

WORLDFIRST

Modern Slavery and Human Trafficking Statement for financial year ending 31 December 2018

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 2018.

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

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

WorldFirst has a zero tolerance of slavery, forced labour or servitude and human trafficking.

We recognise our responsibility to

- Continuously review the steps we are taking to combat modern slavery and human trafficking;
- Ensure our suppliers use fair and ethical labour practices that meet or exceed international labour standards; and
- Make it clear that we expect all of our employees, suppliers and customers to act with integrity.

WorldFirst has a number of policies that 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. In addition to these, WorldFirst has also created and distributed a Human Slavery Policy to all employees.

WorldFirst's recruitment team 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 places a strong emphasis on the wellbeing of its employees and has instigated a number of new positive mental health based initiatives throughout 2018. Employees are provided with access to a confidential employee assistance programme.

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

The WorldFirst supply chain includes the procurement of third party services including, but not limited to, legal firms, brand and marketing agencies, IT support, facilities and travel. It also includes the procurement of office furniture, IT equipment and food and beverages for the use and consumption by our employees. WorldFirst undertakes due diligence when approving new suppliers and partners taking into consideration the geographical location, industry sector and nature of the commercial transaction. On request, suppliers and commercial partners are required to self-certify whether the Act applies to them and that they have met the requirements.

Since last year's statement was published, WorldFirst has enhanced its screening processes to include potential indicators of human trafficking and modern slavery when analysing client behaviours and cross border payment activities. In the coming year WorldFirst will be carrying out a supplier and partner review to assess the current status of our supplier chain.

This statement, which will be reviewed and updated annually, is approved by the Board of Directors of World First UK.