

BBC GROUP MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDED 31 MARCH 2024

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the BBC Group's ninth statement setting out the work undertaken during the financial year ended 31 March 2024 to further prevent, identify and address modern slavery across the organisation and its supply chains.

1. ORGANISATION

The BBC is one of the largest public service broadcasting organisations in the world. Its mission, public purpose, commitments and governance are set out in the Royal Charter and it is regulated by Ofcom, the communications regulator. The BBC uses the income from the licence fee to provide television, radio and online services. The BBC Group comprises the public arm of the BBC, as well as BBC commercial subsidiaries which operate in the UK and internationally-most notably, BBC Studios and BBC Studio Works.

We are committed to ensuring everyone who works for and with us is treated fairly, is able to work safely and has their human rights protected and respected. During 2023/24 there were approximately 22,000 people working for us around the world and thousands more across our global supply chains. Our supply chains are complex, extensive and cover a wide range of products, goods not for resale, and services. We have a responsibility to prevent modern slavery from occurring in any form across our organisation and within our supply chains. We are committed to ensuring our organisational practices and risk-management approach support and facilitate this.

2. APPROACH TO TACKLING MODERN SLAVERY

We have a risk based approach, informed through risk assessment to identify and target ethical issues, including modern slavery, in our organisation and supply chains. 2023 was a challenging year from a geo-political perspective with the ongoing war in Ukraine and conflict in Israel and Gaza. Difficult economic conditions at home with the highest levels of industrial action since the 1980s, along with the cost of living crisis at home and abroad, has continued to be felt both within our organisation and across our supply chains. Whilst this has undoubtedly presented challenges we have ensured that our fundamental approach has remained robust.

In line with our multi-year programme we have structured governance and management arrangements at all levels which are focused on the issue of modern slavery.

• Our work to tackle modern slavery is overseen by our Ethical Trade Working Group, led by Procurement and consisting of stakeholders from key business areas, including those who manage the associated risks on a day to day basis. It drives our multi-year



programme and facilitates collaboration and good practice sharing across the organisation.

- The Ethical Trade Working Group is supported by subject matter experts within the business, and external specialists where beneficial.
- The BBC's Audit and Risk Committee receives an annual update on our activities in relation to tackling modern slavery.
- We continue to collaborate with other media companies through active participation in the TV Industry Human Rights Forum, and learn from other organisations focused on tackling modern slavery, such as the Ethical Trading Initiative.

We continued to promote policies which highlight our ethical requirements with our people and suppliers.

- Policies and guidelines across the BBC Group set out our expectations of our people, stakeholders and suppliers. These policies are issued at the point of engagement with the individual or supplier, are accessible on our website, and are reviewed periodically.
- Our **Ethical Trading Policy** sets out our expectations of our suppliers. It is aligned with the Ethical Trading Initiative Base Code, and incorporates key International Labour Organisation conventions and recommendations, including clauses covering forced labour. This is referenced in our standard **Supplier Terms of Trade**. The Ethical Trading Policy has been reviewed and updated in 2023/24 and will be published in 2024/25.
- Suppliers are expected to observe the Ethical Trading Policy's requirements and to demonstrate a similar commitment to an ongoing programme of ensuring, and where necessary, improving ethical practices. During 2023/24 we monitored our Ethical Trading Policy to ensure its inclusion in contracts as well as actively discussing our continuing expectation with already existing suppliers.
- In 2023/24 our internal **Code of Conduct, continued** bringing together our standards, policies and processes for all staff. This document has been updated in line with our BBC Value For All strategy One of our values is to be accountable which includes observing the highest ethical standards with our suppliers and other partners. Through our Code of Conduct we commit to only contracting with parties who reach our standards with regards to labour and working conditions.
- Our Responsible Procurement Strategy, published in 2023 and aimed at existing and future suppliers to the BBC, emphasises our commitment to identifying and targeting ethical issues, including modern slavery.
- Our **Whistle Blowing Policy** confirms the BBC's commitment to maintaining the highest standards of ethics, honesty, openness and accountability and set out procedures for raising concerns in relation to, amongst other things, acts of abuse or exploitation.

Our approach remained risk-based, targeted to where people are most at risk.

• During 2023/24 we have reviewed and updated our ethical risk assessment and mitigation process. The process is made up of 3 core steps: (i) an annual risk assessment exercise to identify priority operations and supply chains; (ii) continued due diligence



checks on suppliers within this priority group; (iii) a continuing testing, monitoring and reporting regime.

