

Modern Slavery Statement

This Modern Slavery Statement ("Statement") is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and section 54(1) of the Modern Slavery Act 2015 (UK) (collectively the "Acts") and constitutes the Statement of the MoneyGram Group for the reporting period ending 31 December 2024.

The Acts require certain commercial organisations to identify and address their modern slavery risks and maintain responsible and transparent supply chains.

The content of this document reflects the steps taken over the reporting period, and over the longer term, to combat modern slavery within the MoneyGram Group's business and supply chains. All figures are accurate to the date of the Statement being, 1 April 2025.

Introduction

The Statement applies to and has been approved by the Boards of

- MoneyGram Payment Systems, Inc. ("MPSI"), a Delaware corporation registered under no. 25711433, with the principal place of business at 1550 Utica Avenue South, Minneapolis, MN 55416, USA.

In Australia, MPSI is registered as a foreign company with the Australian Securities and Investments Commission ("ASIC") (ARBN 127226537), and registered with the Australian Transaction Reports and Analysis Centre ("AUSTRAC") as a remittance network provider.

- MoneyGram International Limited ("MIL"), a company incorporated in England and Wales, registration number 03287157, whose registered office is Third Floor, 30 Churchill Place, Canary Wharf, London, United Kingdom, E14 5RE.

In the United Kingdom MIL is licenced as an Authorised Payment Institution (FRN 502639) by the Financial Conduct Authority ("FCA") to offer money remittance services through a network of agents and online.

- MIL Overseas Limited ("MILOL"), a company incorporated in England and Wales, registration number 04481406, whose registered office is at Third Floor, 30 Churchill Place, Canary Wharf, London, United Kingdom, E14 5R. MILOL is a limited liability company, conducting sales and marketing activities on a global level to support the MoneyGram money transfer service that is offered worldwide.

- MoneyGram International SA ("MIS"), a company incorporated in Belgium, registration number 0671.690.653, whose registered office is at Rue Joseph Stevens 7, 1000 Brussels, Belgium.

In Belgium MIS is licenced as a Payment Institution by the National Bank of Belgium ("NBB") to offer money remittance services through a network of agents, through own stores and online.

Consultation

During the reporting period, a consultation process was established within MoneyGram to ensure input from the regions in which MoneyGram operates (including entities that each reporting entity owns or controls). Representatives from multiple countries and across functions have supported in the drafting process, led by personnel working in the regions described above. This process of collaboration and shared responsibility assists in improving MoneyGram's process for modern slavery risk mitigation. Further, the Boards of the companies specifically mentioned in this Statement have reviewed and approved the contents by resolution.

Our Business

The aforementioned entities MPSI, MIL, MILOL and MIS are indirect subsidiaries of MoneyGram International, Inc ("MGI"), a company incorporated in the United States. These entities form part of the MoneyGram Group ("MoneyGram"), a global leader in cross-border P2P payments and money transfers.

MoneyGram's objective is to positively impact millions of lives every day in a manner that reflects our values of integrity, respect and commitment. We make decisions, both big and small, with a focus on strong ethics and a dedication to honesty while demonstrating integrity for each other, our customers, and the world at large. MoneyGram fully complies with all applicable laws. We seek to treat everyone fairly, recognising the power of global diversity in creating a trusted business environment. Our policies and procedures relating to the Acts are in line with our company culture and values.

What is Modern Slavery?

The term "modern slavery" is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery encompasses all types of slavery, servitude, human trafficking and forced or compulsory labour across a vast number of industries.

The Acts define modern slavery as including eight types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour, meaning situations where children are subjected to slavery or similar practices or engaged in hazardous work.

MoneyGram strongly condemns all acts of modern slavery and commits to preventing the misuse of MoneyGram's products and services to further these reprehensible crimes.

MoneyGram Operations and Supply Chain

MoneyGram is a global leader in omnichannel money transfer and payment services and is headquartered in Dallas, Texas. MoneyGram's innovative platform leverages its leading digital and physical network, global financial settlement engine, cloud-based infrastructure with integrated APIs, and unparalleled compliance program. MoneyGram provides consumers with affordable, reliable and fast money transfers to their family and friends. Whether online, in-app, at a kiosk, or any one of our more than 440,000 agent locations, MoneyGram connects consumers whenever and wherever they need it. MoneyGram's operations reflect the global nature of its service to consumers. As such, MoneyGram has more than 2,000 employees globally and operates through a diverse network of agents in more than 200 countries and territories.

MoneyGram's agents are its primary point of entry for its consumers. Agents and their employees are part of the first line of defence in protecting consumers and preventing criminal abuse and exploitation of MoneyGram products and services. MoneyGram is committed to protecting its consumers.

MoneyGram expects the same commitment from its agents and their owners, shareholders, governing authorities, management and employees. Accordingly, MoneyGram ensures it has a robust due diligence process and global partner compliance policy for all agents and locations.

Statement: Risk Assessment and Response

Modern slavery risks in our business can manifest in several ways, where users of our remittance platform transfer money to fund human trafficking operations, to support or profit from forced labour or to hide or launder the proceeds of crimes. Remittance businesses that operate internationally are more vulnerable to these risks, as illicit actors can transfer money across borders to regions with weak enforcement of labour rights or human trafficking laws. It is therefore imperative that we have robust monitoring and compliance measures in place to mitigate modern slavery and human trafficking risks.

