

Publishers' Licensing Services Annual Transparency Report

For the year ended 31 March 2025

The purpose of this report is to provide information about the activities of Publishers' Licensing Services (PLS) for the financial year ending 31st March 2025 in compliance with The Collective Management of Copyright (EU Directive) Regulations 2016. The information in this report is drawn from the Report and Financial Statements for PLS for the year ended 31st March 2025 and the PLS website which includes more detailed information on distributions.

Message from the Chief Executive

I am pleased to report on a year of strong revenue growth and new licensing developments. Gross revenues from collective licensing grew by 5.5%, up from £50.2m to 52.96m with corporate licensing once again a key driver. The PLS team has maintained focus on core commitments, ensuring that service delivery, and above all regular licensing payments remain our priority. At the same time, through extensive publisher engagement and close collaboration with licensing partners we have made significant progress in developing our licensing offer.

Artificial intelligence has once again been a dominant theme and we are very much aware of our unique position and responsibility within the wider publishing ecosystem to offer solutions; whether this is the extension of existing licensing to meet the needs of rightsholders and content users, or the development of collective licences for the use of content to train, fine-tune and ground Al models. The latter being a strategic priority for which we have built foundations over the course of the year and will launch in 2025–26.

Some highlights in 2024-25 were:

- A record £53m in gross revenues with £48m distributed to publishers in 15,000 individual payments.
- The launch of a new CLA text and data mining licence.
- Development and successful opt-in campaign for CLA Workplace Al licensing for the corporate and public sectors.
- Agreement between PLS, ALCS and CLA for the development of a collective licence for Al Training and deployment.
- The continued growth of PLSclear which is now used by over **500 publishers** to manage their permissions, a 38% increase from the previous year.
- Celebrating 10 years of providing free, walk-in access for users of public libraries to millions of scholarly articles through our Access to Research service.
- A successful **PLS Conference 2024**, which once again convened publishers, licensing professionals, and other industry leaders and experts.
- Active publisher engagement with account review programmes at London and Frankfurt Book
 Fairs, plus online and in-person meetings throughout the year. As ever, these are a core part of
 our outreach and accountability to registered publishers.
- Policy work including participation in the Creative Rights in Al Coalition (CRAIC) and Make It Fair campaigns. PLS was also an active member of industry groups including the British Copyright Council, Alliance for IP, and Publishers Content Forum.

I would like to extend my sincere gratitude on behalf of PLS to our licensing partners CLA and NLA for their work on our behalf; to the PLS team for the commitment they have shown to delivering for publishers; and to all publishers that have engaged and collaborated with us over the course of the year. With developments in the industry proceeding at an unprecedented pace we value your engagement and insights more than ever.

Looking to 2025–26, in May we bid farewell to Rosie Glazebrook who has served as PLS Chair for the past six years, and welcome Monisha Shah as her successor. On behalf of the PLS staff and board I would like to sincerely thank Rosie for her significant contribution to the success of PLS in that time and wish her all the best for the future.

Financial information:

The following documents and links are attached for ease of reference:

- ✓ Statement of financial position setting out assets and liabilities;
- ✓ Income statement;
- ✓ Cash flow statement;
- ✓ Directors' report on activities for the year;
- ✓ Analysis of the following for the year:
 - o monies received;
 - o monies allocated for distribution to publishers and subvention deductible upon distribution to cover administration fees;
 - o monies attributed to publishers not yet signed up to PLS;
 - o revenues not yet attributed to publishers;
 - non-distributable monies and monies

Legal and governance structure of PLS:

PLS is a private company limited by guarantee providing collective licensing and rights management services for the publishing sector. It operates on a not-for-profit basis. It deducts a subvention of 6% upon distribution to publishers of revenues received from collective licensing of reprographic rights.

Membership of PLS is open to all entities that:

- Represent publisher rightsholders of works in which copyright or like or similar rights subsist under the laws of countries or states which are contracting parties to the Berne Convention and the WIPO Copyright Treaty;
- Are a recognised trade association, properly established, registered and maintained as a body corporate in the United Kingdom;
- o Are trading solvently and can be reasonably expected to continue to do so for at least 12 months;
- Do not and will not whilst a member of PLS directly engage in the collection and/or distribution of monies from collective licensing; and
- Meet such further eligibility criteria for membership as may from time to time be approved by the members and published on the PLS website.

