



# 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 or Shepperton names or brands.

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 Policy and in particular sections on dealings with government officials.

**Next Review Date: March 2027 and earlier if required by law or material update**

### 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.

Pinewood will comply with applicable law and regulatory guidance in all jurisdictions where it operates, including UK legislation such as the Bribery Act 2010, the Political Parties, Elections and Referendums Act 2000, and the Charities Act 2022, as well as local lobbying registration and disclosure laws, and relevant international standards where applicable. Pinewood will monitor legal and regulatory developments and update this Policy as required.

### 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, and no activities of a political or religious nature may be undertaken without such approval.

All proposed political contributions must undergo due diligence proportionate to risk, including verification of recipient eligibility under applicable electoral and anti-bribery laws, assessment of reputational risk, and confirmation of compliance with local limits, registration, and reporting requirements. A written due diligence file must be created and retained. If in doubt, UK employees must escalate to Group Legal Department or the relevant Board/Department before any commitment is made. Records of political contribution due diligence and approvals shall be kept for six years from the end of the financial year to which the record relates, or longer where required by local law. Escalations

concerning legal compliance must be routed to the Group Legal Department and the Company Secretary, with urgent matters escalated to the Corporate Affairs Director.

## **CHARITABLE CONTRIBUTIONS**

Pinewood is committed to its support for local charities and good causes and maintains political neutrality in its donations to charities or non-profit groups, including where such organisations may be affiliated with government officials and/or political or religious activities. 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.

All proposed charitable contributions must undergo due diligence, including verification of charitable status, review of beneficiaries and links to public officials, purpose of funds, and sanctions and fraud checks, to comply with applicable charity, anti-bribery and counter-terrorism financing laws. A written approval and due diligence record must be retained for six years from the end of the financial year to which it relates, or longer where required by local law. Concerns must be escalated to Legal and the Company Secretary; high-risk matters will be referred to the Corporate Affairs Director and, where appropriate, the Board.

## **LOBBYING AND ATTENDING EVENTS**

Lobbying activities may be regulated in certain jurisdictions and can involve contact with legislators, regulators, civil servants, NGOs and other issue-based groups; communications with government officials or employees; efforts to influence legislative or administrative action; and 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 the Corporate Affairs Director, and Pinewood undertakes to maintain its political neutrality in any such instance.

Before engaging in lobbying in any jurisdiction, Pinewood will:

- Identify whether the activity constitutes “lobbying” locally and whether registration, reporting, or disclosure is required.
- Appoint a responsible owner within Corporate Affairs or Legal to oversee registration and filings.
- Complete registration and any mandatory training or briefing before contact is made.
- Maintain contemporaneous records of contacts, topics discussed, expenditures, and filings.
- Undergo periodic compliance checks by the Group Legal Department.

Employees must not engage with public officials on policy or legislative matters on Pinewood’s behalf unless they have received a jurisdiction-specific briefing from Legal or Corporate Affairs covering definitions of lobbying, restrictions on gifts and hospitality, and reporting obligations. Attendance at political or policy events requires prior approval and must be logged..

## **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. 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 or religious groups to hold comparable events; no exclusivity or partiality is permitted on the basis of political affiliation or religious belief. If accepting a 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 Studio General Manager, Group Legal or the Corporate Affairs Director and Group Board.

Decision-making criteria for such bookings include objective assessment of safety, security, operational feasibility, legal compliance (including equality, anti-discrimination and public order considerations), reputational risk, and consistency with neutrality. A written assessment must be completed and retained for six years from the event date. Refusals must be reasoned, recorded, and communicated in writing by the designated decision-maker. Pinewood will respect lawful freedom of expression while ensuring compliance with applicable laws and this Policy. A complaints or challenge process is available whereby

the applicant may seek a review by the Company Secretary and Corporate Affairs Director; a final escalation may be made to the Group Board for determination.

## **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.

## **EMPLOYEE'S 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 use Pinewood funds or resources for personal political/religious activities or engage in any such activity while on Pinewood premises, and must not suggest or imply that they are acting on behalf of Pinewood.

## **ANTI-DISCRIMINATION AND EQUAL OPPORTUNITES**

Pinewood prohibits discrimination, harassment, or victimisation contrary to applicable equality and anti-discrimination legislation, including the Equality Act 2010 in the UK, and equivalent local laws internationally. Compliance is monitored through training, incident reporting, periodic audits of decisions relating to contributions, bookings and lobbying, and review by Legal and HR. Remedial actions, including policy updates and further training, will be implemented where gaps are identified

## **TRAINING, AWARENESS AND DISCIPLINARY MEASURES**

Training on this Policy, anti-bribery, equality and applicable lobbying requirements will be provided to relevant employees on induction and at least annually, with supplemental jurisdiction-specific briefings prior to lobbying or attending political events on Pinewood's behalf. Failure to comply with this Policy may result in disciplinary action up to and including dismissal, and may be reportable to relevant authorities where required by law.

## **RECORD-KEEPING AND RETENTION**

Pinewood will maintain accurate, complete and timely records relating to political and charitable contributions, lobbying registrations and reports, approvals for attendance at political or policy events, and event booking assessments and decisions. Unless a longer period is required by law, records will be retained for six years from the end of the financial year to which they relate for contributions and lobbying, and six years from the event date for bookings. Records must be readily retrievable for audit and regulatory purposes.

## **ESCALATION, REPORTING AND WHISTLEBLOWING**

Employees who have questions or concerns about legal compliance, neutrality, or potential breaches of this Policy should raise them promptly with Legal or the Company Secretary. Confidential escalation routes are available via the Whistleblowing policy and concerns may be raised anonymously where permitted by law. Retaliation against anyone who raises a concern in good faith is prohibited.

## **CONTACT**

In event of any questions or concerns, please contact the Company Secretary or email [legal@pinewoodgroup.com](mailto:legal@pinewoodgroup.com).

## **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.