



Modern Slavery Policy

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Contents

- I Purpose.....4
 - I.1 Scope/To Whom This Policy Applies.....4
 - I.2 Related Policies and Procedures4
 - I.3 Responsibility for Policy.....4
 - I.4 Compliance with This Policy4
 - I.5 Communication and Awareness of This Policy5
 - I.6 Breaches of This Policy5



Purpose

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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Finyx has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Finyx is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.1 Scope/To Whom This Policy Applies

This policy applies to all persons working for Finyx or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee or sub-contractor contract of employment and Finyx may amend it at any time.

1.2 Related Policies and Procedures

This Modern Slavery Policy interacts with the following workplace policies and procedures which can be found within Finyx Team on MS Teams. You are encouraged to familiarise yourself with the policies detailed below. If you have any queries about this policy, please contact admin@finyx.com.

1.3 Responsibility for Policy

All employees or sub-contractors of Finyx have day to day responsibility to ensure compliance with our legal and ethical obligation.

The Finyx Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

1.4 Compliance with This Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

We have undertaken a number of steps to minimise the risk of any human rights violations or any kind of violent and illicit behaviour occurring within our organisation and supply chain. More specifically:

Our HR policies involve strict and rigorous employment checking for the onboarding of both permanent employees and contractors. Considering our comprehensive policies and processes for employing staff we conclude that there is minimal to no risk of slavery, including forced labour in our directly employed workforce.

Finyx also commits to providing a safe working environment for all our employees and contractors. We have several policies regarding building, equipment and staff safety in place that provide the necessary tools to enable people to report any accidents or incidents should they arise, and we adhere to current health and safety legislation. Our policies also facilitate the ability of people to report any concerns should they be asked to act in an improper way or if they have any evidence of unethical, improper, criminal, or unlawful activities by others including Modern Slavery.

Most of our office, equipment and service suppliers outside our staff are companies covered by the Modern Slavery Act 2015. Thus, our directors are responsible of ensuring they fulfil their reporting duties and fully comply with all relevant



legislation. In the rare occasion that this is not the case, the member of our Finance Team responsible for signing off the agreement has a responsibility to ensure their organisation maintains the same professional and ethical standards with Finyx.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify admin@finyx.com.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with admin@finyx.com.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Finyx is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee or sub-contractor, you should raise it formally using the Grievance Policy which can be found in SharePoint.

I.5 Communication and Awareness of This Policy

Communication of this policy, and on the risk our business faces from modern slavery in its supply chains, is provided on the company SharePoint site.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

I.6 Breaches of This Policy

Any employee or sub-contractor who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Finyx may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

