

## **Western Union's UK Modern Slavery and Human Trafficking Statement**

### **Introduction**

This Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes our Statement for the financial year ending in 2017. Our Slavery and Human Trafficking Statement for the previous financial year ending in 2016 can be found here:

[<http://ir.westernunion.com/investor-relations/corporate-governance/governance-documents/default.aspx>]

### **The Structure of our Company**

Western Union is a leader in global payment services, with employees based in over 50 countries around the world and agent locations in over 200 countries and territories. Western Union Business Solutions, an affiliate of Western Union, is a leading global provider of cross-border business payments, with one of the largest and most diverse payment networks. Our agents, whether small family-owned businesses or major retail chains, form part of our core business operations by offering Western Union money transfer and payment services to consumers and businesses. Western Union supply chains are limited as it does not produce, manufacture or retail goods.

### **Our Policy and Approach**

Western Union has zero tolerance to slavery and human trafficking, and is committed to reinforcing that no such practices should take place in any of our supply chains or in any part of our business. Western Union expects all those involved in procurement for the company, or involved in any other part of our business, including suppliers to comply with these values.

Western Union is committed to acting ethically and works to the highest professional standards and seeks to comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we conduct business with.

### **Steps we take in our core business to address Modern Slavery**

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery. Agent employees receive similar training and are required to report any suspicious activity to Western Union and/or the appropriate regulatory agencies.

In addition, Western Union employees confirm they have read and understand the Company's Code of Conduct, which condemns human rights abuses and prohibits the use of forced or involuntary labor.

Further, Western Union partners with governmental agencies to help combat human trafficking and modern slavery, working with law enforcement, regulators, and non-governmental organizations to build a knowledge base and awareness of the issues.

**In the financial year ending 2017, we took the following steps in our core business to address Modern Slavery:**

- Trained employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery;
- Attended and hosted outreach events on a worldwide basis focused on human trafficking;
- Conducted investigative work and information sharing with law enforcement and non-governmental organisations;
- Improved contract language for new and renewing agents to reduce risk; and
- Updated our company's financial crime risk assessments

### **Steps we take with our third parties to address Modern Slavery**

Western Union's Global Sourcing and Procurement Policy provides guidance to support the ethical procurement of goods and services, and upholds our Code of Conduct. As part of the Company's procurement process and procedures, third parties are subject to due diligence and required to affirm that human trafficking and modern slavery is not occurring in their business or supply chain. Where Western Union outsources its business functions, it also assesses whether the risks may be more prevalent due to the location concerned.

Appropriate terms are included in our contractual documentation, standard terms and conditions, to require third parties to comply with the Act. If Western Union determines actual or potential risk of human trafficking or modern slavery in a third party's business or supply chain, Western Union will take the appropriate steps. This may include contract termination.

### **In the financial year ending 2017, we took the following steps with our third parties to address Modern Slavery:**

- Requested suppliers to uphold our values on human trafficking and modern slavery; and
- Reviewed vendor processes, policies, procedures and terms of business for the procurement of goods and services

### **Our Related Policies**

Western Union seeks to identify and mitigate risk and enforce ethical business practices, including the detection and prevention of slavery and human trafficking, through integrating our policies and procedures across the scope of our business activities. Our approach ensures that the environment is not conducive to crime or allowing modern slavery and human trafficking, and allows such risks to be addressed.

Western Union's confidential helpline encourages those with genuine concerns of wrongdoing or breaches of the law or company policy to raise their concerns in confidence and without fear of retaliation. Western Union will assess any instances of non-compliance as they arise on a case by case basis and take action as required.

### **Our Future Plans**

Western Union is committed to combatting human trafficking and modern slavery, and will continue to require its third parties to ensure that human trafficking and modern slavery is not occurring in their business or supply chain. Ongoing measures include;

- Continuing investigative work and information sharing with law enforcement and non-governmental organisations;
- Reviewing and amending vendor engagement processes, policies and procedures for the procurement of goods and services;
- Obtaining formal confirmation from suppliers that no slavery or human trafficking is used within their business or supply chains and that appropriate policies and procedures have been established to maintain this position;
- Updating training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- Reviewing contractual processes to consider further improvement to contract language to reduce risks.

Please direct any questions on this statement to Western Union's Ethics Office at [wuethics@westernunion.com](mailto:wuethics@westernunion.com)

This statement is Western Union's second statement. It was approved by pertinent subsidiaries of The Western Union Company on the dates set out below.



Andrew Pollock

Western Union GB Ltd

**Director**

Date: 14 December 2018

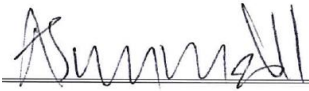


Massimiliano Alvisini

Western Union Payment Services Ireland Ltd

**Director**

Date: 12 December 2018



Andrew Summerill

Western Union Business Solutions UK Ltd

**Director**

Date: 12 December 2018

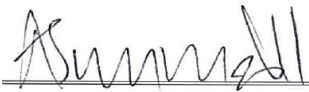


Andrew Pollock

Western Union Retail Services GB Ltd

**Director**

Date: 14 December 2018




Andrew Summerill

Custom House Financial UK Ltd

**Director**

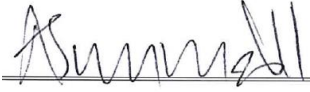
Date: 12 December 2018



Western Union International Bank GmbH

**Director**

Date: 26 November 2018

A handwritten signature in black ink, appearing to read 'A Summerill', written over a horizontal line.

Andrew Summerill

WUBS Payments Ltd

**Director**

Date: 12 December 2018

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Western Union is committed to combatting human trafficking and modern slavery, and will continue to require its third parties to ensure that human trafficking and modern slavery is not occurring in their business or supply chain. Ongoing measures include;

- Reviewing policies, procedures and terms of business for the procurement of goods and services;
- Obtaining formal confirmation from suppliers that no slavery or human trafficking is used within their business or supply chains and that appropriate policies and procedures have been established to maintain this position;
- Training employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- Reviewing contractual processes to consider what amendments are required to reduce the risks.

Please direct any questions on this statement to Western Union's Ethics Office at [wuethics@westernunion.com](mailto:wuethics@westernunion.com)

This statement is Western Union's first such statement and was approved by pertinent subsidiaries of The Western Union Company on 19 June 2017.