



# Western Union

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## **Western Union's Modern Slavery and Human Trafficking Statement for 2025**

## **Reporting Entities**

This Statement applies to and has been approved by the Boards of the Company entities below:

<b>Company</b>	<b>Company Number</b>
Western Union Financial Services (Australia) Pty Ltd	082282773
Western Union Payment Services GB Limited	11326797
Western Union Payment Services Ireland Limited	471360
eurochange Ltd.	02519424
Western Union Retail Services GB Limited	2383761
Western Union GB Limited	4129906

This Modern Slavery and Human Trafficking Statement (“Statement”) is made by The Western Union Company (the “Company”) pursuant to the Australian Commonwealth Modern Slavery Act 2018 and section 54(1) of the UK Modern Slavery Act 2015 on behalf of the Company’s subsidiaries conducting business in Australia and the UK. This Statement is for the financial year ended December 31, 2025.

Our current Statement and those for previous financial years can be found on our [Investor Relations page](#).

## **Our Business, Structure, and Supply Chains**

Western Union<sup>1</sup> is a leader in cross-border, cross-currency money movement, payments, and digital financial services empowering consumers, businesses, financial institutions, and governments with fast, reliable, and convenient ways to send money and make payments around the world. Our goal is to offer accessible financial services that help people and communities prosper. The Western Union brand is globally recognized and represents speed, reliability, trust, and convenience. As we continue to seek to meet the needs of our customers for fast, reliable, and convenient global money movement and payment services while focusing on regulatory compliance, we are also working to go beyond these services by providing consumers and our business clients with access to an expanding portfolio of financial services and to increase the ways our services can be accessed, including through the launch of our digital wallet in certain countries. Additionally, through the acquisition of eurochange, Ltd, we have broadened our travel money currency services within the United Kingdom (UK).

To conduct our services and meet our commitments to our global customers and stakeholders, Western Union maintains approximately 9,200 employees worldwide and a network of 360,000 locations in over 200 countries and territories that have conducted money transfer activity in 2025.

Western Union also sources from a broad network of third-party partners, including banking partners, around the world. As of December 2025, our active vendor base consisted of thousands of companies. These third-party partners 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, and other operating activities.

## **Our Policies and Approach**

Aligned with the requirements under the Australian Commonwealth Modern Slavery Act 2018 and the UK Modern Slavery Act 2015, we condemn modern slavery and human trafficking. We do not use forced or involuntary labor, and we prohibit forced or involuntary labor in our business or supply chains. We are committed to acting ethically, demonstrating high professional standards, and complying with applicable laws and regulations. We expect the same high standards from our third-party partners and from those with whom we do business.

Through our Company values of integrity, respect, trust, and innovation, we aim to:

- Avoid causing or contributing to negative human rights impacts.
- Prevent or mitigate abuses that occur in our operations or the operations of our business partners.
- Promote human rights by contributing to the global communities we serve.

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<sup>1</sup> The term “Western Union” as used in this Statement refers collectively to The Western Union Company and its wholly owned subsidiaries. To the extent that a subsidiary has different policies and practices, they are discussed separately.

We recognize that the risks posed by modern slavery and human trafficking are constantly evolving, and so, too, must our efforts to combat it. Through our Anti-Human Trafficking Initiative, the Company detects, deters, and reports human trafficking issues. The Anti-Human Trafficking Initiative includes educating Western Union's global network of agents, its employees, and its partners about human trafficking and other forms of modern slavery and facilitates Company participation in external working groups.

## **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.<sup>2</sup> The Company reviews compliance policies on an annual basis and updates them as necessary. Relevant compliance policies are accessible companywide via the Company's intranet. These include:

Our [Code of Conduct](#) serves as a guidepost for how we treat our employees, customers, business partners, and other stakeholders. Our Code of Conduct condemns human rights abuses and prohibits the use of forced or involuntary labor. Western Union employees annually complete training on our Code of Conduct, which includes an acknowledgment that they have read and will comply with our Code of Conduct and will speak up when they believe there are possible violations of policies or law. In addition, eurochange, Ltd has a Code of Conduct that covers the same areas.

Our [Third Party Code of Conduct](#) sets out our expectations for vendors, suppliers, partners, agents, and others acting on Western Union's behalf, including guidelines regarding child labor, slavery, human trafficking, and other labor standards. Our vendor risk policies establish requirements to conduct appropriate risk assessments of potential vendors and partners prior to engagement. Our global sourcing and procurement policies govern the acquisition of products and services worldwide and address ethical purchasing and risk mitigation, when appropriate, including risk related to human trafficking and modern slavery. In addition, eurochange, Ltd has a Vendor Management Policy that covers the same expectations.

