



OUR SUSTAINABLE SUPPLY CHAIN CODE OF CONDUCT

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Photo from the BBC Earth Experience, produced by Mooneye Productions under licence from BBC Studios

Introduction

As a responsible business, the BBC takes its duty to people, the environment and respect for the planet seriously. We recognise that our impacts extend far beyond the boundaries of our own organisation and this Sustainable Supply Chain Code of Conduct sets out our commitment to integrating environmental and ethical considerations into every aspect of our supply chain. We view a sustainable supply chain as one which is resilient, this means our sustainable supply chain code of conduct extends beyond environmental sustainability to encompass ethical trade, business integrity, diversity & inclusion, data protection as well as information security.

We see this as a call to action, encouraging continuous improvement, innovation and the pursuit of a sustainable and equitable future. We understand that the sustainability journey is ongoing, evolving and most fundamentally will be dependent on collaboration and partnership.

To foster collaboration we see the need to be transparent on what we, as the BBC, are committed to. Throughout this document we share our own commitments on how we plan to reduce our environmental impacts, ensure fair and safe working conditions for all, promote responsible resource management, uphold the highest standards of business integrity, data protection and information security, and drive a diverse and inclusive organisation. We are dedicated to creating a supply chain which is resilient, ethical and sustainable, and through this code we reaffirm our commitment to this.

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Guiding Principles

Our Commitments

What the BBC is committed to as a responsible business across our operations and supply chain

Our Minimum Standards

The minimum standards all suppliers must meet in order to work with the BBC

Our Advanced Expectations

Our aspirations for suppliers as they mature across all aspects of this code

This code of conduct serves to outline our expectations and aspirations for suppliers, and we ask that all suppliers embrace and align with the principles set out in it.

We appreciate certain aspects of our Advanced Expectations will be more relevant to some suppliers than others depending on a number of factors including company size and nature of goods and services supplied. However, we expect all suppliers to meet our Minimum Standards and to communicate these standards to their relevant agents, personnel, sub-suppliers and contractors as well as procure their compliance with them. In the case of an actual, suspected, or potential breach of the Minimum Standards set out in the code of conduct, we expect our suppliers to notify us as soon as possible and in a timely manner and implement a remediation plan in consultation with relevant stakeholders, as appropriate.

Where there are inconsistencies between the Sustainable Supply Chain Code of Conduct and the contract, contractual requirements prevail. For the avoidance of doubt, the BBC reserves the right to audit the Supplier’s compliance with the Minimum Standards of this Sustainable Supply Chain Code of Conduct.

Our Six BBC Values

We have an established set of values for everyone which underpins our mission and purpose. Our six values represent the expectations we have for ourselves and each other, they guide our day-to-day decisions and the way we behave.

Our values are:

AUDIENCES are at the heart of everything we do

CREATIVITY is the lifeblood of our organisation

TRUST is the foundation of the BBC - we're independent, impartial and truthful

We **RESPECT** each other - we're kind, and we champion inclusivity

We are **ACCOUNTABLE** and deliver work of the highest quality

We are **ONE BBC** - we collaborate, learn and grow together

Environment & a Circular Economy - Our Commitments

The BBC is committed to producing internationally renowned content that informs and educates our audiences on environmental issues, whilst minimising our environmental impacts off-screen

Our Commitments

- ▶ Zero waste to landfill across our UK offices by 2026
- ▶ Eliminate single-use plastic across all operations including our productions, buildings and products as set out in our [Statement of Intent](#)
- ▶ 100% delivery of the Climate Content Pledge, committing us to doing more and better climate story-telling on screen across all genres
- ▶ Mandatory Bafta albert certification for all new commissions and recommissions of qualifying TV and Film broadcast content
- ▶ Brief all relevant editorial staff on sustainability by 2025
- ▶ Embed sustainability in our end-to-end procurement processes with weighted questions included in all high impact tenders at a minimum of 5% with the % increasing depending on the nature of goods and services purchased
- ▶ Facilitate “Green Teams” of volunteer staff who are passionate about improving sustainability in the workplace and promoting greener ways of working

