



## Slavery and Human Trafficking Statement

Picture Holdco Limited and Pinewood Group Limited ("**Pinewood**") and their affiliates and subsidiaries listed in Appendix 1 to this Statement (together, the "**Group**") are committed to the prevention, deterrence and detection of slavery and human trafficking.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 on behalf of the Group and sets out the steps taken to achieve Pinewood's stance of zero-tolerance of all forms of slavery, human trafficking and other exploitation in Pinewood's supply chain or in any part of Pinewood's business for the financial year ending 31 March 2020.

### **Our business**

Pinewood is one of the leading providers of studio and related services to the worldwide film and television industries. Synonymous with world class British and international productions, our studios have an impressive heritage and have been home to some of the most successful feature films and TV shows ever made. Pinewood Studios and Shepperton Studios have been home to over 2,000 films in more than 80 years and have hosted over 800 TV shows.

### **Pinewood's supply chain**

With over 80 years of experience, Pinewood's supply chain and its relationship with its suppliers has been established and improved. The film and television production business traditionally has a close, personal relationship based upon knowledge and experience, with broad types of services and goods supplied by a large pool of suppliers both locally-sourced and from around the globe.

As the Group has expanded it has increased its due diligence and 'know your client' checks; a formal New Supplier Process (defined below) has been improved with the intention to achieve a transparent supply chain in compliance with relevant laws. These on-boarding processes include bank verification, anti-bribery statements, slavery and human trafficking statements, health and safety checks, insurance checks and credit checks to ensure that we know who we are working with and to ensure they are the best suppliers for the service being provided ("**New Supplier Process**").

Responsibility for managing supply chains sits with all employees utilising the New Supplier Process, overseen by the Procurement and Legal departments.

### **Slavery and Human Trafficking Policy and related policies**

The Pinewood Group Board takes a zero-tolerance approach to slavery and human trafficking. The Pinewood Slavery and Human Trafficking Policy ("**Policy**") is publicly available to all staff, customers, suppliers and members of the public and is available at [www.pinewoodgroup.com](http://www.pinewoodgroup.com). The Policy, together with updates to it, are approved by the Board. The Policy is regularly reviewed (at least annually) and, if required, updated by the Legal and Procurement departments.

### **Due diligence and supply chain management**

Pinewood has in place screening and due diligence procedures to be carried out in respect of its agents, advisers, contractors, suppliers, intermediaries, joint venture partners and other representatives prior to being engaged as part of the New Supplier Process. This includes mandatory questions on slavery and human-trafficking contained in Pinewood's '*New Supplier Request Form*' which must be completed

for any new supplier to be added to Pinewood's supply chain. Existing suppliers are required to periodically update their details as part of a 'Supplier Information Update Process'.

Improvements to Pinewood's Finance system and supplier on-boarding process during 2019-2020 have assisted in the rollout of the documentation and awareness of due diligence and process within the business and within our supply chain. A new Head of Procurement was appointed in 2020 who is responsible for supplier management and procedures.

Pinewood requires that its suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. Pinewood's standard terms have been updated to require absolute compliance with the Modern Slavery Act as a condition of contract. In the event of any breach, Pinewood may in its sole discretion terminate suppliers' contracts. All contractors attending Pinewood's premises are further required to comply with Pinewood's Contractors Code of Conduct. This contains reference to Pinewood's Slavery and Human Trafficking Policy and requires contractors to answer additional questions relating to compliance with the Modern Slavery Act.

Regular update and supplier-tracking meetings are held between the business units, Procurement and Legal, together with regular meetings and updates with Pinewood's suppliers. Pinewood provides relevant staff with training on the scope and application of the Policy at appropriate intervals publishes reminders. All Pinewood employees and suppliers should know how to identify or prevent slavery and human trafficking.

### **Film & Television Industry – Principal Risks**

Key "risk areas" particular to the film and television industry in relation to slavery and human trafficking arise in the use of freelancers, contracts and businesses across international borders and the sub-contracting of responsibilities within the Pinewood supply chain. The movement of people internationally within the film production industry is common. This can include travel to filming locations around the world including perceived "high risk" areas for slavery and human trafficking. This raises the risk level. Outsourcing and complicated supply chains also are relevant to the risk level, especially in relation to difficulties of performing due diligence across-borders.

Pinewood uses its New Supplier Process, as well as contractual documentation to minimise the risks within its supply chain, together with risk assessments where relevant in relation to specific areas of the business that could have the potential to present a greater level of risk for slavery and human trafficking.

