



# Western Union's Modern Slavery and Human Trafficking Statement for 2024



# Reporting Entities

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

Company	Company Number
Western Union Financial Services (Australia) Pty Ltd	082282773
Western Union Payment Services GB Limited	11326797
Western Union Payment Services Ireland Limited	471360

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, 2024.

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. We empower consumers, businesses, financial institutions, and governments with fast, reliable, and convenient ways to send money and make payments around the world. We connect our diverse global customer base to the global economy through retail locations and a vast digital network.

To conduct our services and meet our commitments to our global customers and stakeholders, Western Union maintains approximately 9,100 employees worldwide and a network of 380,000 agents in over 200 countries and territories.

Western Union also sources from a broad network of third-party partners around the world. As of December 2024, 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.

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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.

# **Our Policies and Approach**





Aligned with the requirements under the 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.

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. 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. 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.

Our [Third Party Code of Conduct](#) sets out our expectations for vendors, suppliers, 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 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.

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.

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

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.

#### Business Integrity Helpline

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

In 2024, 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, a potential negative human rights impact is the wrongful use of our network by illicit actors to facilitate human trafficking and other human rights abuses that harm individuals and communities. 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. 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.

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



# Actions Taken to Address Modern Slavery



We take a multi-faceted approach to 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, 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.

### Sanction Compliance

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 are among the criteria that these sanctions programs use to impose sanctions on individuals or entities.

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.

### Agent Training and Oversight

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. Western Union provides agents kits, newsletters, alerts, and an online Agent Resource Center to help combat illicit activity.

### 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.

### Financial Intelligence Unit

Our Financial Intelligence Unit 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, NGO partners, and open sources.

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

### 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 have continued to collaborate with partners including various financial institutions; nonprofits such as the International Justice Mission, Stop the Traffik, 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) and leveraged 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 coordinated with law enforcement and nonprofits to target and disrupt human trafficking financial flows. Globally in 2024, we assisted with more than 720 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 in 2025 and beyond. 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.

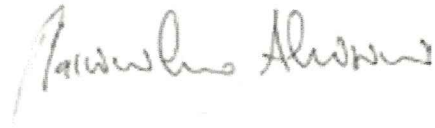
#### Consultation and Approval

This Statement is Western Union's ninth 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.

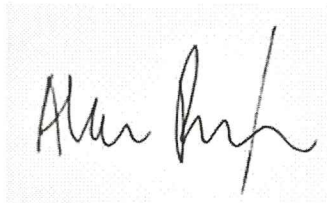
Please direct any questions on this statement to Western Union's Business Integrity Office at [BusinessIntegrity@westernunion.com](mailto:BusinessIntegrity@westernunion.com).



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June 12, 2025



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