



## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Pinewood Group Limited ("**Pinewood**") its parent company Picture Holdco Limited and their subsidiaries and associates (together, the "**Group**") are committed to the prevention, deterrence and detection of bribery and corruption. The purpose of this document is to set out the Group's policy against bribery and other corrupt practices, including the standards and procedures required to ensure compliance with such policy.

### INTRODUCTION

The Bribery Act 2010 (the "**Act**") was implemented with the purpose of harmonising existing law and eradicating bribery and corruption in UK-based business organisations. Pinewood together with its officers and employees could face prosecution under the Act if an offence has been committed.

### Definition

In general terms, bribery is committed where a person (A) offers or gives some benefit to another person (B) as an inducement for that person (B) or another person (C) to act dishonestly in relation to his principal's or employer's business. In such case, all those persons (A, B and C), as well as other persons who were complicit in the offence, may be guilty of bribery.

There are three specific criminal offences under the Act:

- offering, promising or giving a bribe;
- requesting, agreeing to receive or accepting a bribe; and
- bribing a foreign public official.

It is also an offence for a company to fail to prevent a bribe being paid by anyone "associated" with that company to a foreign public official or other person in order to obtain or retain a business advantage for the company. A person will be "associated" with the company if that person provides services for or on behalf of the company.

There are serious criminal penalties for committing a bribery offence under the Act, including up to 10 years in prison or an unlimited fine for individuals. Pinewood may also have to pay a fine, the amount of which is unlimited. Pinewood also risks being debarred from public contracts and is likely to incur substantial negative publicity and reputational damage.

Remember:

- a bribe does not have to be cash. It can be any non-cash benefit such as the offer of tickets to a sporting event or the use of holiday accommodation;
- the person who receives the bribe is as guilty as the person who offers it even if it is unsolicited;
- the bribe will still be an offence under UK law if it is committed overseas, irrespective of whether it would be illegal under local law;
- there are additional offences in relation to bribing government and/or foreign officials; and
- a bribe is a criminal offence.

The Group has a clearly-defined policy of non-tolerance of all forms of bribery and corruption within its business and expects its officers, employees and, where appropriate, business partners to conduct themselves in accordance with this policy. The Group will actively investigate all breaches or suspected breaches of this policy and, if appropriate, invoke disciplinary measures against any employee found to be involved in bribery and take prompt action to remedy the breach and prevent any repetition. In appropriate circumstances, the Group will also invoke contractual sanctions against any business partner who is found to have committed bribery-related offences.

## Compliance Officer and Policy Amendments

The current Pinewood Compliance Officer is Alexander Coles ([alex.coles@pinewoodgroup.com](mailto:alex.coles@pinewoodgroup.com), +44 1753 785157) or such person as may replace him from time to time and whose identity shall be published on the Pinewood website ([www.pinewoodgroup.com](http://www.pinewoodgroup.com)) from time to time. This policy, and any amended version that may apply to Pinewood and its Group from time to time shall be published on the Pinewood website ([www.pinewoodgroup.com](http://www.pinewoodgroup.com)).

Next review date: **September 2025**

## SCOPE

### Who must follow this policy?

This policy applies to all directors, employees, officers, advisors, agents, consultants, sub-contractors, suppliers and professional advisors of the Group. Compliance with this policy is mandatory and it is vital that all staff know the rules and comply with them. The Group provides staff with training on the scope and application of the policy at appropriate intervals. Please contact the Legal Department should you have any questions or require additional training for you or your team members.

The Group encourages the application of this policy amongst its business partners including joint venture partners and consortium members, and in some cases, the Group's contracts will require their partners to comply with this policy.

Employees who engage third parties such as agents, contractors, consultants or intermediaries to work on behalf of the Group must seek to ensure that these parties are aware of this policy. Such third parties may also be required to commit contractually to observe this policy when working on our behalf if they do not have an adequate policy of their own (see paragraph (iii) (Prevention of bribery by Associates) below).

