

## MODERN SLAVERY ACT 2015

### TINOPOLIS LIMITED & ITS UK GROUP COMPANIES - ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

#### INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

We are committed to improving our practices to combat slavery and human trafficking.

#### ORGANISATION'S STRUCTURE

We are an international media producer and distributor with a significant presence in the global media marketplace in the media and entertainment sector. Tinopolis Limited is the parent company of the UK Tinopolis group (Group). The Group has an annual turnover of over £100m. This statement has been approved by the Boards of all the companies set out below as well as the Board of Tinopolis Limited.

Tinopolis Limited  
Passion Distribution Limited  
Firecracker Films Limited  
Firecracker Films I Limited  
Pioneer Film and Television Productions Limited  
The Television Corporation Limited  
Tinopolis Facilities Limited  
Teledu Tinopolis Cyf  
Agenda Films Limited  
Tinopolis Interactive Limited  
Video Arts Limited  
Fiction Factory Limited  
Sunset & Vine Productions Limited  
Golden Break Music Limited  
Mentorn Media Limited  
TVC Media Limited  
Sunset + Vine Midlands Limited  
Mech TV Limited  
In The Womb Limited  
Upstream Media Limited  
Tree on a Hill Films Limited

*Note: Sunset & Vine Productions Limited is the only company in the Group which exceeds the £36m threshold on an individual basis*

#### OUR BUSINESS

The Group is made up of the above UK subsidiary undertakings which are trading companies operating in the media and entertainment sector. For further information, please see our website at [www.tinopolis.com](http://www.tinopolis.com)

#### OUR EMPLOYEES

We review employee salaries annually to ensure that we pay in accordance with the "Real Living Wage" (as set by The Living Wage Foundation), both in and outside London.

#### OUR SUPPLY CHAINS

Our supply chains include:

- **Subcontracting:** we engage production crew as independent contractors as individuals and through loan out companies to work on our television productions. Subcontractors include producers, directors, editors; outside broadcast service providers; etc.
- **Procurement of goods or services:** we engage independent contractors to design and or build sets, lighting, stage building; and
- **Distribution:** we distribute television programmes globally.

The Group's relationship with its suppliers is short-term. The Group sources goods and services in the UK as most of the Group's programmes are filmed and produced in the UK. Where filming or services take place outside the UK, the Group may source some of the goods and services locally.

As we work in the media and entertainment sector, it is not anticipated that there would be any slavery and human trafficking related issues, however, we are committed to undertaking an on-going Risk Assessment to ensure that any potential issues that may arise in the future are dealt with immediately.

#### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

- All Group companies are expected to comply with the Group Anti-slavery and human trafficking policy, which is published on the [www.Tinopolis.com](http://www.Tinopolis.com) website.
- The Heads of Productions of each Group company monitor its company's compliance with the Group policy and have due diligence processes in place when subcontracting goods and supply services to enable them to identify and assess risks in relation to slavery and human trafficking.
- Most of our suppliers are well known providers in the UK media industry who have been vetted and approved by our health and safety advisers and broadcaster clients.
- Our suppliers are expected to comply with Modern Slavery Act 2015 as required by the terms and conditions of our supplier agreements. The penalty for breach of the condition to comply with Modern Slavery Act 2015 is immediate termination of the agreement.
- The Group has a Whistleblowing Procedure in place to protect any whistle blowers working for the Group. A copy of the Whistleblowing Policy is published in the Company's "People Policies" folder.
- We constantly review / assess the effectiveness of our policies and procedures and implement changes in line with our business requirements and those of our clients, and in line with recommendations by our industry body and broadcaster clients.

#### **OUR DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk:

- Our employees and freelancers are provided with information about our company policies as part of their induction and on any ongoing basis as part of our programme compliance work.
- Our goods and services engagements are conditional on compliance with Modern Slavery Act 2015.

- Our subcontractors and suppliers are engaged on standard Producers Alliance for Cinema and Television (PACT) terms and conditions which are updated and compliant with all current laws.
- We run Google and LexisNexis checks and company searches on our contractors and goods and services suppliers.
- We have a process of identifying and checking health and safety standards and provision included as part of our Risk Assessment (RA) process from a recognized company. So for example:
  - If filming overseas with local crew, the RA would ensure the same level of protections and duty of care is in place for local hired nationals, including the supply and use of Personal Protective Equipment (PPE).
  - We conduct a competency of contractor check on all suppliers which addresses the safety performance of the supplier and requires two independent references for any overseas work.
  - We include local crew in the insurance cover we arrange for each production.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains through our due diligence processes.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains through our risk assessment and health and safety procedures.
- Monitor potential risk areas in our supply chains through competency of contractor check on all suppliers.
- Protect whistle blowers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 September 2020.

This statement has been approved by the Board of Directors of Tinopolis Limited.

Signed



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**Arwel Rees**  
**CEO**  
**Tinopolis Limited**

1<sup>st</sup> March 2024