
COMMUNICATION ON PROGRESS

TO THE UNGC



Period of Progress: 23-07-2017 to 23-07-2019
Period covered by this COP: 23-07-2019 to 23-07-2020

Contents

COMMUNICATION ON PROGRESS (COP)	2
1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER	2
2. DESCRIPTION OF ACTIONS	3
Theme 1: Human Rights	3
Theme 2: Labour	3
Theme 3: Environment.....	6
Theme 4: Anti-Corruption	9
SDG 2: Zero Hunger.....	12
SDG 3: Good Health and Well-being.....	12
SDG 4: Quality Education	14
SDG 5: Gender Equality	15
SDG 6: Clean Water and Sanitation	15
SDG 8: Decent Work and Economic Growth	15
SDG 9: Industry, Innovation and Infrastructure	16
SDG 10: Reduced Inequality	17
SDG 11: Sustainable Cities and Communities.....	17
SDG 12: Responsible Consumption and Production.....	17
SDG 13: Climate Action	17
SDG 14: Life Below Water	18
SDG 15: Life on Land	18
SDG 17: Partnerships to achieve the Goal	19
3. MEASUREMENT OF OUTCOMES	20
Human Rights	20
Labour	20
Environment.....	20
Anti- Corruption.....	20
SDG 3.....	21
SDG 4.....	21
SDG 10, 11	21
SDG 17.....	21

COMMUNICATION ON PROGRESS (COP)

Period covered by the Communication on Progress (COP)

From: 23-07-2019

To: 23-07-2020

1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER

22-07-2019

To our stakeholders:

I am pleased to confirm that Finabl Ltd. reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

A global platform for Payments and Foreign Exchange solutions, Finabl operates through its go-to-market brands, UAE Exchange, Travelex, Xpress Money, Unimoni, Remit2India, Ditto and Swych. Through our brands, we have taken considerable measures in line with the UNGC Sustainable Development Goals. In 2017, our brand, UAE Exchange activated a Financial Literacy Campaign for which it was awarded the SDG Pioneer Award for Prosperity in the UAE. As a leading player in the financial services industry, our major areas of work are focused on SDGs 3, 9, 10, 17 along with significant contribution in other SDGs.

In this annual Communication on Progress for last two years (2017-19), we describe the actions taken by Finabl and its companies, to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Promoth Manghat
Group CEO, Finabl Ltd.



Finabl Companies

UAE XCHANGE

Travelex

XPRESS MONEY GLOBAL MONEY TRANSFER

unimoni

Remit2India

Ditto

SWYCH

2. DESCRIPTION OF ACTIONS

Theme 1: Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Finabl operates through its group companies, UAE Exchange, Travelex, Xpress Money, Unimoni, Remit2India, Ditto and Swych. Finabl and its group companies (or “the Group”) are committed to Principle 1 and 2 of the UNGC Theme ‘Human Rights.:

The Group respects Human Rights and encourages fair dealing (non-discriminatory) across all career levels and with all stakeholders it engages with. It complies with all applicable laws on Human Rights, both at a global and national level. The freedoms and rights of all employees, prohibition of torture and all types of harassment including physical, verbal, sexual abuse and threats, are clearly outlined in the policies of the Group. Freedom to share feedback and to practice all religious beliefs and celebrations, is ensured. Significant investments have been made to provide access to affordable healthcare, ensuring work life balance, and towards enabling the learning & development goals of our employees. Similarly, a number of initiatives have been undertaken to ensure that our employees are provided with safe, secure and healthy work environment.

Finabl and its group companies, have operations in different parts of the world, and adhere to the labour laws of the respective countries they operate in. The Group is committed to ensuring freedom from torture and inhuman or degrading treatment, freedom from slavery and forced labour, and right to liberty and security.

The Group encourages its employees to support voluntary and positive contributions to support Human Rights on a regular basis within the companies. For example, the Group ensures to create diverse and inclusive workplaces, invest in communities and public policy advocacy, and engage employees and communities to promote collective action. These types of actions supporting Human Rights are encouraged among all the employees and associates.

Employee engagement activities, off-sites, town hall meetings, rewards and recognition and access to social events are regularly conducted. Some of the group companies provide the employees with flexible working hours to maintain a healthy work-life balance.

The Group maintains clearly documented HR policies that outlines the various actions undertaken.