### Raising concerns

Employees are encouraged to raise questions or concerns at the earliest possible stage about:

- the scope and application of the Act generally or of this policy;
- whether any particular payment or other act may be construed as a bribe or may be in breach of this policy; or
- any instance or suspicion of malpractice or any action which could be construed as a bribe or may be a breach of this policy.

Such concerns will be treated in the utmost confidence and should be raised with your Line Manager in the first instance or the Pinewood Compliance Officer at [legal@pinewoodgroup.com](mailto:legal@pinewoodgroup.com).

You should promptly disclose to the Pinewood Compliance Officer any activities which do not comply with this policy.

No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes or refusing to participate in other corrupt practices even if this may result in the Group losing business.

## MONITORING AND REVIEW

This policy is supported by the Board of Directors of Pinewood (the "**Board**"). The designated director with overall responsibility for this policy is Andrew Smith.

Pinewood will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and is committed to making improvements as appropriate. The Compliance Officer reports to the Group General Counsel, who has ultimate oversight and responsibility for this Policy together with any updates and implementation. Andrew Smith and the Group General Counsel will be responsible for reporting the results of this process to the Board. Employees and business partners who are obliged to comply with this policy will be notified of any change.

## POLICY

### (i) Key Principle

The Group prohibits bribery in any form whether direct or indirect through third parties.

### (ii) Risk areas for the Group

Pinewood has conducted a thorough bribery risk assessment of all aspects of its business and operations and has identified the following areas as vulnerable to allegations of bribery:

- dealings with Associates (as defined below)
- use of consultants
- activities undertaken by joint ventures
- kickbacks
- facilitation payments
- gifts and hospitality
- political donations
- large-scale tenders
- international activities and business ventures
- charitable contributions and sponsorships.

For more on each of these, see below. This list is not exhaustive and all staff should be mindful of the general anti-bribery principle underpinning this policy in all of their conduct and dealings on behalf of the Group. This risk assessment will be repeated periodically and this section of the policy will be updated accordingly in the light of any change of circumstances.

### (iii) Prevention of bribery by Associates

Under the Act, the Group may become criminally liable where an act of bribery has been committed by a person, firm or company who is associated with the Group (such as an employee of the Group, an agent, contractor, consultant or intermediary). Under this offence, a company may be guilty even if no-one within the company knew of the bribery. The Group's only defence is to be able to demonstrate that it had "adequate procedures" in place to prevent bribery being committed by someone associated with it. Pinewood therefore needs to ensure that its anti-corruption procedures are robust and effective to stop any of its employees or Associates acting on its behalf or on behalf of any company within the Group from committing bribery.

### Screening and due diligence procedures

The Group requires certain screening and due diligence procedures to be carried out in respect of its agents, advisers, contractors, intermediaries, joint venture partners and other representatives ("**Associates**") to ensure that the highest ethical standards are maintained and to protect the Group from the risk of it being associated with illegal or corrupt payments or such payments being made on its behalf.

Pinewood Toronto has developed and maintained its own policies and processes harmonised with local law and employees operating at Pinewood Toronto are expected to continue to follow those processes in the screening and due diligence of its Associates.

In the UK, Pinewood requires an upfront risk assessment to be carried out on all potential Associates. This is carried out by completing the 'New Supplier Request Form' (available on Spotlight). Employees are required to confirm whether they are aware of any allegation, prosecution or conviction for bribery involving the Associate of any of its employees, including being debarred from tendering for any private or public contract. The employee must further warrant that they have no suspicion that the Associate is engaged in bribery or corruption and that their appointment or engagement will not give rise to any bribery, corruption or reputational risks. Any concerns or queries relating to bribery or risks in engaging the Associate must be raised prior to their engagement. If you are unsure whether someone is an "Associate" for these purposes please consult Group Legal. You may be required to carry out, or assist with, further due diligence enquiries in relation to any Associate where the answers given on the New Supplier Request Form are unsatisfactory in any way, or raise any particular concerns that the relevant individual, firm or company presents a heightened bribery risk; this may include completion of an official Due Diligence Checklist ("**Checklist**") in the form at Appendix 2.

