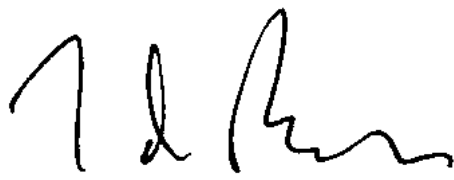


MODERN SLAVERY POLICY

Version Number	Purpose/Change	Author	Date
0.1	Initial draft	Ellie Willis	17/09/2026
1.0	Approved for use	Toby de Burgh	22/09/2026

This document is to be reviewed annually. Next review date is **September 2027**.

Approved by:

Signature:	
Name/position:	Toby de Burgh, CEO
Date:	22/09/2026

Cineon is committed to conducting business ethically, transparently, and with integrity. We have a zero-tolerance approach to modern slavery, forced labour, servitude, human trafficking, and any form of exploitation within our business operations and supply chain.

As an organisation developing ethical and secure digital technologies, we recognise our responsibility to uphold human rights and ensure that modern slavery is not present in any part of our organisation or among those who provide goods and services to us. This policy supports our wider commitments to ethical business conduct, sustainability, and responsible procurement.

Scope

This policy applies to:

- All employees, directors, officers, and contractors.
- Agency workers, consultants, interns, and volunteers.
- Suppliers, subcontractors, and service providers.
- Any other individual or organisation acting on behalf of Cineon.

Our Commitments

Cineon will:

- Comply with all applicable UK legislation relating to modern slavery and human trafficking.
- Maintain appropriate systems and controls to minimise the risk of modern slavery within our operations.
- Consider modern slavery risks when selecting and reviewing suppliers.
- Encourage openness and support anyone who raises genuine concerns regarding unethical labour practices.
- Investigate any credible concerns promptly and appropriately.
- Take action where suppliers or partners fail to meet acceptable standards.

Responsibilities

CEO	The CEO has overall responsibility for ensuring compliance with this policy and for promoting an ethical culture throughout the organisation.
Head of business operations	The head of business operations is responsible for: • Maintaining this policy. • Coordinating supplier due diligence activities. • Recording and investigating concerns raised under this policy. • Arranging awareness and training where appropriate.
Employees and Contractors	All workers are responsible for: • Remaining alert to indicators of modern slavery. • Reporting any concerns immediately. • Complying with this policy and related procedures.
Supplier / Partner Expectations	We expect suppliers and business partners to: • Comply with all applicable employment and human rights legislation. • Prohibit forced labour, compulsory labour, human trafficking, and child labour. • Ensure workers are employed voluntarily and are free to leave their employment in accordance with contractual and legal requirements. • Pay workers fairly and provide working conditions that meet legal standards. • Cooperate with reasonable requests for information relating to ethical employment practices.

Cineon reserves the right to terminate relationships with suppliers/partners where significant modern slavery risks are identified and are not adequately addressed.

Due Diligence

To help identify and manage risks, Cineon will, where proportionate:

- Ask suppliers to confirm compliance with modern slavery legislation.
- Consider ethical and sustainability factors during procurement activity.
- Maintain records of supplier assessments and declarations.
- Review higher-risk suppliers periodically.
- Encourage suppliers to adopt their own anti-slavery policies.

Reporting Concerns

Any employee, contractor, supplier, or stakeholder who suspects modern slavery, human trafficking, forced labour, or exploitation should report their concerns immediately to the Office Manager or CEO.

Reports will be treated seriously and handled confidentially wherever possible.

No employee will suffer detrimental treatment for raising genuine concerns in good faith.

Training and Awareness

Cineon will provide appropriate awareness information to relevant employees involved in:

- Procurement.
- Supplier management.
- Recruitment.
- Senior management responsibilities.

Monitoring and Review

This policy will be reviewed annually or sooner if legislation, organisational requirements, or identified risks change.