

# BBC WORLDWIDE LTD MODERN SLAVERY STATEMENT 2016/17

(Last updated July 2017)

This is the second annual Modern Slavery Statement to be published by BBC Worldwide Ltd, for financial year ending March 31<sup>st</sup> 2017; <u>see here for our 2016 statement</u>. For the BBC's Modern Slavery Statement, <u>see here</u>.

#### BBC Worldwide Ltd & our supply chains

BBC Worldwide Ltd is a wholly owned commercial subsidiary of the BBC, the UK's public broadcaster. We are an intellectual property company, maximising the value of BBC programmes and brands through our commercial activities and bringing value to the British public by returning to the BBC the profits from our global businesses.

While our primary activity is the distribution of TV content, we also operate ancillary businesses such as licensed consumer products and live events.

For more a more detailed description of our global businesses, operations and supply chains, <u>see last year's Modern Slavery Statement</u> as well as <u>this general introduction to the company</u>.

#### BBC Worldwide policy, ethical programme & governance

BBC Worldwide's <u>Ethical Policy</u> has been in place since 1999 and incorporates key **ILO Conventions and Recommendations,** including those relating to forced labour. It is a public document that can be viewed on our website and forms part of all contracts with suppliers and licensees. The policy sets our requirements on labour standards and is prefaced by a list of minimum standards which supplier factories must meet before we are able to work with them.

To support our policy and to ensure that our standards are being adhered to, we operate an ethical trading programme that monitors and assesses labour standards within our supplier factories. This programme is carried out by a dedicated team of three subject experts, though all staff are expected to follow its requirements.

As a condition of doing business with BBC Worldwide, all our suppliers and licensees sign up to our Ethical Policy and agree to put their factories through our programme's extensive system of on-going audits for tier one factories located in higher risk territories.

The programme is governed by three fundamental principles:

- All BBC Worldwide supplier tier one factories must be approved before our products can be manufactured.
- BBC Worldwide will approve supplier factories that are working towards full compliance with our code, as long as they have first demonstrated that they meet our minimum standards, including those on forced labour.
- If suppliers or their factories do not meaningfully engage with our programme or attempt to hide issues of concern then they will be terminated.

We also work with labour standards experts and multi-stakeholder initiatives such as the **<u>ETI</u>** and **<u>SEDEX</u>** to better understand the risks of issues such as forced labour and human trafficking.

The policy and programme are overseen at executive level by the quarterly BBC Worldwide Ethical Steering Group (ESG), which is chaired by the company's General Counsel who also has board level responsibility for ethical trading. The ESG is made up of key roles within our global

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businesses, including other members of the BBC Worldwide Executive Committee. The ESG signs off ethical trading strategy and oversees issues of particular significance. This on-going, executive-level oversight and accountability for our policy and programme therefore provide both a solid foundation and a clear direction for BBC Worldwide's ethical trading commitments and actions.

For more details about our policy, operations and governance, see last year's statement.

#### Ensuring the effectiveness of our programme and training

We advise staff and licensees that they should allow sufficient time when ordering products to ensure that the approvals process can be completed in time and that pressures on manufacturers are kept to a minimum. We also reinforce the message that minimum standards on forced labour and other serious issues must first be met before a factory can be approved for production. To this end we have built ethical sign-off into our products approval process.

We provide online training on ethical trading which is mandatory for staff in sourcing or licensing roles. Our commercial teams take new suppliers and licensees through the requirements of our ethical trading programme and we provide follow-up written guidance for their reference.

For more detail on all of the above areas, see last year's statement.

# Our actions in the last financial year

Since the very beginning of our ethical trading programme, we have constantly reviewed our processes and augmented them whenever required.

In the 2016/17, we undertook the following actions to further mitigate forced labour risks:

# • Strategic planning

As a member of the ETI (Ethical Trading Initiative), we produced our 3 year strategic plan for ethical trading, including our approach to tackling modern slavery, which was reviewed and assessed by the experts at the ETI.

#### • Site visits

We carried out a number of site visits on a selection of our supplier factories, accompanied by expert ethical auditors. Such site visits are a long-standing part of our ethical trading programme and are an additional check to the standard industry ethical audits that we review. Their purpose is to verify the findings of the original audits and to build our first-hand knowledge and understanding of the issues that may arise in our supply chains.

#### • Technology

We developed an in-house bespoke database for tracking our licensee and supplier factories' performance against our ethical policy.

# • Training

In September we held a staff engagement session on modern slavery to mark International Anti-Slavery Day.

Lysbeth Ford from the **Gangmasters & Labour Abuse Authority** visited our offices and talked to staff about her work with the GLAA, followed by a Q&A session on how to identify people at risk from human trafficking.

#### • Industry collaboration

Along with other media companies including **ITV**, **Sky** and **All3Media**, we founded the **TV Industry Human Rights Forum**. The group's remit is to share ideas and practices in mitigating forced labour risks relating to operational and ancillary roles within TV productions and to identify potential areas for a common response across the industry.

Additionally, in March we developed and hosted a workshop for ETI members, which focused on modern slavery and ethical trading challenges within the licensing business model.

# Looking ahead

Broadly, we will focus on the following areas over the next financial year:

#### • Data analysis

Using our new ethical operations database, we plan to carry out greater analysis of the data that we collect from industry audits and our own risk assessments to identify areas of concern and to respond appropriately. The analysis will also inform our discussions with our suppliers and licensing partners, to help them focus their own efforts on ethical trading and dealing with forced labour risks.

# • Site visits

Site visits will continue to be a key component of our programme. While industry audits remain at the core of our programme, the best way to truly understand our supply chains is to observe them first-hand whenever possible.

We will identify key licensing partners with whom we will undertake additional, detailed assessments in order to better understand how their factories are performing.

#### • Industry collaboration

Collaboration will remain at the heart of our work in this area, as we know that we cannot tackle modern slavery alone. We will therefore continue to work closely with our licensees and supplier partners to monitor our supply chains for forced labour risks.

We will look to increase our engagement with the ETI and SEDEX and we plan to build on our work with our TV and licensing industry peers, as well as to invite in other responsible companies who wish to bring about sustainable solutions to modern slavery issues within our industry. Overall, we will continue to ensure that ethical trading stays at the forefront of how we do business and that labour standards considerations, including those relating to forced labour, remain fully embedded within our practices.

This statement has been approved by

Martyn Freeman General Counsel & Company Secretary, BBC Worldwide Ltd on behalf of the BBC Worldwide Board.

31st July, 2017