# Supplier & Environmental Policy

### April 2022

Penguin Random House UK is committed to managing sustainable solutions effectively across our entire value chain and understand the importance of ensuring that local and national environmental standards are continuously met and upheld.



## Introduction

As the UK’s leading publisher, our most important role is through the books we publish and their power to change minds and behaviour. Alongside this, it is also vital that we consider how we can, in our own operations, innovate and improve efforts to reduce our environmental impact.

Thinking and acting for the planet underpins everything we do, every day.

As a business we take our responsibility to reducing our environmental impact seriously and have a dedicated Sustainable Sourcing Team responsible for ensuring continuous improvement of working conditions in our value chains.

We know, among many other issues, that climate change, natural resource scarcity, deforestation and the pollution of ecosystems are global issues, with the negative consequences of these becoming increasingly clear. We also recognise that reducing ours, and our suppliers, impact on the environment is challenging, but it is a necessity to do so.

Our Supplier Environmental Policy reflects our values, and the principles within it draw from the Bookchain project's Code of Conduct as well as several of the United Nations 17 Sustainable Development Goals (SDGs).

This Supplier Environmental Policy and supplementary policies provide minimum standards that should be exceeded where possible. In applying it, suppliers must comply with national and other applicable laws.

We expect suppliers within our book production supply chain, whether they are distributors, licensees, direct suppliers, or agencies, to adopt and implement our Supplier Environmental Policy or have their own policies that reflect equivalent or similar standards.

Should you require any further details about our Supplier Environmental Policy, or our Sustainability Programme, please contact: sustainableproductionteam@penguinrandomhouse.co.uk

## Environmental Standards for Suppliers

1. Management Systems

1.1 Suppliers will comply with all local environmental laws and regulations.

1.2 Suppliers will complete an annual supply chain environmental risk assessment to understand the potential impact of their operations on the environment and establish written policies and procedures based on this risk assessment.

1.3 Suppliers will have a written plan for managing environmental impacts, including targets, to facilitate continuous improvement.

1.4 Suppliers will measure and track their environmental impacts.

1.5 Suppliers will ensure at least one senior manager has responsibility for environmental management.

1.6 Suppliers will take practical steps to reduce their environmental impacts.

1.7 Suppliers will acquire, and file all permits, and waste receipts required by local and national law.

1.8 Suppliers will ensure that trained personnel are in place to manage environmental impacts.

2. Energy

2.1 Suppliers will continuously measure, record, and track the consumption of electricity, gas, fuel, and renewable energy onsite from all sources. This includes for all forms of transportation.

2.2 Suppliers will set targets to reduce consumption of energy and start a programme to achieve the reduction.

2.3 Suppliers will carry out projects to reduce energy consumption onsite.

3. Water

3.1 Suppliers will continuously measure, record, and track the consumption of water onsite. This includes water used for both domestic and industrial processes, and from all sources including municipal mains, groundwater (boreholes and wells), and surface water (rivers, lakes).

3.2 Suppliers will set targets to reduce their consumption of water and start a programme to achieve this reduction.

3.3 Suppliers will carry out projects to reduce water consumption onsite.

3.4 Suppliers will ensure their operations do not negatively impact access to safe water for the community.

4. Wastewater

4.1 Suppliers will reduce the volume and impact of wastewater. This will be achieved by replacing potentially hazardous substances used in processing and reducing the volume of wastewater that needs to be treated by separating liquids (e.g., separating storm water from process wastewater).

4.2 Suppliers will treat wastewater in a fully functioning effluent treatment plant (ETP) before discharging. Treatment must be completed either on-site or in a shared ETP offsite before discharge.

4.3 Suppliers will measure, record and track wastewater volume and quality by collecting samples from the final discharge points.

4.4 Suppliers will ensure that wastewater leaving the site meets the IFC Effluent Guidelines for Printing and all applicable local and national laws.

4.5 If discharging to a central ETP, suppliers will have valid permits to do so, and test reports that show compliance with the central ETP’s requirements. Both permits and reports must be kept on file.

5. Hazardous Substances

5.1 Suppliers will continuously measure, record, and track the use of hazardous substances.

5.2 Suppliers will keep an inventory of hazardous substances used, handled, transported, and stored onsite, including their quantities and where they have been bought from.

5.3 Suppliers will have Material Safety Data Sheets (MSDSs) available in the local language for all hazardous substances used onsite.

5.4 Suppliers will ensure there are measures to prevent the exposure of workers to hazardous substances via inhalation or dermal contact, and measures to prevent the contamination of the environment. These will include:

* Training for workers who handle hazardous chemicals on how to do so safely.
* Personal protective equipment (PPE) for workers.
* Clear labelling of all hazardous chemical containers.

