



PINEWOOD

NEUTRALITY POLICY

Neutrality is at the heart of Pinewood Group's ("**Pinewood**" or "**Pinewood Group**") approach to its business and its clients. Pinewood endeavours not to take sides or accept any bias in relation to issues of a political, racial, religious or ideological nature. This policy applies to Pinewood's UK and International studios, offices and sites using the Pinewood name or brand.

Pinewood is not a political or religious organisation and is not aligned with any political party, cause or religious group or belief. Pinewood holds no religious or political affiliations anywhere in the world.

While individual employees may hold personal political opinions and/or religious beliefs, Pinewood undertakes to be impartial and politically neutral in its decisions, actions and business practices. Pinewood furthermore rejects any discrimination on the basis of ethnicity, nationality, political opinion, race, religion, sex or social class.

Attention is further drawn to Pinewood's Anti-Bribery policies and in particular sections relating to dealings with government officials.

GUIDING PRINCIPLE – ENSURING PINEWOOD'S INDEPENDENCE

It is Pinewood's policy to always remain independent and neutral in relation to political and religious issues. Any involvement Pinewood has with political parties or religious groups must be balanced and must protect and emphasise Pinewood's independence.

Pinewood does not and will not act in a way that is affected by any political stance or religious belief, or allow the personal political views of its employees, contractors or clients to affect any of its decisions or actions.

POLITICAL CONTRIBUTIONS

Pinewood does not give and has not given support or funding to a particular political party, nor to a candidate or politician, or a particular religious group.

It is Pinewood's policy not to contribute directly to political candidates, party committees, or other political entities, unless specifically sanctioned by the Company Secretary of Pinewood Group Limited in the case of the UK or the relevant Executive Board. Certain jurisdictions may set strict limits on contributions by corporations to political parties and candidates. Any proposed contribution must be reviewed and approved by the relevant Board, Committee or Company Secretary of Pinewood Group Limited in the case of the UK. No activities of a political or religious nature may be undertaken without such approval. If in any doubt, always raise potential issues with the relevant Board or Department, or in the case of the UK the Company Secretary of Pinewood Group Limited.

CHARITABLE CONTRIBUTIONS

Pinewood is committed to its support for local charities and good causes. In its donations to charities or non-profit groups (which may involve or be affiliated with government officials and/or political or religious activities), Pinewood maintains its political neutrality. No contributions to charities or other non-profit groups are made by Pinewood on the basis of political affiliation or religious belief. Only designated individuals within Pinewood are authorised to make charitable or non-profit contributions on behalf of Pinewood and must have received the necessary approvals to do so.

LOBBYING AND ATTENDING EVENTS

Lobbying activities may be regulated in certain jurisdictions. Pinewood employees should be aware that lobbying may require registration, reporting and/or be the subject of other local law restrictions. Lobbying can involve many kinds of activity, including:

- Contact with legislators, regulators, civil servants, NGOs and/or other issue-based groups;
- Communications with government officials or employees;
- Efforts to influence any legislative or administrative action;
- Providing gifts or entertainment to government officials or employees.

No lobbying activities may be undertaken on behalf of Pinewood without the prior approval of the relevant Board or in the case of the UK, the Corporate Affairs Director, and Pinewood undertakes to maintain its political neutrality in any such instance.

Certain events involving political or religious issues and groups may be relevant to Pinewood's business and strategic planning (for example, party conferences, industry-led events and/or planning sessions etc.). Pinewood representatives may attend such events to represent the group's interests on issues being or potentially being discussed, without jeopardising Pinewood's independence, provided such attendance has been approved by the relevant Pinewood Department or Board or in the case of the UK the Corporate Affairs Director. Such attendance by Pinewood representatives in no way means that Pinewood is affiliated with or shares the views of the political or religious group responsible for organising such events.

EVENTS HELD AT THE STUDIOS FOR POLITICAL OR RELIGIOUS GROUPS

Decisions or actions in relation to Pinewood business must not be politically or religiously motivated, and Pinewood must be balanced and neutral in relation to any activities or bookings at Pinewood premises which may involve political or religious groups. For example, if Pinewood allows a political or religiously-affiliated group to hold an event on Pinewood premises, this must be balanced by allowing other political parties/religious groups to hold comparable events. No exclusivity or partiality in relation to such bookings is permitted on the basis of political affiliation or religious belief.

Before any booking is made which may involve political or religious groups, thought must be given to the circumstances, impression and impact that any such booking may have on Pinewood's brand and reputation. If accepting booking is likely to give the impression that Pinewood is affiliated with or supports a particular political or religious group or beliefs, such a booking should not proceed unless and until it is considered and approved by the relevant Board or Department or in the case of the UK the Corporate Affairs Director.

USE OF COMPANY RESOURCES FOR POLITICAL OR RELIGIOUS ACTIVITIES

The use of Pinewood resources in support of any political or religious activities is not permitted.

EMPLOYEES PERSONAL POLITICAL/RELIGIOUS ACTIVITIES

Employees are free to engage in personal political or religious activity in their own time and contribute personal resources to candidates, parties, and/or religious groups in any manner consistent with local laws. Employees may not, however, use Pinewood funds or resources for personal political/religious activities or engage in any such activity while on Pinewood premises. Employees furthermore must not suggest or imply that they are acting on behalf of Pinewood when making personal contributions or engaging in personal political/religious activities.

RESPONSIBILITY FOR THIS POLICY

Responsibility for updating and enforcing this policy sits with the Company Secretary of Pinewood Group, supported by the Legal Department and, as necessary, escalated to the Corporate Affairs Director and Board of Directors. All employees have a responsibility to comply with the Group's stance on neutrality. In event of any questions or concerns, please contact the Company Secretary or email legal@pinewoodgroup.com.