

This statement addresses the period from October 1, 2021 – September 30, 2022 pursuant to the requirements of the *UK Modern Slavery Act (2015)* on behalf of The Walt Disney Company Limited. This statement also covers The Disney Store Limited, Magical Cruise Company, Limited, Disney Networks Group (UK) Limited, Industrial Light & Magic (UK) Limited and Walt Disney EMEA Productions Limited which are part of The Walt Disney Company group of companies (“Disney”) and to whom the requirements also apply.

Disney does not tolerate any form of slavery, human trafficking, forced labour or other similar work environments or practices and is committed to maintaining and improving the processes we have in place to help ensure that these abuses do not occur either in the operations of Disney’s businesses around the world or in those operations of our suppliers, vendors and business partners. Disney is committed to utilizing the United Nations’ *Guiding Principles on Business and Human Rights* and recognizing the rights referenced in the *International Bill of Human Rights* as well as the principles referenced in the International Labour Organization’s *Declaration on the Fundamental Principles and Rights at Work*.

#### 1. Our Structure, Business and Supply Chains

Disney operates businesses around the world in accordance with the practices and policies of the parent company, The Walt Disney Company, incorporated in the United States. The relevant practices and policies are set out below.

Disney is an entertainment company whose mission is to entertain, inform and inspire people around the globe through the power of unparalleled storytelling. Disney’s operations include the marketing and distribution of Disney+ and direct-to-consumer streaming services; production, promotion and distribution of films, television programmes and digital content which are exhibited and broadcast in cinemas and on television; the operation of subscription TV channels; the promotion and licensing of Disney, Marvel, Lucasfilm, 20<sup>th</sup> Century Studios, and National Geographic intellectual property and other properties to third parties for the production of merchandise and publications; the sourcing and sale of merchandise; the promotion of theme parks, 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 businesses necessarily has supply chains that are highly varied in terms of types of supply and their locations, as well as the potential risks associated with possible labour-related abuses in each supply chain. We exercise due diligence on an on-going basis to evaluate where we may cause or contribute to actual or potential adverse human rights risks and impacts, or where human rights impacts may be directly linked to our operations, including modern slavery and forced labour. We seek to prioritize our efforts on identifying, preventing or remedying, if needed, abuses in such supply chains according to where we may have a negative impact or can affect greater change.

#### 2. Relevant Practices and Policies

Disney is committed to fostering safe, inclusive and respectful workplaces. Disney continually works to ensure its suppliers, vendors and licensees are consistently compliant with applicable laws and policies related to modern slavery, including through review and implementation of contractual terms, improvement of administrative processes and communication of Disney’s practices and policies.

Disney's Standards of Business Conduct ("**SOBC**") ([link](#)) apply to all employees and sub-contractors and provide resources and tools to promote ethical conduct and compliance with the law. This includes a whistleblowing policy for employees and other people with relevant information to share. Employees have the responsibility and right, if they see or suspect a violation of the SOBC or company policies, to alert their human resources department or contact the Guideline - an independent company that allows employees and sub-contractors to submit an online report or share their concerns with a professional interview specialist. Reports are accepted anonymously where permitted by law.

Disney's SOBC also require adherence to the International Labor Standards ("**ILS**") Program and our Human Rights Policy, as described below.

In addition, Disney maintains a [Supply Chain Code of Conduct](#) ("**Code of Conduct**") and operates the [ILS Program](#) to enforce the Code of Conduct with its independent suppliers, vendors and licensees. Disney's Code of Conduct specifically prohibits forced labor, including but not limited to, prison, bonded, indentured or coerced labor and child labor. Our Code of Conduct also includes provisions on harassment and abuse that prohibit the use of corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse against workers.

Disney's human resources teams strive to ensure that all parts of our business comply with applicable employment laws, amongst others, through policies, trainings and ensuring regular feedback is gathered from employees and employee representative groups. Disney further requires that vendors with whom Disney contracts also comply with applicable laws.

