

Modern Slavery and Human Trafficking Statement

Financial Year End June 2025

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps that Fonix plc and its subsidiaries (“Fonix”, “we”, “our”) have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Fonix has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to implementing and maintaining effective systems and controls to safeguard against any form of modern slavery taking place within our business or supply chain.

Our business

Fonix is a UK-focused mobile payments and messaging company, enabling businesses to charge users’ mobile bills and send users messages via their carrier. This statement covers the business activities of Fonix, which are as follows:

- Mobile payments: acting as an intermediary between mobile carriers and merchants to facilitate payments charged to a mobile bill.
- Mobile messaging: acting as an intermediary between mobile carriers and business clients to facilitate the delivery of SMS or RCS messages to end users’ mobile phones.

The Company currently operates in the following countries:

- Mobile payments: UK, Republic of Ireland and Portugal.
- Mobile messaging: Predominantly UK, Republic of Ireland and Portugal, with some international clients and suppliers.

Fonix employs staff across branches in the UK, Ireland and Portugal, and also engages suppliers based in Poland, Belarus, Switzerland, France and the United States. Fonix's supply chain primarily consists of UK and European-based technology, telecommunications, and professional service providers.

Our policies and procedures

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships, as well as implementing and enforcing effective systems and controls to minimise the risk of modern slavery.

We have a number of policies in place to ensure that we are conducting business in an ethical and transparent manner, including:

- Recruitment practices – incorporating right-to-work checks for all employees to safeguard against human trafficking or forced labour.
- Whistleblowing policy – allowing employees to raise concerns about suspected wrongdoing or unethical practices without fear of reprisal.

Although we do not have a standalone written supplier due diligence policy, supplier assessment and oversight are inherent in the way we operate. We typically engage only with large, well-established corporates or regulated professional bodies—such as telecommunications carriers, technology providers, solicitors and accountants—whose own operations are governed by strict ethical, legal and compliance standards. This significantly reduces the risk of modern slavery within our supply chain.

Due Diligence and Risk Assessment

We have reviewed the risks our supply chains can present and, while we consider our exposure to modern slavery to be low, we expect all suppliers and contractors to maintain a zero-tolerance approach to exploitation.

Our approach to due diligence is proportionate to the nature and risk profile of each supplier. Given that the majority of our suppliers are large, well-established corporates or regulated professional bodies—such as telecommunications carriers, technology companies, law firms and accountants—we consider the risk of modern slavery within these relationships to be minimal.

Where we engage with smaller or less regulated suppliers, we undertake appropriate checks to ensure that they uphold ethical labour practices and comply with applicable legislation. We also maintain regular engagement with key suppliers and review our supplier base periodically to confirm continued alignment with our standards and expectations.

During the reporting period, no instances or allegations of modern slavery were identified within our business or supply chain.

Training

To ensure awareness and understanding of the risks of modern slavery and human trafficking in our business and supply chains, Fonix provides training to staff involved in the procurement and management of suppliers. This training ensures that those responsible for supplier selection and oversight are aware of the potential risks of modern slavery and understand how to identify and address any concerns.

Given the low-risk nature of our supply chain, broader employee training is not currently deemed necessary, but this position will be kept under review.

Performance indicators

Given the nature of our operations and the low-risk profile of our supply chain, Fonix measures the effectiveness of its approach to preventing modern slavery through a proportionate set of indicators. These include:

- ensuring that staff involved in the procurement and management of suppliers have completed relevant modern slavery awareness training;
- maintaining oversight of our key suppliers and reviewing them periodically to ensure continued alignment with our ethical standards; and
- recording and addressing any concerns raised in relation to modern slavery or unethical labour practices.

Fonix has not identified or received any reports of modern slavery or human trafficking within its business or supply chain. We remain committed to reviewing and refining our approach to reflect best practice and to ensure ongoing compliance with the Modern Slavery Act 2015.

Approval for this statement

This statement was approved by the Board of Fonix on 5th November 2025

Authorised by:

Rob Weisz

Chief Executive Officer

Date: 5th November 2025