The current members of PLS are four trade associations representing publishers' interests:

- o the Association of Learned and Professional Society Publishers (ALPSP);
- Independent Publishers Guild (IPG);
- o Professional Publishers Association (PPA) and
- o the Publishers Association (PA).

Each member may nominate up to three directors to serve on the PLS Board. Subject to the recommendation of the Board, nominees are appointed by the members in general meeting. The Chair is appointed by the Board and is independent of the members. The Chief Executive is appointed by the Board.

Remuneration:

No remuneration was paid to any individual person exercising the supervisory function other than to the Chair of the Board. PLS paid governance fees to each of its trade association members in respect of their participation in and contribution to the Board of PLS at the rate of £12,588 per year in respect of each director elected to the Board. The total paid in the year was £151,056.

The total remuneration paid during the year to the Chair was £41,741.

The total remuneration paid during the year to the Chief Executive, including pension contributions and healthcare insurance, was £169,296.

Investment income:

Bank interest earned during the year on monies held by PLS amounted to £352,478. Such monies were applied towards the costs of managing PLS.

Costs of collective rights management and other services:

PLS's total operating and financial costs for the year amounted to £3,015,473 which equates to 6.0% of total copyright fees received in the year.

These costs were covered by:

- o the 6% subvention deducted from reproduction licensing revenue distributed to publishers;
- o interest earned;
- o charges for administering its permissions service, PLSclear.

The total costs include the figures below:

- £6,500 for allocating and distributing revenue received from Stichting Reprorecht for publishers' public lending rights in the Netherlands.
- o £302,000 for administering PLSclear.

The above figures are only indicative as some or all of the cost of providing these services are covered by or shared with resources required for the organisation's collective licensing services and cannot easily be isolated.

Licensing revenue exceeded expectations, resulting in more revenues being distributed to publishers and subject to the deduction of 6% of subvention. In addition, savings were made on management costs, including lower than expected recruitment costs. The Board therefore agreed, in accordance with the Distribution Charter, to invest £100,000 in the special projects outlined in the attached report.

PLS did not contribute to any other social, cultural or educational services during the year.

Statement of financial position setting out assets and liabilities for the year ended 31 March 2025:

	2025 £	2024 £
Fixed assets Intangible assets	76,804	88,476
Tangible assets	215,488	10,709
	292,292	99,185
	1000 511	1500.007
Current assets Debtors	1,869,511	1,560,687
Investments	5,159,255	4,149,313
Cash at bank and in hand	4,984,792	6,862,246
	12,013,558	12,572,246
Creditors: amounts falling due within one year	(11,085,638	(11,834,364)
Net current assets	927,920	737,882
Provisions	(47,992)	(14,594)
TOTAL NET ASSETS	1,172,220	822,473
CAPITAL AND RESERVES		
Profit and Loss Account	1,172,220	822,473
MEMBERS' FUNDS	1,172,220	822,473

Income statement:

	2025 £	2024 £
COPYRIGHT FEES RECEIVED	52,962,226	50,207,372
Distributable to rightsholders	(49,822,456)	(47,487,682)
TURNOVER	3,139,770	2,719,690
Administrative expenses	(3,015,473)	(3,017,545)
OPERATING SURPLUS / (DEFICIT)	124,297	(297,855)
Interest receivable	352,478	297,855
SURPLUS BEFORE TAXATION	476,775	-
Taxation	(127,028)	124
SURPLUS FOR THE YEAR	349,747	124
MEMBERS' FUNDS BROUGHT FORWARD	822,473	822,349
MEMBERS' FUNDS CARRIED FORWARD	1,172,220	822,473

Cash flow statement:

	2025 £	2024 £
Cash flows from operating activities	2	L
Surplus for the financial year	349,747	124
Depreciation and amortisation of fixed assets	80,552	78,228
Net interest (receivable)	(352,478)	(297,855)
Taxation	127,028	(124)
Increase in trade and other debtors	(297,637)	(6,234)
(Decrease)/increase in creditors	(838,952)	2,812,118
Cash from operations	(931,740)	2,586,257
Taxation paid	(3,404)	(46,142)
Net cash (absorbed by)/generated from operating activities	(935,144)	2,632,399
Cash flows from investing activities		
Purchases of tangible fixed assets	(224,858)	(11,065)
Purchases of intangible assets	(48,801)	(43,684)
Proceeds from sale of investment	-	5
Interest received	341,291	227,510
Net cash absorbed by investing activities	67,632	172,766
Net (decrease)/increase in cash and cash equivalents	(867,512)	2,805,165
Cash and cash equivalents at beginning of the year	11,011,559	8,206,394
Cash and cash equivalents at end of year	10,144,047	11,011,559

Publishers' Licensing Services Limited

DIRECTORS' REPORT

The directors present their report and statement of accounts for the year ended 31 March 2025.

PRINCIPAL ACTIVITIES AND REVIEW OF THE BUSINESS

The principal activity of the Publishers' Licensing Services Limited (PLS) is to represent the interests of publishers in the collective management of their rights and to distribute collective licensing revenue to publishers. PLS's other services to publishers include a permissions clearance service and guidance on best practice in rights management.

PUBLISHERS AUTHORISING PLS TO MANAGE THEIR COLLECTIVE LICENSING RIGHTS

PLS held active Accounts for 4,499 (2024: 4,411) publishers at the year end.

COLLECTIVE LICENSING

PLS works closely with a number of other collective management organisations to deliver the benefits to publishers of effective collective licensing including the following:

- a) The Copyright Licensing Agency (CLA) continues to be PLS's primary licensing agent, collecting revenues from the education, public and business sectors for copying and using extracts from books, journals, magazines and websites under (a) licences which it negotiates and issues in the UK and (b) its bilateral agreements with equivalent reproduction rights organisations overseas. PLS works in conjunction with the other members of CLA in overseeing its work on behalf of right holders. The members of CLA are the Authors' Licensing and Collecting Society (ALCS) representing authors, and visual artist organisations, Design and Artists Copyright Society (DACS) and Picture Industry Collecting Society for Effective Licensing (PICSEL).
- b) NLA media access (NLA), PLS's licensing agent for those magazine publishers that have instructed PLS to license the copying and use of their titles to the business and government sectors through NLA.

REVENUE

PLS received collective licensing revenue for the year of £52.3m (2024: £49.5m) from the following sources:

- CLA: £47,785,246 (being the publishers' share of CLA revenues) (2024: £44,910,666) and
- NLA: £4,540,599 (being the publishers', authors' and visual artists' share of NLA revenues) (2024: £4,608,148).

Other sources of revenue for the year included:

- Stichting Reprorecht for publishers' public lending rights in the Netherlands: £50,526 (2024: £51,879) and
- PLSclear: generated gross revenues for publishers of £585,855 (2024: £636,679).

	2024/25	2023/24	% change
Collective Licensing	£	£	
CLA			
Education	16,904,624	15,932,737	6.1%
Business	20,552,393	18,729,166	9.7%
Government	2,374,336	2,174,483	9.2%
NHS	1,188,642	1,125,422	5.6%
Document delivery	30,385	76,394	(60.2%)
Media monitoring	319,662	225,165	42.0%
Foreign	5,400,337	5,644,124	(4.3%)
CLA Exceptional Distribution	1,014,867	1,003,175	1.2%
CLA Total	47,785,246	44,910,666	6.4%
NLA media access	4,540,599	4,608,148	(1.5%)
	52,325,845	49,518,814	5.7%
Other revenue			
PLR (Netherlands)	50,526	51,879	(2.6%)
PLSclear	585,855	636,679	(8.0%)
Total	52,962,226	50,207,372	5.5%

DISTRIBUTIONS

Distributable collective licensing revenue was £49.8m (2024: £47.5m), after deduction of PLS 6% administration fee, and was processed in accordance with the PLS Distribution Charter and the Distribution Timetable, both available on the website at www.pls.org.uk.