Environment & a Circular Economy - Our Supplier Expectations

Our Minimum Standards

- ▶ Comply with all relevant environmental laws and regulations in the jurisdictions where your organisation operates
- ▶ Maintain an up-to-date Environmental policy or strategy or comply with the [BBC Environmental Sustainability Policy](#)
- ▶ Commit to sustainable procurement, embedding environmental sustainability into your key purchasing decisions
- ▶ Promote a culture of sustainability across your business and supply chain
- ▶ Implement the Waste Hierarchy and embrace Circular Economy principles wherever possible
- ▶ Ensure the removal of single-use plastics from all goods and services supplied to the BBC¹ and maximise the use of sustainable materials, avoiding all single-use items wherever possible

Our Advanced Expectations

- ▶ Measure, report and set targets to reduce waste at source and divert unavoidable waste from landfill
- ▶ Design reuse and recycling into goods and products
- ▶ Deliver training to all staff on sustainability in the workplace and best practice and embed training into new employee onboarding
- ▶ Always optimise the packaging used

Decarbonisation - Our Commitments

The BBC is committed to producing internationally renowned content that informs and educates our audiences on environmental issues, whilst minimising our environmental impacts off-screen

Our Commitments

- ▶ Reduce scope 1 and 2 greenhouse gas (GHG) emissions by 46% by FY2030/31 from a FY2019/20 baseline year and scope 3 GHG emissions by 28% within the same timeframe
- ▶ Reduce scope 1, 2 and 3 GHG emissions by at least 90% by FY2050/51 from FY2019/20 baseline year.
- ▶ To achieve our ambitions, we are committed to:
 - ▶ Publishing our Transition Plan by the end of 2024 setting out how we will deliver upon our deep decarbonisation strategy
 - ▶ Implementing the best quality renewable electricity solutions across our sites and removing our reliance on fossil fuels
 - ▶ Embedding detailed sustainability schedules and targets into contracts >£5 million
 - ▶ Partnering with our suppliers to drive long-term decarbonisation initiatives associated with the goods and services purchased

Decarbonisation - Our Supplier Expectations

Our Minimum Standards

- ▶ Working towards¹ the capability to report a full scope 1, 2 and 3 third party assured GHG emissions footprint to the BBC if requested
- ▶ Develop a strategy to understand how your business can support the BBC's Net Zero strategy and identify and introduce initiatives to reduce GHG emissions across your operations and supply chain
- ▶ Actively explore renewable electricity solutions

Our Advanced Expectations

- ▶ Set Science-Based Targets or equivalent aligned to limiting global warming to 1.5 degrees above pre-industrial levels
- ▶ Submit public environment-related disclosures through CDP or comparable methods
- ▶ Work with the BBC to measure and report contract specific emissions to enable consumption-based calculations rather than spend-based
- ▶ Deliver year-over-year reductions in the GHG emissions associated with the BBC contract
- ▶ Develop and publish a transition plan to achieve net zero emissions targets
- ▶ Source 100% renewable electricity in all locations where available
- ▶ Implement a sustainable travel policy and have processes in place to minimise GHG emissions associated with transport and logistics

Nature & Biodiversity - Our Commitments

The BBC is committed to integrating nature and biodiversity within our wider sustainability strategy and climate disclosures.

