

MODERN SLAVERY STATEMENT

Television Centre



For the purposes of the UK Modern Slavery Act, this is the tenth such statement for BBC Studios Limited (CRN 04463546) and covers lines of business managed through subsidiary companies, including BBC Studios Productions Limited (CRN 09463829), BBC Studios Distribution Limited (CRN 01420028), BBC Global News Holdings Limited (CRN 08176300), UKTV Media Holdings (CRN 07596400) and its subsidiary company UKTV Media Limited (CRN 04266474)¹, BBC Natural History and Factual Productions Limited (CRN 10378537). Links to previous statements can be found at the bottom of this statement.

For the purposes of the Australian Modern Slavery Act, this statement relates to BBC Studios Australia Holdings Pty (ABN: 85 127 624 104, “BBC Studios Australia”), a holding company which is used primarily for consolidated reporting. Its activities are carried out and managed through its subsidiary trading companies: BBC Studios Australia Pty Limited (ABN: 20 129 255 616 for distribution and BBC Studios Productions Australia Pty Limited (ABN: 47 129 527 082) (and its Special Purpose Vehicle subsidiaries) for production. These subsidiaries operate within the same compliance risk assessment framework as BBC Studios Australia Holdings Pty Limited and the same consultation process has been applied across these entities. **BBC Studios Australia Holdings Pty** is a wholly owned subsidiary of **BBC Studios Limited**.

For the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, this statement relates to BBC Studios Limited (CRN 04463546) whose subsidiary, BBC Studios Distribution Limited, is the principal distributor of BBC content to Canadian audiences through the discretionary service television channels (BBC First and BBC Earth, both of which are operated by a

third party partner) and Britbox LLC (Tax ID: 4861966), an on-demand streaming platform. Our commercial activities in Canada are primarily carried out through our subsidiary companies, BBC Studios Canada Limited (BN 3993329-9) and BBC Studios Americas Inc (801059705), both of which are wholly owned and controlled by BBC Studios Distribution Limited and also operate within the same compliance risk assessment framework as BBC Studios Limited.

BBC Studios Limited sets the policies, training, and processes to assess and address modern slavery, forced labour and child labour risks in its supply chains and these are followed by the reporting subsidiaries set out in this statement. The same consultation process has been applied across these entities. They were consulted in the development of this statement.



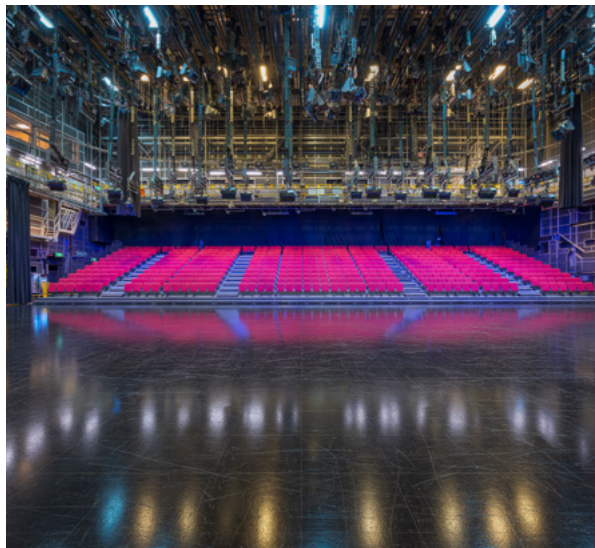
For the purposes of the UK Modern Slavery Act, whilst BBC Studioworks Limited (CRN 03593793) has been in scope for reporting since 2019, this is the first such statement for BBC Studioworks Limited. Both BBC Studios Limited and BBC Studioworks Limited are commercial subsidiaries of BBC Commercial Limited (CRN 04463534) and whilst the maturity of the compliance framework varies, it is recognised that a consistent framework should be applied. Accordingly, implementation work has commenced with BBC Studioworks Limited to ensure consistency in approach to managing modern slavery risks. Details of this work is set out in this statement.

The information set out herein was gathered by BBC Studios Ethical Trading Team in consultation with relevant internal functions including Legal, HR, and Finance.

¹ This entity was dissolved December 2025.



OUR ORGANISATION



BBC Studios Limited (“BBCS”) and **BBC Studioworks Limited** (“Studioworks”) are wholly-owned subsidiaries of BBC Commercial Limited which is wholly owned by the **BBC**, the UK’s publicly funded broadcaster.

For the BBC Group UK Modern Slavery statement, [see here](#).

The purpose of BBCS is to produce and distribute world-class content that informs, educates and entertains, strengthening the BBC both creatively and financially through our commercial activities.

