices but to exceed these where possible.

We expect our Business Partners to manage their environmental impacts, as relevant to their business. This includes seeking to improve energy efficiency, using renewable energy where possible and considering setting recognised, science-based climate targets to reduce carbon emissions.

International environmental obligations have resulted in legal requirements related to carbon emissions reduction and the protection of natural environments.

These include obligations to manage through the supply chain. In this context, we expect our Business Partners to assess and manage environmental risks and impacts across their operations and value chains, considering not only how local communities are affected, but also in line with legal obligations applicable to Springer Nature.

CARBON EMISSIONS

Springer Nature has been carbon neutral for emissions related to its buildings, fleet and flights since 2020, and is committed to becoming net zero through its value chain by 2040. Our science-based targets were validated

by the Science Based Targets initiative (SBTi) in 2023.

We report our carbon footprint according to the methodology of the Greenhouse Gas Protocol and in alignment with our business activities.

We recognise the importance of reducing carbon emissions to avoid global temperatures increasing beyond 1.5C degrees above pre-industrial levels. These commitments, our carbon reduction plan and the importance of our supply chain in this are detailed in our Annual Report, available on our [website](#).

As our targets include supply chain emissions, we encourage our business partners to take action to set their own targets to reduce their operational CO₂-emissions, in line with the science and internationally-agreed emissions reduction pathways.

We expect our Business Partners to engage with us in meeting current and future legal reporting requirements to allow us to collectively measure and reduce CO₂-emissions. We encourage you to gradually implement advanced practices that measure, manage and reduce the carbon emissions associated with your businesses, even where not yet legally required.

You should also consider longer-term climate-related risks to your operations, such as the impact of extreme weather events, and take steps to mitigate them to ensure business continuity.

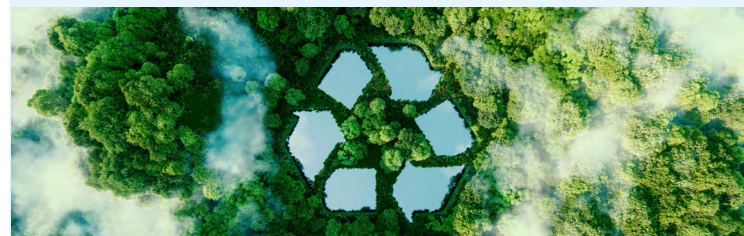
This means that

We expect our Business Partners to share our commitment to sustainable business.

- You are expected to undertake initiatives to improve your own impact on the climate and the environment and to promote greater environmental responsibility in your supply chains.
- This includes, 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.
- We expect you to consider the impacts of relevant current and future laws and directives on your business, and to be prepared to comply with reporting requirements, including those which may require you to provide information as part of our value chain.

Our Business Partners share our responsibility for reducing carbon emissions.

- You should strive to reduce your power consumption, use of finite natural resources and emission of greenhouse gases through alternative, cost-effective technologies and/or production processes, and the use of clean/renewable electricity.
- You should make every effort to conserve natural resources, including fossil fuels and water, in your production processes and operations by reusing, recycling, and/or substituting materials, or by other practical means.
- We encourage you to set your own short- and longer-term targets to reduce carbon emissions and other environmental impacts, both in your own operations and in your supply chain and procurement.



1/ SPRINGER NATURE'S APPROACH TO ENVIRONMENTAL RESPONSIBILITY CONTINUED

NATURAL RESOURCES

Our Business Partners are expected to use natural resources responsibly and to comply with all applicable laws, regulations and standards to protect the environment.

POLLUTION, SUBSTANCES OF CONCERN AND WASTE MANAGEMENT

You should make every effort to reduce pollution impacts (whether that is pollution to air, water or land) of your operations. Ensure any substances of concern are managed according to local regulations and with any impact to the local environment minimized and eliminated where possible.

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 expected to dispose of, or recycle, solid waste responsibly.

