

Small World Modern Slavery and Human Trafficking Statement

December 2019

Introduction

This Modern Slavery Statement is made in accordance with section 54(1) of the UK Modern Slavery Act which requires us to prepare a statement for each financial year. This is our Modern Slavery statement for the financial year ending June 2019. It sets out our approach to ensuring that modern slavery and human trafficking are not taking place within any part of our business or supply chain

What is Modern Slavery?

The term Modern Slavery encompasses all types of slavery, servitude and forced or compulsory labour, human trafficking, exploitation and child labour across any industry.

Our Business

Small World Financial Services Group is one of the world's leading payment services providers. We operate a group of Authorised Payment Institutions in the UK, as well as across Europe and the Americas. Our business is focused on providing our customers with an efficient, low cost service to allow them to send money internationally. The SWFS Group provides services using our omni-channel model including our own branches, agents and digital platform. Our global network of payout locations is offered through a diverse range of correspondents including local banks, Post Offices and Money Transfer Organisations. None of our work is seasonal.

As our main offering is the provision of payment services, we have a very limited supply chain. We do provide our Branch customers with additional services - such as mobile top up and courier services and these are with named, reputable service providers.

Our Values and Policy

Small World has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically, morally and in compliance with all applicable laws and regulations and we are open and transparent in our business dealings. This approach is supported by our company policies which have all been in place throughout the financial year ending in 2019.

Our Company Policies

Small World Financial Services Group has a strong compliance regime underpinned by a dedicated Compliance team who monitor our services and work with local law enforcement and regulatory bodies to ensure we identify and report any aspect of Money Laundering - including Modern slavery.

We also have an established Global Compliance and Ethics programme which is regularly reviewed to ensure that we operate ethically at all times.

Code of Conduct Policy

Small World Financial Services Group Ltd.

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The Code of Conduct outlines the standards of behaviour we expect from all our employees and reinforces our expectation that all our employees act ethically and morally as our customers would expect .

Anti Bribery and Corruption Policy

Our Anti Bribery and Corruption Policy compliments our Code of Conduct and focuses on our business practices with third parties and reinforces the standards of behaviour we expect of employees in their dealings with third parties.

Whistleblowing Policy

We have a confidential reporting channel where employees, agents and other third parties can report any concerns of illegal, immoral, or unethical behaviour occurring in our business. The whistleblowing policy protects any individual who raises concerns in good faith from any adverse action.

AML programme

Our AML programme is well established and at the core of all our business practices and has been operational across the Group throughout the financial year that ended in 2019. Any transactions that are suspected as being funded by any illegal activity are investigated in accordance with our AML programme.

Our Supply chain

We are committed to ensuring that slavery and human trafficking do not take place within any part of our business or within our supply chains. We will not knowingly support or do business with any organisation that is involved in such practices and we will terminate any relationship immediately where we discover a breach of any aspect of the Modern Slavery Act.

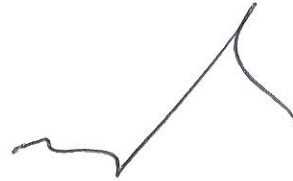
We have systems and controls in place to safeguard our business and our clients from any form of modern slavery and to identify, stop and report transactions we suspect are linked to the proceeds of crime. We carry out extensive due diligence on all our suppliers to ensure compliance with relevant regulations, including anti-money laundering and terrorist financing.

Senior Management Approval

The senior management of Small World Financial Services Group have approved the Modern Slavery Statement for publication on 23 December 2019.



Nicholas Day
Chief Executive Officer



Martin Boden
Group Chief Financial Officer