Its commercial activities are divided into two lines of business: **Global Content Studio** and **Global Media & Streaming**.

Content Studio is responsible for creating thousands of hours of television, radio and podcast content for the BBC and other commissioners around the world, as well as the subsequent commercial sale of titles in the UK secondary window and international markets. It also licenses the intellectual property relating to our content to specialist third party companies who produce live events and consumer products based on these brands.

Global Media & Streaming broadcasts and streams our programmes to international audiences on BBCS branded channels and services, including BBC Earth, CBeebies, BBC First, BBC Brit and BBC Kids. It is also responsible for the operation of BBC Global News, which encompasses international news channels and bbc.com. This line of business also includes Britbox International, an on-

demand streaming platform servicing Australia, Americas, parts of Europe and South Africa, and **UKTV Media Holdings**, a commercial multichannel broadcaster operating in the UK and the Republic of Ireland via pay, free-to-air and digital platforms. UKTV is the home for channels such as U& Dave, U&Alibi and U&Eden.

BBCS’ head office is based in London with further regional offices located throughout the UK and the world. A detailed list of our offices can be found [here](#) and [here](#).

BBCS has over 3700 staff in more than 20 offices. Our entities in the UK (including UKTV) have approximately 2810 employees. Our operations in Canada¹ and Australia employ 8 and 96 employees respectively.

Studioworks provides a comprehensive range of studio facilities, post-production services, and technical expertise to leading UK broadcasters and production companies. It employs approximately 100 staff and 122 freelancers. Its studios are home to some of the nation’s most popular programmes, including *Strictly Come Dancing*, *Saturday Night Live UK*, *EastEnders*, *Taskmaster*, and *The Graham Norton Show*. The company operates across multiple sites, including Television Centre in White City, Elstree Film Studios, Kelvin Hall in Glasgow, and Digbeth Loc. Studios in Birmingham. These facilities offer a diverse

mix of multi-camera studios and sound stages, ranging in size from 3,430 sq. ft to 37,000 sq. ft.

The supply chains for our operations and commercial activities are varied and complex. For example:

- In offices and studios, we contract with third parties for key services such as cleaning, catering, and security.
- BBCS Content Studio and Studioworks relies on the services of freelancers predominately for operational roles and support from contractors such as riggers, stagehands, camera operators, cleaners, caterers and security to help make and support our programmes and service our studios and stages.
- BBCS also uses the services of post-production houses for editing services and to deliver our content to UK and international broadcasters. Postproduction houses rely on the services of freelancers and contracts with third parties for key services such as cleaning, catering and security.
- In BBCS’ live events business, we work with licensees who contract with venues for our shows, who in turn often contract with labour service providers, such as cleaners, catering and security.

- In BBCS’ consumer products business, the vast majority of our branded products are produced by licensees who source from manufacturers across the globe. We work directly with a small number of CD, DVD and vinyl manufacturers and distributors. We also purchase goods from third-party suppliers and licensees to serve our modest online retail offering, BBC Shop, which is managed by our New York office and serves the US and Canadian market. As part of that service, we contract with a third-party warehouse for storage and services such as customer service, fulfilment, and shipment of orders.
- In BBCS’ Global Media & Streaming business, we contract with suppliers for a range of broadcast operations relating to our channels as well as the development, operation and distribution of our digital services, such as U and Britbox.

Our approach to assessing this large variety of suppliers is based on where our research shows the greatest risk of labour exploitation may be found. See [Due diligence and effective risk management through our ethical trading programme](#) below.

¹ Our office in Canada closed February 2026.



GOVERNANCE AND OVERSIGHT OF BBCS ETHICAL TRADING POLICY AND PROGRAMME

In keeping with the BBC’s mission and values, BBCS has a strong commitment to ethical trading and corporate human rights.

A team of subject matter experts are responsible for the implementation and management of our Ethical Trading Policy and programme, ensuring BBCS is complying with relevant corporate human rights regulations, and that BBCS operates within the agreed risk appetite with regards to ethical trading. Overall executive ownership of our policy and programme sits with BBCS’ Chief Operating Officer, who also chairs BBCS’ Operations Committee. This committee has responsibility for the company’s risk management process. As part of this process, human rights and supply chain risks are reviewed and challenged on at least a quarterly basis and a risk report is also provided and reviewed by both the [BBCS’ Executive Committee](#) and the [BBC Commercial Board](#).