PAPER AND PRINT PRODUCTION

Business Partners involved in the supply of printed materials are required to read and follow our Paper Policy and associated guidance, which states that only paper sourced from known, legal and responsible sources be used in our products.

Suppliers must ensure that paper and wood-based products they use are deforestation-free, produced in accordance with applicable laws in the country of origin with precise traceability information and cooperate fully with Springer Nature's due diligence requirements.

This means that

Business Partners involved in the supply of printed materials are required to read and follow our Paper Policy.

- You should use paper with certified content (e.g. FSC, PEFC, SFI). If this is not possible, papers should be, as a minimum, starred 3 or 5 in the PREPS database.
- Paper that does not meet these standards cannot be used for Springer Nature products.
- Information to confirm all relevant certifications / compliance with PREPs 3* or 5 is required from printers on an annual basis and any exceptions must be by explicit agreement.
- You may be expected to demonstrate that papers comply with other applicable regulations, including due diligence statements, or other information to assure traceability and compliance with all applicable laws in the country of production.
- You are expected to cooperate fully with Springer Nature's due diligence requirements by supplying relevant information and documentation upon request.



SPRINGER NATURE'S APPROACH TO SOCIAL RESPONSIBILITY

2



2/ SPRINGER NATURE'S APPROACH TO SOCIAL RESPONSIBILITY

Springer Nature's goal as a corporate citizen is to not only comply with the laws, rules and regulations relating to labour practices and human rights but to exceed these where possible. We follow the UN Global Compact, the OECD Guidelines for Multinational Enterprises, OECD Due Diligence Guidance for Responsible Business Conduct, OHCHR Guiding Principles on Business and Human Rights and the standards issued by the International Labour Organisation (ILO), and we expect our Business Partners to do the same. We are committed to the well-being of all employees and freelancers working for our business, either directly or through Business Partners.

We consider social responsibility to be an essential part of the way we work; this is among the principal factors we 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, labour conditions, health and safety and anti-corruption. Business Partners are also expected to ensure compliance with these standards within their own supply chains and procurement. Any freelancers working with Springer Nature either directly or through our Business Partners must also comply with these

standards. We expect a trend towards more and stricter laws and regulations relating to human rights and social responsibility over time. As our Business Partner, you are expected to consider the impacts of future laws and regulations on your business, and to be prepared to comply with applicable reporting requirements.

CHILD LABOUR

No Springer Nature Business Partner may (directly or indirectly) employ children who are under the relevant country's minimum age threshold for completion of compulsory schooling. 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 LABOUR

Springer Nature prohibits any form of violence or coercion against workers. 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.

This means that

Business Partners are expected to consider the impacts of current and future laws and regulations on your business, and to be prepared to comply with reporting requirements.

Child Labour

- You are expected to take active steps to ensure that children under the relevant compulsory school age are not employed in your supply chains.

Prevention of Forced Labour

- We expect you to ensure that there is no forced labour of any kind, including slavery, indentured labour, involuntary prison labour, human trafficking or disregard of labour protection obligations in your organisations or your wider supply chains.



2/ SPRINGER NATURE'S APPROACH TO SOCIAL RESPONSIBILITY CONTINUED

FAIR PAY AND CONDITIONS

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

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Springer Nature recognises the importance of open communication and engagement between workers and managers regarding working conditions. We respect our employees' legal rights to freely associate, organise and bargain collectively without fear of harassment, intimidation, penalty or reprisal. We require our business partners to do the same with their own employees.

We have works councils, employee representation forums and other local, formally elected employee representation groups in Austria, France, Germany, the Netherlands, Spain and the United Kingdom, covering more than 40% of our global workforce. In markets where collective bargaining is inhibited by law or by custom, we provide other means for employees to provide collective feedback and receive a considered response, such as town halls and via our company intranet.

