Anti-slavery policy

Blink Payment · Fidelity Payment Processing Limited · Version 1.0 · Effective from August 2026 · Next review August 2027

Our position

Blink Payment does not tolerate slavery, servitude, forced or compulsory labour, or human trafficking in any part of our business or our supply chain. That applies to how we recruit and treat our own people, and to the suppliers and partners we choose to work with.

We are a small UK payment technology company. We build the software that lets businesses take payments; the regulated checks on those businesses are carried out by the acquiring banks and payment providers we integrate with. We employ our people directly, and most of what we do happens in our own offices and in the cloud. That shapes where our risk sits, and we would rather be specific about it than repeat a list of risks that belong to a different kind of business.

What we mean by modern slavery

The Modern Slavery Act 2015 creates two offences:

- holding somebody in slavery or servitude, or requiring them to perform forced or compulsory labour;
- arranging or facilitating somebody's travel so that they can be exploited, which is human trafficking.

The Act does not define slavery, servitude and forced labour itself. It takes their meaning from Article 4 of the European Convention on Human Rights. Two points matter in practice. Trafficking does not require anybody to cross a border. And a person's apparent consent does not stop a situation from being slavery, servitude or forced labour.

Signs to look out for

Exploitation is usually hidden. These are the things most likely to be noticed at work:

- somebody who is not free to leave a job, or who is working to repay a debt they did not freely agree to;
- wages paid into an account that is not in the worker's own name, or otherwise controlled by another person;
- identity documents held by an employer, an agency or any other third party;
- another person speaking for a worker, or controlling where they live and how they get to work;
- a fee demanded or deducted from somebody in order to get or keep a job.

Who this policy applies to

This policy applies to Blink Payment, the trading name of Fidelity Payment Processing Limited, and to everyone who works for us or on our behalf, including employees, directors, contractors, consultants and temporary workers, across both our offices.

We expect the suppliers, distributors and partners we work with to meet the same standard, and to hold their own suppliers to it.

Our reporting position

Section 54 of the Modern Slavery Act 2015 applies only to organisations with a turnover of £36 million or more, so Blink Payment is not required to publish an annual statement. This policy sets out our position instead, and we will produce a formal statement if our obligations change or a partner requires one.

Where our risk sits

We have looked at this properly rather than assuming a company of our size and type carries no risk. Four areas matter:

- **Office services.** Cleaning at our London office is provided by an external contract cleaning company. Contract cleaning is a sector where labour exploitation is known to occur, and because this work happens on our premises but not on our payroll, it is our most direct area of exposure.
- **Payment hardware.** We supply card payment terminals, bought mainly through a UK distributor. Manufacturing sits several tiers upstream of us, in global electronics supply chains that are widely recognised as carrying a higher risk of forced labour. We are realistic that our influence over those tiers is limited, and we do not claim to audit them.
- **Merchants and payment partners.** We provide the software that facilitates transactions. Customer due diligence, anti-money-laundering and fraud checks on the businesses using it are carried out by the regulated acquiring banks and payment providers we integrate with, not by Blink Payment. Our exposure is therefore indirect, but the proceeds of labour exploitation can move through payment systems, so it matters that we work with regulated partners and that we pass on anything we become aware of.
- **Our own workforce.** We recruit directly, we do not use labour supply agencies, and we employ and pay our people through PAYE. We treat this as a low-risk area, but we still run the checks below rather than assume it.

What we do

These are things we do now, not things we intend to do.

- We recruit directly rather than through labour supply agencies, so there is no third party standing between us and the people who work for us.
- We verify the right to work in the UK for everyone we hire, and we use a third-party screening provider to carry out right to work and background checks.
- We pay at or above the National Minimum Wage and National Living Wage, through PAYE, into a bank account held in the worker's own name.
- We never ask anyone to pay a fee to get or keep a job with us.
- We check for duplicated bank details and home addresses when we set up payroll for new starters, and we follow up on anything that does not look right rather than assume there is an innocent explanation.

What we are putting in place

Two things follow from the risk areas above. We would rather name them than imply they are already routine:

- asking suppliers in the higher-risk categories above about their own approach to modern slavery before we take them on, and keeping a record of what they tell us;
- including an obligation to comply with the Modern Slavery Act 2015 in new and renewed supplier contracts where we are the contracting party, and expecting suppliers to pass that obligation down their own chain.

Raising a concern

If you think that somebody connected to Blink Payment, our offices or our suppliers is being exploited, say something. You do not need to be certain, and nobody will be criticised for raising a concern that turns out to be unfounded.

- Speak to your line manager, or to the person named at the end of this policy.
- If you would rather not raise it internally, use our whistleblowing procedure.
- You can contact the Modern Slavery and Exploitation Helpline yourself, free and in confidence, on 08000 121 700. It is open every day of the year.
- Concerns about the treatment of workers can also be reported to the Gangmasters and Labour Abuse Authority on 0800 432 0804.
- If somebody is in immediate danger, call 999.

Please do not confront a suspected victim or their employer. It can put the person at greater risk. Report it instead and let the people trained to handle it take over.

Nobody who raises a concern in good faith will be treated badly for it, whatever the outcome. If you believe you have been, raise it immediately with the person named at the end of this policy.

Training and awareness

Everyone who joins Blink Payment receives this policy as part of our policy set, and we brief the people who choose and manage suppliers on the risk areas described above and what to look for. We do not currently run formal accredited modern slavery training, and we would rather say that than imply otherwise.

If this policy is breached

An employee who breaches this policy may face disciplinary action, up to and including dismissal for gross misconduct. Where a supplier or partner breaches it, we will raise it with them directly and, if it is not resolved, we are prepared to end the relationship.

Responsibility and review

Overall responsibility for this policy sits with our Chief Operating Officer, on behalf of Blink Payment's senior management team. [Name and role] is the named individual responsible for day-to-day oversight of our approach to the Modern Slavery Act 2015 and for the reporting route described above.

We review this policy at least annually, and sooner if our business, our suppliers or our legal obligations change. It is communicated to everyone who works for us, and we make it available to customers, partners and prospective partners on request.