

# **Western Union's Modern Slavery and Human Trafficking Statement for 2019**

**June 30, 2020**

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**WesternUnion // WU**

# Introduction

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This Modern 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 2019. 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 Payment Services GB Limited (company number 11326797), Western Union International Bank GmbH (company number FN256184t), and Western Union Payment Services Ireland Limited (company number 471360) (collectively “Western Union”). Our Modern Slavery and Human Trafficking Statement for the previous financial years ending in 2016, 2017, and 2018 can be found here:

[http://s21.q4cdn.com/100551446/files/doc\\_downloads/gov\\_documents/2019/Historical-Modern-Slavery-Statement.pdf](http://s21.q4cdn.com/100551446/files/doc_downloads/gov_documents/2019/Historical-Modern-Slavery-Statement.pdf)

## Our business and structure

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Western Union is a leader in global money movement and payment services with approximately 11,500 employees in 55 countries.

Our consumer-to-consumer money transfer service enables people to send money around the world. As of December 31, 2019, our services were available through a global network of over 550,000 agent locations in more than 200 countries and territories, approximately 90% of which are located outside of the United States. Most of our agents are third parties. They include large networks such as post offices, banks and retailers, and other established organizations as well as smaller independent retail locations, which typically provide other consumer products and services.

Our Business Solutions services facilitate payment and foreign exchange solutions, primarily cross-border, cross-currency transactions, for small and medium-size enterprises and other organizations and individuals.

To conduct our consumer and business services and to meet our commitments to our customers and stakeholders, Western Union sources from suppliers around the world. Our active vendor base consists of approximately 7,000 companies. They

provide a diverse range of goods and services, including cloud-based software services; software application support; development, hosting and maintenance of our operating systems; merchant acquiring services; call center services; check clearing; processing of returned checks; and other operating activities.

## Our policies and approach

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As set out in our [Code of Conduct](#), Western Union is committed to promoting human rights through our shared values of trust and respect and by giving back to the global communities we serve. This commitment benefits our employees, customers, and the communities where we operate.

Western Union condemns modern slavery and human trafficking. We do not use forced or involuntary labor and prohibit this in any part of our business or supply chains. Western Union expects all those involved in procurement or other parts of our business, including suppliers, to comply with these values. We are committed to acting ethically, demonstrating high professional standards, and complying with applicable laws and regulations. We expect the same high standards from those with whom we do business.

### Related Policies

Western Union's commitment to enforcing ethical business practices, including the detection and prevention of slavery and human trafficking, is embedded in our policies and procedures. Our [Code of Conduct](#) promotes our shared values of being purpose driven, globally minded, and trustworthy and respectful, and serves as a guidepost for how we treat our employees, customers, business partners, and stakeholders. Our employees confirm they have read and will comply with our [Code of Conduct](#), which not only condemns human rights abuses and prohibits the use of forced or involuntary labor, but also defines our employees' responsibility to speak up when they believe there to be possible violations of policies or law. Our confidential ethics helpline allows employees to raise concerns and provides for anonymity, subject to applicable law. Western Union reviews concerns raised and investigates and takes action, if appropriate. Western Union prohibits retaliation for raising concerns in good faith.

Our vendor risk policies establish requirements to ensure we conduct appropriate risk assessments of potential vendors prior to engagement to ensure we engage quality and trustworthy vendors who meet our ethical standards. Similarly, our procurement policies provide guidelines governing employees worldwide in the acquisition of products and services to ensure ethical purchasing and risk mitigation, including

addressing risk related to human trafficking and modern slavery. Our global Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) policies provide additional guidance for employees on how to prevent Western Union's services from being used for illicit purposes.

## Steps we took in 2019 in our core business to address modern slavery

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### Employee Training

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery in our annual online [Code of Conduct](#) training. In 2019, human trafficking was one of the four primary modules included in the online training, which covered topics like common forms of trafficking, identifying red flags, and employee reporting obligations. The training required employees to acknowledge having read and understood the content as well as pass a knowledge test.

### Outreach

Last year, Western Union raised awareness about human trafficking through hosting or attending more than 25 outreach events in over ten countries focused on the issue. For example, we participated in National Human Trafficking Awareness Day in the United States by issuing a call to action to our employees worldwide to wear blue to raise awareness about the issue of human trafficking. Hundreds of Western Union employees, including our CEO and senior executives, across more than 10 countries participated.

### Investigation

Western Union investigated a number of human trafficking cases in 2019 as part of its AML/CFT obligations and cooperated with law enforcement and non-governmental organizations to combat human trafficking. These cases are often initiated by our AML/CFT internal monitoring triggers, information from law enforcement, or publicly available news. Investigations generally consist of (i) transaction analysis to identify suspicious activity or connections to previous investigations; (ii) a due diligence review of open source intelligence; (iii) risk determination; and, as needed, (iv) risk mitigation measures, including interdiction, regulatory reporting, reporting to law enforcement, and/or internal control changes.