Theme 2: Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Finablr operates through its group companies, UAE Exchange, Travelex, Xpress Money, Unimoni, Remit2India, Ditto and Swych. Finablr and its group companies (or “the Group”) are committed to Principle 3, 4, 5 and 6 of the UNGC Theme ‘Labour’ with the following supporting points:

The Group has adopted numerous policies to protect workers' rights, including in the areas of recruitment, pay, staff accommodation and healthcare. There is no fee charged for recruitment, visas or work permits and the organization does not deal with unscrupulous recruiters. Recruitment is managed through a preferred list of recruitment agencies with reviews to ensure that relationships with these companies are robust and ethical. Where applicable, employees are provided with comprehensive health insurance in their respective country of assignment.

The Group complies with all applicable laws on Human Rights and labour, both at global and national levels. It is committed to ensuring freedom from torture and inhuman or degrading treatment, freedom from slavery and forced labour, and right to liberty and security.

Abolition of child labour is ensured through the Group’s recruitment policy which clearly states and that a candidate shall be at least 21 years of age to be hired as an employee in any of the group’s global operations.

The Group strongly promotes equal opportunities and diversity in employment and encourages a supportive and inclusive culture, free from unfair and unlawful discrimination, in every country it operates in. It ensures fair treatment of all employees by providing equal opportunity in recruitment, remuneration, work hours, paid holidays, maternity protection, job assignments, performance assessment, training, job prospects, social security, occupational safety and health for all employees, associates and applicants for employment. It does not discriminate on the basis of race, color, religion, gender, age, sexual orientation, national origin, marital status, disability, pregnancy, or any other basis prohibited by national or local laws & regulations. These principles are applied across all HR processes spanning recruitment, promotion, demotion, transfer, layoff, termination, compensation, conduct at work, disciplinary and grievance procedures, training, recreation programs, benefits and all other details and conditions of employment. Clearly established processes are in place to monitor and ensure these are in order.

The Group strives to provide a work environment where:

- We encourage a diverse work environment and there are no individual differences and the contributions of all employees are equally recognized and valued. Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. The Group and its companies have a zero tolerance to any form of intimidation, bullying or harassment.
- Training, development and progression opportunities are provided to all employees.
- Equality in the workplace adhered to as a standard management practice
- All the employment practices and procedures are reviewed regularly to ensure fairness.
- Communications around these are provided to all employees to promote visibility and key equality considerations are included in relevant training programs.
- No person is victimized or subjected to any form of bullying or harassment.

The Group remains committed to follow the above and actively works towards eliminating any form of unlawful discrimination. It encourages line managers and supervisors to provide equal opportunities. Additionally, individuals at all levels have the responsibility to treat others with dignity and respect. The personal commitment of every employee and the application of these principles are essential to eliminate unlawful discrimination and ensure equality within the Finablr Group.

Some of the initiatives undertaken by Finablr group companies to further solidify the Group’s commitment towards the mentioned UNGC principles are furnished below:

UAE Exchange, Unimoni and Xpress Money (Headquartered in the UAE):

- Complies and adheres to the changes in labour regulations and provides transparency of job terms and employment contracts. As per the new policies of the UAE, prospective candidates will be asked to sign a standard employment offer in their home country that will in turn be filed with the Ministry of Labour, UAE, before a work permit is issued. That agreement will then be registered as a legal contract once the candidate arrives in the country, and no changes will be allowed unless they extend additional benefits to which the employee agrees.
- Ensures 98% of employee salaries are routed through the Wage Protection System (implemented in the UAE).
- Engages, advocates and organizes events related to health, safety, diversity and inclusion.
- Periodically creates, develops and implements workplace practices that promotes employee wellbeing.

Travelex (Headquartered in the UK):

- In line with the Modern Slavery Act 2015, publishes an annual slavery and human trafficking statement on its website explaining the measures taken to ensure that slavery and human trafficking are not taking place in any part of its business.
- Documented Global Equality and Diversity Policy, that sets out the approach to equality and diversity, and the prevention of unlawful discrimination at work. This policy applies to all Travelex employees, consultants, contractors, casual workers and agency workers.
- A Diversity and Inclusion Survey was conducted recently among Travelex employees. The results of the 2019 D&I survey showed that the following % of people agreed/strongly agreed with the following statements:
 - 85% - There is a culture of diversity and inclusion at Travelex.
 - 80% - Travelex welcomes and accommodates the different needs of all employees.
 - 74% - I feel emotionally and socially supported at work.
 - 84% - I feel that men and women have equal opportunities at Travelex.
 - 80% - I feel that employees with family commitments have equal opportunities at Travelex
- In accordance with the European Works Council Directive of 1994, an agreement was negotiated at Travelex between Management Representatives and elected / appointed Employee Representatives (the Special Negotiating Body). It was signed on 19th November 2009 and was effective from May 2010. Any Travelex company based in an EU Member State that has implemented the EWC Directive falls within the scope of the EWC Agreement. At the time of signing the Agreement this included Belgium, Czech Republic, Finland, France, Germany, Italy, the Netherlands, Malta, and the United Kingdom. The European Works Council (EWC) was set up to comply with legislation (beginning with the EWC Directive in 1994) obliging multinational companies to provide information and engage in consultation with workers' representatives on managerial decisions taken at the European level which have an impact on workers.

