



ANTI-FRAUD AND CORRUPTION POLICIES

(BBC STUDIOS PRODUCTION AND DISTRIBUTION)

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ANTI-BRIBERY POLICY

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Executive Sponsor: Amanda Jones

Author: Alina Vlad / Ben Rowlands

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Related Policies:

BBC Studios Anti-Fraud and Corruption Statement

BBC Studios Anti-Fraud Policy

BBC Studios Guidance on Avoiding Facilitation Payments

BBC Code of Conduct

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BBC STUDIOS ANTI-BRIBERY APPROACH

BBCS (BBCS) is committed to conducting business in accordance with the highest ethical and legal standards. The integrity of our staff, and those with whom we do business, is critical to our success and to protecting the reputation of the BBC and the BBC brand.

BBCS takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates.

The BBCS Anti-Fraud and Corruption Statement reflects our commitment to uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. In particular, we are committed to compliance with the Bribery Act 2010 and Criminal Finances Act (2017), in respect of our conduct both at home and abroad.

The purpose of this Policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

Individuals involved in bribery and corruption face imprisonment (for example, up to 10 years under UK Law). If BBCS is found to have failed to prevent bribery in relation to its business, it could face unlimited fines and extensive reputational damage. We therefore take our legal responsibilities very seriously.

WHO IS COVERED BY THIS POLICY?

Employees and those working on our behalf

This Policy applies to all individuals working at all levels and grades across BBCS Production and Distribution, as well as UKTV and any majority owned subsidiaries. This includes: senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual staff and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as staff in this Policy).

Third parties

We expect those third parties working on our behalf to adopt a similar zero tolerance approach to bribery when working on our behalf. Third parties are expected to sign up to [The BBCS Anti-Fraud and Corruption Statement](#), or to demonstrate they have adequate procedures and policies in place to meet the requirements of all relevant international anti-bribery legislation, including the UK Bribery Act.

A third party means any individual or organisation you come into contact with during the course of your work. This could include: actual and potential customers, suppliers, licensees, distributors, business contacts, agents, fixers, production service companies, advisers, Independent Production Companies, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Equity investments in independent production companies

Majority owned companies are expected to adopt and comply with this policy. Production companies where BBCS holds a minority interest, are expected to either adopt our policy or have a policy and approach that aligns to ours and meets the expectations of relevant international anti-bribery legislation, including the UK Bribery Act.

WHO IS RESPONSIBLE FOR THE POLICY?

The BBCS Executive Committee (SEC) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The BBCS General Counsel is the senior sponsor of this Anti-Bribery Policy.

Day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness sits with Regional General Managers for BBCS Distribution and MDs and Genre Heads for Production. The BBC General Counsel and the Director of Regulatory and Compliance have primary responsibility for dealing with any queries on its interpretation. BBC management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

BRIBERY RISK ASSESSMENT

New and emerging bribery risks are identified through the quarterly BBCS risk management reporting process and the Ethics and Compliance framework.

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This could be:

- A payment in cash
- A gift, hospitality or entertainment, often extended to include family members
- An offer to pay someone's expenses
- Giving someone a loan
- A favour such as helping obtain a visa or an internship for a relative
- A charitable donation to an individual's charity

Offering a bribe:

- You work in production and offer an artist's agent tickets to a major sporting event, but only if they agree to reduce the advance requested by the artist for his performance
- A similar example in distribution would be to offer the tickets to the major sporting event to a customer who was considering acquiring BBCS content

Both examples could be considered a bribery offence, as you personally are making the offer to gain a commercial advantage. BBCS may also be found to have committed an offence because the offer has been made to obtain business for BBCS. It may also be an offence for the artist's agent or the customer to accept your offer.

Receiving a bribe:

- An example of receiving a bribe would be supplier offering to take you and your family on holiday in return for awarding them with a contract

It is an offence for the supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a public official:

A fixer / local agent that you are using makes a cash payment to a public official to speed up the issuing of a registration licence for a local branch in a remote country. There is no official process for speeding up the issuing of a licence in the country

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for the BBCS. BBCS itself may also be found to have committed an offence, if it has failed to prevent such occurrences negligently.

EXTERNAL HOSPITALITY, ENTERTAINMENT AND GIFTS

This policy does not prohibit the giving or receiving of normal and appropriate hospitality and small gifts. However, the following requirements must be met:

- It complies with the rules for External Hospitality, Entertainment and Gifts contained within the BBCS Expenses Policy.
- No cash or cash equivalent (such as gift vouchers) is offered
- It is appropriate to the circumstances
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- It complies with the rules on facilitation payments in the BBCS Facilitation Payments Guidance and is not being offered a payment to a government official to expedite or facilitate a routine procedure.
- it complies with local law
- it is given openly on behalf of BBCS and not in your name

Third parties offering hospitality, entertainment and gifts when working on behalf of BBCS are also expected to comply with these rules. Guidance is available for third parties on what is and is not acceptable within the BBCS Expenses Policy.