The distributable revenue received by PLS from CLA and Stichting Reprorecht was allocated and distributed to publishers. CLA deducts the shares payable to authors and visual artists before distribution to PLS.

The distributable revenue received by PLS from NLA included the shares payable to authors and visual artists. In accordance with the decision in the Rights Valuation, effective 1 January 2016, and as reflected in the Distribution Charter, PLS paid the shares due to authors (17.5%) and visual artists (10%) to ALCS and to DACS and PICSEL respectively for onward distribution prior to distributing NLA revenues to publishers.

A small part (under 1.5% on average per licence sector) of the monies PLS receives from CLA is for copying and use of works owned by publishers who have not previously signed a Publisher Account Form. PLS employs two members of staff who are dedicated to tracing such publishers and inviting them to sign up to PLS so that the monies allocated to the copying of their works can be released to them. Largely as a result of this work 79 publishers returned a PLS Publisher Account Form over the course of the year.

PLS SERVICES

In 2025 we brought together our various collective licensing services and responsibilities under a single brand: **PLS Collect**. PLS Collect provides publishers with direct access to UK and international collective licensing. Our service enables publishers to easily manage and track licensing via a user-friendly platform, with regular payments when content is used.

PLSclear is our bespoke permissions management tool that makes it easy to request and grant permission from books, journals, magazines, and online content. Use of the service continues to grow, with the number of publishers using the service to manage their permissions increasing by 38% in the last 12 months to 512.

Access to Research provides users of UK public libraries with free walk-in access to millions of scholarly articles. In 2024 we celebrated the 10th anniversary of the service.

PLS's **Rights & Licensing Hub** and the work of the **PLS Rights Group** to promote rights management best practice was an important strategic priority. We launched a popular mentorship scheme and grew direct engagement with our Rights Management Essentials online training by 27%. The Rights Group welcomed two new co-chairs, and established a strategic partnership with US-based Book Industry Studies Group (BISG).

Over the course of the year all services were delivered in accordance with the PLS code of conduct.

WORKING WITH PUBLISHERS

PLS manages direct relationships with 4,500 publishing organisations: from those that publish single titles, through to multinational STM journal and consumer book publishers. Our publisher engagement programme caters for the full range, ensuring that we maintain close contact and transparency, and working to address the needs of all. In 2024-25 we maintained that engagement through a combination of in-person and online meetings including in-person account review meetings at the London and Frankfurt Book Fairs.

We ran extended consultations on Al licensing including a formal consultation on a CLA Workplace Al licensing extension which is due to launch in Q1 2025-26.

In July we hosted our second all-day conference in London, open to all PLS registered publishers and partner stakeholders. A record number of delegates enjoyed a day of practical seminars and the latest updates from the world of rights and licensing.

PLS sponsored, attended, and presented at various industry conferences over the course of the year, all of which provided valuable opportunities to connect with publishers and support the industry.

POLICY AND COPYRIGHT

PLS has continued to work in close partnership with its trade association members, with CLA and all its members, NLA media access, and various industry bodies including the British Copyright Council and Alliance for IP to support the interests of publishers. The dominant policy issue throughout the year was once again generative AI and the ongoing exchanges between big tech and the creative industries over the unauthorised use of copyright protected works. PLS has played an active role both in supporting industry initiatives and campaigns including the Creative Rights in AI Coalition (CRAIC) and the Make It Fair campaign. We have consistently championed the role of collective licensing in maintaining an orderly marketplace – one that balances the needs of users with respect for copyright and fair remuneration for rightsholders. In February PLS submitted a response to the UK Government's consultation on Copyright and AI.

COMPLIANCE AND CODE OF CONDUCT

PLS is regulated under the Collective Management of Copyright (EU Directive) Regulations 2016 and continues to ensure that its governance and operations are compliant with the Regulations.

PLS staff continue to work in accordance with the PLS Code of Conduct. No complaints were received during the year.

OFFICE RELOCATION

In December, PLS moved from its offices at WeWork, St Katharine Docks (London EC3), to new premises at 6 Hays Lane, London SE1, secured under a long-term lease.