Our Commitments

- ▶ We are committed to becoming a nature positive organisation; managing our impact on nature to do more good than harm to our planet
- ▶ We will achieve this by:
 - ▶ Assessing and calculating our biodiversity footprint to understand the main impacts of our operations and supply chain on nature
 - ▶ Working with our suppliers to avoid future impacts and transform our supply chain to one which does not negatively impact ecosystems
 - ▶ Investing in restoring ecosystems in areas where we have identified our past and/or current actions may have contributed to a negative impact
 - ▶ Embedding nature into our procurement decisions, as applicable

Nature & Biodiversity - Our Supplier Expectations

Our Minimum Standards

- ▶ If requested, work with the BBC to develop an understanding of the geographical location of your operations and supply chain
- ▶ Working towards understanding the impacts and associated risks of your operations and supply chain on nature and biodiversity
- ▶ Working towards moving your operations and supply chain away from high-risk ecologically sensitive areas e.g. divesting from rainforest¹

Our Advanced Expectations

- ▶ A complete geographical understanding of your operations and supply chain
- ▶ Understand where your supply chain is having the highest impacts on nature and implement strategies to avoid and mitigate these impacts
- ▶ Commit to an ecologically restorative operation and supply chain
- ▶ Work with your suppliers to transform their practice into one which is nature restorative

Human Rights & Modern Slavery - Our Commitments

The BBC is 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.

Our Commitments

- ▶ We take a risk-based approach to human rights due diligence and commit to collaborate with our suppliers to ensure responsible business practices and to prevent and mitigate the risk of modern slavery in our business or supply chains. Our annual Modern Slavery Statement outlines our approach to tackling modern slavery
- ▶ 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
- ▶ Adherence to our Ethical Trading Policy is included in our standard Supplier Terms of Trade
- ▶ Our work to tackle modern slavery is overseen by our Ethical Trade Working Group
- ▶ We offer training to our staff on human rights and modern slavery in the supply chain to ensure teams are aware of the risks, warning signs and mechanisms available to raise concerns
- ▶ To protect our creative ambition, we are committed to protecting the health, safety, and wellbeing of the people making it happen. That means our employees and anybody that works for us and with us
- ▶ We always encourage people to speak up where there are incidences of misconduct or malpractice across our staff and our supply chain. Our whistleblowing policy outlines our commitment to this

Human Rights & Modern Slavery - Our Supplier Expectations

Our Minimum Standards

- ▶ Comply with our Ethical Trading Policy or maintain an up-to-date Ethical Trading Policy equivalent to our own Minimum Standards
- ▶ Comply with all relevant international and local human rights laws and regulations. This includes, but is not limited, to the UK Modern Slavery Act 2015
- ▶ Reasonably assist the BBC in its requests for information as part of its own risk assessment, due diligence and audit processes or in compliance with requests made by a recognised government authority
- ▶ Uphold the highest standards of employment practices and align with the Ethical Trading Initiative Base Code
- ▶ Have appropriate due diligence in place to identify, prevent, and mitigate human rights risks within your own operations and supply chain
- ▶ Must not use any form of forced, bonded or involuntary labour, workers must not be obliged to lodge identity papers or pay any recruitment fees
- ▶ Recognise and respect legitimately-formed trade unions and worker representation groups and the right of workers to freedom of association and collective bargaining according to law
- ▶ Understand and follow all relevant health and safety regulations, codes of practice and industry standards. Ensure safe & hygienic working conditions and accommodation (where provided) and ensure workers' life and limb are not endangered in the course of work
- ▶ Ensure workers do not work extreme hours or work without adequate rest periods

Human Rights & Modern Slavery - Our Supplier Expectations

Our Minimum Standards continued

- ▶ Must not use workers under the age of 15, or the minimum legal working age in the country in question, whichever is higher
- ▶ Must not subject workers to physical or verbal abuse or threats, sexual or other forms of harassment, intimidation, inhumane treatment, or retaliatory behaviour of any description
- ▶ Pay minimum wages and legally mandated benefits as dictated by relevant local law. For suppliers based in the UK, pay the Real Living Wage to all staff working on the BBC account
- ▶ Maintain transparent, proper and accurate employment records, including calculation of pay and hours worked
- ▶ Make available appropriate whistleblowing mechanisms for anyone working for or with the company
- ▶ Notify the BBC where there is an actual, suspected, or potential breach and implement a remediation plan in consultation with relevant stakeholders, as appropriate

Our Advanced Expectations

- ▶ Ongoing monitoring of suppliers on the effectiveness of their modern slavery due diligence programmes
- ▶ Provide training to relevant staff on modern slavery risks and fair employment practices
- ▶ For suppliers based in the UK, encourage your own suppliers to pay the Real Living Wage

Equality, Diversity & Inclusion - Our Commitments

The BBC is committed to creating an organisation and supply chain that reflects the society we serve.