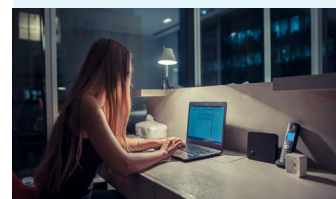
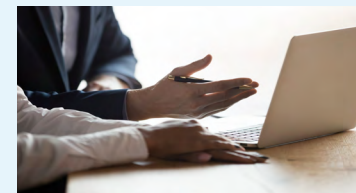
**This
means
that**

Fair Pay and Conditions

- You are expected to respect applicable local laws regarding maximum working time.
- Other than in exceptional circumstances, you are expected to restrict your employees' working week to a maximum of 60 hours or such lower cap as might be applied under local legislation. This amount includes 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

- We expect you to respect any legal rights of your employees to freely associate, organise and bargain collectively without fear of harassment, intimidation, penalty, or reprisal..



2/ SPRINGER NATURE'S APPROACH TO SOCIAL RESPONSIBILITY CONTINUED

RESPECT, DIVERSITY, DISCRIMINATION AND HARASSMENT

At Springer Nature, 'respect' and 'diversity' are important values that we promote throughout our own organisation and our supply chain.

We are committed to better understanding our supplier base and its diversity. We want to work together with our key suppliers to create inclusive work environments and start looking into creating opportunities to work with more inclusive and diverse suppliers.

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' organisations including unions, political affiliation or opinions, sexual orientation, gender identity, family responsibilities, marital status or any other factors.

ACCESSIBILITY

Springer Nature is committed to providing equal access and equal opportunity to people with diverse abilities. The United Nations Convention on the Rights of Persons with Disabilities recognises that access to information and communications technologies, including the Web, is a basic human right. The fundamental principle is that Springer Nature's products and services can be used by anyone, regardless of any permanent, temporary, or situational disability they are currently experiencing.

HEALTH AND SAFETY

Springer Nature expects our Business Partners to fully comply with applicable laws, regulations and standards governing health and safety at work.

This
means
that

Respect, Diversity, Discrimination and Harassment

- We expect you 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.

Accessibility

- Our Business Partners are expected to meet or exceed all relevant local laws pertaining to disability, and to ensure the products, services, and content which you procure and/or provide conform to the latest "Standard" W3C Web Content Accessibility Guidelines, to at least level "AA".



Health and Safety

- You shall ensure, at a minimum, reasonable access to free potable (drinking) water and safe sanitary facilities, fire safety, emergency preparedness and response and industrial hygiene equipment, adequate lighting, ventilation and machine safeguarding in the workplace and in any dormitory or canteen facilities provided to workers.



- You 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.

SPRINGER NATURE'S APPROACH TO GOVERNANCE

3

16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS



17 PARTNERSHIPS
FOR THE GOALS



3/ SPRINGER NATURE'S APPROACH TO GOVERNANCE

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

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.

POLITICAL DONATIONS, CHARITABLE DONATIONS AND SPONSORSHIP

Our Business Partners are not authorised 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 Organisation ("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.

This means that

Under no circumstances may you or anyone in your supply chain do anything on Springer Nature's behalf that we would not do directly.

- You may not, under any circumstances, offer, promise or provide any Springer Nature employee or member of their family with any personal benefit, kick-back, favour, 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. of low financial value, not regularly occurring and reflect ordinary local business custom.

- You are not authorised to make any type of political contribution, charitable donation or sponsorship on behalf of Springer Nature.
- You 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.



3/ SPRINGER NATURE'S APPROACH TO SOCIAL GOVERNANCE CONTINUED

FACILITATION PAYMENTS

Springer Nature's Business Partners are not authorised 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. Springer Nature has a zero-tolerance policy against this behaviour and any other bribery or bribery-related activities.

FAIR COMPETITION

We expect our Business Partners to always compete fairly and to comply with applicable antitrust laws and regulations.

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.

RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Springer Nature is committed to the ethical and responsible use of AI as set out in the [Springer Nature AI Principles](#). We design, develop, and deploy AI systems in line with these principles and any applicable laws and regulations. We expect our Business Partners to do the same.

This
means
that

Facilitation Payments

- You are not authorised to offer or make any kind of facilitation payment to a government official or any other person to speed up or facilitate a routine government action or process.

Fair Competition

- You may not enter into agreements with competitors that might constitute a breach of antitrust law, or take advantage of any dominant market position that they might hold.

Intellectual Property, Confidential Information and Privacy Rights

- You may not reproduce, distribute, transfer or share copyrighted or confidential materials, except according to the terms of your agreement with us.

Responsible Use of Artificial Intelligence

- When working with us to build, provide, deploy or supply AI systems, you must ensure that these meet the legal requirements applicable to both you and to us. This includes appropriate risk assessment and risk management, human oversight, preventing bias, transparency to the user, documentation and registration requirements.
- You are expected to use high-quality, representative, and unbiased data in AI system development and training.
- If you are working with subcontractors, they are expected to meet the same requirements that apply to you and to us.



3/ SPRINGER NATURE'S APPROACH TO SOCIAL GOVERNANCE CONTINUED

FINANCIAL INTEGRITY AND RECORD-KEEPING

All records relating to dealings with Springer Nature must be accurate, transparent, kept according to 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.

TAX COMPLIANCE

Springer Nature has a zero-tolerance policy with respect to tax evasion and its facilitation and will not engage in, facilitate, or be associated with any form of tax evasion anywhere in the world.

SANCTIONS COMPLIANCE

Our Business Partners are expected to respect and adhere to international restrictions on the provision of goods and services. Several international bodies (e.g. OFAC, UN, EU) and many countries impose such restrictions. We expect you to be aware of the sanctions that are in force and to comply with these.

This
means
that

Tax Compliance

- You are expected to pay your fair share of taxes in all jurisdictions where these obligations may arise.
- Tax planning should be conducted in a way that is transparent and aligned to the letter and demonstrates clear intentions of all applicable regulations and legislation.
- You may not use your affiliation with Springer Nature to evade or avoid tax obligations in any part of the world, under any circumstances.