STATUS

The Company is limited by guarantee and does not have a share capital. In the event of the Company being wound up, each member undertakes to contribute to the assets of the Company such amount as may be required but not exceeding £1. The members of the Company are:

The Association of Learned and Professional Society Publishers (ALPSP) Independent Publishers Guild (IPG)
Professional Publishers Association Limited (PPA)
The Publishers Association Limited (PA)

RESULTS

The result for the year is shown in the Income Statement on page 6.

DIRECTORS

Up to three directors are nominated by each of the members and approved by the Board. The Chair is appointed by the Board and is independent of the members. The Chief Executive is appointed by the Board. The following directors have held office since 1 April 2024:

RP Glazebrook, Chair

THH West - Chief Executive

WC Sime (ALPSP)

MP Cianfarani (PPA) (Appointed 28/11/2024)

DC Conway (PA)

DM Dixon (ALPSP)

AR Freeman (PA)

BC Shine (IPG)

WC Sime (ALPSP)

S Voss (PPA)

M Walford (PA)

TJL Williams (IPG)

ACR Yeates (PPA) (Resigned 27/11/2024)

SL Fricker (ALPSP) H Kogan (IPG) S Merali (PPA)

PLS purchased and maintained throughout the financial year directors' liability insurance in respect of itself and for its directors. This gives appropriate cover for any legal action brought against PLS or its directors.

STATEMENT AS TO DISCLOSURE OF INFORMATION TO THE AUDITOR

The directors who were in office on the date of approval of these financial statements have confirmed, as far as they are aware, that there is no relevant audit information of which the auditor is unaware. Each of the directors have confirmed that they have taken all the steps that they ought to have taken as directors in order to make themselves aware of any relevant audit information and to establish that it has been communicated to the auditor.

AUDITOR

Moore Kingston Smith LLP, formerly Shipleys LLP was appointed as auditor to the company by the Director(s) and in accordance with section 485 of the Companies Act 2006, a resolution proposing that they be re-appointed will be put at a General Meeting.

This report has been prepared in accordance with the provisions applicable to companies entitled to the small companies exemptions.

On behalf of the board

Allha

THH WEST Director

Registered Office: Third Floor 6 Hays Lane London SE1 2HB

2nd June 2025

Analysis of reprographic collective licensing income and distributions in financial year

1 April 2024 to 31 March 2025:

1. 2024-25 licensing revenue summary

Type of Use	Source	Revenue
		£
Education	CLA	16,904,624
Business (CLA)	CLA	20,552,393
Business (NLA)	NLA	4,540,599
Government (inc. NHS)	CLA	3,562,978
Document Delivery	CLA	30,385
Media Monitoring	CLA	319,662
CLA Exceptional Distribution	CLA	1,014,867
Foreign	Various	5,400,337
	Total	52,325,845

a) Foreign means monies received from overseas collective management organisations (CMOs).

2. 2024-25 licensing revenue allocated for distribution to mandating publishers

			Retained	
Type of Use	Source	Gross £	subvention £	Net £
Education	CLA	16,664,963	999,898	15,665,065
Business (CLA)	CLA	20,050,020	1,203,001	18,847,019
Business (NLA)	NLA	3,290,922	197,455	3,093,467
Government (inc. NHS)	CLA	3,477,256	208,635	3,268,621
Document Delivery	CLA	28,828	1,730	27,098
Media Monitoring	CLA	317,235	19,034	298,201
Foreign (various territories)	CLA	5,395,356	323,721	5,071,635
Exceptional Distribution	CLA	1,014,867	60,892	953,975
	Total	50,239,447	3,014,366	47,225,081

a) All monies received from CLA are distributable to publishers, after deduction of PLS's subvention, CLA having already deducted the share payable to authors and visual artists. In contrast, 72.5% of monies received from NLA are distributable to publishers after deduction of PLS's subvention. PLS is responsible for distributing the balance to the CMOs representing authors and visual artists (see section 6 below).

CLA and NLA make deductions for their respective administration fees prior to paying PLS at the rates set out in section 3 of the PLS Distribution Charter (see www.pls.org.uk/distribution-charter)).