FACILITATION PAYMENTS

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary government action by a government official, when we have already paid for, or are entitled to, that action. Under Sections 1 and 6 of the Bribery Act 2010, bribes and facilitation payments are illegal and the offer of any of these forms of payments in any of the countries in which we operate is against BBCS policy.

BBCS has specific [Guidance](#) on managing the risk of facilitation payment requests. Anyone who works in production or travels overseas on behalf BBCS, is required to review this guidance and act in accordance with it. BBCS zero-tolerance approach to bribery in the case of facilitation payments, involves a policy of resistance, which is achieved in stages. The policy is to refuse to pay facilitation payments unless payment is clearly unavoidable and being made in exceptional circumstances. This would include having to make a payment if faced with a threat of, or fear of, violence or loss of liberty. The safety of our employees is of primary concern in all our operations both at home and abroad. The Guidance issued by the Ministry of Justice on the Bribery Act includes a defence of duress which is stated to be likely to be available in the case of payments made to protect “life, limb or liberty”.

Clear documentation is required for any payments made. The ultimate goal is the elimination of such payments made on behalf of BBCS.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Where practical, and safe to do so, you should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager or your Business and Legal and Business Affairs representative.

DONATIONS

BBCS does not make contributions to political parties or charitable donations, except in relation to designated BBC charities. Any proposal, in exceptional circumstances, to make a charitable donation, must be referred to the Editorial Standards team with BBC Studios Regulatory Affairs at the outset

TRAINING AND COMMUNICATION

Online anti-bribery training is given to staff as part of the BBCS Code of Conduct training portfolio (including the updated Preventing Financial Crime module for BBCS). Regular monitoring and follow up of completion is undertaken for all code of conduct training modules. The training is accessible to high risk third parties such as Freelancers and joint venture companies. Additional tailored training is also delivered face to face to teams facing higher bribery risk and also on request from management or those teams on location who cannot access our systems.

DUE DILIGENCE

Third party due diligence process in place to screen third parties for reputational and compliance risks, including bribery. This is risk based and uses a mixture of internal and external resources, which include database licences and use of reputable companies offering due diligence services.

YOUR RESPONSIBILITIES

All staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

- You must ensure that you read, understand and comply with this Policy
 - The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
 - You must notify your line manager OR your Business and Legal and Affairs representative or follow our process on how to raise concerns.
 - Any employee who breaches this Policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to dismiss staff if they breach this Policy.
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RECORD-KEEPING

- Financial records must be retained of transactions, and appropriate internal controls must be put in place, which will evidence the business reason for making payments to third parties.
- Staff are expected to retain records of all hospitality, entertainment and gifts accepted or offered and ensure they seek the appropriate authorisations per the BBCS Policy.
- All expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with the BBCS Expenses policy and specifically state the reason for the expenditure and the third party who received it.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

RAISING A CONCERN ABOUT BRIBERY OR CORRUPTION

- All staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager OR your Business and Legal Affairs representative.
- It is important that you tell your line manager and your Business and Legal Affairs representative as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are affected by any another form of unlawful activity.
- If you suspect someone else of offering or accepting a bribe then you can report your concerns via our [“Speak Up”](#) process.

Who to speak to: Information about who to talk to and also your options to anonymously report your suspicions via our third party hotline, Navex Global can be found on the **Code of Conduct intranet site**. The site as well as the [Speak up website](#) also contains information on our protected disclosure whistleblowing policy.

Internal contacts:

BBCS Anti-Fraud Contact: You can also speak directly to the nominated BBCS Anti-Fraud contact:

- **Ben Rowlands** Tel: +442084331645 x31645, Email: ben.rowlands@bbc.com
Address: 4B, 1 Television Centre, 101 Wood Lane London W12 7FA

BBC Investigations team:

The email address for Corporate Investigations is BBC.Investigation.Service@bbc.co.uk

And further contact details as well as incident reporting forms are linked on the intranet [here](#).

If the nature of the matter is such that you cannot raise it through internal channels, you can speak confidentially and anonymously to the following external independent organisations:

EXTERNAL ORGANISATIONS

○ **Navex Global**

For the UK, call the external number: **0800 890 011, at the prompt, dial 833 573 1750**

If you are outside of the UK or wish to make a report in a language other than English, [click here: https://bbc.navexone.eu](#)

Or alternatively [report online](#)

PROTECTION

Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

BBCS is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally through our reporting process or the HR grievance procedure.

BRIBERY RED FLAGS

The following is a list of possible bribery red flags that you may encounter during your day-to-day business. You must ensure they are reported to your Line Manager or your Business and Legal Affairs Representative or you can use the "Speak Up" process.

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- you are offered an unusually generous gift or offered lavish hospitality by a third party.