

MODERN SLAVERY & HUMAN RIGHTS POLICY

Last updated: November 2025

Company: CinePath Ltd (Company No. 16817624)

Contact: legal@cinepath.co.uk

Domain: cinepath.co.uk and related subdomains

1. Overview

CinePath Ltd ("CinePath," "we," "our," "us") is committed to upholding the highest ethical and human rights standards in all areas of our business operations.

We recognise our responsibilities under the Modern Slavery Act 2015 and strictly prohibit any form of modern slavery, human trafficking, forced labour, or child labour in our organisation and supply chain.

This policy outlines the measures we take to prevent, detect, and address human rights violations in all areas of operation.

2. Scope

This policy applies to:

- All employees, directors, and contractors of CinePath Ltd.
- All suppliers, subcontractors, and business partners providing goods or services to CinePath.
- All CinePath operations, including manufacturing, logistics, and digital services.

Compliance with this policy is mandatory for all parties engaging with CinePath Ltd.

3. Our Commitment

CinePath Ltd is fully committed to:

- Conducting business ethically and transparently.
- Protecting the fundamental rights of workers within our organisation and supply chain.
- Ensuring that employment is freely chosen and never coerced.
- Upholding fair wages, safe working conditions, and equal opportunities for all employees.

We will not tolerate any form of exploitation or abuse and will take immediate action if such practices are identified.

4. Supply Chain Standards

CinePath requires all suppliers and partners to comply with the Modern Slavery Act 2015 and international labour conventions.

Suppliers must ensure:

- Employment is freely chosen and without coercion.
- Workers are not subject to debt bondage or forced labour.
- Child labour is strictly prohibited.
- Working hours, wages, and conditions meet or exceed legal standards.

Suppliers must confirm compliance as part of CinePath's approval process and maintain transparent documentation to verify ethical operations.

5. Due Diligence and Auditing

CinePath Ltd conducts supplier due diligence to identify and mitigate risks related to human rights and modern slavery.

We reserve the right to:

- Audit supplier operations for compliance verification.
- Request evidence of ethical sourcing and labour practices.
- Terminate business relationships with any supplier found to be in breach of this policy.

6. Training and Awareness

Employees involved in procurement, contracting, or supply chain management receive training to identify potential risks related to modern slavery or human rights violations.

CinePath promotes awareness among staff to ensure they understand their role in preventing exploitation.

7. Reporting Concerns

CinePath encourages anyone — including employees, contractors, or external parties — to report suspicions of unethical or unlawful labour practices.

Reports should be directed to:

Email: legal@cinopath.co.uk

All reports will be treated confidentially and investigated promptly. CinePath prohibits retaliation against individuals who report concerns in good faith.

8. Continuous Improvement

CinePath reviews this policy and related procedures annually to strengthen prevention measures and ensure compliance with evolving legislation and industry standards.

9. Governing Law

This Policy is governed by the laws of England and Wales, and any disputes shall be subject to the exclusive jurisdiction of the courts of England and Wales.