

UK Modern Slavery Statement 2023

This statement addresses the period from October 1, 2022, to September 30, 2023, pursuant to the requirements of Section 54 of the *UK Modern Slavery Act* (2015). This statement covers the operations of: The Walt Disney Company Limited, The Disney Store Limited, Magical Cruise Company Limited, Industrial Light & Magic (UK) Limited, Walt Disney EMEA Productions Limited and Banner Productions Limited (collectively, the “Disney Group”). The entities that form the Disney Group are subsidiaries and controlled entities of The Walt Disney Company (“TWDC”).

TWDC, on behalf of itself, its subsidiaries and affiliates (“Disney”) maintain policies which prohibit slavery, human trafficking, forced or child labour in its work environments. Disney is committed to maintaining, evaluating and improving the myriad processes in place to seek to prevent these abuses in the operations of Disney’s businesses around the world and in the operations of Disney’s suppliers, vendors, licensees, and business partners. As detailed below, Disney upholds numerous standards in its operations and employs a variety of policies, due diligence processes, risk assessment and mitigation tools, remediation systems, trainings and regular audits to help honour its commitments.

To support these goals, Disney utilizes the United Nations’ *Guiding Principles on Business and Human Rights* and recognises the rights referenced in the *International Bill of Human Rights* and the principles referenced in the International Labour Organization’s *Declaration on the Fundamental Principles and Rights at Work*.

Additionally, Disney makes a variety of disclosures and publishes reports pursuant to international, regional, and country-specific corporate social responsibility regimes, including Disney’s annual [Sustainability & Social Impact Report](#).

1. Our Structure, Activities and Supply Chains

Disney businesses around the world operate in accordance with the practices and policies of the parent company, TWDC, which is incorporated in the United States. The relevant practices and policies are outlined below and are communicated and apply to all of Disney’s subsidiaries and affiliates, including those entities conducting business within the United Kingdom that are within the scope of Section 54 of the UK Modern Slavery Act (2015).

Disney is an entertainment company whose mission is to entertain, inform and inspire people around the globe through the power of unparalleled storytelling.

The Disney Group’s operations in the UK include the marketing and distribution of Disney+ and other direct-to-consumer streaming services; production, promotion, marketing, distribution and licensing of film, episodic and online digital content; the operation of subscription TV channels; the promotion and licensing of Disney, Marvel, Pixar, Lucasfilm, 20th Century Studios, National Geographic, and other intellectual property to third parties for the production of merchandise and publications; the sale of merchandise; the promotion and marketing of theme parks and resorts, cruises, and experiences; the operation of retail shops and e-commerce websites; the production and promotion of live stage shows; the sale of travel packages; and the operation of cruise ships.

The wide range of Disney activities around the world involve numerous and highly varied supply chains. Disney sells products directly to consumers around the world through its parks, stores and online.

Accordingly, as further detailed below, Disney institutes company-wide policies and proactive measures to identify and address potential risks associated with possible labour-related abuses in various company activities and relevant supply chains.

2. Relevant Practices and Policies

In accordance with Disney's policies, the Disney Group is committed to fostering safe, inclusive, and respectful workplaces. Disney employs policies and implements due diligence processes across the company and works to confirm its suppliers and licensees comply with company policies and applicable law. These include policies related to forced and child labour, specifically the **Human Rights Policy**, **Standards of Business Conduct**, and **Supply Chain Code of Conduct**. With respect to Disney-owned or operated environments, Disney's human resources teams strive to monitor compliance with applicable employment laws, among others, through policies and trainings and by gathering regular feedback from employees and employee representative groups.

Disney's [Human Rights Policy](#) outlines the company's commitment to human rights and is informed by the United Nations' *Guiding Principles on Business and Human Rights*, the *International Bill of Human Rights* and the International Labor Organization's *Declaration on Fundamental Principles and Rights at Work* and the Convention on the Rights of the Child.

Disney's [Standards of Business Conduct](#) ("**SOBC**") enumerates Disney's expectations for all Disney employees, and provides resources and tools to promote ethical conduct and compliance with the law. These tools include a whistleblowing procedure and protections for employees, as well as persons and entities with whom Disney does business to voice concerns and report suspected violations of the SOBC and other policies. Employees have the responsibility and the right to report suspected violations to their supervisors, to their human resources department or via an independently operated online portal and tip line available to employees and sub-contractors.

Disney's [Supply Chain Code of Conduct](#) ("**Code of Conduct**") and **International Labor Standards ("ILS") Program** establish labour standards across the vast supply chain for Disney-branded and non-branded consumer products. The Code of Conduct prohibits forced labour, including but not limited to, prison, bonded, indentured or coerced labour and child labour. The Code of Conduct also prohibits physical, sexual, or psychological harassment, threats of violence, and abuse of workers.