Our Commitments

- ▶ We are committed to creating an inclusive culture for everyone at the BBC, and we're putting the sense of belonging at the very heart of our work. More information on our strategy can be found on our [website](#)
- ▶ Accessibility is a cultural as much as a compliance need. A human-centred BBC puts people's needs first. The BBC is committed to equity & inclusion for all and aims to provide leadership in the field of accessibility
- ▶ Our [Technology Accessibility policy](#) requires that all digital products, services and hardware brought onto the BBC estate, comply with internationally recognised accessibility standards
- ▶ We are committed to our buildings being inclusive environments which are accessible and enjoyable for everyone. This is including (but not limited to) the elderly and people with physical, sensory, cognitive or learning disabilities

Equality, Diversity & Inclusion - Our Supplier Expectations

Our Minimum Standards

- ▶ Comply with all relevant laws and regulations in the jurisdictions where your organisation operates
- ▶ Have an equality, diversity & inclusion policy or strategy
- ▶ Support staff in upskilling on equality, diversity and inclusion through training and internal communications
- ▶ Where applicable, comply with our Technology Accessibility Policy
- ▶ Embed accessibility into your policies and consider ways to ensure your services are accessible to all, embedding these principles into your physical and digital environments
- ▶ Be willing to work with the BBC to make your goods and services more accessible to our staff

Our Advanced Expectations

- ▶ Track and have the capability to report workforce diversity statistics and the gender pay gap for the company
- ▶ Commit to continuously improve workforce diversity at all levels of the organisation and reduce any gender pay gap and pay gaps for other characteristics
- ▶ Invest in diverse leadership and succession planning for diverse talent
- ▶ Implement inclusive recruitment and selection processes which drive a diverse talent pipeline
- ▶ Have the ability to clearly outline how you can meet and deliver on our Technology Accessibility policy
- ▶ Working towards accessibility best practice, for example alignment with European accessibility act
- ▶ Demonstrate investment in accessibility specialists and accessibility training for staff, ensuring requisite skillsets exist to deliver & support accessible products over the contract lifecycle
- ▶ Collaborate with the BBC to ensure accessibility standards are maintained as the technology is upgraded or replaced during the lifecycle of the contract in compliance with the Policy

Supplier Diversity - Our Commitments

The BBC is committed to creating an organisation and supply chain that reflects the society we serve.

Our Commitments

- ▶ We are committed to fostering a diverse and inclusive supply chain. In order to achieve this we will:
 - ▶ Track and monitor our spend with small¹ and diverse-owned² suppliers
 - ▶ Continuously engage with small and diverse suppliers in our supply chain to understand what barriers may exist within our procurement processes
 - ▶ Actively work to reduce unforeseen barriers to entry
 - ▶ Maintain fairness in, and transparency of, our buying decisions consistent with the BBC purchasing policy
- ▶ [See our Creative Diversity commitments here](#)

Supplier Diversity - Our Supplier Expectations¹

Our Minimum Standards

- ▶ Working towards an understanding of your spend with small and/or diverse-owned suppliers
- ▶ Seek for addressable areas of your supply chain to be accessible for small and diverse-owned suppliers

Our Advanced Expectations

- ▶ Have the capability to track and report subcontracted spend with small and diverse-owned suppliers associated with the BBC contract
- ▶ Actively work to understand existing barriers to entry for small and diverse-owned suppliers and work to reduce these
- ▶ Where available, seek to invite at least one small or diverse vendor to bid for every tender
- ▶ Encourage your own suppliers to increase opportunities for small and diverse-owned suppliers within their supply chains
- ▶ Embed a responsible payment culture and sign up to the Prompt Payment Code for small businesses. Encourage your suppliers to adopt the same approach

Anti-Bribery & Corruption - Our Commitments

The BBC takes a zero-tolerance approach to bribery, corruption, and financial crime and is committed to acting professionally, fairly and with the highest legal and ethical standards in all areas of its business.

