



## **Holtzbrinck Supplier Sustainability Policy**

December 2025

### **Introduction**

Sustainability is a key priority for the Holtzbrinck Group (hereinafter “Holtzbrinck”). The following policy outlines sustainable sourcing priorities for Holtzbrinck and its companies including Macmillan, Pan Macmillan, Holtzbrinck Buchverlage, Die ZEIT. This policy will be updated on an annual basis with the intention to guide and set requirements for supply chain partners to both source paper responsibly and pursue more sustainable production practices.

To ensure that Holtzbrinck’s sustainability standards are upheld, we request that the following sourcing guidelines be adhered to. These are general requests for Holtzbrinck suppliers – if you have questions regarding specific actions mentioned in the policy please reach out to the sustainability contact at your Holtzbrinck company. Please find more information on Holtzbrinck’s sustainability programs and priorities [here](#).

### **Responsible Paper Sourcing**

A primary component of our sustainability program is responsible paper sourcing. A key component of responsible paper sourcing includes the use of paper certifications to ensure that our paper comes from sustainably grown timber and does not contribute to deforestation. Globally, Holtzbrinck companies utilize paper certifications such as the [Forest Stewardship Council](#) (FSC), [Sustainable Forestry Initiative](#) (SFI), [Programme for the Endorsement of Forest Certification](#) (PEFC), and the [Canadian Standards Association](#) (CSA). These certifications ensure that our products are derived from forests that are managed according to strict environmental and social standards. We expect that our partners obtain at least one of these certifications to align with our environmental priorities.

In addition, Holtzbrinck prioritizes the use of wood-containing paper (also referred to as mechanical or groundwood paper, in contrast to wood-free/chemical pulp papers) where appropriate. For paperback and mass market titles, our goal is to source predominantly wood-containing paper, while for hardcover books we aim to ensure that at least 60% of production utilizes wood-containing grades.

Wood-containing papers are generally lighter in weight due to their lower density, and based on current supplier data, they often carry a lower carbon footprint compared to wood-free alternatives. By prioritizing these paper types, we seek to reduce emissions during both production and transportation.

## Recycled Paper

While we are proponents of the use of recycled fiber, our primary focus is on reducing the emissions intensity of our books. Paper may be recycled in regions of the world where environmental criteria are not well established and electricity grids may still be dependent on coal. Additionally, the quality and inherent degradation of recycled paper may not be appropriate for all of our products.

## **Environmental Assessments**

Holtzbrinck companies expect our supply chain partners to engage with the [Bookchain Project](#) across its Paper Sourcing, Chemical and Materials, Labour and Environmental tools to review and track initiatives and progress. We ask that our partners perform environmental assessments on an annual basis, uploading data into the Bookchain Project platform. This ensures that sustainable production practices remain a priority across our supply chain. The Bookchain environmental assessment covers key areas of impact including:

- Carbon Footprint
- Materials & Waste
- Environmental Management
- Water Usage

If you are not already on-boarded to the Bookchain platform, or have any questions, please reach out to your production or publisher contact at Holtzbrinck.

We also use [Watershed](#) to help calculate our corporate carbon footprint. This sustainability platform may be used in the future to survey, communicate with, and assess the environmental performance of our suppliers. These surveys and requests may include the following:

- General information on company sustainability goals & commitments
- Requests related to emissions reduction targets, including [Science Based Targets](#)

- Information related to if and how your company collects its environmental data

## Carbon Emissions

The Holtzbrinck Group is actively committed to combating climate change. We aim to reduce our carbon footprint, increase energy efficiency and drive sustainable innovations consistently across all areas of our value chain by adopting a holistic approach. Our actions are guided by both the UN Sustainable Development Goals and the Paris Agreement's 1.5°C pathway, shaping our efforts to become a net-zero emissions business by 2050 at the latest.

Holtzbrinck recognizes the importance of effectively managing and reducing emissions throughout paper production and consumption processes. Therefore, it is crucial that our supply chain partners are effectively tracking and reporting their emissions. Ideally, our partners have developed and are working towards achieving climate targets, including [Science Based Targets](#).

In addition to the expectation that our supply chain partners both understand and are taking action to address areas of high emissions in their operations, Holtzbrinck representatives may request that our partners adhere to annual emission limits.

The below resources can support your efforts to understand environmental impacts and gather emissions data.

- [Greenbook Alliance Publisher – Printer Guide](#)
- [Intergraf CO2 Roadmap](#)
- [Intergraf CO2 Calculation Recommendations](#)
- [Bookchain Environmental Resources](#)

## Compliance

Relevant global laws and regulations should be followed to support responsible sourcing practices. This includes regulations such as the [European Deforestation Regulation \(EUDR\)](#) which mandates rules that prevent the EU from contributing to deforestation. This regulation also requires companies on the EU market to perform assessments confirming that action is being taken to mitigate risks. All suppliers should ensure that they are compliant with EUDR compliance requirements.



Holtzbrinck partners should ensure that they are compliant with all global laws and legislations, as well as provide necessary compliance information to our teams as requested.

In addition to following global laws and regulations, our partners are required to sign a **General Certificate of Conformity** (GCC). This certificate attests that all products conform to a wide range of safety and material standards. The standards covered include, but are not limited to:

- **Product Safety:** GPSR, EN71 part 3, ASTM F963 Heavy Metals, CPSIA Total Lead, and CPSIA Phthalates.
- **Chemical and Material Restrictions:** EU Phthalates, EU Total Cadmium, 94/62/EC, REACH (including all updates), CA Proposition 65, and global legislation on PAHs, Formaldehyde, Bisphenol A, and Benzophenones.
- **Inks:** All inks must be mineral-oil free and conform to the French decree Arrêté du 13 avril 2022. This is currently not a requirement in the US.
- **Toy Safety:** The Toys (Safety) Regulations 2011, Directive 2009/48/EC, ASTM F963, CPSIA, CA Proposition 65, and AUS/NZ ISO 8124.3.

It is important to note that raw materials cannot be tested to EN71 parts 1 and 2, as these requirements apply to finished products. Any finished product testing and associated costs will be managed separately and can be requested as needed.

## Suggested Initiatives

Reducing our footprint is of the utmost importance to Holtzbrinck and our various companies have made significant improvements across global businesses and offices. We are constantly expanding our sustainability efforts, with our programs covering a wide range of our operations. We encourage our partners to adopt sustainable practices wherever possible. Please see below list of suggestions.

- Paper Policy
  - Develop internal standards on paper sourcing and management, in alignment with customer requests and industry standards
- Sustainable Design
  - Utilize the most environmentally friendly attributes for book design including cover finishes, paper choices, inks, lower impact materials, etc.



- Bookchain Project has developed a [Design Guide for the Publishing Industry](#) that ranks impacts of materials used in publishing
- Fiber Analysis
  - Perform paper testing on an annual basis to confirm ethical sourcing
- Transportation
  - Reduce air freight, utilizing rail where possible
  - Adjust operations timelines to ensure you can access the least carbon intensive form of transportation
  - Consolidate transportation of products where possible
  - Utilize low carbon fuels, such as second-generation biofuels
- Office & Warehouse Improvements
  - Utilize renewable energy sources – solar, hydro-electric, etc.
  - Partner with leaders in sustainability who have their own targets – utilize couriers with electric vehicles, etc.