In relation to Studioworks, overall executive ownership of ethical trading and modern slavery risks sits with Studioworks’ Chief Executive Officer who reports into BBCS’ Chief Operating Officer. Its senior management team (SMT) is responsible for the company’s enterprise risk management process. BBC Commercial Board has oversight of both BBCS and Studioworks.



OUR POLICIES IN RELATION TO MODERN SLAVERY AND FORCED LABOUR

Our [Ethical Trading Policy](#) is central to the way in which BBCS does business and has been since its establishment in 1999.

The policy sets out our commitment to supporting and working with suppliers to prevent and mitigate the risk of modern slavery and our requirements on labour standards within our operations and supply chains, including the requirement for appropriate remedy where workers’ rights have been breached (see [Our approach to the remediation of modern slavery, forced labour and child labour](#) below). It forms part of our standard contracts and purchase conditions with suppliers and licensees.

It is prefaced by a set of Engagement Principles that form part of the criteria by which BBCS determines whether to engage a supplier or partner. These include expectations that third parties engaged commit to improving ethical standards through a due-diligence approach to risk management and meeting our policy standards.

Our Standards are modelled on the ETI Base Code and incorporates key ILO Conventions & Recommendations, as well as the UN Guiding Principles on Business & Human Rights. The first of these standards address forced labour and child labour.

The Standards further oblige suppliers to respect rights of workers to join or form unions and engage in collective bargaining throughout our supply chains. Within our direct operations, BBCS is committed to fostering constructive relations with our [recognised trade unions](#) in line with the BBC’s Charter obligations. Members of trade unions vote on key issues affecting direct

staff like pay offers, pensions, and employment terms and conditions. Meaningful engagement and consultation with trade unions and their representatives is embedded in all [key policies and procedures](#) governing employment with BBCS.

The [BBC Code of Conduct](#) further enshrines our commitment to responsible business conduct, ensuring staff and partners are empowered in doing the right thing and reflecting of the values of the BBC in our commercial engagements. The [BBC Sustainable Supply Chain Code of Conduct](#) further reiterates our commitment to collaborating with our partners in the responsible management of human rights risks.

The Ethical Trading Policy and BBC Code of Conduct have recently been adopted by BBC Studioworks and work on effectively implementing these will begin in financial year 2026/27.



DUE DILIGENCE AND EFFECTIVE RISK MANAGEMENT THROUGH OUR ETHICAL TRADING PROGRAMME

IDENTIFYING SALIENT RISKS

BBCS’ Ethical Trading Team operates an ethical trading programme which incorporates due diligence and regular risk assessment processes. Utilising data from a range of resources (including independent third-party assessments, independent third party risk assessment platforms, licensee self-assessment questionnaires, global indices, NGO and academic reports, and internal data) and assessing the geographical region and/or sector in which our activities are taking place, the BBCS Ethical Trading Team continuously identifies and prioritises those areas of our operations where the risk of exploitation may be greater and manages response accordingly.

Our prioritisation and assessment in identifying and managing risk take into account: i) the likelihood and severity of potential/actual adverse human rights impacts on workers and stakeholders as direct/indirect results of our commercial activities, and ii) the likelihood of adverse reputational and operational impacts on our business arising from risks identified in our supply chain.

Activities which result in the manufacture of physical product has been identified as presenting the greatest risk for exploitation for workers including those with identified vulnerabilities (e.g. relating to migrant status, gender, and/or indirect recruitment). Therefore, these supply chains are a priority for the

business, especially those associated with BBCS’ Licensed Consumer Products business, due to the volume of product it generates and the large geographical spread of its supply chain.

The majority of the factories that manufacture these products are located in the following countries: China, Brazil, India, United Kingdom, Bangladesh, United States, Vietnam, Portugal, Australia, and Turkey.

This assessment process enables BBCS to identify those risks most salient to these supply chains. Whilst we recognise these risks can appear throughout all tiers of the supply chain, BBCS’ programme and mitigation actions focus on the management of Tier 1, where BBCS has most leverage to address risks where they present. A core mitigation of these risks (which are most salient within our apparel, toys, homeware, and food supply chains) is our Ethical Trading Policy and Programme (see [BBCS’ Ethical Trading Programme: Assessment Process](#) below) which is embedded in all standard contracts with licensees.

BBCS has not found instances of forced labour in its supply chains this financial year, though recognises that indicators of other salient risks can also be indicators of forced labour and modern slavery. Accordingly, it has implemented specific mitigating actions regarding salient issues identified as set out in the table on the right.