The Group requires that Associates are made aware of this policy. Associates may also be required to commit contractually to observe this policy if they do not have an adequate policy of their own. Appropriate anti-corruption language for inclusion in the contractual terms can be obtained from Group Legal. If the Associate is found to be in breach, the relevant Group company may terminate the contract. The Group may also write to Associates periodically to remind them of this policy, their contractual obligations and other compliance requirements.

### **Monitoring procedures**

Employees must keep compliance by Associates under review and report any suspected breaches of contractual obligations or unlawful conduct as set out below.

The New Supplier Request Form (and any follow-up due diligence and/or Checklist) is designed to eliminate bribery and corruption risks posed by Associates at the pre-contract stage. However, it is also your responsibility to monitor the activities of those with whom you have direct contact.

In your dealings with Associates, the following non-exhaustive list of "red flags" should put you on notice of possible bribery risks and should be reported to your Line Manager and Group Legal:

- dealings in jurisdictions with a history of bribery and corruption (see the [Transparency International Corruption Perceptions Index](#));
- close ties with the UK or Canadian, or any other overseas Government or any Government agency in the UK or overseas;
- poor or non-existent anti-bribery policy or a reluctance to co-operate with the New Supplier process;
- refusal to accept anti-corruption language or attempts to substantially modify the language included in their contractual terms;
- poor or non-existent records of monitoring compliance with its own anti-bribery policy;
- extensive use of third party agents and intermediaries, particularly in jurisdictions with a history of bribery and corruption;
- odd payments or unexplained accounts in financial records (if available for review);
- false or misleading documentation;
- adverse press comment on business dealings; and
- evidence of extravagant corporate hospitality, gifts or expenses.

### **(iv) Use of Consultants**

From time to time, the Group uses consultants to facilitate new business opportunities. The Group recognises that reliance on consultants and, in particular, difficulties in monitoring expenditure which may involve cash transactions, is a potential source of risk of bribery being undertaken on the Group's behalf. The Group therefore requires that due diligence is carried out prior to engagement (as set out at paragraph (iii) above). The Group also requires anti-corruption language to be included in the contractual arrangements with the consultants. Appropriate anti-corruption language for inclusion in the contractual terms can be obtained from the Legal Department. If the consultant is found to be in breach, the relevant Group company may terminate the contract.

### **(v) International activities**

The Group has international businesses including wholly owned subsidiary companies incorporated in Canada and the USA. The Group requires its businesses activities to comply with all applicable local law and regulations relating to anti-bribery and anti-corruption compliance. The Act has extra-territorial effect and regulates the Group's activities internationally. This means that offences involving any directors, employees or Associates of non-UK entities will be subject to UK law irrespective of whether the offence took place overseas, or if it would be an offence under local law. Therefore, this Policy applies to all international businesses and Group companies, and all international Group employees and Associates must comply with this Policy at all times, in addition to any applicable local law requirements. The list of the Group's subsidiary entities to which this Policy applies (subject to change from time to time) is set out at Appendix 3.

## **(vi) Kickbacks**

Contracting is one of the operational functions with the highest vulnerability to kickbacks. A kickback is the 'return' of an undue favour or service rendered, an illegal secret payment made as a return for a favour. A kickback is a bribe and the offer or receipt of any kickback is a criminal offence. A contractual rebate, discount or refund for bulk purchasing would not normally fall within the definition of a kickback.

The Group has no tolerance of kickbacks.

The Group is committed to the highest standards of business integrity and will operate transparently and fairly in its business dealings. Compensation to Associates must be appropriate and justifiable remuneration for services rendered. A payment should never be made to a commercial counterparty to win business or influence a business decision in the Group's favour. All potential agreements with Associates involving success fees or bonuses must be approved in advance by Pinewood's executive management. Kickbacks, secret commissions and similar payments made in the course of the Group's business are strictly prohibited.

