



# PINEWOOD

## Slavery and Human Trafficking Statement FY22

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 2022.

### 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 film and television productions, our studios have an impressive heritage and have been home to some of the most iconic and successful feature films and TV shows ever made.
- Pinewood Studios and Shepperton Studios have been home to more than 2,000 films and 800 TV Shows for over 90 years.

### Pinewood's supply chain

With 90 years of experience, Pinewood's supply chain and its relationship with its suppliers is well-established and has been further enhanced over recent years and we continue to develop our studios. 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 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, sanctions exposure, 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 ("**Supplier Process**"). Responsibility for managing supply chains sits with all employees utilising the Supplier Process, overseen by the Procurement and Legal departments.

### Slavery and Human Trafficking Policy and related policies

The board of directors of Pinewood (the "**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 was last reviewed and updated by the Legal and Procurement departments in March 2022.

### 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 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 that suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. Pinewood's standard terms 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 that 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 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 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 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.

## **2022 Updates**

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

- Ongoing diarised monthly internal meetings for key business units with Procurement and Legal to oversee all supply chain management issues, and improved tracking of suppliers. In FY22 this was widened to include the Communications & Marketing team;
- Centralised documenting of procurement processes;
- Key operational supplier contracts were tendered during FY22, 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. The Group also

entered into high-value building contracts for its Shepperton Studios development during the financial year and undertook reviews of the contractor supply chains as part of the contract tenders;

- A review of the Group's existing contractual protections and provisions on anti-slavery and human trafficking in its standard terms and contracts to ensure ongoing compliance ;
- Risk-focused procurement process, amending/updating questionnaires included in the Supplier Process and tenders and requesting suitable evidence and warranties on compliance;
- Filing of strike off applications for dormant entities as part of the Group's ongoing entity review process. Seven UK entities and one Irish entity were dissolved and removed from the Group in the year ending 31 March 2022; 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, landscape maintenance and cleaning providers.

## Future Plans

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

- Continuing its regular annual review of the Policy to ensure that the Group's procedures and processes remain in compliance with the Modern Slavery Act 2015. The next review is diarised for March 2023;
- Modern Slavery training for all new starters who joined Pinewood in 2022 and refresher sessions for all staff before the end of FY2022;
- Enhanced Modern Slavery training for operational staff with supply chain responsibility to raise greater awareness and better spot the signs if potential cases are encountered;
- Ad hoc/spot check auditing of Group suppliers and their compliance, including with Modern Slavery laws, including supplier staff training documentation, and supplier policies and processes;
- Enhanced screening and due diligence for large-scale operational and development tenders planned in the upcoming year;
- Enhanced and additional checks on processes and training for international contracts, upcoming development contracts, and partners, including Dominican Republic;
- Further dissolution of dormant entities and simplification of the Group structure, including four entities with active/pending applications to strike off in the 2022 calendar year (being Pinewood Films No.13 Limited, Pinewood Films No. 14 Limited, Where Hands Touch (FPC) Limited and Pinewood Camera Trap Limited. The entity review project remains underway and further entities may be identified for strike off or dissolution in FY22; and
- Reminder letters to key suppliers and partners in December 2022.

## Board Approval

The Board approved this Statement on 26 September 2022 and authorised Paul Golding to sign accordingly and instructed it to be published accordingly on the Group website and the Modern slavery statement registry.

Signed: 

**Paul Golding**  
**Chairman and Acting Chief Executive Officer**  
**Date: 26 September 2022**

## Pinewood Group – Relevant Entities as at 31 March 2022

### *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.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
Pinewood South Limited	12765273

### *International Incorporated Entities*

<b>Company</b>	<b>Company No.</b>
Pinewood Film Production Studios Canada Inc. (British Columbia incorporated)	BC0892587
Pinewood USA Inc. (California incorporated)	n/a