SALIENT ISSUES	HOW RISKS CAN APPEAR IN OUR PRODUCT SUPPLY CHAINS	FINDINGS IN BBCS SUPPLY CHAIN FY 25/26	REGIONS TYPICALLY IMPACTED IN BBCS SUPPLY CHAINS	MITIGATIONS
Forced labour	Involuntary Overtime	0	China, Bangladesh, Vietnam, India, United States	- BBCS conducts desk-based due diligence including academic and NGO reports, sanction lists (including prohibited entity lists). - Use of certified and recycled materials (e.g. cotton) mitigates against raw materials risks. - Adverse media screening is conducted on licensees, and their traceability and mitigating actions are reviewed through due diligence questionnaires. - BBCS has no approved manufacturers in Myanmar.
	State-imposed forced labour	0	China, Myanmar	
	Recruitment fees paid by workers	0	Thailand, Vietnam, Cambodia, India, Bangladesh	
Working hours	Extreme consecutive days worked, risking worker safety	15	China, Bangladesh, Brazil, Vietnam, Cambodia, South Africa, Colombia, India,	- Where high working hours are found, BBCS works with partners to ensure working hours action plans, including those monitored by third party certification bodies/labour standards experts, are in place to manage and reduce these sustainably overtime. - Working hours and progress against plans are monitored on a yearly basis.
	Extreme weekly hours worked, risking worker safety	25	China, Cambodia, USA, Bangladesh, Vietnam, India	
	Insufficient rest periods provided, risking worker safety	2	Bangladesh, China, India, Vietnam.	
Unsafe workplaces	Inadequate fire safety/emergency measures in place	24	China, Vietnam, Cambodia, Brazil, Indonesia, Pakistan, South Africa, Sri Lanka, Bangladesh	Where audits show serious health & safety risks to workers, BBCS requires evidence of verified third party closure of issues, including measures implemented for prevention and mitigation of the risk of future harms, before approving the site for use.
	Extreme heat/inadequate temperature management systems	4	Cambodia, Brazil, Bangladesh	
	Other serious risks to worker health and safety	9	Bangladesh, Cambodia, India, China, South Africa, UAE.	
	Delayed payment of wages	1	Cambodia, Bangladesh	
Wages and benefits	Inappropriate wage deductions (<i>including for disciplinary purposes</i>)	3	Ecuador, Mexico, Cambodia	- BBCS maintains an “employer pays” principle for all work-related fees. - Payment of work-related fees are monitored in third-party audits. - Where found, BBCS engages licensees to ensure the verification of proper reimbursement and that management systems changes are effected to mitigate risks of future reoccurrence. - Through our engagements with multi-stakeholder initiatives, BBCS is updated on legislative changes regarding minimum wages in our licensees’ top sourcing countries. - Where appropriate, we engage licensees to ensure they are supporting their manufacturing sites in complying with minimum wage changes where they arise.
	Work-related fees paid by workers (<i>excluding recruitment fees</i>)	5	Turkey, Thailand, Vietnam	
	Incorrect/insufficient provision of wages & benefits (<i>including overtime</i>)	7	Vietnam, Bangladesh, Cambodia, India	
	Minimum wage violations	3	South Africa, Bangladesh, India, Cambodia	
Vulnerable workers	Child labour	0	Vietnam, China	- As part of BBCS standard operating protocol for where child labour is found, labour standards experts engaged support manufacturers in effecting management systems changes to prevent future cases of child labour. - See Our approach to the remediation of modern slavery, forced labour and child labour below.
	Young workers worker night shifts	2	Vietnam, China	
	Young workers assigned unsuitable work	2	Vietnam, China	
	Special protections & benefits not in place for young workers	2	Vietnam, China	
	Mismanagement/discrimination of vulnerable workers (<i>e.g. migrant, temporary, agency workers</i>)	2	China, India, Bangladesh, India, Vietnam, Malaysia	
Freedom of association	Infringements to the independence of unions/ worker representatives	2	Mexico, Bangladesh, India	- BBCS continuously reviews risks related to freedom of association in countries where we have a manufacturing presence. - Whilst we have limited leverage to mitigate related risks at root cause, we have recently updated our Ethical Trading Policy (which binds our licensees and their manufacturers) to strengthen protections for workers engaged in collective bargaining in our supply chain.
	Infringements on rights of workers to form unions	0	United States, India, Bangladesh	



The risks of forced labour, child labour, and other modern slavery risks in these supply chains are further impacted by the following factors:

1. the ongoing concerns arising from those sourcing regions where the employment of migrant workers is common and regulated contrary to best practice;
2. increasing instability in sourcing regions due to economic volatility, geopolitical unrest and impacts of climate change;
3. the changing employment landscape for the workforce that has historically supported the manufacturing industry; and
4. the growth of our licensed consumer products business and increased manufacturing sites resulting from the success of key BBCS’ brands.

