



## **Moneycorp Group Modern Slavery and Human Trafficking Statement 2024**

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the Moneycorp statement of transparency for the financial year ending 31 December 2024. This statement covers the activities of the Moneycorp Group, including Moneycorp Group's legal entities based in the United Kingdom, TTT Moneycorp Limited, Moneycorp Financial Risk Management Limited, Moneycorp Shared Services Limited, First Rate FX Limited and Moneycorp CFX Limited. The Moneycorp Group currently has entities based in Jersey, Hong Kong, Brazil, the United States, Canada, Ireland and Gibraltar. Whilst these non-UK subsidiaries are not subject to the Act, Moneycorp Group policies and procedures continue to demonstrate global commitment to the ethical treatment of people.

Moneycorp Group is a global financial institution conglomerate providing foreign exchange currency solutions, electronic money and cross border payments services to private individuals and corporate customers, and banknotes services to financial institutions. Our footprint extends beyond Europe into Africa, the United States of America, South America, the Middle East and Asia.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### **Policies related to Anti-Slavery and Human Trafficking**

Our commitment to combatting modern slavery is embedded across our relevant policies and practices, ensuring our responsibilities to our staff are upheld. Our employees share fully in this commitment. We aim to ensure all employees feel safe in the knowledge that they can report suspicions of wrongdoing, and are protected by the policies outlined below, which are regularly reviewed and updated as necessary:

- Whistleblowing Policy
- Anti-Corruption and Bribery Policy
- Outsourcing Policy
- Environmental Social and Governance Policy
- Anti-Slavery and Human Trafficking Policy



- HR Policy Recruitment Policy
- Code of Conduct Policy
- Third Party Risk Management Policy

We do not tolerate or condone the practice of modern slavery in any form and Moneycorp Group is committed to ensuring that there is no modern slavery in our business or supply chain.

### **Due Diligence**

We continue to work on our due diligence processes in order to ensure they embed our modern slavery commitments.

The third-party risk management policy published in 2024 confirmed the steps that Moneycorp's supplier onboarding procedures must take to ensure potential counterparties are complying with modern slavery regulations. Moneycorp have begun the implementation of a vendor risk management tool to better ensure that our new and existing suppliers are evaluated for their commitment to preventing modern slavery. We expect our suppliers to share and promote the same core ethical values with integrity, collaboration, and accountability instilled into their work culture. Whilst we appreciate human rights violations can never be fully eradicated, our aim is to build strong ethical relationships that aid in the combatting of modern-day slavery and rights violations. High-risk suppliers are evaluated, prior to procurement agreements, and complete a screening programme that assesses their commitment to the Modern Slavery Act 2015. Any suspicion that a supplier is violating human rights is referred to the Chief Compliance Officer for their review and a decision on the appropriate action to take (i.e. cessation of the business relationship, reporting to law enforcement, further investigation etc).

### **Risk Assessment and Management**

Managing an identifying supplier risk is a key part of Moneycorp's approach to the combatting of modern slavery. Risk assessments are conducted across the company with a regularly maintained risk register. Indicators to identify the risk level and exposure are under continuous scrutiny to ensure our data remains current and our processes maintain the level of integrity expected by international bodies and treaties, such as The Office of the UN High Commissioner for Human Rights, The International Bill of Human Rights.

### **Training on Modern Slavery and Human Trafficking**

Our commitment to the combatting of modern slavery is reflected in our approach to staff training. We have developed compulsory training for all our staff, which aims to increase their understanding of modern slavery, its legislative context and key indicators, as well the steps Moneycorp expects its staff to undertake to comply with Moneycorp's commitment to combatting modern slavery.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved on 5th June 2025.

DocuSigned by:  
*Linton Eccles*  
707FA148023A4B6...

Linton Eccles  
Uk Head of Risk and Compliance  
5<sup>th</sup> June 2025