Our Commitments

- ▶ Our Financial Crime Policy outlines the standards we hold for ourselves and expect of those we work with
 - ▶ We do not offer, promise or give bribes, nor ask for, agree to receive or accept bribes
 - ▶ We do not make facilitation payments, nor do we allow other people to do so on our behalf
 - ▶ We do not engage in tax evasion or facilitate another person to do so
 - ▶ We take appropriate action to prevent all forms of fraud

Anti-Bribery & Corruption - Our Supplier Expectations

Our Minimum Standards

- ▶ Comply with all relevant laws and regulations in the jurisdictions where your organisation operates
- ▶ Commit to uphold all laws relevant to countering bribery, corruption and financial crime including:
 - ▶ Bribery and Corruption
 - ▶ Tax evasion
 - ▶ Fraud
 - ▶ Sanctions
- ▶ Report to the BBC all instances of suspected or actual bribery, fraud or other financial crime that may be linked to a BBC contract
- ▶ Embed anti-bribery and corruption considerations into procurement and onboarding processes

Our Advanced Expectations

- ▶ Deliver training to your staff on the ethical standards which need to be upheld and encourage them to report suspected malpractice

Data Protection, Information Security & AI - Our Commitments

The BBC is committed to conducting business in accordance with the highest ethical and legal standards and relies on the integrity and accuracy of its data in order to deliver its services.

Our Commitments

- ▶ We are committed to ensuring we have a mature and robust approach in place in relation to data protection and information security. We are dedicated to ensuring these are also key components within our supply chain and the business processes of our partners
- ▶ To meet this commitment the BBC is governed by its own Corporate Information Security Policy and Data Protection Handbook

Data Protection, Information Security & AI - Our Supplier Expectations

Our Minimum Standards

- ▶ Comply with all applicable data protection legislation and regulations including but not limited to the UK and EU GDPR, and all applicable controller and/or processor obligations
- ▶ Proactively engage with the BBC for input into remedial actions following a data breach involving BBC personal data
- ▶ Engage in BBC due diligence and be able to provide assurances to the BBC of your security processes, where reasonable to do so
- ▶ Be able to provide reporting to the BBC on the effectiveness of your information security controls
- ▶ Have robust processes in place to manage data protection and information security risk within your own supply chain
- ▶ Established security incident response responsibilities and procedures and a tested business continuity and disaster recovery plan in relation to the provision of Services to the BBC, setting out how business operations will be restored within an agreed time period
- ▶ Comply with the BBC's minimum information security standards found in the [BBC's Third Party Information Security Requirements](#)
- ▶ Should you be using AI in association with your BBC contract(s), comply with our [nine AI principles](#) and respond to our pre-contractual due diligence questions

Our Advanced Expectations

- ▶ Adoption of Privacy Enhancing Technologies and automation of compliance procedures, including data subject requests and retention policies
- ▶ Tag BBC personal data within systems and use separate data storage locations for datasets that include special category data
- ▶ Where applicable, maintain a records of processing
- ▶ Where applicable, provide the BBC with a copy of your Transfer Impact Assessments
- ▶ Except where required by law, not to correspond directly with data subjects and/or regulators without the prior agreement of the BBC
- ▶ Have a dedicated information security resource as well as keeping up to date with new trends and requirements within the industry
- ▶ Demonstrate continuous innovation and improvements to your security measures to counter emerging threats
- ▶ Have the capability to actively participate in threat intelligence sharing and collaboration

