



PINEWOOD

Slavery and Human Trafficking Statement FY21

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 2021.

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. 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 screening and due diligence procedures in place in respect of its agents, advisers, contractors, suppliers, intermediaries, revenue-generating entities where the Group holds a minority interest 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*'.

Pinewood requires 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 the Policy and requires contractors answer additional questions relating to compliance with the Modern Slavery Act.

Regular updates and supplier-tracking meetings are held between the business units by the 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, as well as relevant updates and reminders to staff on their obligations. 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, operations and businesses across international borders and the sub-contracting of responsibilities within supply chains. 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, especially in relation to difficulties of performing due diligence across-borders.

Pinewood uses its New Supplier Process, the Policy together with other company policies such as the Whistleblowing Policy, Reserved Matters and various internal processes and approvals, 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.

2021 Updates

Key updates and changes in the last financial year have been:

- Ongoing diarised monthly internal meetings for business units with Procurement and Legal to oversee all supply chain management issues, and improved tracking of suppliers. In FY21 we widened out the formal department meetings to additional teams such as Human Resources and Technology, which previously undertook ad-hoc reviews of their suppliers and supply chains;
- Consideration of supply chain management and adaptations, including additional technology resources to enable remote tracking and videocall supplier updates, in light of COVID-19 and

improved automation and systems for Finance and supplier management;

- Several key supplier contracts were tendered during FY21, involving full reviews and due diligence of tenderer policies and processes in relation to tackling slavery and human trafficking and contractual provisions included in the resulting 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;
- Filing of strike off applications for dormant UK and Irish entities completed as part of the ongoing entity review process. Seven entities were struck off/removed from the Group in the year ending 31 March 2021, including three international-incorporated entities in Germany, Ireland and Canada; and
- The Group continues to take 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 to our on-site caterer, security and cleaning providers.

Future Plans

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

- Centralised documenting of procurement processes to be completed before the end of 2021;
- Modern Slavery training for all new starters who joined Pinewood in 2021 and refresher sessions for all staff before the end of 2021;
- Reminder letters to key suppliers and partners; and
- A number of key contractual tenders are due during 2021/2022, so enhanced screening and due diligence processes will be undertaken.

Board Approval

The Group Board approved this Statement on 6 September 2021 and authorised Paul Golding to sign accordingly.

Signed:



Paul Golding
Chairman and Acting Chief Executive Officer
Date: 6 September 2021

Pinewood Group – Relevant Entities as at 31 March 2021

England and Wales Incorporated Entities

Company	Company No.
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 Film Advisors Limited	8164867
Pinewood Film Advisors (W) Limited	08864165
PSL Consulting Limited	8655214
Pinewood Dominican Republic Limited	07096246
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

Company	Company No.
Pinewood Productions Ireland Limited (ROI incorporated)	479869
Pinewood Film Production Studios Canada Inc. (British Columbia incorporated)	BC0892587
Pinewood USA Inc. (California incorporated)	n/a