Our **Anti-Money Laundering Program** includes our Global Anti-Money Laundering and Counter-Terrorism Financing Policy that sets forth the principles for preventing Western Union's services from being used for illicit purposes. We also have policies that establish due diligence requirements for agents and partners, designed to detect and mitigate concerns of modern slavery or human trafficking, including our Global Sanctions Policy, Global Anti-Bribery & Corruption Policy, and Global Agent, Customer, and Intermediary Due Diligence Policy. In addition, eurochange, Ltd has an Anti-Financial Crime Policy.

Our [Speak Up & Anti-Retaliation Policy](#) applies to all employees, those within a contractual relationship with the Company, or whistleblowers, and encourages raising concerns about

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<sup>2</sup> eurochange, Ltd aligns to Western Union's modern slavery approach as set out in this Statement. Applicable supporting policies and procedures remain in transition, with a phased adoption of selected Western Union policies, including the Code of Conduct and Speak Up policies, during 2026, in line with applicable legal and employment requirements.

possible violations of Western Union policies, the Code of Conduct, or the law, without fear of reprisal. This includes reports or concerns pertaining to human trafficking or modern slavery. Additionally, Western Union Financial Services (Australia) PTY Ltd. has implemented a [Procedure for Disclosable Matters and Protection of Whistleblowers](#) which supplements the Code of Conduct. In addition, eurochange, Ltd has a whistleblowing policy.

eurochange, Ltd's Recruitment Policy includes right-to-work verification controls designed to support fair pay and lawful employment practices and requires criminal records checks, with any indicators of human trafficking treated as a significant risk factor requiring further review.

### **The Helpline**

Our primary channel for reporting issues related to modern slavery and human trafficking is the Company's Helpline. It is a secure and confidential mechanism for receiving and processing whistleblower reports and other concerns. The Helpline allows employees and external reporters to raise concerns anonymously. Reports involving suspected human trafficking incidents can be made via the Helpline at [westernunion.ethicspoint.com](https://westernunion.ethicspoint.com), by phone (number is available at [westernunion.ethicspoint.com](https://westernunion.ethicspoint.com)), or via email at [BusinessIntegrity@westernunion.com](mailto:BusinessIntegrity@westernunion.com).

In 2025, Western Union did not receive complaints through the Helpline involving suspected human trafficking incidents.

### **Assessing and Managing Risk**

As a global leader in money transfer services, the Company recognizes that a potential negative human rights impact arises from the misuse of its network by illicit actors to facilitate human trafficking and other human rights abuses. Human traffickers can and do attempt to use platforms like Western Union's to recruit potential victims of human trafficking, finance the lodging and transportation of victims, and profit from victims' exploitation, including through the use of victims to launder the money themselves. We recognize some of these risks are inherent to our role as a global technology and financial services company, and some are due to external, contextual factors in the geographies where we operate, such as conflict, weak rule of law, and the uneven application of the law.

Regarding our operations and supply chain, Western Union has identified specific areas, through its ongoing risk assessment processes, that may present a heightened risk of being linked to modern slavery practices. These areas include outsourced services, such as call centers, technology support, janitorial services, and marketing events providers. To mitigate risk with call centers and technology support, we contract with established global brands. Additionally, all vendors, including smaller local vendors that provide janitorial services and marketing event providers, are subject to the same contracting policies and Third Party Code of Conduct.

Western Union has a zero-tolerance policy for modern slavery, in any form. Given the risks inherent in our business, we will continue to develop mitigation and remediation strategies to address the material impacts identified.

## **Actions Taken to Address Modern Slavery**

We take a multi-faceted approach to detect, deter, and prevent our services from being used to facilitate illicit money movement associated with modern slavery and human trafficking. Our approach includes monitoring and analyzing transactions, auditing our programs, testing internal controls, educating our agents, employees, and partners about human trafficking and other forms of modern slavery, and partnering with external organizations.

### **Compliance Program**

The bedrock of our efforts in combating modern slavery is our compliance program. Our global policies and procedures establish the framework for our compliance program, based on international standards created by organizations such as the Financial Action Task Force.

We maintain an Anti-Money Laundering Risk Assessment Framework that informs our approach to detect, deter, prevent, and report illicit transactions with dedicated teams of employees who are responsible for risk assessment, risk modeling, and ongoing analysis. This framework requires a multifaceted approach to assess and manage risk, including:

- Consumer-level monitoring, investigation, and reporting
- Agent-level due diligence, monitoring, investigation, and oversight
- Product risk assessment
- Country and regional level risk assessments
- Emerging risk and strategic intelligence analysis
- Control testing and audits
- Outreach and Intelligence gathering

The compliance program includes a number of functions that are designed to help prevent the illicit use of our services, including abuse that may result in human rights violations or transitions that may be tied to parties associated with human right abuses. Such functions include:

### ***Global Sanctions Program***

We know it is important to do business with the right people for the right reasons and are committed to complying with applicable laws, including applicable economic and trade sanctions designed to support national and international security, policy, and human rights interests. Concerns related to human-trafficking, and human rights violations are among the criteria that certain sanctions programs use to impose sanctions on individuals or entities. We sanction screen agents, customers, vendors and certain third parties that we contract with to ensure that no services or financial transactions are executed with, or on behalf of parties that are associated with these sanctions programs.

