



## **MIL Overseas Limited**

### **Modern Slavery Statement**

This Modern Slavery Statement ("**Statement**") is made pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes our Statement for the financial year ending 31 December 2018.

The Modern Slavery Act 2015 requires certain commercial organisations to set out the steps that they have taken during their previous financial year to ensure that modern slavery and human trafficking are not taking place within any part of their business or any of their supply chains.

The content of this document reflects the steps we have taken over the last financial year, and over the longer term, to combat modern slavery and human trafficking within MoneyGram's business and supply chains.

## What is Modern Slavery?

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Modern slavery encompasses all types of slavery, servitude, human trafficking and forced or compulsory labour across a vast number of industries, such as agriculture, retail and manufacturing, affecting individuals both abroad and in the UK.

## Our Business and Supply Chains

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MIL Overseas Limited (“**MILOL**”), is a limited liability company, conducting sales and marketing activities on a global level to support the MoneyGram money remittance service that is offered worldwide. MILOL forms part of the MoneyGram Group (“**MoneyGram**”), which has employees in over 30 countries. As a provider of global money remittance services only, MoneyGram’s supply chain is limited, and does not include suppliers that either produce or manufacture goods.

MoneyGram as a global operation has a zero-tolerance approach to modern slavery and human trafficking in any form. MoneyGram is committed to acting ethically and with integrity and transparency in its business dealings and ensuring effective systems and controls are put in place to safeguard against any modern slavery or human trafficking.

MoneyGram’s objective is to have the ability to positively impact millions of lives every day and our values of integrity, respect and commitment underpin the company’s culture. We make decisions, both big and small, with a focus on impeccable ethics, honesty and demonstrating integrity for each other, our customers and the world at large. We fully comply with all policies, laws and ethical and professional codes. We seek to treat everyone fairly and consistently, recognising the power of global diversity in creating a strong, open, respectful and trusted business environment. Our policies and procedures relating to the Modern Slavery Act 2015 are in line with our culture and values.

## Statement

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As a company offering sales and marketing support to the wider MoneyGram group and its remittance service, MILOL’s commitment to eliminate modern slavery centres on its business relationships with suppliers and third parties and furthering the MoneyGram ethics objectives. MoneyGram has a zero-tolerance policy to modern slavery and human trafficking both within its own business and within all parts of its supply chain.

As part of our initiative to identify and mitigate risk, MoneyGram’s supplier selection policy and process in appointing new suppliers mandates that new suppliers are required to adhere to MoneyGram’s policies and procedures and all applicable laws and regulations (including the Modern Slavery Act), prior to commencing activities with MoneyGram also ensures that all contracts and agreements entered into with suppliers and other third parties, require compliance with all applicable laws, including all anti-slavery and human trafficking legislation, and MoneyGram’s own policies and procedures. Any non-compliance with this clause would be considered a material breach of contract, in the event of which appropriate action would be

taken, including the termination of the agreement in question. This ensures that, as far as possible modern slavery is not taking place in any of our supply chains.

MoneyGram uses only specific reputable employment agencies to source labour at any level and for any reason, and always verify the practices of any new agency used before accepting workers from that agency. A review is undertaken for all instances of non-compliance of which it become aware, on a case-by case basis and will implement appropriate remedial action. MoneyGram keeps its global Ethics Program under regular review to ensure that, as a company entrusted by customers worldwide to transfer funds quickly and reliably, it maintains a high ethical standard in the way it conducts business. MoneyGram also undertakes to offer annual Code of Business Conduct training, which is mandatory for all employees of the business

MoneyGram globally keeps its global Ethics Program under regular review to ensure that, as a company entrusted by customers globally, we maintain a high ethical standard in the ways we conduct our business. We also undertake annual Code of Business Conduct training, which is mandatory for all employees of the business.

MoneyGram also has a strong legal and compliance team, as well as a dedicated Law Enforcement department who monitor our services and work with local police and other government law enforcement departments globally to aid in the fight against modern slavery throughout the business as a whole.

## **Our Policies and Procedures**

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MoneyGram operates a number of internal policies and procedures, to ensure that we conduct our business ethically and in a transparent manner.

These include:

MoneyGram Ethics Hotline: All employees are required to report any activities within the business or a supply chain that they are aware of that may be illegal or unethical. The Hotline ensures that there will be no adverse consequences for reporting a concern if it is done in good faith.

Whistleblowing Policy: MoneyGram operates a whistleblowing policy which applies to all workers with a contractual relationship with the company including employees, contractors, agency workers, amongst others. The policy is distributed in the employee handbook and aims to encourage employees to raise concerns about how employees are treated or concerns regarding MoneyGram's practices within our business or supply chains, without fear of reprisal.

Recruitment and Employment Policy: MoneyGram operates a companywide recruitment and employment policy, aimed to safeguard against modern slavery and human trafficking. The eligibility of all UK employees to work in the UK is checked thoroughly to ensure that no employee is placed in a position, potentially vulnerable to modern slavery.

Code of Business Conduct: MoneyGram's Code of Business describes the way in which we, as an organisation behave and how we expect our employees and suppliers to act. Adherence to our Code is mandatory and affirms our unwavering commitment to conducting our business with the highest standards of integrity and ethics. Any slavery or human trafficking conducted by our employees or suppliers within their employment practices would be in clear breach of this code. It is our policy and practice to take action against any employees and suppliers who breach our Code of Business Conduct, including terminating our relationships with suppliers or other third parties, as appropriate.

We expect all those in our supply chain and contractors to align with our values. The MoneyGram Global Compliance team is responsible for monitoring compliance with all MoneyGram policies and procedures and all suppliers and third parties are encouraged to report any suspected instances of non-compliance with our Code of Business Conduct, Policies and Procedures or applicable laws and regulations (including the Modern Slavery Act) more generally.

### **Our Future Plans**

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MoneyGram pledges to continue its commitment to eliminate modern slavery and human trafficking in any guise it appears. We will continue to hold our third parties to the same standards that we would expect from ourselves to ensure that does not occur in any business or supply chain. To ensure that we are able to fulfill these commitments MoneyGram shall conduct the following:

- MoneyGram will regularly review policies, procedures and terms of business relating to third parties and suppliers.
- MoneyGram will obtain supplier confirmation that no slavery or human trafficking is used within their business or supply chains
- MoneyGram will train continue to train all employees on how to identify, prevent and report potential signs of human trafficking and modern slavery.
- MoneyGram will ensure contractual processes are continually review in light of the risks of human trafficking.

### **Approval**

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This statement was approved by the Board of Directors of MIL Overseas Limited on 18 February 2019.



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**Grant Lines**

Chairman

MoneyGram Overseas Limited