- b) Subvention is "retained" pending distribution of the relevant licensing revenue to a publisher. It is only recognised in PLS's accounts upon actual distribution to each publisher.
- c) Revenues allocated to mandating publishers are distributed in the calendar month following receipt unless there is good reason preventing this, such as when a publisher's account balance is below the minimum payment threshold (see PLS Distribution Charter www.pls.org.uk/distribution-charter).
- d) Total accumulated revenue held on mandating accounts at year end was £1,118,713. Monies are held on mandating accounts:
 - until the balance has reached the minimum payment threshold;
 - until outstanding queries (e.g. following a change in ownership of titles or in contact details for a publisher) are resolved;
 - pending the conclusion of a diligent search process when a publisher has ceased trading or has become untraceable.
- e) The various revenue sources are distributed in accordance with the PLS distribution timetable: www.pls.org.uk/collective-licensing/distribution-of-licensing-revenues/)and the PLS Distribution Charter.

3. Attributed revenue received in 2024-25

Type of Use	Source		Gross £
Education	CLA		228,708
Business (CLA)	CLA		502,402
Business (NLA)	NLA		0
Government (inc. NHS)	CLA		85,783
Document Delivery	CLA		1,121
Media Monitoring	CLA		2,428
Foreign (various territories)	CLA		60,817
		Total	881,259

- a) Attributed revenue is revenue allocated to titles belonging to publishers that did not mandate PLS at the time of distribution. These monies are held by PLS until publishers can be identified, contacted, and paid.
- b) £1,051,594 (Gross) of revenue attributed in both the current year and previous years was paid to publishers in 2024-25.
- c) Total attributed revenue accumulated in both the current and previous years and not yet distributed at year end was £3,523,855.

4. Collected but unattributed revenue

- a) Unattributed revenue consists of:
 - Revenue received from overseas CMOs without accompanying title data that has not yet been allocated to publishers.
 - Revenue received for titles that are not part of licensed repertoire e.g. "excluded categories" and which is therefore due to be redistributed in accordance with the PLS Distribution Charter.

b) Total unattributed revenue accumulated in the current year and previous years and not distributed at year end was £2,152,296.

5. Non-distributable revenue received in 2024-25

Type of Use	Source	(Gross £
Education	CLA		65,440
Business (CLA)	CLA		219,994
Business (NLA)	NLA		0
Government (inc. NHS)	CLA		32,035
Document Delivery	CLA		602
Media Monitoring	CLA		407
Foreign (various territories)	CLA		36,721
-		Total	355,199

- a) Non-distributable includes:
 - Allocations to publishers found to have ceased trading ("Ceased") or who cannot be located ("Untraceable") following completion of a diligent search process.
 - Allocations to titles ineligible to receive revenue under the terms of the PLS Distribution Charter.
- b) Non-distributable monies will be re-allocated as being non-title specific monies and distributed to publishers on a pro rata basis in accordance with the PLS Distribution Charter: www.pls.org.uk/distribution-charter.

6. Distributions to other CMOs

The following distributions were made of revenues received by PLS from NLA in accordance with the Rights Valuation 2015.

- £805,789 to Authors' Licensing and Collecting Society (ALCS).
- £337,432 to Design and Artists Copyright Society (DACS).
- £72,001 to Picture Industry Collecting Society for Effective Licensing (PICSEL)

Special projects supported by PLS in 2024-25

In addition to the services delivered directly to publishers, PLS partnered with its four member trade associations to support services and initiatives designed to support and develop the UK publishing industry and to further PLS' strategic aims. A designated fund of £100,000 was shared equally between the four project leaders.

