



MoneyGram International 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 the 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?

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

MoneyGram International Limited (“MIL”), is a limited company authorised as a payment services provider by the UK Financial Conduct Authority (FRN 502639). MIL offers money transfer services through a network of agent organisations. MIL forms part of the wider MoneyGram Group (“MoneyGram”), which has employees in over 30 countries globally, and operates through a diverse network of agents in over 200 countries and territories. As a provider of global money remittance services only, MoneyGram’s supply chain is limited, and does not include suppliers that either produce, manufacture or sell 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

As a company trusted by our customers to perform money remittance services across the globe, in a heavily regulated industry, MoneyGram has a zero-tolerance policy to modern slavery and human trafficking. MoneyGram has strong legal and compliance functions, 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.

The MoneyGram service is offered in over 8,000 agent locations in the UK alone. Accordingly, MoneyGram ensures it has a robust due diligence process on all agents and locations both in the UK and globally. These checks are extensive and include a review of whether any agent or supplier has been involved in any criminal offences, and additionally mandates adherence by agents with MoneyGram’s code of conduct and compliance policies and procedures, as well as all applicable laws and regulations.

MoneyGram also ensures that all contracts and agreements entered into with third parties

require compliance with all applicable laws (including the Modern Slavery Act), 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.

We use only specific reputable employment agencies to source labour at any level and for any reason, and we always verify the practices of any new agency used before accepting workers from that agency. We will review all instances of non-compliance of which we 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, 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.

Our Policies and Procedures

MoneyGram operates a number of internal policies, 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.

AML Policies: As a payment service provider, MoneyGram is required to take measures to ensure that our services are not used in conjunction with illegal activity under AML initiatives. MoneyGram applies this rigorous oversight specifically to modern slavery and human trafficking by continually reviewing our customer interactions to ensure we are best placed to identify a payment associated illegal activity by a user and report it to the relevant authorities.

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 for example, terminating our relationships with agents, 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 agents and suppliers 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

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 continue to ensure 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 maintain rigorous hiring practices to ensure that the individuals responsible for compliance with laws and regulations like the Modern Slavery Act are qualified to ensure compliance.
- MoneyGram will train continue to train all employees and agents on how to identify, prevent and report potential signs of human trafficking and modern slavery.
- MoneyGram will ensure contractual processes are regularly reviewed in light of the ever evolving risks of human trafficking.

Approval

This statement was approved by the Board of Directors of MoneyGram International Limited on 18 February 2019.



Grant Lines
Chairman
MoneyGram International Limited