

BBC Studios Modern Slavery Statement 2024/25

This statement has been prepared and published on behalf of BBC Studios Limited for the financial year ended 31 March 2025 in accordance with the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024.

For the purposes of the UK Modern Slavery Act, this is the ninth 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), BBC Studios Productions (Clifton) Limited (CRN 11991655), BBC Natural History and Factual Productions Limited (CRN 10378537), and those independent production companies in which we hold shares. 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 Holdings (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. BBC Studios Production Australia Pty Limited also owns and controls Werner Film Group Holdings Pty Ltd (ABN 63 675 650 236). 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. They were consulted in the development of this statement. [BBC Studios Australia](#) Holdings Pty Holdings is a wholly owned subsidiary of [BBC Studios Ltd](#).

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

Our organisation

[BBC Studios Limited](#) is a wholly owned subsidiary of the [BBC](#), the UK's publicly funded broadcaster. For the **BBC Group UK Modern Slavery** statement, [see here](#).

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

Our commercial activities are divided into two lines of business: Production & Distribution and Global Media & Streaming.

Production & Distribution 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 BBC Studios' branded channels and services, including BBC Earth, BBC Knowledge, 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 [UKTV Media Holdings](#), a commercial multichannel broadcaster operating in the UK and the Republic of Ireland via pay, free-to-air and digital platforms, and Britbox International, an on-demand streaming platform servicing Australia, Americas, parts of Europe and South Africa. UKTV is the home for channels such as U& Dave, U&Alibi and U&Eden.

BBC Studios' 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](#).

BBC Studios Limited has over 4000 staff across its 21 offices. Our offices in the UK (including UKTV) have approximately 3300 employees. Our office in Toronto, Canada has 10 employees and our office in Sydney, Australia has 92 employees.

Our operations and supply chains

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

- In our offices, we contract with third parties for key services such as cleaning, catering and security.
- Production relies on the services of freelancers and support from contractors such as riggers, stagehands, caterers and security to help make our programmes, as well as post-production houses for editing.
- In Distribution, we use the services of post-production houses to deliver our content to UK and international broadcasters.
- In our 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.
- Within consumer products, 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 our channels and digital services, 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.

Governance and oversight of BBC Studios' Ethical Trading Policy and programme

In keeping with the BBC's mission and values, BBC Studios 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 with overall executive ownership sitting with our Chief Operating Officer, who also chairs BBC Studios' 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 [BBC Studios' Senior Executive Committee](#) and the [BBC Commercial Board](#).

Our policies in relation to modern slavery and forced labour

Our [Ethical Trading Policy](#) is central to the way in which BBC Studios does business and has been since its establishment in 1999. Modelled on the ETI Base Code, it references key ILO Conventions & Recommendations as well as corporate human rights legislation and frameworks, such as the UK and Australian Modern Slavery Acts, and the UN Guiding Principles on Business & Human Rights.

The policy sets out our requirements on labour standards within the supply chains of our licensees and suppliers and includes the requirement for appropriate remedy where workers' rights have been breached.

It is prefaced by a list of minimum standards (Core Requirements of the Policy) that suppliers must meet to be considered for approval. The first two of these address forced labour and child labour. The policy forms part of our standard contracts and [purchase conditions](#) with suppliers and licensees.

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](#), published November 2024, sets out our commitment to collaborating with our partners in the responsible management of human rights risks.

Due diligence and effective risk management through our ethical trading programme

BBC Studios' 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 and internal data) and assessing the geographical region and/or sector in which our activities are taking place, we continuously identify and prioritise those areas of our operations where the risk of exploitation may be greater and manage our response accordingly.

Our prioritisation and assessment in identifying and managing risk takes 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 as a result of risks identified in our supply chain.

BBC Studios has identified those activities which result in the manufacture of physical product as presenting the greatest risk for exploitation for workers. Therefore, these supply chains are a priority for the business, particularly those associated with our 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, India, Brazil, Bangladesh, United States, Portugal, Vietnam, United Kingdom, Turkey, and Mexico.

