

# Western Union's Modern Slavery and Human Trafficking Statement



**Western  
Union**

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# Introduction

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This Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “Act”) and is our statement for the financial year ending in 2018. It applies to and has been approved by the boards of Custom House Financial (UK) Limited (company number 4380026), Western Union Retail Services GB Limited (company number 2383761), Western Union GB Limited (company number 4129906), Western Union International Bank GmbH (company number FN256184t), and Western Union Payment Services Ireland Limited (company number 471360) (collectively “Western Union”). Our Slavery and Human Trafficking Statement for the previous financial years ending in 2016 and 2017 can be found here:

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

## The structure of our company

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Western Union is a leader in global payment services with employees in over 50 countries 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’s supply chains are limited as the company does not produce, manufacture or retail goods.

## Our policy and approach

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Western Union condemns modern slavery and human trafficking and has developed a global Anti-Human Trafficking initiative to help detect, deter, and report the misuse of Western Union services. Working in collaboration with law enforcement, governmental, non-governmental and private organizations, and other stakeholders, Western Union’s Anti-Human Trafficking initiative raises awareness about human trafficking for Western Union agents, employees and industry partners to help them detect, investigate, disrupt and communicate potential human trafficking issues to law enforcement. Western Union 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 or other parts of its business,

including suppliers, to comply with these values.

Western Union is committed to acting ethically, demonstrating the highest professional standards, and complying with applicable laws and regulations. We expect the same high standards from those with whom we do business.

## **Steps we take in our core business to address modern slavery**

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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.

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

## **Steps we take with our third parties to address modern slavery**

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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 they comply with all applicable laws and regulations, including all applicable laws and regulations prohibiting human trafficking and modern slavery.

Appropriate terms are included in our contractual documentation and standard terms and conditions, to require third parties and third parties' workers to comply with all applicable laws and regulations. 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 appropriate steps, which could include contract termination.

Western Union's Financial Intelligence Unit partners with law enforcement and nonprofit entities to pursue intelligence that can help target and disrupt human trafficking financial flows. This Unit also has a global law enforcement outreach program that includes cooperation efforts with police investigations in the fight against human trafficking.

# Steps we took in 2018 to address modern slavery

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- Trained employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery, including providing targeted human trafficking awareness training for certain agent locations determined to be at higher risk for trafficking-related activity.
- 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 organizations.
- Updated our company's financial crime risk assessments.
- Joined and/or participated in working groups designed to address modern slavery.
  - Joined as a founding member of an international datahub between NGOs, law enforcement, and financial institutions. This datahub uses machine-learning and structured data from contributors to identify the characteristics of human trafficking incidents and is designed to more easily facilitate the exchange of information about human trafficking across organizations.
  - Became a member of the Expert Working Group on Human Trafficking and Organised Immigration Crime, which is a subgroup of the Joint Money Laundering Intelligence Taskforce. The Taskforce, whose members include financial institutions, law enforcement agencies and the UK Home Office, exchanges information regarding human trafficking and shares typologies to identify and disrupt the financing of human trafficking and modern slavery.
  - Became a founding member of the U.S. Department of Homeland Security's Blue Campaign and worked in collaboration with NGOs, private companies, law enforcement and governments to protect the basic right of freedom and to bring those who exploit human lives to justice.
  - Participated in other initiatives, including: Interpol Expert Working Group on Trafficking in Human Beings; Stand Together Against Trafficking ("STAT"); the Super Bowl Human Trafficking Disruption Taskforce; and Thomson Reuters Foundation's Banks Alliance Against Trafficking.

## Our related policies

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

Western Union's confidential ethics helpline allows those with good faith concerns of wrongdoing or breaches of the law or company policy to raise their concerns and provides for anonymity, subject to applicable law. Western Union prohibits retaliation for raising concerns in good faith. Western Union reviews concerns raised and conducts an investigation, if appropriate, and takes action, if appropriate.

## Our future plans

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Western Union is committed to combatting human trafficking and modern slavery.

Ongoing measures include:

- Implementing a Vendor Risk Oversight program to formalize how we review potential new vendors for risk and establishing an ongoing monitoring process to review these vendors throughout the engagement life cycle. Through this program, Western Union will take a risk-based approach to assess vendors for potential human trafficking or modern slavery within their business.
- Updating training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery.
- Continuing investigative work and information sharing with law enforcement and non-governmental organizations.
- Reviewing contractual processes to consider further improvement to contract language to reduce risks.

# Effectiveness/monitoring

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Western Union recognizes that the risks posed by slavery and human trafficking are constantly changing. As such, Western Union continues to monitor the effectiveness of our approach to preventing human trafficking and slavery in our business and supply chains. Our participation in working groups and work with law enforcement agencies and nonprofit entities plays an important part in helping us to monitor the changing nature of slavery and human trafficking and to refine our approach to combatting it.

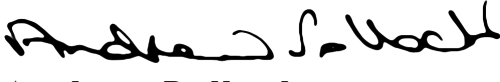
Please direct any questions on this statement to Western Union’s Ethics Office at: [wuethics@westernunion.com](mailto:wuethics@westernunion.com)

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


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June 10, 2019

  
**Andrew Pollock**  
Director  
Western Union Retail Services GB Limited  
June 10, 2019

  
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Western Union Payment Services  
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May 31, 2019