# Steps we took in 2019 with third parties to address modern slavery

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## Vendor Relations

Western Union maintains a Vendor Risk Oversight program to formalize how we review potential new vendors for risk. We take a risk-based approach to assess vendors for potential human trafficking or modern slavery within their business. We conduct due diligence before we enter into third party contracts to ensure potential risks are identified and mitigated as appropriate. For example, we identify vendors in high-risk jurisdictions as well as vendors that provide high-risk services and mitigate these risks through actions such as contractual terms.

The Vendor Risk Oversight program is overseen by the Vendor Risk Oversight Committee, which develops and monitors our framework for vendor risk oversight and ensures alignment to strategic priorities and internal control and oversight of strategic and emerging vendor risks. The Committee consists of senior leaders throughout the organization and met throughout 2019.

Prior to working with Western Union, prospective vendors must complete our risk assessment process, which includes completion of a survey that is analyzed by applicable departments within Western Union who consider risks related to human trafficking and modern slavery. Western Union's contractual documentation and standard terms and conditions require third parties and their workers to comply with all applicable laws and regulations, including all applicable laws and regulations prohibiting human trafficking and modern slavery. Vendors are also subject to additional due diligence.

## Agent Training

Western Union trains our new agents to detect, prevent, and report numerous forms of suspicious activity—including activity potentially related to human trafficking and modern slavery—to Western Union and/or the appropriate regulatory agencies. In 2019, we rolled out Human Trafficking Awareness training for a targeted set of agent locations determined to be at higher risk for trafficking-related activity based on a transactional analysis.

## Risk Assessments and Monitoring

In 2019, Western Union conducted risk assessments on new and potential vendors. We recognize that the risks posed by modern slavery and human trafficking are constantly changing. As such, we continue to monitor the effectiveness of our approach to preventing human trafficking and modern 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.

In 2019, we maintained a programmatic approach to addressing human trafficking risks. This included appropriate interdiction using social network analysis, which enabled us to disrupt human trafficking networks. It also featured real time transaction controls and threat analysis to monitor and decline transactions that met specified parameters.

### **Collaboration with Law Enforcement, Government Organizations, and Nonprofits**

We developed a global Anti-Human Trafficking initiative to help detect, deter, and report the misuse of Western Union services. 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. Our Financial Intelligence Unit has been involved in more than 1,800 human trafficking investigations since 2013, resulting in hundreds of arrests and the rescue of hundreds of victims.

As part of the initiative, we participated in multiple working groups designed to address modern slavery. These included:

- ***Combating Human Trafficking at the Super Bowl:***  
We took part in an initiative designed to disrupt human trafficking connected to the Super Bowl in Miami, Florida. The group was comprised of financial industry leaders, NGOs, and law enforcement.
- ***U.S. Financial Coalition Against Child Sexual Exploitation:***  
We participated in the work of this organization, whose mission is to disrupt the economics of child pornography business.
- ***International Data Hub:***  
We continued our participation in an international data hub among NGOs, law enforcement, and financial institutions. This data hub 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.
- ***Expert Working Group on Human Trafficking and Organised Immigration Crime:***  
We continued operating as a member of this 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.

- ***Interpol Human Trafficking Experts Group:***  
We continued our participation in this group, which facilitates the sharing of best practices and information, supports international and regional investigations, and operations, and develops specialized training standards and curricula to educate about and combat human trafficking.
- ***U.S. Department of Homeland Security's Blue Campaign:***  
We contributed to the Blue Campaign's social media channels, including a call-to-action to report suspected human trafficking activity to the National Human Trafficking Hotline.
- ***European Bankers Alliance :***  
We continued to engage with the European Bankers Alliance, a multi-stakeholder working group on human trafficking and modern slavery issues established by the Thomson Reuters Foundation and of which Western Union is a founding member.
- ***Fintel Alliance :***  
We continued operating as a member of this public-private intelligence analysis partnership organized and run by AUSTRAC, the Australian Financial Intelligence Unit. The Alliance's goal is to connect banks, money remitters, and law enforcement partners to fight serious financial crimes, including child exploitation.

## Our future plans

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Western Union remains committed to leveraging our global footprint to help combat human trafficking and modern slavery in 2020 and beyond. Going forward, we will continue to look for new opportunities to engage our employees, customers, business partners, and stakeholders on this important issue and will develop our efforts through various measures, including:

- Enhancing our Vendor Risk Oversight program to increase due diligence risk identification and implement an ongoing monitoring process to review vendors throughout the engagement life cycle. We will continue to enhance program governance for risk oversight, specifically as it relates to potential human trafficking or modern slavery within potential vendors.
- Continuing to ensure that training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery remain up to date.
- Expanding employee engagement with Western Union's global Anti-Human Trafficking initiative across the organization.
- Remaining focused on investigative work and cooperating with law enforcement and non-governmental organizations across the globe.

- Expanding the reach of our global anti-human trafficking and modern slavery initiatives through a focus on continuing to strengthen our partnerships with law enforcement and non-governmental organizations in certain regions.

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 fourth Modern Slavery and Human Trafficking Statement. It was approved by pertinent subsidiaries of The Western Union Company on the dates set out below.



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May 18, 2020



**Massimiliano Alvisini**  
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**Graham Baker**  
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