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Project leader	Initiative
ALPSP	Creation of Al-Specific Training Content for the ALPSP Training OnDemand Platform ALPSP to create a specialised set of training modules focused on applying artificial intelligence (AI) within academic publishing. These modules will be hosted on ALPSP's Training OnDemand platform and will cover topics such as ethical considerations, operational efficiencies, content generation, and rights management in the context of AI. This initiative will provide actionable insights to publishing professionals and enhance industry-wide understanding of AI's potential. This content will be available to everyone, not just ALPSP members.
	Refresh and Expansion of Early Career Content for the ALPSP Careers Hub ALPSP to refresh the early career video content initially created in 2021. This initiative will include updating existing material to reflect current industry trends and creating new educational videos tailored for early career professionals. The content will be integrated into the ALPSP Careers Hub, which provides resources such as a job board, mentorship program, redundancy support, and an educational resource library. This content will be available to everyone, not just ALPSP members.
IPG	Improving rights sales and management A training resource tailored to independent publishers regarding the management and commercial aspects of rights. Available to IPG members and publishers registered with PLS. Protecting rights in the age of AI Update CPD-accredited training on AI and copyright to include an overview of current copyright law as it relates to AI; a comprehensive guide to the legal lifecycle of content from
	creation onwards; advice for protecting against copyright infringement and other AI risks; a guide to current and future government policy and consultations; the role of collective licensing and AI-related developments from PLS and CLA.
PPA	 Next Gen – repositioning magazine media Under a definition of "Trusted Editorial Brands" Trusted Editorial Brands' the funding will support the following outputs: Provide a foundation for collective industry positioning. Build proof points to evidence brand identity & effectiveness of magazine media. Enhance how we present the industry's value to government stakeholders. Further highlight the important of the investment that goes into journalism and in turn the value of rights sales to the industry. Emphasise the importance of effective rights management to future collective licensing Underscore our commitment to combating misinformation and ensuring brand safety.
Publish ers Associa tion	Supporting content protection and enforcement Continued support for high impact, pioneering investigative and enforcement work. While doubling down on current targets the work will pursue different sites and networks that will include (but may not be limited to): Anna's Archive, Pdfdrive, Oceanofpdf. As a collective these pirate sites attract nearly 2 million monthly visits from UK users. In addition, we plan to leverage and build on the US Internet Archive decision to the advantage of UK publishers.

AUDITORS' REPORT TO THE DIRECTORS OF PUBLISHERS' LICENSING SERVICES LIMITED

We have performed the procedures agreed with you and enumerated below with respect to the annual transparency report of Publishers' Licensing Services Limited for the year ended 31 March 2025. Our engagement was undertaken in accordance with the International Standard on Related Services applicable to agreed-upon procedures engagements. The procedures were performed solely for the purpose of your compliance with Regulation 21(2)(b) of the Collective Management of Copyright (EU Directive) Regulations (2016) and are summarised in guidance issued by the Intellectual Property Office to Auditors in October 2017.

The procedures are set out in Annex A: Agreed upon procedures for the audit of an annual transparency report of the "Guidance on the collective management of Copyright (EU Directive) Regulations 2016: annual transparency reports and audit" issued by the Intellectual Property Office in October 2017.

Solely on the basis of the above procedures we report that:

We carried out the procedures as set out in Annex A: Agreed upon procedures for the audit of an annual transparency report of the "Guidance on the collective management of Copyright (EU Directive) Regulations 2016: annual transparency reports and audit" issued by the Intellectual Property Office in October 2017. There were no errors or exceptions found as a result of our testing.

Because the above procedures do not constitute engagements made in accordance with International Standards on Auditing (UK) or the International Standard for Review Engagements (UK and Ireland), we do not express any assurance on the annual transparency report for the year ended 31 March 2025.

Had we performed additional procedures or had we performed engagements in accordance with International Standards on Auditing (UK) or the International Standard for Review Engagements (UK and Ireland), other matters might have come to our attention that would have been reported to you.

Use and purpose of our report

Our Report is prepared solely for the use of Publishers' Licensing Services Limited and solely for the purpose of its compliance with Regulation 21(2)(b) of the Collective Management of Copyright (EU Directive) Regulations (2016). It may not be relied upon by Publishers' Licensing Services Limited for any other purpose whatsoever. Our Report was not prepared for the benefit of any party other than Publishers' Licensing Services Limited. Moore Kingston Smith LLP neither owes nor accepts any duty to any other party (including any copyright owner, heirs to copyright owners, agents or licensees) and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by their reliance on our Report.

Tim Hardy

Moore Kingston Smith LLP, 10 Orange Street, Haymarket, London, WC2H 7DQ

Date: 16/6/2025