5.5 Suppliers will ensure that hazardous chemicals are securely stored in areas with spill prevention/ secondary containment controls.

5.6 Suppliers will communicate emergency procedures to workers in the workers’ main language and will follow these procedures in the event of a spill or release.

5.7 Suppliers will make sure that all chemicals used in the manufacturing of our products comply with our publishers’ Restricted Substances Lists and applicable global legislation.

5.8 Suppliers will take steps to reduce the use of hazardous substances and, where possible, replace them with safer alternatives e.g., water-based adhesives and inks instead of solvent-based.

5.9 Where further chemical or hazardous substance testing or documentation is required, suppliers will provide evidence in the form of safety tests reports, declaration of conformities, declaration of holding technical documentation etc. when and as requested by Penguin Random House UK.

6. Air Emissions

6.1 Suppliers will continuously measure, record and track emissions generated by any onsite combustion.

6.2 Suppliers will keep records of annual solvent consumption.

6.3 Suppliers will continuously measure, record and track process emissions and ensure emissions of volatile organic compounds (VOCs), particulates, nitrogen oxides (NOx) and Isocyanates meet the Air Emissions Levels for the Printing Industry.

6.4 Suppliers will conduct periodic air quality testing to capture air quality on the factory floor. The results of these tests must be filed.

6.5 Suppliers will minimise, and where appropriate, treat all emissions to air before they are released if they have the potential to adversely affect human health and/or the environment.

6.6 Suppliers will develop a solvent management plan. This plan should set targets to reduce emissions to air and state options for achieving these targets.

6.7 Suppliers will select materials or processes with no or low demand for VOC containing products.

6.8 Suppliers will avoid or minimise VOC losses through process modifications and solvent vapour recovers.

6.9 Suppliers will implement secondary controls to address residual emissions if necessary.

6.10 Suppliers will keep a list of all air emissions points within the factory and which substances are emitted at each point.

6.11 Suppliers will install air extraction devices in areas of the factory where fumes or particulates (including dust) are generated and can be inhaled by workers.

7. Raw Materials

7.1. Suppliers will maximise efficiency of non-renewable material use to avoid unnecessary consumption of resources.

7.2. Suppliers will use renewable, sustainable and responsibly-sourced materials where possible.

7.3 Suppliers will trace raw materials, including paper sources and chemicals, back to the mill or factory where they were produced. Suppliers will be able to provide the brand name of the paper, chemical or other raw material that the mill or factory uses.

7.4 Suppliers will ensure that all raw materials used are compliant with both local law and relevant global requirements.

21. Solid Waste

8.1 Suppliers will continuously measure, record, and track the types and amount of solid waste produced by the factory for all solid waste streams. This includes paper and board, plastics, metal, glass, wood, chemicals, plates, inks, toner cartridges, lacquers, glues, adhesives, general (domestic), sewage sludge if there is onsite wastewater treatment, and any other hazardous waste.

8.2 Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or disposal of waste.

8.3 Suppliers will set targets to reduce solid waste production and start a programme to achieve the reduction.

8.4 Suppliers will attempt to reduce, re-use and recycle for each waste stream (hazardous and non-hazardous).

8.5 Suppliers will track the disposal route for each waste stream.

8.6 Suppliers will ensure safe and legal disposal of hazardous waste using licensed waste contractors only.

9. Noise

9.1 Suppliers will conduct periodic noise level testing and where appropriate, employ noise prevention and control strategies and provide appropriate PPE for workers.

9.2 Suppliers will ensure they meet the Noise Level Guidelines stipulated by the [IFC](https://www.ifc.org/wps/wcm/connect/4a4db1c5-ee97-43ba-99dd-8b120b22ea32/1-7%2BNoise.pdf?MOD=AJPERES&CVID=ls4XYBw)

Suppliers overarching sustainability commitments

All suppliers, within our book production supply chain, will endeavour to reduce their carbon emissions, as part of working with Penguin Random House UK. On request from Penguin Random House UK, suppliers will provide the relevant data and information of how they are accounting for, and reducing, their own carbon emissions. This will support Penguin Random House UK's carbon reduction ambitions (Carbon neutral by 2030), in line with the Science Based Targets Initiative.

Please sign below to confirm you understand and will comply with this Supplier Environmental Policy:

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| --- | --- |
| Supplier name: |  |
| Name and position of signatory:  |  |
| Signature: |  |
| Date: |  |