



Modern Slavery and Human Trafficking Statement

Financial year
2018-19

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The UK's Modern Slavery Act requires Framestore to make a statement of the steps we are taking during each financial year to ensure slavery and human trafficking is not taking place in any of our supply chains.

Organisational Structure

Across Framestore we have approx. 2000 employees based in the UK, USA, Canada, India and China.

Countries of operation and supply

The organisation currently operates in the following cities:

- London
- New York
- Los Angeles
- Chicago
- Montreal
- Pune, India - Anibrain partnership film location
- China - Stakeholders



Our Approach

Framestore takes a zero-tolerance approach to slavery and human trafficking. We do not tolerate slavery or human trafficking in our organisation or in our supply chain.

We will never knowingly deal with any organisation which is connected to slavery or human trafficking. Given the nature of the services we provide, we consider that we are at low risk of exposure to slavery and human trafficking. We are not aware of any areas of our operations and supply chain likely to lead to a breach of the Modern Slavery Act 2015. It is Framestore's policy to conduct all of its business in an honest, transparent and ethical manner.

Our clients agree in our client agreements to adhere to all relevant UK legislation including Modern Slavery Act.

We tend where possible to build long term relationships with our key suppliers. We expect our suppliers to act at all times in adherence to the principles of this statement and the Modern Slavery Act.



Our Approach (cont.)

For the next financial year, Framestore will introduce a procurement policy which will include a process whereby new and existing suppliers will be required to respond to a self-assessment questionnaire on how they meet their obligations under the Modern Slavery Act.

We will also introduce a supplier code of conduct to reinforce our baseline requirement for all suppliers to adhere to the Modern Slavery Act.



Our Policies

Framestore operates a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Ethical Complaints and Whistleblowing policy**
The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact Anne Murphy, Human Resources Director anonymously if preferred to raise a concern.
- **Anti-Bribery and Corruption Policy**
Framestore is committed to conducting all of its business activities in an honest and ethical manner. Framestore takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, honestly and with integrity in all our business dealings and relationships and in implementing and enforcing effective systems to counter bribery wherever we operate.



Our Policies (cont.)

- **Grievance Policy and Procedure**
- **Fair Treatment at work policy**
Framestore employees receive no less than the prescribed minimum wage and we apply robust immigration checks, and expect the same standards from all of our customers and suppliers.



Awareness Raising

The company has drawn the attention of employees who work with third party suppliers to a number of online guidance relating to modern slavery and human trafficking activities in the UK, including at www.globalsslaveryindex.org.

Employees are also aware of where they can obtain external help for example through the Modern Slavery Helpline www.modernslaveryhelpline.org or Ph: 0800-0121-700. Posters are displayed throughout the office and information shared on the Intranet with employees. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

This statement was approved by Senior Management on February 2019 for and on behalf of Framestore Limited.

Signed:



William Sargent | Chief Executive Officer
Date: 14.2.19