Disney requires suppliers and licensees of Disney-branded products to observe the standards established by its Code of Conduct and ILS Program and to implement necessary corrective actions to ensure compliance. Failure to remediate identified issues in a timely manner, or failure to meet the Code of Conduct and ILS Program standards, may result in a loss of authorization to produce Disney-branded products. As necessary, Disney issues updated guidance on its policies, including those addressing forced labour and ethical recruitment. For example, in 2020, Disney informed its suppliers and vendors that Disney's forced labour policy ("[Enhancement to the ILS Involuntary Labor Policy](#)") prohibits workers from being made to pay fees or expenses to obtain or retain employment and that employers are required to reimburse workers for any such fees that have been paid by the workers. In 2021, Disney established a

formal process to conduct in-depth audits if such recruitment fees were identified. Disney also works to confirm that its suppliers' and licensees' facilities comply with applicable laws and policies related to forced and child labour through the review and implementation of contractual terms, vendor on-boarding and training, and communication of Disney's practices and policies.

3. Our Due Diligence Processes

The Code of Conduct, Human Rights Policy, and ILS Program are designed to help address working conditions -- including preventing the circumstances which could lead to the use of forced labour, slavery and human trafficking -- in workplaces and facilities around the world. The facilities that manufacture Disney-branded products are not owned or operated by Disney. They are generally engaged by, or associated with, the independent suppliers, vendors, and licensees with whom we do business. As a condition of doing business with Disney, when engaged in the production of Disney-branded products, our licensees, suppliers and vendors agree to observe the standards established by our Code of Conduct and ILS Program and to implement any necessary corrective actions to ensure compliance. Failure to remediate identified issues in a timely manner or to meet standards set forth in our Code of Conduct and ILS Program may result in a loss of authorization to produce Disney-branded products.

The ILS Program establishes requirements for licensees and vendors to monitor their supply chains for compliance with relevant labor law and the Code of Conduct. As a requisite of the ILS Program, designated licensees and vendors must conduct audits and provide audit reports on a regular basis as described in detail in the [ILS Program Manual](#). This is intended to provide Disney with greater visibility into the working conditions of facilities in which Disney-branded products are produced and to promote compliance with the requirements of the Code of Conduct.

In accordance with contractual terms with Disney, licensees, suppliers and vendors agree, represent and/or warrant that they will comply with all applicable laws and regulations, which includes compliance with laws regarding forced labor, human trafficking and slavery. Disney also requires licensees, suppliers and vendors of Disney-branded products to provide Disney with advance notice of facilities they intend to use and to wait for approval before using a new facility.

Disney regularly trains and provides resources to licensees and vendors of Disney-branded products regarding Disney's labour rights expectations and social compliance audits requirements to assess labour conditions. Disney also works with external organizations, such as NGOs and international organizations, to build up capacity and promote safe, inclusive, and respectful workplaces. In 2023, Disney implemented an initiative to explore tools for advancing supply chain visibility and to leverage new technologies and resources to gain more information about relationships in the extended supply chain.

4. Assessing and Managing Risk and Measuring Effectiveness

Disney continually strives to assess and manage the risk of forced and child labour across its various entities and activities. Disney follows and incorporates policy guidance from various international organizations, governments, and other entities to assess and manage forced and child labour risks. Disney utilizes the World Bank's *Worldwide Governance Indicators* (WGI) as a primary resource to identify and compare areas of risk. Disney uses the U.S. Department of State's *Trafficking in Persons Report* and the U.S. Department of Labor's *List of Goods Produced by Child Labor or Forced Labor* to guide Disney's auditing activities around areas of potential forced and child labour risk.

Disney evaluates and measures compliance with its policies and goals through a variety of methods. For example, Disney publishes data in its annual [Sustainability & Social Impact \(SSI\) Report](#) (“SSI Report”) on the number of facilities that are authorized to produce Disney-branded products under the ILS Program requirements. Disney maintains a dedicated facility database to store this information. Disney annually provides the names and addresses of facilities associated with the production of Disney-branded products for sale in Disney’s own retail locations, available [here](#).

The ILS Program also requires licensees and vendors to ensure their authorized facilities comply with **Minimum Compliance Standard (MCS)** requirements, as outlined in the ILS Program Manual. In the event of known violations of MCS, licensees and vendors are required to take appropriate corrective actions, and failure to do so in a timely manner may result in a loss of authorization to produce Disney-branded products. Aggregate audit violation results can be found in the data table in our annual SSI Report. A sample of a Disney-directed audit agenda, checklist and Corrective Action Plan can be found in the ILS Program Manual.

To further assess and monitor potential risks associated with forced or child labour, Disney’s [Permitted Sourcing Countries](#) policy requires licensees and vendors involved in the production of Disney-branded goods to produce and manufacture products in specific, authorized countries. In accordance with the ILS Program, Disney regularly requires audits of labour conditions in the supply chain for Disney-branded products that are manufactured in certain Permitted Sourcing Countries. Social compliance audits are conducted by Disney’s dedicated global internal audit staff or by approved third party audit firms.

