

FISCAL FX

Fiscal FX Ltd
Modern Slavery Statement
2023

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1 Introduction

- 1.1 Fiscal FX Ltd is a financial institution providing secure currency exchange and, international payments to private individuals and corporate customers.
- 1.2 Our employees share our values of integrity and transparency, and these are embedded into the core of our business, not just when communicating with our customers, but also with our suppliers and business associates.
- 1.3 With our values, we aim to leave a positive impact on the communities we share, standing up for human rights and creating true opportunities for the people we connect with.
- 1.4 It is with this in mind that we increase our attention to our ethical footprint and review our commitment to combatting Modern slavery and Human Trafficking.
- 1.5 This statement aims to cover our operational impact, and that of our suppliers, both directly and indirectly.

2 Business Structure and Supply Chains

- 2.1 Our base of Operations is centred in London UK; however our customer base and supply chain are global in nature.
- 2.2 Our supply chain comprises of numerous entities across multiple jurisdictions. These include sectors that recent studies have identified as higher risk, such as services providing technical support, marketing outsourcing and facilities management. These suppliers assist in providing our clients and ourselves with a broad range of products and services. They come with an extensive connection of suppliers, thus further increasing our footprint worldwide.
- 2.3 Our primary focus is to underpin our first tier of the supply chain and incorporate our values and commitments with these relationships to ultimately create a shared commitment to human rights.
- 2.4 We continue to target high risk indicators including.

3 Applicable Policies

- 3.1 We incorporate our commitment to combatting modern slavery in our relevant policies and procedures, ensuring our responsibilities to our staff are upheld. This commitment is shared fully by our employees. We aim to ensure all employees feel safe in the knowledge that they can report suspicions of wrongdoing, and are protected by the policies outlined below:

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3.1.1 Modern Slavery Policy 2023.1

3.1.2 Whistleblowing Policy 2023.1

3.1.3 Anti-Bribery and Corruption Policy 2023.1

3.1.4 Anti-Money Laundering, Counter-Terrorist Financing and Counter Proliferation Financing Policy 2023.1

3.1.5 Conduct Policy 2023.1

4 Supplier Due Diligence

4.1 All suppliers are evaluated prior to procurement agreements and Fiscal FX Ltd will only enter into agreements that enshrine a commitment to tackling modern slavery and people trafficking issues.

4.2 Our ongoing suppliers undergo reviews on a risk-based approach and may be required to complete in depth assessments conducted by independent third parties.

4.3 We expect and require our suppliers to share and promote the same core ethical values in relation to modern slavery, human trafficking and corruption.

4.4 Whilst we appreciate human rights violations can never be fully eradicated, our aim is to build strong ethical relationships that aid in the combatting of modern slavery and people trafficking.

5 Customer Due Diligence

5.1 We recognise that a significant risk to human rights violations can occur through our customer's activities.

5.2 Implementation of modern slavery checks have been incorporated into our client on-boarding processes.

5.3 We will not enter into any business arrangement with a client whom we know, or suspect is operating in violation of or with disregard to the Modern Slavery Act 2015 or other applicable laws and regulations.

6 Risk Management

6.1 Risk assessments are conducted across the company with a regularly maintained register logging modern slavery risks.

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- 6.2 Indicators to identify the risk level and exposure are under continuous scrutiny to ensure our data remains current with all modern slavery or human trafficking risks assessed on a minimum of quarterly basis.
- 6.3 Our main suppliers undergo an annual assessment of their continuous adherence of integrity in monitoring their principles of ethical practice.

7 Reporting

- 7.1 Employees are required to raise concerns about any issue or suspicion of modern slavery in Fiscal FX Ltd.'s operations or in any of Fiscal FX Ltd.'s customers or suppliers as soon as possible.

8 Training

- 8.1 All staff receive training on this and related policies.
- 8.2 The training aims to broaden understanding of the negative impacts of modern slavery and how our industry can help to protect vulnerable citizens, to improve staff recognition of risk indicators of human rights violations, and to explain how to act upon suspicion raised, when communicating with clients and suppliers.
- 8.3 New joiners will receive training as part of the induction process. Further training will be provided at least annually or whenever there is a substantial change in the law or our policy and procedures.

9 Victim Support

- 9.1 If you think you are a victim of modern slavery or human trafficking help is available.
- 9.2 You may wish to contact:
 - 9.2.1 the Modern Slavery Helpline on 080 0012 1700
 - 9.2.2 online via <https://www.modernslaveryhelpline.org>
 - 9.2.3 the Victim Support Helpline on 080 8168 9111
 - 9.2.4 online via www.victimsupport.org.uk

10 Statement Approval

- 10.1 This statement has been reviewed and approved by:

FISCAL FX

Andrew Harrison MCSI
Chief Compliance Officer
Fiscal FX Ltd
08/03/2023