## **(vii) Facilitation payments**

The Group prohibits the making of facilitation or "grease" payments. Facilitation payments are often described as unofficial payments made to secure or speed up routine actions, often by public officials, such as issuing permits, licences or consents, immigration controls, scheduling inspections associated with contract performance, providing services or releasing goods held in customs. The payment offered or requested may be small but it will still be a bribe unless it is permitted or required by written local law.

*Example: An "expediting" fee is required by a government official to issue a permit in circumstances where the legitimacy of the fee is not clear, or a fee is demanded which the official claims is legitimate but is higher than the published fee or appears to be disproportionately high given the action required.*

Suggested response: You should consider the following action:

- first off, payment should be resisted, particularly any payment in cash and/or payment directly to the official, perhaps using illegality and the prospect of prosecution under the Act as a reason not to pay;
- if the official persists in the demand, ask for documentary proof that the fee is payable;
- if the official cannot supply evidence of the validity of the fee, you should again politely refuse to pay it or ask to see a more senior official;
- if this request is refused, or if the senior official is unhelpful, you should not make the payment and say to the official that you have noted their identity and that your employer will make a formal complaint to the official's employer and to the relevant authorities; and
- finally, you should report the incident to your Line Manager and Group Legal as soon as practicable giving as much detail as possible so that we can make a meaningful record of the situation and decide what action to take to ensure that it is not repeated.

If you have no option other than to pay, perhaps because you have good reason to believe that you cannot escape serious harm unless you meet a demand for payment, you may make such a payment in these exceptional circumstances. You should report the incident to your Line Manager and the Compliance Officer without delay.

The report must state:

- why the payment was unavoidable;
- the purpose of the payment;
- the amount of the payment;
- the date it was made; and
- the identity of the recipient of the payment, and of any superior official to whom reference was made, if known.

## **(viii) Gifts and hospitality**

The Group recognises that offering or accepting gifts and hospitality is usually a legitimate contribution to building good business relationships. However, gifts and corporate hospitality may cross the line and become an illegal bribe if they are disproportionate and/or intended to influence a decision (e.g. to

award a contract or business) such that the decision is made improperly. Therefore certain safeguards must be applied when offering or accepting corporate hospitality. The Group's policy, which must be complied with by all staff, is set out in Appendix 1.

#### **(ix) Political Donations**

None of the Group nor its employees shall make any form of direct or indirect political donation, contribution or payment where that donation or contribution is made as a way of obtaining an advantage for the Group in business transactions, for example, it is linked in any way to a tender for a government contract, the obtaining of a permit or licence, or it is designed to influence the content or timing of legislation which could impact on the business of the Group. A political contribution for these purposes would include any payment or donation to a political party or organisation including a trade union, either in the UK or overseas or to any lobbyist or lobbying group or to any candidate for election to public office in the UK or overseas.

Where any political donations or contributions are to be made by or on behalf of any Group company, they should only be made in compliance with the Group's Neutrality Policy and with the prior approval of the Board and will be publicly disclosed.

#### **(x) Charitable contributions and sponsorships**

Charitable contributions should not be made by or on behalf of the Group if the contribution is or may in any way be interpreted as a means of buying influence in relation to any situation which may have an impact on the Group's business. For example, this may be the case if a charity is supported by a high-profile individual who is, or where the charity is, lobbying for a particular outcome which is relevant to the Group's business.

Sponsorships by or on behalf of the Group shall only be made for bona fide charitable or public relations reasons and shall not be made in circumstances where there is or may be any inference of undue influence. Sponsorships should only be offered if they are supported by reasonable and transparent selection criteria.

Any charitable contribution or sponsorship by or on behalf of any Group company should only be made in accordance with the Group's Neutrality Policy and with the prior approval of the Company Secretary and may be publicly disclosed.

### **IMPLEMENTATION**

All employees of Pinewood have a responsibility to combat bribery and comply fully with this policy. The Board has ultimate responsibility to communicate this policy and to ensure Pinewood employees and Associates understand and comply with it.