With respect to social compliance audits, Disney itself conducts or engages specialized third parties to conduct thousands of compliance audits annually, including unannounced audits. Disney requires these audits to evaluate compliance by interviewing workers and facility management, inspecting the facilities, including dormitories where present, and reviewing documents and existing policies.

Additionally, the ILS Program makes available ILS Program Manual supplemental guides to licensees and vendors to promote compliance. For example, Disney developed a [Forced Labor Supplemental Guide](#) for licensees and vendors that provides additional details and guidance on the prevention of forced labour in the supply chain. In 2022, Disney published a [Health & Safety Supplemental Guide](#).

5. Training and Awareness

To promote compliance with Disney’s various human rights policies and applicable law governing the Disney’s activities throughout the world, Disney mandates regular training programs for employees and collaborates with various stakeholders to offer training and other resources to licensees, suppliers and vendors.

Disney requires all new employees to undergo an extensive onboarding training program, which includes training regarding the SOBC. The SOBC training includes modules focused on Disney’s human rights policy and the ILS Program, both of which outline the prohibition of forced and child labour. At regular intervals throughout an employee’s tenure with the company, employees are required to refresh their training on the SOBC. Relevant Disney employees also receive training on the ILS Program and Disney makes available additional online forced labour trainings to all employees.

With respect to vendors, suppliers and licensees of Disney-branded products, Disney makes available training and resources regarding the Code of Conduct and the ILS Program. The ILS Program and ILS Program Manual raise awareness and provide detailed guidance to Disney's licensees, suppliers and vendors on the Code of Conduct.

Stakeholder Engagement

Disney also collaborates with a variety of external stakeholders in its efforts to address forced and child labour. For example, Disney is a member of the Joint Forced Labor Working Group - a multi-sectoral group dedicated to address shared challenges around forced labour and advance scalable solutions. Disney is also an active member in various business organisations aimed at preventing and combating forced labour, including the Organization of Economic Co-operation and Development's Responsible Business Conduct Committee and the Responsible Labor Initiative, the Mekong Club, Business for Social Responsibility and the International Labour Organization's and International Finance Corporation's Better Work program. Our external stakeholders and collaborators include non-governmental organizations, multi-stakeholder initiatives, peer companies, inter-governmental organizations, governments, socially responsible investors, industry associations and others. A list of several of our frequent collaborators can be found [here](#).

Over the last three years, Disney has collaborated with the [Responsible Sourcing Network's YESS: Yarn Ethically & Sustainably Sourced](#) program to develop assessment and auditing standards at the spinning and fabric mill level for cotton. The objective is to work collaboratively to create tools and guidance that can identify, assess and address the risk of forced labour in cotton production.

Disney created the [Supply Chain Investment Program](#) which provides funding that prioritizes programmes which seek to address labour and/or supply chain issues, including forced labour, human trafficking, and slavery. In 2023, the Supply Chain Investment Program marked a decade of engagement and collaborations that has included support of more than 40 unique programs in over 20 countries. During the reporting period, Disney made new grants to the following programmes:


- [Open Supply Hub \(OSH\)](#): Disney's funding went to support open access to global supply chain data to improve human rights and environmental conditions in and around factories. To expand visibility into raw material and commodity supply chain, Disney's grant helped OSH expand the supply chain mapping platform to include agricultural supply chains.
- Working Capital Fund (WCF): Disney's funding supports WCF's efforts to work with entrepreneurs to help them develop and deploy new tools that are designed to improve working conditions and supply chain traceability technologies that increase end-to-end visibility.

4. Governance and Internal Accountability

Disney employs a variety of processes to evaluate the effectiveness of Disney's policies, due diligence processes, risk assessments, remediation efforts, and training programs to uphold Disney's commitment to combatting slavery, human trafficking, forced or child labour, and other similar work environments in its supply chains.

Senior-level executives and human rights professionals oversee and regularly assess Disney's policies and procedures. At the executive level, the Senior Executive Vice President, Chief Legal & Compliance Officer

has oversight of human rights policies and practices. Disney's Chief Financial Officer is responsible for implementation of the ILS Program. At the Board level, the Governance and Nominating Committee oversees, and reviews Disney's human rights practices and the Audit Committee oversees and reviews Disney's labour rights practices. In addition, Disney also employs a dedicated team of cross-functional internal human rights professionals to evaluate new business opportunities, collaborations, and productions, and to review existing company policies and practices against international standards.

Signed: 
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Tracy Bermingham

Board Director

The Walt Disney Company Limited, Industrial Light & Magic (UK) Limited, Walt Disney EMEA Productions Limited and Banner Productions Limited