This assessment process enables BBC Studios to identify those risks most salient to these supply chains. Those risks can be summarised as follows:

Risk:	How these risks could appear in our product supply chains:	Sourcing regions typically impacted:
Forced Labour	Involuntary overtime Withholding workers' passports State-imposed forced labour Restricted movement Recruitment fees paid by workers	Asia, Americas, Europe
Working hours	Excessive and extreme weekly hours/consecutive days worked risking worker safety Insufficient rest periods provided	Asia, Americas
Unsafe workplaces	Failing to provide appropriate PPE Disabled and/or missing safety mechanisms on machinery Inadequate fire safety and emergency measures in place Failing to store chemicals safely	Asia, Americas
Wages and benefits	Delayed payment of wages Wage deduction used as disciplinary method Incorrectly calculated overtime pay Failure to pay overtime wages Inappropriate payment of work-related fees by workers (including recruitment fees) Incorrect provision of wages and benefits	Asia, Americas
Vulnerable workers	Workers under legal working age Young workers working night shifts Young workers assigned unsuitable work Apprenticeships/work experience programmes being inappropriately managed Temporary/agency/migrant workers being inappropriately managed	Asia, Americas

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 resulting from the success of key BBC Studios' brands.

To assess and mitigate these risks, BBC Studios adopts a collaborative and continuous improvement approach to supply chain management, acknowledging that not everyone is immediately able to meet our standards in full. However, we take a zero-tolerance approach to the most serious rights abuses as set out in our Core Requirements, including forced labour and child labour, and these issues must be addressed and remediated before BBC Studios can start working with a supplier.

As a licensor, we do not directly manage the relationships with these factories and so must work closely with our licensees to assess their proposed sites and identify and mitigate areas of concern.

A key element of our programme includes utilising annual, independent, ethical trade audits for 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 undergo this assessment process and where non-compliances (including issues that fall below our minimum standards) are identified, then appropriate remediation is put in place on a case-by-case basis. Where possible and appropriate, we engage third-party supply chain stakeholders who have greater leverage over our licensees proposed manufacturers (e.g., our suppliers' retailers) to address risk collaboratively and verify remedial actions undertaken.

All events, actions and outcomes of BBC Studios due diligence and risk process are captured in our ethical trading database, which is linked to BBC Studios' 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 factory. 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.

Our programme also includes the use of secondary, forensic assessments to enhance our due diligence procedure where needed. We instruct third-party auditing firms and labour standards experts to ensure the integrity and verification of audit findings where appropriate.

As we do not have a direct relationship with our licensees' suppliers, we have limited knowledge of downstream suppliers beyond Tier 1. However, we survey our licensees regarding their sourcing structures and locations beyond Tier 1 to establish a more comprehensive understanding of our licensees' sourcing practices, related risks, and mitigations. This helps inform our risk assessment and allows us to address risk more collaboratively. In the past financial year, we surveyed 102 licensees, and the insights generated will inform the actions we take in financial year 2025/26 to improve our Ethical Trading Programme.

Our approach to the remediation of modern slavery, forced labour and child labour

If issues contravening our policy's minimum standards (including the use of forced labour or child labour) arise in our licensee's supply chains, we work with our licensees on the necessary actions that they and their suppliers must take to address, mitigate, and where appropriate, remediate identified issues as stipulated by the Core Requirements of our Ethical Trading Policy.

Such mitigation can include the engagement of expert third-party labour standards 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.

If an underage worker were to be identified at a factory through the BBC Studios due diligence process, we would support our partner in implementing a child labour remediation plan that aligns with the Child Labour Operational Procedures devised by Impactt Limited. In summary, the plan would reflect or include the following points:

- The physical safety and well-being of the child is foremost priority.
- The child should be removed from the workspace immediately, though safeguarding may often dictate that the child stay onsite/in a dormitory in the short-term.
- The child’s parents/guardians should be contacted immediately and ideally asked to come to the site. If they are unable to come to the site, the factory must appoint a dedicated manager to monitor the child.
- The child’s needs will be assessed, and an appropriate plan should be devised to remove the child from the workplace and place them in a quality education programme until they come of working age.
- The child will be paid a monthly stipend equal to the wages they were earning in employment.
- The child should be offered employment back at the site once they come of working age.
- The remediation programme will be independently monitored.
- The employer must not use coercion or threats to deter the child or their family from entering into a remediation programme.

In the financial year 2024/25, no cases of forced labour or child labour cases were found in manufacturing sites approved for use by BBC Studios. We have not found that the steps taken by BBC Studios to eliminate forced or child labour risks have resulted in loss of income for vulnerable families.

Our approach to measuring the effectiveness of our programme

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

- training attendance rates;
- number of ethical trade grievances (by topic) received;
- number of factories by sourcing country;
- number of audits where findings below our minimum standards have been identified (by type);
- occurrence and type of non-compliances with our minimum standards per sourcing country;
- number of findings below our minimum 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 in order 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 a quarterly basis.

In the financial year 2024/25, BBC’S Ethical Trading Team identified, through the Ethical Trading due diligence process, 64 manufacturing sites that did not meet the core requirements of our Ethical Trading Policy and as such these sites were not approved for manufacture of BBC branded goods. Through our collaborative approach and commitment to continuous improvement, we saw positive change and improvement in the supply chain: following the verification of appropriate corrective and remediation measures taken by our partners and suppliers, we were able to subsequently approve 38% of those sites.