### 3. Our Due Diligence Processes

The ILS Program requires suppliers, vendors and licensees involved in the production of Disney-branded goods to only produce and manufacture products in accordance with Disney's [Permitted Sourcing Countries policy](#), which is updated on a regular basis. As a requisite of the ILS Program, suppliers, vendors and licensees must conduct audits and provide audit reports on a regular basis which are described in detail in the [ILS Program Manual](#). This is intended to: gain greater visibility into the working conditions of facilities in which Disney-branded products are produced; foster safe, inclusive and respectful workplaces; and promote continuous improvement in meeting the requirements of Disney's Code of Conduct.

Disney has maintained the Code of Conduct since its adoption in 1996. In line with our commitment to continually review and improve our processes with regards to identifying and eliminating any form of forced labour, slavery, and human trafficking, we last updated the Code of Conduct in 2022. Included in the update, the concept of suppliers now includes any person or entity engaged in the production or provision of materials, components, products or services that Disney acquires, authorizes or licenses.

Disney also maintains a [Human Rights Policy](#) ("**Human Rights Policy**") which was also last updated in 2022. In the current reporting period, we also expanded our human rights disclosures and have included an overview of our salient human rights issues and supporting policies and practices [here](#).

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 mostly 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 suppliers, vendors and licensees 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 failure 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.

Disney requires our independent suppliers, vendors and licensees to agree, represent and/or warrant that they will comply with all applicable laws and regulations concerning the manufacturing of Disney-branded products, which would include compliance with laws regarding forced labour, human trafficking and slavery. Disney also requires our independent suppliers, vendors and licensees to disclose to us all the facilities that they intend to use to produce Disney-branded products, including any for subcontracting, and await our approval before use.

In our annual [Corporate Social Responsibility Report](#), Disney publishes data on the number of facilities that are authorized to produce Disney-branded products under our ILS Program requirements. We maintain a dedicated facility database to store this information. Disney annually publishes the names and addresses of facilities associated with the production of Disney-branded products for sale in Disney's own retail outlets on our website [here](#).

In 2022, we deepened our commitment to advancing supply chain visibility and embarked upon an initiative 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's consumer products business sells products directly to consumers worldwide through our parks, stores, and online. We also license characters and stories to third parties to produce and sell Disney-branded products, making Disney the largest consumer products licensor in the world.

Across these business models, Disney-branded products are produced in over 44,000 facilities in more than 100 countries across the globe. This manufacturing network and global footprint creates a highly complex network of suppliers, many of whom are several degrees removed from our direct operations.

Disney uses the World Bank's Worldwide Governance Indicators (WGI) as a primary resource for identifying and comparing areas of risk, for determining sourcing policies and for focusing our monitoring resources and auditing activities. This data helps generate the Permitted Sourcing Countries [list](#), which determines the countries from which suppliers, vendors and licensees may source their production of Disney-branded products and the associated audit requirements. Furthermore, Disney uses several guidance documents including 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 prioritization of its auditing activities around areas of potential forced labour risk.

Disney continues to develop innovative approaches in managing this extended supply chain, by working collaboratively with our suppliers, vendors and licensees to educate them about labour rights expectations; requiring social compliance audits to assess labour conditions; and working with external organizations, including NGOs and international organizations, to build up capacity that promotes safe, inclusive and respectful workplaces.

In accordance with our Permitted Sourcing Countries policy, Disney regularly requires audits of labour conditions in certain facilities in the supply chain for Disney-branded products. On-site social compliance audits are conducted by Disney's dedicated global ILS staff, by specialized third parties engaged by Disney for this purpose, and/or by or on behalf of our independent licensees and vendors. For this statement for the year ending 30 September 2022, we conducted and/or received approximately 17,500 social compliance audits, 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.

The ILS Program also requires an acceptable minimum level of compliance, known as the Minimum Compliance Standard. In the event of known violations of the Minimum Compliance Standard, our independent suppliers, vendors and licensees are required to take appropriate corrective action and failure to do so in a timely manner can result in removal of authorization to produce Disney-branded products. Information related to audit results can be found in the data table in our annual Corporate Social Responsibility Report. A sample of a Disney-directed audit agenda, checklist and Corrective Action Plan can be found in our ILS Program Manual, which contains details of the Code of Conduct and the Minimum Compliance Standard.

