

Pretzel Films Ltd
Anti-Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Pretzel Films Limited and any company directly or indirectly owned or controlled by it (“PF”).
- 1.3 The purpose of this policy is to set out the PF’s policy on modern slavery. The Group has a zero-tolerance approach to modern slavery within its business and its supply chains.
- 1.4 This policy applies to all members of PF, and to all:
 - (a) persons working for or on behalf of the Group in any capacity, including all employees, directors, officers, agency workers, seconded workers, volunteers, interns and agents (“PF Staff”); and
 - (b) contractors, external consultants, agencies, third-party representatives, and business partners (“Suppliers”). Where a Supplier has its own modern slavery policy, we expect the Supplier to adhere to that policy.
- 1.5 PF is committed to:
 - (a) acting ethically and with integrity in all our business dealings and relationships;
 - (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
 - (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

- 1.6 We expect the same high standards from all of our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.
- 1.7 PF specifically prohibits the use of work paid recruitment fees, compulsory overtime, child labour, discrimination, confiscation of identification documents and any act which may directly or indirectly impede freedom of movement, freedom of association, or the freedom of a worker to terminate their employment with PF.

2.0 Identifying Modern Slavery

- 2.1 Modern slavery may be found in our business, our supply chains, and outsourced activities.
- 2.2 There is no typical victim of modern slavery, and some victims do not understand they have been exploited or that they are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery, human trafficking, or forced labour:
 - (a) The person is not in possession of their own passport, identification or travel documents.
 - (b) The person's wages are being paid to a bank account in another name, which may be an indicator of debt bondage or withholding of wages.
 - (c) The person is acting as though they are being instructed or coached by someone else.
 - (d) The person is working excessive overtime.
 - (e) The person allows others to speak for them when spoken to directly.
 - (f) The person is dropped off and collected from work.
 - (g) The person is withdrawn or appears frightened.
 - (h) The person does not seem to be able to contact friends or family freely.
 - (i) The person has limited social interaction or contact with people outside of their immediate environment.
 - (j) There are signs of abusive working or living conditions.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3.0 Training

- 3.1 A training note is available to all PF Staff during onboarding.
- 3.2 Face to face training is available to all PF Staff members on request.

4.0 Responsibility for this policy and compliance

4.1 The Board has overall responsibility for ensuring this policy complies with PF's legal and ethical obligations.

4.2 All PF Staff members must comply with this policy.

4.3 Each Supplier must comply with this policy, or its own anti-slavery policy.

5.0 Reporting Modern Slavery

5.1 PF Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- (a) if you are a member of PF Staff, your Line Manager;
- (b) if you are a Supplier, your primary account manager or business contact with PF;
- (c) if you are a member of PF Staff or a Supplier and you wish to remain anonymous, you may email hi@pretzelfilms.com and your report will be dealt with in accordance with the PF Whistleblowing Policy

6.0 Publication of this policy

6.1 This policy is available to PF Staff

6.2 This policy is available to Suppliers on the PF's website <https://www.pretzelfilms.com/group-policies>

7.0 Breaches of this policy

7.1 Any PF Staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

7.2 The relevant member of PF may terminate its relationship with a Supplier if it is in breach this policy. Alternatively, the relevant member of PF may elect to work with the Supplier to resolve such issues.

8.0 Policy review

- 8.1 PF Board is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- 8.2 This policy does not form part of any contract of employment and may be amended at anytime.
- 8.3 PF Staff members are invited to provide feedback on this policy and to suggest actions to improve on our anti-slavery measures by emailing feedback to PF hi@pretzelfilms.com

It is the responsibility of PJ Bickford, to ensure that this policy is implemented throughout the organisation.

PJ Bickford
CEO
on behalf of PRETZEL FILMS LIMITED
9th August 2021