To assess and mitigate these risks, BBCS adopts a collaborative and continuous improvement approach to supply chain management.

As a licensor, BBCS do not directly manage the relationships with its licensees’ manufacturing sites. This means BBCS has limited knowledge of downstream suppliers and manufacturers beyond tier 1.

As such, we work closely with our licensees (who have greater leverage over these manufacturers than BBCS) to review their ethical trading controls to manage their supply chain risks (including their policies and processes, engagements with unions and worker representatives, risk assessments, and available internal expertise), and where relevant, assess their proposed manufacturing sites.

As part of our collaborative approach, we endeavour to engage our licensees on a regular basis through surveying exercises and other forms of engagement to further identify and assess where risks are most salient in their supply chains. Insights generated from these engagements inform our own risk assessments, help ensure we are effectively prioritising the management of the most salient supply chain risks, and enhance our understanding of risks beyond Tier 1 where we have limited visibility.

CASE STUDY: ENGAGING STAKEHOLDERS TO INFORM PROGRAMME CHANGES

In financial year 2025/26, we surveyed 304 licensees through our Due Diligence Questionnaire on our partners’ policies and processes, supply chain visibility & traceability beyond Tier 1, and due diligence & risk assessments undertaken. These insights informed recent changes to our Ethical Trading Programme (see BBCS Ethical Trading Programme below). In financial year 2026/27, the Ethical Trading Team will work with commercial teams to ensure this questionnaire is completed on a regular basis for all new/renewing licensing partners.

BBCS’ ETHICAL TRADING PROGRAMME: ASSESSMENT PROCESS

The BBCS Ethical Trading Team operates a risk-based ethical trading programme designed to monitor the effective implementation of our policy standards. It applies to all business areas contracting goods and services and/ or are involved in the physical manufacture of product, including our Licensed Consumer Products Business, which accounted for 96% of onboarding/assessment activity in the programme this financial year.

A key element of our programme includes utilising annual, independent, labour standards audits for proposed manufacturing sites located in higher-risk countries and sectors. For lower risk regions an Employment Profile Assessment (EPA) is used to identify any risk indicators of forced labour and other serious issues to determine if further due diligence may be required.

All first-tier manufacturing sites are required to have undergone a third-party labour standards audits or EPAs (depending on geography) to determine whether the proposed sites meet BBCS policy standards. Where non compliances (including issues indicating a manufacturer is falling below our standards are identified, appropriate remediation in line with our Remediation Principles is put in place on a case-by-case basis (see [Our approach to remediation of modern slavery, forced labour and child labour below](#)).

Where possible and appropriate, we engage third-party supply chain stakeholders who have greater leverage over our licensees’ proposed manufacturers (e.g. our licensees’ retailers) to address risk collaboratively and verify remedial actions undertaken. Our programme also includes the use of secondary, forensic assessments to enhance our due diligence procedures where needed. We instruct third-

party auditing firms and labour standards experts to ensure the integrity and verification of audit findings where appropriate. All events, actions and outcomes of BBCS due diligence and assessment processes are captured in our ethical trading database, which is linked to BBCS’ online product approval system for our licensed consumer products business, meaning production approval cannot be granted to a licensee until the Ethical Trading Team has completed due diligence and approved a manufacturer. This link helps drive the effectiveness of our programme by motivating licensees to make improvements in their supply chains to avoid delays in their product development process.

CASE STUDY: RESPONSIBLE SUPPLY CHAIN MANAGEMENT & ADDRESSING RISK COLLABORATIVELY

In FY 2024/25, inconsistent working hours and wage records were found through an audit conducted for BBCS at new manufacturer proposed by a licensee’s supplier. Following an enhanced third-party verification directed by BBCS, workers were found to be working extreme hours at the site, a key risk indicator for worker exploitation.

BBCS engaged with the partner, its supplier, and their manufacturer to enrol the manufacturer in an ongoing capacity-building and management training programme with a third-party labour standards consultancy. In FY 2025/26, the manufacturer continued to engage with the programme and has implemented positive changes in management systems, including the maintenance of complete and accurate records.

ADVANCED ETHICAL TRADING PROGRAMME

BBCS recognises that its licensees’ manufacturing sites may be shared with other stakeholders such as retailers and other brand owners, and as such, our assessment requirements can present as duplicated compliance processes which may disproportionately burden manufacturers and pressurise our licensee’s purchasing practices, leading to adverse effects on working conditions (e.g., higher working hours to meet

rushed orders). To mitigate this risk, BBCS has implemented a new programme stream, the Advanced Ethical Trading Programme, which applies to those licensees’ supply chains where equivalently robust monitoring and verification efforts are already being carried out on a continuous basis by our licensees and their retailers.