Remit2India (Headquartered in India):

- Maintains an exhaustive documented policy to ensure equal opportunities and fair treatment of all employees without any sort of discrimination.
- Initiated the 'Protocol and Recommendation' promise to act as a catalyst for achieving the vision of a world without forced labour, aiming to effectively eliminate traditional and state-imposed forced labour systems and to significantly reduce contemporary forms of forced labour to develop and implement a "convergence-based" approach for the prevention and reduction of vulnerability to bonded labour.

Ditto (Headquartered in France):

- Ditto employees are represented by a Working Committee (Délégation Unique du Personnel) and a Health and Security Committee (Comité d'Hygiène et Sécurité des Conditions de Travail) complying with the French law.

Theme 3: Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;**
- Principle 8: undertake initiatives to promote greater environmental responsibility; and**
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.**

Finablr operates through its group companies, UAE Exchange, Travelex, Xpress Money, Unimoni, Remit2India, Ditto and Swych. Environment is an integral part of Finablr's Corporate Social Responsibility and the Group recognises that managing the environmental impact benefits the organizations, our customers and communities as a whole. Finablr and its group companies (or "the Group") are committed to Principle 7, 8, 9 of the UNGC Theme 'Environment' with the following supporting points:

The Group is committed to meet legal compliance obligations related to environmental aspects of the business and integrates environmental responsibility into all business operations through planning, environmental protection as well as reviewing processes and procedures. All employees are encouraged to work towards improving our environmental performance and a philosophy of continuous improvement at all levels is encouraged at the Group.

Several impactful initiatives have been undertaken to promote greater environmental responsibility. Most of the Group companies focus on specific "Go Green" organization-wide campaigns to promote awareness amongst partners and other stakeholders at large. Key initiatives undertaken are focused on energy savings, waste reduction, efficient water usage and using sustainable natural resources.

Apart from these, some Group companies are aligned with specific CSR standards and have incorporated these as part of their broader organization strategies as well.

UAE Exchange (Headquartered in the UAE):

UAE Exchange is compliant to ISO 14001:2015 guidelines and has successfully concluded external audit for the year with zero non-conformances. Employees are trained to conduct annual internal audits to ensure alignment with the upgraded standards and guidelines. The company has integrated social responsibility with business strategy to be a responsible organization. The CSR objectives and strategies are developed from one of the organization's core value "care". A well-defined CSR policy has been drafted as a guideline for stakeholders at various levels in their interactions with Society and Partners. The company promotes employee volunteering and around 300,000 plus volunteering hours clocked in 2017.

Energy Savings:

- UAE Exchange has proactively replaced its lighting systems to energy efficient light bulbs
- By end of 2018, 53% branches in UAE were converted to use energy efficient lighting.
- Its IT Department undertook an initiative to reduce server footprint and consequent the energy demands of its data centre through virtualization and server consolidation.
- Other initiatives include, energy efficient fit out design & operations, movement sensors and time switches for all light fittings, local sourcing of materials, and reuse of material wherever possible

Waste Reduction:

- UAE Exchange expects suppliers/partners to promote greater environmental responsibility and support in the use of goods and services which help in mitigating any negative impact on environment, as well as better managing and utilizing resources such as energy, paper, water and waste, paper recycling (32,645 kg in 2018), digitalization (55,000 documents) etc.
- 15% (2018) of the office transportation has been shifted to carpool model.
- UAE Exchange has partnered with Emirates Environmental Group's (EEG) and is the UAE's top contributor in Paper Recycling Campaign for the last 3 years.

Natural Resources:

- UAE Exchange has planted 117 trees in the UAE, as part of EEG's "For Our Emirates We Plant" campaign.

Safety:

- UAE Exchange expects its suppliers/partners to adhere to local health and safety regulations and standards, and to implement all precautions to protect the health and safety of its employees.
- Products and services offered by UAE Exchange has negligible impact on the environment, public health or safety.
- All the offerings made are technology driven, and any impact on the environment may be only in the form of consumption of paper, or by the usage of energy for day-today business operations.