Employees must help to ensure that records accurately and fairly reflect transactions and dispositions of assets. No undisclosed or unrecorded fund or asset may be established or maintained for any purpose. All employees must respond fully and truthfully to any questions from Pinewood's internal or external auditors and the Compliance Officer. Forging or fraudulently altering documents is a crime and is strictly prohibited by Pinewood.

#### **Warning Signs**

The below is a non-exhaustive list of "red flags" that an Associate intends to make or conceal improper payments or other benefits:

- unusual payment patterns
- lack of visibility of the actual services rendered by the Associate, or lack of qualifications or resources reasonably necessary to properly perform the services
- requests for unusually high commissions
- close connections between the Associate and a public official
- unknown companies with no business history including without limitation no office address or registration
- payment requests at odds with an agreed payment schedule, including requests to make payment to an unknown third party

- failure or refusal to provide information upon request
- attempts to make late changes to fees/payments

## **Training**

All employees will receive relevant training which will include implementation of this policy, consequences of failing to comply, guidance on how to respond and how to report violations. Employees may be required to undertake refresher sessions at regular intervals.

## **Sanctions**

In addition to criminal penalties for offences under the Act, failure to comply with this policy by Pinewood employees is grounds for disciplinary action up to and including termination of your contract of employment. No employee will be penalised or face other disciplinary measures for refusing to pay or accept bribes. But all such incidents must be reported to your Line Manager and the Compliance Officer. Failure to report an incident is deemed a breach of this policy.

## **Compliance with other regulations, policies and global initiatives**

The Group reviews relevant international policies, initiatives and regulations when formulating and reviewing this policy. Where appropriate the Group will from time to time incorporate and apply elements of such initiatives, the Group does this proactively and irrespective of whether such policies are of direct effect.

## **ACKNOWLEDGEMENT**

To confirm that you have read and understood this policy, you will be asked to “click to accept” when prompted to do so following receipt of a “Mandatory Read” notice from the Group intranet and/or you may be asked to sign and return an acknowledgment form to HR. If you do not fully understand any aspect of this policy, please contact Group Legal for further assistance and guidance before you sign.

## APPENDIX 1

### GIFTS AND HOSPITALITY POLICY

#### Introduction

Directors and employees must exercise care when offering or accepting gifts and hospitality in order to protect their reputation and the Group's reputation against allegations of improper behaviour and to ensure that bribery laws are not breached.

**Gifts** include money, goods, services or loans given ostensibly as a mark of friendship or appreciation.

**Hospitality** includes entertaining, meals, receptions, tickets to entertainment, social or sports events, participation in sporting events, such activities being given or received to initiate or develop relationships with business people or other third parties.

**Gifts and hospitality that are never acceptable are those consisting of loans and/ or money.**

Directors and employees shall not:

- actively request or seek gifts, entertainment, favours, or anything of substance, directly or indirectly, from customers, vendors, suppliers, or others that do business or are trying to do business with the Group;
- accept the offer of hospitality where the host, or a representative of the host, will not be present;
- accept or offer cash or its equivalent or an unduly extravagant gift or offer of hospitality to or from customers, vendors, suppliers, or others that do business or are trying to do business with the Group;
- accept or offer a gift, entertainment, favour or anything of substance to or from any person if a sense of obligation is incurred in relation to the award of a contract or business to or by the relevant person or organisation;
- offer a gift, entertainment, favour or anything of substance to any foreign public official or any member of their family;
- offer a gift, entertainment, favour or anything of substance to any UK public official or any member of their family if it is in any way intended to, or an inference may be drawn that it is intended to, influence any action or decision which may have an impact on the business of a Group company;
- accept a gift, entertainment, favour or anything of substance that would not be reciprocated by the Group; or
- accept or request a gift, entertainment, favour or anything of substance on behalf of any of your friends or family or offer any such thing to any friend or family member.