Additionally, the ILS Program makes available supplemental guides to suppliers, vendors and licensees to help them work with their facilities to promote compliance. For example, we developed additional details and guidance on the prevention of forced labour in the supply chain by publishing a [Forced Labor Supplemental Guide](#). In 2022, we published a new [Health and Safety Guide](#).

## 5. Training and Awareness

As part of the ILS Program, training resources are available for ILS staff, management, and business partners outlining the requirements of our Code of Conduct, which includes prohibitions on the use of forced labour. Participation within the ILS Program includes detailed guidance via the ILS Program Manual, and implementation support from dedicated ILS staff located in key international markets. Disney conducts training on the requirements of the ILS Program to internal staff and external business partners. Beyond the ILS Program, Disney makes available to employees an online forced labor training.

As part of Disney's induction programme, and at a regular cadence throughout their period of employment with the company, each employee is trained in our Standards of Business Conduct and the requirements those standards impose with respect to behaviour in the workplace (see Section 2).

A cross-functional team comprised of Global Public Policy, International Labor Standards, Legal, Sourcing, and Trade and Compliance continues to convene regularly to explore and test new tools for understanding potential risk areas for forced labour, human trafficking, and slavery in supply chains. In 2022, we deepened our commitment to advancing supply chain visibility and embarked upon an initiative to leverage new technologies and resources to gain more information about relationships in the extended supply chain.

## Stakeholder Engagement

In recognition of the complexity and scale of Disney's supply chain, Disney works with a range of stakeholders to continuously learn about, identify, prevent and mitigate situations of forced labour, human trafficking, and slavery. Disney works with a variety of external stakeholders, including the Joint

Forced Labor Working Group, Business at OECD Investment and Responsible Business Conduct Committee, the Responsible Labor Initiative, Mekong Club and ILO's Better Work, to seek shared solutions on how to prevent and combat forced labour and modern slavery. Our external stakeholders and partners include non-governmental organizations, multi-stakeholder initiatives, labour unions, peer companies, inter-governmental organizations, governments, socially responsible investors, industry associations and others. A list of our frequent partners and collaborators can be found [here](#).

Over the last two years, we have partnered 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 forced labour, human trafficking, and slavery. In 2022, the Supply Chain Investment Program marked a decade of engagement and partnerships that has included support of more than 40 unique programmes in over 20 countries. During the reporting period, Disney made new grants to the following programmes:

- [FishWise](#): Disney's funding supported the creation of a market-based framework for monitoring labor and human rights in the seafood sector in alignment with existing human rights due diligence practices and models. Recognizing that seafood is a high-risk sector for forced labor and modern slavery, FishWise aims to advance tools and practices that can improve working conditions for workers around the world.
- [International Organization for Migration \(IOM\)](#): Recognizing that migrant workers are particularly vulnerable to modern slavery, trafficking and forced labour, Disney provided funding support to IOM's Integrated Recruitment Integrity System Global Policy Network, a platform for dialogue and exchange between policymakers, regulators, and key stakeholders to facilitate ethical and responsible recruitment of migrant workers.

## 6. Governance and Internal Accountability

There are several internal accountability systems and teams that work to mitigate and prevent adverse impacts to human rights. Disney has a dedicated cross-functional internal team that reviews human rights and forced labour impacts of new business opportunities, partnerships and productions. Additionally, there are dedicated internal human rights experts that continually review existing policies and practices around labour and social compliance in the supply chain to assess and propose enhancements. At the executive level, to promote integration of due diligence efforts and labor compliance, Disney's Chief Financial Officer has responsibility for the ILS Program. The General Counsel has oversight of broader human rights policies and practices. At the Board level, both the Governance and Nominating Committee and the Audit Committee oversee and review our human and labor rights practices and receive updates, generally on at least an annual basis, on its performance.