



PINEWOOD

Slavery and Human Trafficking Statement

Pinewood Group Limited ("**Pinewood**") and its 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 2018.

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 is Europe's largest provider of stage and studio space. Pinewood Studios, Shepperton Studios and Pinewood Studio Wales together accommodate 37 stages and three dedicated digital television studios. Pinewood Studios is home to Europe's leading studio-based underwater filming stage, as well as one of the largest exterior water tanks in Europe. 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 international network of studios and operations include Canada, Malaysia, the Dominican Republic, the USA, and activities in China and Ireland.

Pinewood Supply Chain and Suppliers

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 KYC; a formal New Supplier Process (defined below) has been introduced and 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**").

Slavery and Human Trafficking Policy

Pinewood and its Board take a zero-tolerance approach to slavery and human trafficking. Pinewood has a published Slavery and Human Trafficking Policy (available at www.pinewoodgroup.com ("**Policy**")). The Policy is available to all staff, customers, suppliers and members of the public.

Pinewood requires certain screening and due diligence procedures to be carried out in respect of its agents, advisers, contractors, suppliers, intermediaries, joint venture partners 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 will be required to complete the questionnaire as part of a '*Supplier Information Update Process*'.

Pinewood requires that its suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. In the event of any breach of slavery and human trafficking laws or breach of the Policy, Pinewood may in its sole discretion terminate suppliers' contracts.

Pinewood provides relevant staff with training on the scope and application of the Policy at appropriate intervals and regular reminders are published. All Pinewood employees and suppliers should know how to identify or prevent slavery and human trafficking.

The Policy is actively reviewed and maintained in order to maintain high standards of compliance in Pinewood's procurement process and supply chain.

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 and businesses across international borders and the sub-contracting of responsibilities in the Pinewood supply chain. 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 to the risk level, especially in relation to difficulties of performing due diligence across-borders.

Pinewood uses its New Supplier Process, as well as contractual documentation to minimise the risks within its supply chain.

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.

- 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 suppliers with poor or non-existent slavery and human trafficking policies or a reluctance to co-operate with the New Supplier Process;
- Number of suppliers refusing to accept slavery and human trafficking language or attempts to substantially modify the language included in their contractual terms;
- Periodic review of contractual language and know-how as necessary; and
- Numbers of Pinewood staff trained on the Policy.

2018 Updates

Key updates in the last financial year have been to:

- Improve contractual protections by adding contractual provisions on anti-slavery and human trafficking in all new contracts and standard terms.
- Improved Pinewood's procurement process, including adding specific questions to the New Supplier on-boarding process and all tenders, and requiring suppliers to provide suitable evidence and warranties on compliance;
- Ongoing communication and review. The Group took 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 under the Act; and
- Training given to key stakeholders, including Procurement and Operations teams.

Future Plans

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

- Further analysis of the Group's supply chain;
- Roll out awareness training to the remainder of the Group's employees; and
- Continue to improve and enhance Group policies and procedures in respect of human rights and modern slavery risks.

Signed:

Andrew Smith
Director of Corporate Affairs
Pinewood Group Limited
12 December 2018

Pinewood Studios Group – Relevant Entities

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 Riot Club Limited	8446929
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 Media Development Limited	09592018
Pinewood Film Advisors Limited	8164867
Pinewood Film Advisors (W) Limited	08864165
PSL Consulting Limited	8655214
Pinewood Studio Wales Limited	08863162
Pinewood Dominican Republic Limited	07096246
Pinewood Malaysia Limited	07074446
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

International Incorporated Entities

Company	Company No.
Pinewood Productions Ireland Limited (ROI incorporated)	479869
Space Bear IR Designated Activity Company (ROI incorporated)	565529
Pinewood Film Services GmbH (Hamburg incorporated)	n/a
Pinewood Film Production Studios Canada Inc. (British Columbia incorporated)	BC0892587
Pinewood Production Services Canada Inc. (Ontario incorporated)	885239-1
Pinewood USA Inc. (California incorporated)	n/a