#### Gifts and hospitality requiring prior approval before acceptance

For any gift or hospitality (given or received) above £250 (or CAD 400) you must request prior approval from the Compliance Officer before giving or receiving the gift or hospitality. When registering the gift or hospitality on the Gift Register (see below) you will be required to confirm that approval was sought and given in advance. Failure to follow this procedure will be a breach of this policy.

#### Gifts and hospitality that are usually acceptable without prior approval (subject to the self-approval test)

Where gifts and hospitality are sufficiently modest (meaning with a monetary value of less than £50 (CAD 80) for entertaining and £25 (CAD 50) for gifts), they should not require prior approval (subject to the self-approval test).

#### Self-approval test

You should ask yourself the following questions to determine whether a gift or hospitality is appropriate:

- what is the context or purpose of the gift or hospitality?
- is the gift or hospitality proportionate? Would the guest or the recipient (as appropriate) be able or likely to purchase something of comparable value reasonably routinely?
- would a person of a similar position to yourself regard the gift or hospitality as unduly



- extravagant in the circumstances?
- would you be embarrassed if your manager, colleagues or anyone outside the Group became aware of the gift or hospitality?

The following will usually be acceptable without prior approval:

- infrequent meals with someone with whom the Group does business;
- occasional attendance at sports, theatre or other social events; or
- gifts of nominal value.

### **Gifts and hospitality that may be acceptable with prior approval**

For anything that does not fit into the above categories, the gift or hospitality may or may not be acceptable and you must get approval from your Line Manager or if your Line Manager is not available, Group Legal.

### **Gift and Hospitality Register**

All gifts and hospitality must be recorded in the gifts and hospitality register located on Spotlight. This does not apply to nominal value items, such as promotional material. This register will be subject to management review.

## APPENDIX 2

### DUE DILLIGENCE CHECKLIST – ASSOCIATE APPROVAL FORM

#### Checklist for proposed agent, adviser, contractor, consultant, intermediary, joint venture partner or other representative (each an "Associate")

This checklist should be completed and signed by the Associate and submitted to the Compliance Officer for countersignature. If you have any doubts or problems in answering the questions or if information is not available, you should consult the Compliance Officer. You should ensure that a copy of the completed checklist is signed and kept on file.

#### SECTION 1 (NEW SUPPLIER FORM – TO BE INCLUDED IN NEW SUPPLIER FORM AND COMPLETED AND SIGNED FOR ALL NEW ASSOCIATES)

##### A. BACKGROUND CHECKS – QUESTIONS TO BE COMPLETED BY THE ASSOCIATE

Nature and history of your business, identifying in particular: <ul style="list-style-type: none"> <li>- number of years in operation</li> <li>- other companies or organisations for which you provide similar services</li> <li>- resources available to you</li> </ul>	
List of all directors and officers of your organisation	
Please provide details of any connection with any government department or agency, public official or any politically exposed person, identifying in particular: <ul style="list-style-type: none"> <li>- if any such entities or persons have an interest (financial or otherwise) in your business</li> <li>- if any owner, officer or employee of your business is an elected or appointed official or employee of a government department or agency</li> <li>- if any owner, officer or employee of your business has a close family or marital relationship with anyone who is an elected or appointed official or employee of a government department or agency</li> </ul>	
What countries do you have businesses or branch offices (if these are numerous, list the main countries of operation).	
Please provide details of any criminal offences that your or any of your associated organisations or any employees have been accessed, prosecuted and/or convicted of	
Do you have an Anti-Bribery and Corruption Policy?	
Do you train all staff on Anti-Bribery and Corruption?	