As part of our commitment to continuous improvement, BBC Studios’ 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 BBC Studios Operations Committee for approval.

We regularly engage our licensees to assess the effectiveness of our programme and to understand licensees own equivalent programmes through surveys and onboarding processes which help increase our understanding of their supply chains, monitor existing controls and mitigation frameworks, and inform any changes required to our programme.

It is fundamental to BBC Studios' 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 [TV Industry Human Rights Forum](#), the [Ethical Trading Initiative](#) 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 2024/25 there were no reports received related to modern slavery via the Whistleblowing grievance mechanism.

Training

BBC Studios' Code of Conduct online training is mandatory for all employees and freelancers and completion is monitored by BBC Studios' 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. As of 1 May 2025, this training was completed by 96.6% of the total population required to complete it.

Teams in those business areas identified as higher risk for modern slavery and other forms of labour exploitation 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 BBC Studios' employees and partners. Where specific issues arise that impact our supply chains, BBC Studios Ethical Trading Team also develops targeted guidance to provide additional support.

Our actions in the last financial year

In financial year 2024/25, as part of our programme goals, we undertook the following actions to further mitigate the risks of exploitation within our operations and supply chains:

Licensee Due Diligence Questionnaire

To bolster existing due diligence processes, BBC Studios developed new ethical trading and sustainability due diligence questionnaires to its licensees for onboarding and renewal stage. As part of this work, we rolled out a tailored questionnaire to our US and Latin American partners which helped enhance our understanding of the market and augment existing risk assessment frameworks.

Embedded new desk-based research tool to aid identification of supply chain risks

Having explored several digital services and platforms that enhance identification of supply chain risks, BBC Studios implemented the use of a new research tool in our desk-based due diligence processes to more effectively identify human rights risks related to the use of proposed manufacturers.

BBC Sustainable Supply Chain Code of Conduct

BBC Group published its Sustainable Supply Chain Code of Conduct in November 2024. BBC Studios was engaged in the development of this and the standards and commitments in the Code relating to the responsible management of human right risks are in alignment with the expectations set out in the BBC Studios Ethical Trading Policy.

Britbox

Following BBC Studios' acquisition of Britbox International Limited, we have embedded our Ethical Trading Policy programme in its operations. This includes the roll out of our Code of Conduct training and Ethical Trading Workshops. As a result, referrals are being made in accordance with the BBC Studios Ethical Trading processes and requirements.

Engagement in industry initiatives

As part of our engagement with the Ethical Trading Initiative, BBC Studios participated in thematic working groups that explore best practice in areas such as Responsible Purchasing Practices and Just Transition, enabling greater learning in these areas and fostering collaboration in responding to ethical trading risks.

Looking ahead

BBC Studios is committed to continuous improvement of its Ethical Trading Policy and programme. As part of this, we will continue to monitor, review and update our due diligence processes to improve our assessment and management of modern slavery and child labour risks in our supply chains.

In the coming year, our goals for our programme include:

- **Bolstering engagement with our licensees.** We will use the findings from the new due diligence questionnaire to identify opportunities to leverage the expertise and existing best practice processes of our partners in order to facilitate greater collaboration in the responsible management of our supply chains.
- **Continue to bolster supplier engagement with the BBC Sustainable Supply Chain Code of Conduct** and further integrate environmental and human rights considerations in our due diligence practices in a more holistic manner. As part of this work, we will consolidate and revise our guidance documents and awareness materials to better support our colleagues and partners.

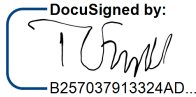
BBC Studios Ethical Trading Team have set Key Performance Indicators to monitor progress towards these goals which includes 80% response rate to our questionnaire and 100% engagement of our top 20 global licensees by revenue.

BBC Studios 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 BBC Studios UK Modern Slavery Statements can be found [here](#).

This statement was approved by the BBC Studios Board on 13 May 2025.

Signed by:

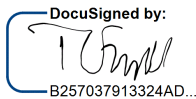
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Tom Fussell
Chief Executive Officer, BBC Studios Limited
Date: 13 May 2025

Attestation Statement

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Office of BBC Studios Limited, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. 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 within this report.

- Tom Fussell
- Chief Executive Officer, BBC Studios Limited
- Date: 13 May 2025
- Signature:

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I have the authority to bind BBC Studios Limited.

Previous BBC Studios Modern Slavery Statements can be found [here](#).