Under the Advanced Programme, licensees who demonstrate to BBCS that they independently operate mature ethical trading controls equal to or exceeding that of BBCS do not submit manufacturer audits to BBCS for approval. Instead, they ensure BBCS policy standards are met whilst onboarding and commit to maintaining their own manufacturer due diligence and ensuring their declared manufacturers continue to meet BBCS ethical trading requirements, including through reviewing up-to-date independent audits against BBCS policy standards on a yearly basis. They remain obliged to notify BBCS where breaches of BBCS policy standards occur and verifying appropriate remedial or corrective action in cases of breaches.

This approach allows BBCS to leverage existing best practice and remain effective in prioritising the management of risks in those supply chains where equivalent controls are not yet in place. To manage potential risks arising from this approach, BBCS maintains regular dialogue with licensees on their supply chains risks and changes in manufacturer bases. BBCS also screens manufacturing sites against its internal database to identify any historic or current concerns with a proposed site and retains rights to audit, refuse approval of use of manufacturing site, or direct further verifications for manufacturers where necessary. As of 31 March 2026, there are 10 licensees streamed in the Advanced Programme, accounting for approximately 11% of active and approved manufacturers. As part of the onboarding process, BBCS confirmed BBCS policy standards were being applied.



OUR APPROACH TO THE REMEDIATION OF MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR

If issues contravening our policy standards (including the use of forced labour or child labour) arise in our supply chains, we work with our licensees and suppliers on the necessary actions that they and their suppliers must take to address, mitigate, and where appropriate, remediate identified issues as stipulated by the Remediation Principles, which are aligned with UNGP, OECD, and ILO principles, set out in the Ethical Trading Policy.

These principles include the requirement that all remedial and corrective actions prioritise the wellbeing of affected workers, are carried out without prejudice to workers’ rights and state-based remedial processes and not result in loss of income for affected workers. Our suppliers are obliged to prioritise engagement and cooperation in remediation processes over termination of an agreement.

Remediation efforts can include the engagement of expert consultancies to address issues such as child labour and/or for monitoring the implementation of an action plan developed in consultation with third-party labour standards experts.

In the financial year 2025/26, no cases of forced labour or child labour cases were found in manufacturing sites approved for use by BBCS. The Ethical Trading Team have not found that the steps taken by BBCS to eliminate forced or child labour risks have resulted in loss of income for vulnerable families.

ADDRESSING CHILD & UNDERAGE LABOUR

Historically, where BBCS has identified child/underage labour in sites proposed to BBCS through its assessment processes, it has supported partners in implementing a child labour remediation plan that aligns with the Child Labour Operational Procedures devised by Impactt Limited, which are aligned with ILO remediation principles and which BBCS has adopted as a standard operating protocol. Steps include the engagement of worker’s parents/guardians, the payment of a monthly stipend equivalent to wages earned in employment, and the offer of employment once the worker reaches working age. In all such cases, third party expertise was engaged to assess findings and monitor remedial actions.



OUR APPROACH TO MEASURING THE EFFECTIVENESS OF OUR PROGRAMME

To further monitor and measure progress as well as the effectiveness of our programme we track a number of KPIs and trends for the business.

These include:

Training attendance rates

Number of ethical trade grievances (by topic) received

Number of factories by sourcing country

Number of audits where findings below our standards have been identified (by type)

Occurrence and type of non-compliances with our minimum standards per sourcing country (including those that are indicators of forced labour or child labour)

Number of findings below our standards that have been satisfactorily remediated

By regularly reviewing these, we are able to determine what further improvements are needed to strengthen our existing controls and processes to mitigate modern slavery, child labour and other forms of labour exploitation risk. These KPIs are also reviewed and challenged by our senior leadership team on at least a quarterly basis.

In the financial year 2025/26, BBC’S Ethical Trading Team identified, through the Ethical Trading due diligence process, 70 manufacturing sites that did not meet the standards of our

Ethical Trading Policy and as such these sites were not approved for manufacture of branded goods. Through our collaborative approach, we saw positive change and improvement in the supply chain: following the verification of appropriate corrective and remediation measures taken by our partners and manufacturers, we were able to subsequently approve 66% of those sites.