##### B. BACKGROUND CHECKS – INTERNAL PINEWOOD QUESTIONS – TO BE COMPLETED BY RELEVANT STAKEHOLDER

By what process and for what reasons was the Associate selected?	
Was the appointment of the Associate required or recommended by any person? If so, please detail	
Does the Associate have any history of allegations (substantiated or not) of bribery or corruption in the last six years? You should search a global media database (e.g. Google) for the name of the Associate and the	

names of the key employees. You should also search appropriate Government databases. A number of Government organisations maintain lists of persons and organisations that have violated various laws or regulations	
As far as you are aware, has there been any prosecution or conviction involving the Associate or any of its key employees within the last six years, including being debarred from tendering for any public or private contract	
Have unusual payment patterns or financial arrangements been requested by the Associate (e.g. substantial and unorthodox upfront payments, payment through or to third parties or payment by some other unusual means, such as through shell companies)? If so, please detail.	
Have unusually high commissions been requested?	
Has the Associate stated that a particular sum of money is needed for him to "make the necessary arrangements" or "secure the business" or another similar expression?	
Has the Associate requested that he be paid in another country (other than the Associate's country of residence or the territory in which services are to be performed), in another currency or in another name?	

## NEXT STEPS

If having completed **SECTION 2**, you are satisfied that the appointment or engagement of the Associate will not give rise to any undue bribery, corruption or reputational risks, you should now go to **SECTION 4: CERTIFICATION**.

If any "red flags" have been raised during the due diligence assessment in **SECTION 2**, you must contact the Compliance Officer who will advise you on how to proceed, which may include completing **SECTION 3**.

## SECTION 3 – ADDITIONAL COMPLIANCE QUESTIONS

### (TO BE COMPLETED BY YOU IN CONJUNCTION WITH THE COMPLIANCE OFFICER)

This section should be completed with input from the Associate. Once completed, if you are satisfied that the appointment or engagement of the Associate will not give rise to any undue bribery, corruption or reputational risks, you should go to **SECTION 4: CERTIFICATION**.

If the Associate has an anti-bribery policy, they should provide a copy	
If no formal written procedures are available, the Associate should describe how it handles these issues when they arise	
Who is responsible for compliance with the anti-bribery procedures? Please provide contact details.	
What procedures are employed by the Associate to monitor compliance with the anti-bribery procedures	
Has the Associate been prosecuted or convicted in the last six years for bribery or corruption violations? Does the Associate have any history of allegations (substantiated or not) of bribery or corruption in the last six years?	

#### SECTION 4: CERTIFICATION

I certify that:

- (a) I have no suspicion that the Associate is engaged in bribery or corruption;
- (b) I am satisfied that the appointment or engagement of the Associate will not give rise to any undue bribery, corruption or reputational risks;
- (c) I am satisfied that the services to be provided by the Associate are clear and the payments to be made to the Associate are commensurate to those services; and
- (d) I am not aware of any other matters that may present a bribery risk for the Pinewood Group.

**Signature:**

**Name:**

**Title:**

**Date:**

**Counter-signature (by relevant Line Manager or Compliance Officer, or if you have completed Section 3, the Compliance Officer):**

**Name:**

**Title:**

**Date:**

**IF YOU CANNOT GIVE THE CERTIFICATION ABOVE, YOU MUST NOT APPOINT OR ENGAGE THE ASSOCIATE**

### APPENDIX 3

#### PINEWOOD GROUP ENTITIES As at 16 October 2024

<b>Company</b>	<b>Company No.</b>
Picture Holdco Limited	10296277
Pinewood Group Limited	03889552
Pinewood Studios Limited	00392619
Shepperton Studios Limited	02974333
Pinewood Finco plc	11054849
Pinewood-Shepperton Studios Limited	02985190
Pinewood Shepperton Facilities Limited	07527390
Pinewood Films Limited	07660856
Pinewood Film Advisors Limited	08164867
Pinewood Film Advisors (W) Limited	08864165
PSL Consulting Limited	08655214
Pinewood Dominican Republic Limited	07096246
PSL Development 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 Canada Inc (Ontario incorporated)	1000467880
Pinewood Toronto Development Inc. (Ontario incorporated)	1000467859
PT Studios Inc. (Ontario incorporated)	1000554199
Pinewood USA Inc. (California incorporated)	N/A