### ***Customers, Agents, and Third-Party Due Diligence and Oversight***

Our compliance processes and dedicated teams that specialize in vendor risk, third party due diligence, and agent oversight seek to identify and mitigate third party risks.

We also implement due diligence procedures to vet our agents and other business partners and seek to comply with Know Your Agent (KYA) and Know Your Customer (KYC) requirements. Under these processes, we collect and verify identifying information to make sure we know with whom we are conducting business. This information helps us identify sanctioned parties and others with whom we are prohibited from doing business and allows us to identify risk indicators and prevent transactions when necessary.

Because many of our transactions are initiated or completed by agents, it is important that these partners comply with applicable laws and regulations. In addition to conducting due diligence on our agents, we conduct risk-based reviews of their compliance programs.

Western Union also trains our new and existing agents to detect, prevent, and report suspicious activity, including activity potentially related to human trafficking and modern slavery, to Western Union or the appropriate regulatory agencies. All Agent staff that will provide Western Union services must complete mandatory Anti-Money Laundering, Counter-Terrorism Financing, and Anti-Fraud training before conducting any Western Union transactions, and at least annually thereafter. Western Union provides agents kits, newsletters, alerts, and an online Agent Resource Center to help combat illicit activity.

### ***Financial Intelligence Unit***

Our Financial Intelligence Unit (FIU) staff – comprised primarily of Investigators, Analysts, and Outreach personnel – both facilitate and undergo regular, advanced training on the human trafficking typology. Staff attend and present at external webinars and other training events and raise awareness around relevant trend information obtained from law enforcement, non-governmental organization partners, and open sources.

To enhance comprehension of evolving human trafficking dynamics, the FIU annually refreshes a variety of reference materials that contain human trafficking trends, investigative resources, and transaction patterns.

### ***Educating Consumers***

We work to educate the public about consumer fraud and how consumers can protect themselves from fraud, including fraud schemes related to human trafficking. We educate consumers about modern fraud schemes through digital and social media materials. To amplify educational fraud content, we present at consumer protection events and take part in panels and forums. We also partner and engage online through social media with relevant industry members, consumer advocacy organizations, and associations.

## **Coordinating Efforts to Prevent and Investigate Human Trafficking**

We know our efforts to stop illicit activity through the use of our system are amplified when combined with the efforts of other organizations. Our FIU exchanges techniques, strategies and intelligence with third parties across the world to help combat threats posed by international criminal organizations.

### Organizations and Associations

We continue to collaborate with partners including various financial institutions; nonprofits such as the International Justice Mission, the Child Rescue Coalition, and Polaris; and both the International and National Centers for Missing and Exploited Children (ICMEC and NCMEC). We continued our industry-first collaboration with Child Rescue Coalition (CRC), leveraging CRC data to enhance our investigations for over five years. We are also a member of the U.S. Department of Homeland Security's Blue Campaign, a national public awareness movement aimed at combating human trafficking.

### Law Enforcement

The FIU coordinates with law enforcement and nonprofits to target and disrupt human trafficking financial flows. Globally in 2025, we assisted with more than 1500 human trafficking investigations. Our efforts and reported information resulted in numerous arrests of human traffickers and the recovery of human trafficking survivors around the world. A large majority of these investigations were advanced by referrals from Romanian and other law enforcement entities in Europe. The team also participated in both the Europol Financial Intelligence Public Private Partnership (EFIPPP) and the Joint Money Laundering Intelligence Taskforce (JMLIT), led by the UK's National Crime Agency, on investigations combatting modern slavery and child sexual abuse.

## **Looking Forward**

Western Union remains committed to leveraging our global footprint to combat human trafficking and modern slavery. Going forward, we will continue to look for new opportunities to engage our employees, customers, business partners, third-party 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 ongoing monitoring.
- Continuing to update and expand training materials and investigative resources for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery.
- Expanding the reach of our global anti-human trafficking and modern slavery initiatives by strengthening our partnerships with third parties.

## **Consultation and Approval**

This Statement is Western Union's tenth statement. It was drafted in consultation with several internal stakeholders from departments across the organization, who provided feedback throughout the process. It was approved by pertinent affiliates of The Western Union Company on the dates set out below.

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

**SIGNATURE PAGE**



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eurochange, Limited  
June 4, 2026



Gregory Laurent, Director  
Western Union Financial Services  
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Graham Baker, Director  
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June 24, 2026



Graham Baker, Director  
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