As part of our commitment to continuous improvement, BBCS’ Ethical Trading Policy, programme, and related documents are also subject to an annual review by the Ethical Trading team and updates are made when necessary. Any significant changes to the policy or programme are referred to the Chief Operating Officer or BBCS Operations Committee for approval.

It is fundamental to BBCS’ programme that we remain aligned with industry best practice and actively engage in cross-industry efforts to tackle modern slavery, child labour and other forms of labour exploitation in our supply chains. Therefore, we are members of the **Ethical Trading Initiative** (ETI) and **Sedex**, all of which are multi-stakeholder initiatives that bring together like-minded companies to tackle labour exploitation risks through collaboration and action.



SPEAK UP CULTURE

Our Code of Conduct programme encourages a “speak up” culture through, amongst other things, our [Whistleblowing Policy](#) and related reporting mechanisms, which includes a number of routes for employees and third parties to confidentially raise concerns related to modern slavery and labour exploitation.

Any grievance raised via these mechanisms is investigated following strict protocols and appropriate action is taken to remediate any issues. In financial year 2025/26, no reports were received in relation to modern slavery via the whistleblowing grievance mechanism.

BBCS’ Code of Conduct online training, which was developed internally in consultation with key subject matter experts such as the Ethical Trading team is mandatory for all employees and freelancers and completion is monitored by BBCS’ Operations Committee. It provides a general introduction to key company policies and includes an overview of ethical trading that sets out the expectations and processes that we require all staff and freelancers to meet. The content of the course is refreshed every two years. As of 2nd Apr 2026, this training was completed by 98.4% of the total population required to complete it (including employees of Studioworks). A version of this training was made available via ScreenSkills in financial year

2025/26 to ensure freelancers in the production industry are aware of BBCS’s standards and expectations ahead of commencing work with BBCS.

Teams in those business areas identified as higher risk for modern slavery and other forms of labour exploitation, such as the consumer products, are also required to attend workshops developed and presented by the Ethical Trading Team (delivered virtually or face-to-face). The Ethical Trading team also provides training to key external agents, partners, and licensees to ensure that our policy, standards, and requirements are communicated.

Guidance documents on our policy and programme are provided to support BBCS’ employees and partners. Where specific issues arise that impact our supply chains, BBCS Ethical Trading Team also develops targeted guidance to provide additional support.





ACTIONS UNDERTAKEN IN THE LAST FINANCIAL YEAR & PROGRESS AGAINST KPIS

UPDATED LABOUR STANDARDS RISK ASSESSMENT FRAMEWORK

The BBCS Ethical Trading Team undertook a comprehensive review of the criteria and assessment framework by which it assesses the labour standards of proposed manufacturers. This review took into account trends pertaining to the increasing salience of labour standards risks arising from the effects of climate change.

REVIEW OF BBCS ETHICAL TRADING POLICY

The BBCS Ethical Trading Policy was reviewed and updated in consultation with BBC Group to ensure alignment in standards. Key changes include the consolidation of policy standards for clarity and consistency, the introduction of new standards and commitments with regards to remediation, bolstered health & safety provisions that address the effects of climate change and extreme weather on workers, and greater articulation of protections for workers engaging in collective bargaining.

DUE DILIGENCE QUESTIONNAIRE

As part of BBCS’ commitment to continuous improvement of its Ethical Trading Programme, BBCS implemented a refreshed due diligence process with its licensees to help facilitate greater collaboration in the responsible management of our supply chains. BBCS ambition was for an 80% response rate to our questionnaire and 100% engagement of our top 20 global licensees by revenue. As of 31st March 2026, 304 licensees (72%) have responded to the questionnaire with 100% engagement of our global 20 licensees by revenue. BBCS is pleased with this outcome given the request to complete the questionnaire came at a time when licensees were prioritising and navigating complex external trading pressures. The information generated from the self-assessment

questionnaires will help inform improvements to BBCS Programme for financial year 2026/27.

IMPLEMENTATION OF ADVANCED PROGRAMME

Results from recent due diligence exercises and engagement (including from our Due Diligence Questionnaire) show there has been greater investment and maturity in the human rights risk management frameworks of some of BBCS licensing partners. In financial year 2025/26, BBCS introduced a more collaborative approach to our ethical trading programme (the Advanced Ethical Trading Programme) for select licensees who operate programmes/ethical trading controls that are equivalent to or exceed BBCS’ own. See more in [Advanced Ethical Trading Programme](#) above.

ENGAGEMENT IN INDUSTRY INITIATIVES

As part of our engagement with the Ethical Trading Initiative, BBCS continued to participate in the Just Transition working group to enable greater understanding and learning in this area. The learning has helped shaped BBCS risk assessment process and areas such as extreme heat which is now addressed in BBCS’ Ethical Policy.