- The BBC's Ethical Trade Risk Assessment is conducted annually by our Ethical Trade and Procurement teams, and aims to assess modern slavery risk in our supply chain in order to better direct our efforts to combat this. It considers where workers are more likely to be at risk of ethical issues, including modern slavery, based on the type of product or service being provided, their geographic location and any known previous issues. For our suppliers, we also considered their relationship with us in terms of scale and type.
- Our risk assessment methodology continued to align with the International Labour Organisation risk categorisations and industry best practice.
- From the completed risk assessment, we identified our risk is greater in our supply chain categories of print and promotional merchandise, couriers, hotel and conference services, private hire taxis, and events and exhibitions. Our due diligence measures described below focused on these areas.
- BBC Studios continued their ethical trading programme which focuses on the risks in their licensing and branded product business. More detail can be found in the BBC Studios 2023/24 Modern Slavery Statement.

Our due diligence processes continued to identify and monitor issues, and work towards their resolution.

- We continue to incorporate a standard set of ethical trade questions into our tender processes. Where there is an increased risk identified through our risk assessment, a further specific question relating to ethical trade is included to evaluate potential suppliers' ethical trade processes and controls.
- We engaged both new and existing suppliers based on our assessment of their responses to our questions relating to ethical trade and modern slavery.

We continue to employ measures to monitor the on-going effectiveness of our programme.

• These measures have been used to monitor compliance with our policies which include a zero tolerance of modern slavery. They include ensuring all contracts reference our Ethical Trading Policy, ensuring relevant tenders include questions on ethical trade (KPIs measure performance in this area) and monitoring the engagement of key suppliers

We have raised further awareness across key internal and external stakeholders.

- In 2023/24 we launched our new 'Our BBC and You' mandatory training for all new starters and existing staff (to be completed every 2 years). The course includes guidance on complying with our Code of Conduct, which sets out our expectations in relation to ethical conduct. Completion rates are monitored and non-completion is followed up.
- With the publication of the Responsible Procurement Strategy we continued to engage directly with key teams and suppliers to help raise their awareness and understanding of the risks associated with modern slavery and the expectation the BBC has in managing these.



• We continue to have a dedicated Modern Slavery area on our intranet where we publish awareness materials alongside communication channels for queries.

3. FUTURE PLANS AND PRIORITIES

We appreciate the significance of our role in helping to identify, prevent and help eradicate modern slavery. We are committed to continuously improving and evolving our practices in relation to operating a responsible organisation, sourcing products and services ethically, and helping to raise standards across the industry.

In line with our multi-year programme, during the next year we will:

- Continue to manage our activity via our Ethical Trade Working Group, and will collaborate with key partners and peers through channels such as the TV Human Rights Forum, to continually enhance our approach.
- Take a risk based approach and revisit our ethical risk assessment annually, in 2023/24 we reviewed and updated our risk mapping and ratings and this will feed into the completion of the 2024/25 Risk Assessment.
- Continue to ensure our supplier relationships contain adequate procedures that comply with our ethical trading policy and all relevant legislation and best practice.
- Update the international bureaux Compliance self-assessment questionnaires, with additional categories including ethical trade.
- Enhance measures used to ensure effectiveness of our ethical trade programme.
- Launch training on Modern Slavery and ethical trade awareness, currently in development, during 2024.Monitor progress of the House of Lords Select Committee on the Modern Slavery Act 2015 and consider any changes to our approach that may be required as a result of their findings.

This Statement was approved by the Board of Directors on 24th June 2024.

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Tim Davie Director-General (on behalf of the BBC Board) BRITISH BROADCASTING CORPORATION 10th July 2024



Footnotes

¹ The year 2023/24 refers to the reporting year 1 April 2023 to 31 March 2024.

Further information

- Previous BBC Group Modern Slavery Statements
- https://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2022.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2021.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2020.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2019.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2018.pdf
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 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2017.pdf
- BBC Studios Modern Slavery Statement (https://www.bbcstudios.com/modern-slavery-statement/)
- BBC Group's businesses and operations (http://www.bbc.co.uk/aboutthebbc/)
- BBC Group's supply chains (http://www.bbc.co.uk/supplying/)
- BBC Group Code of Ethical Policy (http://downloads.bbc.co.uk/supplying/pdf/BBC_Ethical_Policy.pdf)
- The Ethical Trading Initiative Base Code (https://ethicaltrade.org/eti-base-code)
- BBC Group Terms of Trade (https://www.bbc.co.uk/supplying/working-with-us/terms-of-trade/)
- BBC Group policies (https://www.bbc.com/aboutthebbc/reports/policies/)