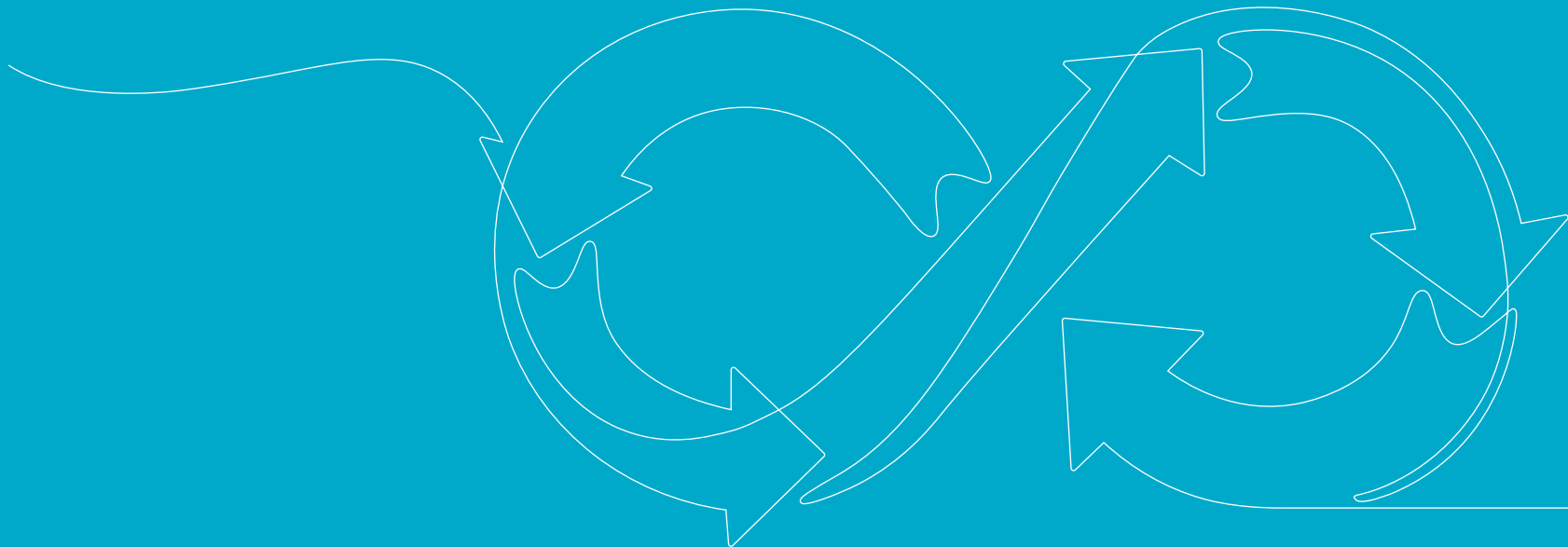
Sanctions compliance

- Business Partners must only sell in the territories permitted under the contract and under no circumstances (including where global rights are granted) resell, distribute, or otherwise conduct business on behalf of Springer Nature in any territory deemed "sanction-sensitive", unless expressly authorised through a written agreement. "Sanction-sensitive" territories include but are not limited to territories subject to [broad-based geographic sanctions issued by the United States](#).



SUPPLY CHAIN MANAGEMENT AND COMPLIANCE WITH THIS CODE

4



4/ 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, labour conditions, health and safety, artificial intelligence, anti-corruption and environmental protection when fulfilling their contractual obligations.

Springer Nature may from time to time conduct audits (remote or on-site) for risk analysis, assessments of environmental and social practices, training on environmental and social issues within the supply chain, labour standards, health and safety issues, artificial intelligence or other purposes.

COMPLIANCE WITH THIS CODE

Compliance with this Code is in addition to our Business Partners' obligations under local law – it does not replace these obligations.

If 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 be provided with all relevant information upon request and/ or to terminate business according to 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, including any suspected violation of human rights. 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](#).

Springer Nature does not tolerate retaliation against anyone who raises a question or reports a concern in good faith.

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

This means that

Audit Rights

- Where our agreement with you includes an audit right, you must ensure that this right is also included in agreements with third parties in your supply chain that are used to provide goods and services to us.
- You undertake to provide us with any information we may request as part of these audits promptly and to ensure that your suppliers do the same if required.
- When requested, you are expected to provide information as part of Springer Nature's third party due diligence and ongoing monitoring processes.

Compliance with this Code

- Where local laws are less restrictive than this Code, as our Business Partner, you must comply with the Code, even if the conduct would otherwise be legal.
- If local law is more restrictive than this Code, you must, at a minimum, comply with the applicable law.



Springer Nature refers to a number of initiatives and standards in everything we do. Some of the key initiatives and standards we follow in upholding our commitment to environmental and social responsibility are listed below.

INITIATIVES AND STANDARDS REFERENCED BY SPRINGER NATURE

[United Nations Global Compact](#)

[The Climate Pledge – Net Carbon Zero by 2040](#)

[United Nations Framework Convention on Climate Change – Race to Zero Campaign](#)

[Universal Declaration of Human Rights](#)

[International Labour Standards \(ILO\)](#)

[ISO 45001 Occupational Health and Safety Management](#)

[International Organization for Standardisation \(ISO\)](#)

[OECD Guidelines for Multinational Enterprises](#)

[Science Based Targets initiative \(SBTi\)](#)

[OECD Due Diligence Guidance for Responsible Business Conduct](#)

[OHCHR Guiding Principles on Business and Human Rights](#)

[Springer Nature AI Principles](#)