LOOKING AHEAD

BBCS is committed to ensuring a high standard of ethical practices across its global businesses and throughout its supply chains. BBCS Ethical Policy and Ethical Trading Programme are designed to ensure it is effectively identifying, preventing and responding to modern slavery risks in its operations and supply chain. To help achieve this, BBCS sets key objectives for its programme. These include:

OBJECTIVE	WHAT SUCCESS LOOKS LIKE
Governance and leadership: senior level oversight of ethical trading/modern slavery risks across company’s operations and supply chain	- Quarterly review of modern slavery risks by BBCS Operations Committee - Senior level engagement in risk assessment process and business operating within agreed risk appetite
Policy, Training and Awareness material: Effective policy in place setting out our expectations and regular training to staff to ensure understanding of their obligations and BBC process and standards	- Remains up to date and reflective of external legislative landscape - Above 90% of completion of training by employees and freelancers 80% of selected licensees participate in collaborative dialogue with BBCS - Annual review of policy
Grievance mechanism: effective ethical culture within our company and awareness of BBC Whistleblowing reporting channel to report modern slavery concerns without fear of retaliation	- Promotion of the whistleblowing channel across various internal and external platforms such as BBC website - Awareness of grievance mechanism and ways to report (above 60% of staff confirm awareness in staff survey) 0% of cases reported via the whistleblowing process, report retaliation
Monitoring and Auditing: arrangements in place to ensure effective identification and mitigation of risk.	- As part of the standard Ethical Trading Programme, 100% manufacturers in higher-risk territories undergo annual labour standards audits that are reviewed against and meet BBCS policy standards 100% of licensees participating in the Advanced Programme have measures in place that meet or exceed BBCS standards
Response and Corrective Action: to mitigate reoccurrence and remediate risk	- Where a breach of BBCS process has been identified, 100% of cases to submit a qualifying labour standards audit or EPA - Where independent labour standards audits or EPA’s identify areas which fall short of standards in BBCS Ethical Policy, BBCS works with 100% of licensees to verify corrective action - Where breaches of BBCS standards are identified, corrective measures (including those implemented to prevent future harm) must be in place in 100% of cases before approving the site for use

BBCS regularly reviews performance against its programme objectives to confirm its policy and programme is effectively managing modern slavery risks.

As part of BBCS commitment to continuous improvement, BBCS at least on an annual basis identifies assurance monitoring reviews and opportunities for further improvement. For FY 2026/2027, BBCS will:

Explore the use of new and emerging technology to assist key aspects of its programme such as risk assessment whilst factoring in effectiveness, proportionality, costs and benefits.

Consolidate and revise its guidance documents and awareness materials to better support its colleagues and key stakeholders. Updated guidance will be implemented across 100% of key stakeholders.

Review effectiveness of BBCS’ speak up/ grievance awareness programme for vulnerable workers working in BBCS facilities and identify any enhancements to the existing programme.

Bolster our supply chain risk mapping exercise with data collected through collaboration with key stakeholders and learnings derived from

participation in key industry group such as the Ethical Trading Initiative.

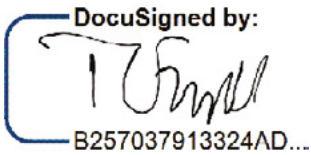
Support Studioworks to embed a proportionate Ethical Trading Framework into its operations prioritising:

- The effective implementation of the BBCS Ethical Trading Policy
- A holistic ethical trading risk assessment process to ensure all salient risks are identified and effectively mitigated
- Strengthening of its due diligence process with third party suppliers of services to ensure third parties are aware of BBCS Ethical Policy and can meet the standards set out therein

BBCS remains proactive in engaging with industry organisations and partners to develop, support and participate in collaborative responses to modern slavery and child labour risks whenever possible, and will continue to do so in the next financial year.

Previous BBCS UK Modern Slavery Statements can be found [here](#).

This statement was approved by the board of BBC Commercial Limited on 29 April 2026.

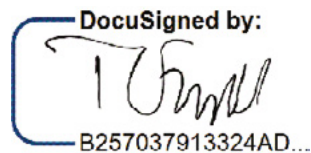
Signed by: 

Tom Fussell
Director of BBC Commercial Limited

Date: 21 May 2026

ATTESTATION STATEMENT

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity in scope of the Act, BBC Studios Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed by: 

Tom Fussell
Chief Executive Officer, BBC Studios Limited

Date: 21 May 2026

I have the authority to bind BBC Studios Limited.