Modern Slavery Statement 2018

Introduction
This statement is made pursuant to section 54(5) of the Modern Slavery Act 2015 and sets out how the Travelex Group continued its efforts to adhere to the Act during the financial year ending 31st December 2018 to ensure that no slavery or human trafficking takes place in any part of our business or within our supply chain.

Business Structure:
Travelex is a market leading independent foreign exchange business covering the entire value chain of the retail foreign exchange industry and its retail operations span 26 countries in 8 trading geographies. We have over 8,000 employees across the globe, the headquarters of which are located in the UK.

Our Obligation
Subsequent to the publication of our first Modern Slavery Statement in 2017, we have remained committed to ensuring that no slavery or human trafficking takes place within our business or within our supply chain.

The following sets out the obligations to which Travelex will adhere as a socially responsible group of companies, and describes how Travelex will continue to ensure that steps are taken to embed into the culture of the business appropriate systems and controls in order to prevent slavery and human trafficking in the United Kingdom and across our global companies. For the purposes of this statement, we report on the steps taken between 1st January and 31st December 2018 (the ‘Reporting year’) to prevent slavery and human trafficking occurring in our business operations and within our supply chain, covering Travelex Holdings Limited and its subsidiary companies (‘Travelex’). This statement should be read in conjunction with the Modern Slavery Statements made in prior years.

Our Supply Chain
As a large global organisation, Travelex use many supply chain networks to support general day-to-day business operations across the world, included but not limited to its retail stores, ATMs, the sourcing and distribution of foreign exchange banknotes, our IT platforms and systems, and our offices. We believe that our presence across the entire value chain and our decentralised structure supports our ability to identify and carefully choose our suppliers. As a trusted brand in foreign exchange, Travelex is committed to act ethically with integrity and transparency in all business relationships throughout the supply chain, undertaking appropriate due diligence and ongoing assurance to identify and assess potential risk areas and to mitigate the risks posed by slavery and/or human trafficking occurring.
Steps Taken during the Reporting Year:

During the year 2018, we have continued to pursue our initiatives to identify and mitigate the risk of Modern Slavery and human trafficking at Travelex and within our supply chain, which included:

- The UK, Europe, the Middle East, Asia, Japan, Australia/New Zealand, Africa, North-America and Brazil
- Deployment of our Third Party Module launched in February 2018, which facilitates and automates Travelex’s approach to supplier assurance across the Group, consolidating both the upfront due diligence and ongoing assurance processes.
- The focus for 2018 has been ensuring that critical suppliers for UK and central functions have been identified and either has or is undergoing the assurance process, utilising a risk-based approach. Travelex has continued to re-assess our key supply network which includes questions related to modern slavery and human practices.
- The focus for 2019 is to roll out the Third Party Module globally, to ensure that Travelex conducts consistent approach to supplier assurance across the Group, this includes:
  - Identifying and assessing potential risk areas when engaging new suppliers and reinforcing due diligence checks in high risk areas as part of the supplier selection process;
  - Performing ongoing due diligence when reassessing existing suppliers, including the downward supply chain.

Our Business, our Policies and Staff Training:

As a regulated financial services group, we believe that the risk of human trafficking within our colleagues is low. During the Reporting Year, as part of our commitment to preventing slavery and human trafficking in our business:

- Travelex has clearly communicated to all Employees that they must adhere to the standards outlined in the Anti-Bribery and Anti-Corruption suite of policies, which incorporates Modern Slavery.
- Travelex has continued to ensure that Modern Slavery is included in other key Travelex policies. Other documents relevant to preventing modern slavery in Travelex’s operations include the Global Ethical Conduct Policy and local Corporate Social Responsibility policies (where applicable) and the Supplier Management Governance Policy. Travelex will continue to raise awareness of Modern Slavery within the employee network, completed by training, communication and internal publications.
- Travelex has in place systems to encourage the reporting of concerns or breaches of policy via Whistleblowing gateways, and ensure the protection of any whistle-blower.

Our Commitment

Travelex is committed to acting ethically and to comply with all laws, regulations and rules applicable to our business as well as demonstrating the highest professional standards. Accordingly, Travelex will continue to assess and monitor the effectiveness of the programme, implementing enhancements when required, and ensuring that policies and procedures in relation to Modern Slavery are implemented. Annual reviews will be carried out in addition to audits of the associated policy and procedures. Our approach to managing modern slavery risks is an integral part of our approach to respecting human rights and we expect our business partners to adhere to the same high standards and values.

Governance

The ongoing oversight for the continuous evolution of the policy and procedures relating to Modern Slavery sits within Travelex’s Compliance and Risk team, with ongoing support from Travelex’s Procurement, Human Resources, Legal and Audit functions.

Tony D’Souza  
CEO and Director of Travelex Holdings Limited

Daryl Norman  
Chief Risk & Compliance Officer

Date 11 April 2019