

World First UK Limited: Modern Slavery Statement

Introduction

This statement is pursuant to section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the WorldFirst statement of transparency for the financial year ending 31 December 2017.

Business structure

This statement covers the activities of the WorldFirst Group, of which World First UK Limited is the ultimate parent company. WorldFirst has subsidiaries based in the USA, Australia, Hong Kong and Singapore. Whilst these non-UK subsidiaries are not subject to the Act, the WorldFirst group policies and procedures demonstrate an ongoing commitment to the ethical treatment of people globally.

WorldFirst offers foreign exchange currency solutions, electronic money and cross border payment services to commercial and private customers.

Ongoing commitment

WorldFirst recognises that it has a responsibility to take a robust approach to slavery and human trafficking. WorldFirst has a zero tolerance of slavery, forced labour or servitude and human trafficking. As a business with a strong history of putting people first, treating all people with dignity, respect and integrity is at the core of our company values.

Policies and training

WorldFirst has a number of internal policies in place to mitigate the risk of unknowingly facilitating slavery or human trafficking. These include, but are not limited to, the Code of Conduct, Anti-Money Laundering, Prohibited Industries, Vulnerable Customers and Whistleblowing.

WorldFirst employs an in house recruitment team who conduct pre-employment checks to confirm identities and eligibility to work in the UK. WorldFirst employment is freely chosen and no discrimination is practiced. Staff are paid living wages and working hours are contracted to 40 hours per week. Freedom of association and the right to collective bargaining are respected.

WorldFirst recognises that training is crucial to raising awareness of modern slavery, recognising potential signs of trafficking and reporting concerns. WorldFirst will be providing relevant employees with further electronic training and guidance over the coming year.

Supply chain

WorldFirst undertakes due diligence when approving new suppliers and partners taking into consideration the geographical location, industry sector and nature of the commercial transaction and conducts an assessment of the risk from a slavery and human trafficking perspective. Suppliers and commercial partners are required to self-certify whether the Act applies to them and that they have met the requirements.

**WORLD
FIRST**

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www.worldfirst.com

World First UK Limited is a UK registered company – our company number is 05022388. World First UK Limited is authorised by the Financial Conduct Authority ("FCA") as an Electronic Money Institution under the Electronic Money Regulations 2011. Our FCA Firm Reference number is 900508. The registered address for World First UK Limited is Millbank Tower, 21-24 Millbank, London, SW1P 4QP.

Actions taken

Since last year's statement was published WorldFirst has carried out a review of its cross border payments, focusing on the risk of facilitating slavery or trafficking through its business operations, and has implemented further ongoing monitoring. Due diligence policies have been updated to reflect slavery indicators.

Governance

This statement, which will be reviewed and updated annually, was approved by the Board of Directors of World First UK Limited on 22 August 2018.

Signed by Jonathan Quin



Chief Executive Officer

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