### **Performance Indicators**

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Key factor risk assessments – by territory, sector, business type, transactions, outsourcing, department, level of spend, individuals involved, and agencies/partnership relationships.
- Numbers of new suppliers added to the supply chain yearly;
- Incidents and reports from employees or other individuals of non-compliance;
- Suppliers terminated for breach of the Policy;
- Number of potential suppliers with poor or non-existent slavery and human trafficking policies or a reluctance to co-operate with the New Supplier Process;
- Number of potential suppliers refusing to accept slavery and human trafficking language or attempts to substantially modify the language included in their contractual terms;
- Number of suppliers in compliance;
- Periodic review of contractual language and know-how as necessary; and

- Numbers of Pinewood staff trained on the Policy.

## 2020 Updates

Key updates in the last financial year have been:

- New monthly internal meetings for business units, Procurement and Legal to oversee all supply chain management issues, and improved tracking of suppliers and status;
- Improved automation and systems for Finance and supplier management;
- Some key new suppliers, including a new caterer, joined the Pinewood supply chain in this financial year. Full reviews and due diligence were undertaken of their policies and processes in relation to tackling slavery and human trafficking and contractual provision included in their Services Agreement;
- Continuing to add contractual protections and provisions on anti-slavery and human trafficking in all new contracts and standard terms;
- Risk-focused procurement process, amending/updating questions on the New Supplier onboarding process and tenders and requesting suitable evidence and warranties on compliance;
- Continuing as a member of the TISCreport and reviewing suppliers in compliance via the portal;
- Refocus of international strategy:
  - Closure of German-based company, Pinewood Film Services GmbH
  - Completion of the exit from collaboration agreement with Iskandar Malaysia Studios.
  - Termination of Services Agreement with Pinewood Atlanta Studios in Georgia
  - Filing of strike off applications for dormant UK and Irish-based entities.
- The Group took a risk-based approach to evaluate its supply chain and to contact the Group's key suppliers with specific and bespoke reminders of their obligations, including our new caterer, together with our security and cleaning providers; and
- Consideration of supply chain management and adaptations, including remote tracking and videocall supplier updates, in light of Covid-19.

## Future Plans

For the next financial year, the Group plans to focus on:

- Additional training for new starters who joined Pinewood in 2020 and refresher sessions for all staff before the end of 2020;
- Support for new Head of Procurement and full review of all policies and procedures in respect of human rights and modern slavery risks;
- Reminder letters to key suppliers and partners; and
- A number of key contractual tenders are due during 2020/2021, so enhanced screening and due diligence processes will be undertaken.

## Board Approval

The Group Board approved this Statement on 30 September 2019 and authorised Paul Golding to sign accordingly.

Signed: 

**Paul Golding**

**Chairman and Acting Chief Executive Officer**

**Date: 30 September 2020**

## Pinewood Group – Relevant Entities FY2020

### *England and Wales Incorporated Entities*

<b>Company</b>	<b>Company No.</b>
Picture Holdco Limited	10296277
Pinewood Group Limited	03889552
Pinewood Studios Limited	0392619
Shepperton Studios Limited	02974333
Pinewood Finco plc	11054849
Pinewood-Shepperton Studios Limited	02985190
Pinewood Shepperton Facilities Limited	07527390
Pinewood Films Limited	07660856
Pinewood Camera Trap Limited	8153323
Pinewood Films No.11 Limited	08865342
Pinewood Films No.12 Limited	08865668
Pinewood Films No.13 Limited	9006529
Pinewood Films No.14 Limited	9176261
Where Hands Touch (FPC) Limited	9443603
Pinewood Media Development Limited	09592018
Pinewood Film Advisors Limited	8164867
Pinewood Film Advisors (W) Limited	08864165
PSL Consulting Limited	8655214
Pinewood Studio Wales Limited	08863162
Pinewood Dominican Republic Limited	07096246
Pinewood Malaysia Limited	07074446
Pinewood Germany Limited	07079399
Pinewood PSB Limited	06300755
Shepperton Management Limited	05907027
Shepperton Studios (General Partner) Limited	05913009
Pinewood Shepperton Limited	09083961
Shepperton Studios Property Partnership	LP11523
Baltray No. 1 Limited	05776674
Baltray No. 2 Limited	05778635
Pinewood South Limited	12765273

### *International Incorporated Entities*

<b>Company</b>	<b>Company No.</b>
Pinewood Productions Ireland Limited (ROI incorporated)	479869
Space Bear IR Designated Activity Company (ROI incorporated)	565529
Pinewood Film Production Studios Canada Inc. (British Columbia incorporated)	BC0892587
Pinewood Production Services Canada Inc. (Ontario incorporated)	885239-1
Pinewood USA Inc. (California incorporated)	n/a