

## Modern Slavery and Human Trafficking Statement 2020

This Modern Slavery and Human Trafficking Statement relates to actions and activities from 16.04.2020.

The statement sets down Fonix's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### Organisational structure and supply chains

This statement covers the business activities of Fonix which are as follows:

1. Mobile payments - working as an intermediary between UK mobile carriers and merchants to facilitate payments charged to a mobile mobile.
2. Mobile messaging - working as an intermediary between UK mobile carriers and business clients to facilitate the delivery of SMS to end-users' mobile phones.

The Company currently operates in the following countries:

- Mobile payments - UK only.
- Mobile messaging - predominantly UK, with some international clients and suppliers.

All of Fonix's staff are based in the UK.

Fonix assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking at a board level for any concerns raised.

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: The CEO is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.
- Risk assessments: The CEO is responsible for risk assessments in respect of human rights and modern by a process of raising concerns for any prospective clients or suppliers with the Board.
- Due diligence: The CEO is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all management staff to familiarise themselves with Fonix's anti-slavery policy.

### Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing policy - Fonix encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- Fonix Employee Handbook - sets down the actions and behaviour expected of employees when representing Fonix

### Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners AND/OR evaluating the modern slavery and human trafficking risks of each new supplier AND/OR invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

### Performance indicators

Fonix measures how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains by requiring all relevant staff to have familiarised themselves with Fonix's policies, and logging all reported concerns around slavery and human trafficking, together with the action taken.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Rob Weisz

Position: CEO