As a company trusted by our consumers to perform money transfer services across the globe, MoneyGram has a zero-tolerance policy to modern slavery 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 form of modern slavery. To aid in the fight against modern slavery throughout the business, MoneyGram has strong legal and compliance functions, as well as a dedicated law enforcement team that monitors our services and works with local police and other government law enforcement departments globally. MoneyGram's compliance programs are continually assessed for effectiveness and sufficiency through regulatory examinations, audits and independent reviews.

As an organisation, MoneyGram also ensures that all contracts and agreements entered into with third parties require compliance with all applicable laws (including, where applicable the Acts), and our 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 could be taken, including the termination of the agreement in question. MoneyGram's Procurement and Information Security Teams appraise and regularly review their suppliers to ensure that they are not engaging in criminal activity and are complying with the terms of their supplier agreement. Any operational expediency or cost saving measures gained from an external supplier is insufficient to prolong a relationship with a supplier that does not adhere to MoneyGram's own standards.

As previously stated, MoneyGram utilises agents to deliver the MoneyGram service to its customers globally. Accordingly, MoneyGram performs a robust due diligence process on all agents and locations. These checks are extensive and include a review of whether any agent or supplier has been involved in any criminal offences, and additionally mandates the adherence with MoneyGram's Code of Conduct and Compliance policies and procedures, as well as all applicable laws and regulations. MoneyGram's Compliance personnel perform reviews on all agents throughout the tenure of the relationship and are trained to identify any criminal behaviour, including that described by the Acts.

Further, MoneyGram verifies the practices of any new employment agency used, before accepting workers from that agency. MoneyGram will review all instances of non-compliance of which we become aware, on a case-by case basis, and will implement appropriate remedial action.

As a company entrusted by customers worldwide to transfer funds quickly and reliably, MoneyGram regularly reviews its global Ethics Program to ensure that we maintain a high ethical standard in the ways we conduct our business. We also undertake annual Code of 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. Representatives from entities within MoneyGram globally provide input and include regional specific requirements and recommendations to ensure that MoneyGram is best placed to combat the risks of modern slavery wherever they may manifest.

These include:

MoneyGram Whistleblower Policy and Ethics Hotline: MoneyGram encourages employees to report workplace practices or policies that they believe to be in violation of law, against public policy and/or fraudulent or unethical. MoneyGram maintains a third-part hotline to which employees and third parties may report concerns anonymously. MoneyGram strictly prohibits retaliation against employees who report a concern in good faith. MoneyGram has established practices for investigating credible reports of misconduct.

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's AML policies require ongoing review of customer interactions to ensure we are able to identify a payment associated with illegal activity by a user and report it to the relevant authorities.

Recruitment and Employment Policy: MoneyGram's global recruitment and employment policy aims to safeguard against modern slavery. The eligibility of all employees to work in the specific country is checked thoroughly to ensure that no employee is placed in a position, potentially vulnerable to modern slavery.

Code of Conduct: MoneyGram's Code of Conduct describes the way in which we, as an organisation, behave and how we expect our employees and suppliers to act. Adherence to our Code of Conduct 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 breach of this Code of Conduct. We may take adverse action against any employee or supplier who breaches our Code of Conduct, including for example, termination of employment or business relationship, 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 Conduct, policies and procedures or applicable laws and regulations (including, where applicable the Acts) more generally.

Actions Taken and Future Initiatives

MoneyGram pledges to continue its commitment to eliminate modern slavery. We will continue to hold our third parties to the same standards that we would expect from ourselves so that modern slavery does not occur in any business or supply chain.

To fulfil these commitments, MoneyGram shall continue to do the following:

- Regularly review policies, procedures and terms of business relating to third parties and suppliers.
- Obtain confirmation that suppliers do not have slavery or human trafficking present in their business or supply chains. This confirmation is performed on an ongoing basis.
- Maintain rigorous hiring practices with a goal of hiring compliance individuals who are qualified to ensure compliance with laws and regulations, like the Acts.
- Continue to train all employees and agents on how to identify, prevent and report potential signs of human trafficking and modern slavery.
- Ensure contractual processes are regularly reviewed in light of the ever-evolving risks of human trafficking.
- Strive to be the preferred partner within our industry, a pillar of the MoneyGram corporate strategy. As MoneyGram builds long-term relationships with our partners, we are better able to work together to safeguard human rights.

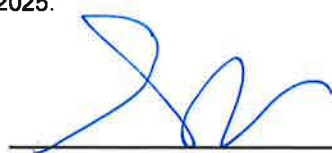
Effectiveness and Monitoring

MoneyGram recognises that the risks posed by modern slavery are ever changing. As such, MoneyGram is committed to maintaining vigilance in its effort to identify and combat the risks associated with modern slavery in its operations and supply chains. MoneyGram's work with law enforcement agencies and non-profit entities plays an important part in helping it monitor the changing nature of slavery and human trafficking and to refine the approach to combatting it.

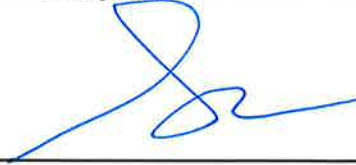
Internally, the MoneyGram Ethics Hotline aims to be a source of information for how the risks may be developing within the business and the effectiveness of initiatives to combat and mitigate those risks. Further, MoneyGram's compliance, legal, human resources and law enforcement teams are responsible to respond and support the company in addressing any new challenges.

Approval

This statement was approved by the Board of Directors of MoneyGram Payment Systems, Inc. MoneyGram International Ltd, MIL Overseas Ltd and MoneyGram International SA effective 1 April 2025.



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