Unimoni (Headquartered in the UAE)**Natural Resources**

- Keeping the motto of 'Plant trees and save the environment and future' in mind, Unimoni has conducted various programs. It has distribution tree saplings as gifts to customers at 'Customer Meets'. It maintains a garden through employee volunteering efforts at a busy area of Cochin City (India) for public repose.
- Unimoni has also conducted various successful campaigns against pollution.
- Unimoni has provided financial support to the farmers for Hebbevu tree plantation at Mysore, India

Xpress Money (Headquartered in the UAE):**Energy Savings:**

- It is a mandate for all Xpress Money employees to keep their office computers and laptops shut down after use or on standby mode, when they are not around their desk.
- Initiatives have been taken to introduce light sensors at the office, with plans of an open office with natural lighting, which will reduce the dependency on artificial light.
- Administration personnel regularly move around after office hours, to check if all systems and electric equipment's including the lights are switched off.
- In addition to the above, the administration team undertakes periodic & surprise checks of employee accommodation, to ensure its proper maintenance & upkeep. The check also includes a list of whether energy appliances are being used efficiently or not, based on which a report is generated & feedback given to the concerned employees for improvements/ corrective actions, if need be.

Material Usage:

- Xpress Money partnered with ShredIT– which is a globally recognized company for shredding papers and recycling. Over the last two years, Xpress Money have saved around 61.9 trees (calculation based), as reported by ShredIT. The company is awarded with encouragement certifications from Shred IT every quarter basis the number of trees saved.
- Encouraging employees to reduce the usage of paper and printer toner, Xpress Money has provided central HD Printer/Scanner for each floor. This also helped in reducing individually allocated printers and scanners.
- Xpress Money employees are encouraged to use ceramic mugs at coffee stations. Xpress Money distributed branded ceramic mugs to employees and introduced plastic free cups at office pantries.
- As part of the awareness and employee engagement campaign, a Go Green Poster competition was launched during the first half of 2019.
- Digitization: Document management system is an integral part of all the HR processes. All the documents of employees, including work contracts, letters, employee profile information, educational details, declarations, etc. are stored electronically. Only mandatory documents that are required for physical audits (as part of audit requirement) are stored in physical files.

Water Usage:

- Initiatives have been taken to introduce aerators for water control in office premises.
- Washroom usage guidelines have been kept on each of the washrooms to induce clean & efficient use of water.
- Regular broadcast of company accommodation policy is done to the employees availing this facility, to be cautious of switching off water taps, washing machines and any other water consuming outlets. Periodic inspections are conducted to keep a tab on the implementation of these initiatives.

Travelx (Headquartered in the UK):**Energy savings:**

- Initiatives to save energy are continuously practiced, implemented and managed to increase efficiency. Travelx is committed to examine ways of reducing, wherever feasible, the level of emissions to air, land and water. All Travelx employees are encouraged to save energy wherever possible.

Waste Reduction:

- Travelx is committed to mitigate waste streams through efficient use of materials and energy, adopting the principles of 'reduce, re-use and recycle'.
- Travelx aims to reduce the amount of waste produced by the business, by encouraging efficient printing, ensuring water/electricity is used responsibly by employees, using technology to lessen the need for travel, using public transport wherever possible when travelling is unavoidable.
- Wherever possible, Travelx encourages employees to re-use stationary items and other office equipment;
- Travelx is committed to waste minimization and makes re-cycling facilities for paper, cardboard and aluminum cans, and other recyclable materials, available where practicable, at the business locations.

Natural resources:

- Travelx is committed to protect the environment, preventing pollution to the extent possible and meeting all specific commitments relevant to the company.

Remit2India (Headquartered in India):**Energy Savings:**

- Remit2India's office as per company mandate uses only LED lighting. The office layout and design support maximum usage of natural light and further reduces dependency on cooling and plumbing systems. Energy efficiency and quality of air has improved within the office.
- On a regular basis to maintain efficiency and reduce energy consumption, all electrical devices including air condition units are serviced and maintained.

Water Usage:

- Only recycled water is used for cleaning and flushing purposes in the washrooms.

Waste Reduction:

- E- Waste is disposed as per environmental standards.
- Employees are encouraged to use company buses and reduce usage of private vehicles.

Material Usage:

- Printing of documents are done only where digital formats are not able to serve the purpose.
- Posters and pamphlets are kept at relevant location(s) to educate employees on saving natural resources, practicing no wastage and efficient utilization of consumable assets. Employees are also instructed on shutting power sources down while not being used.

Safety:

- To maintain a healthy and hygienic work atmosphere, regular pest control is carried out.
- Purified water is made available for drinking in office for employees and visitors.
- Hygiene units are installed in all washrooms

Responsible Supply Chain:

- Wherever practicable, environmentally friendly products are sourced. As part of due diligence process to select new suppliers, environmental policies of new potential suppliers are assessed to ensure their values are aligned with that of the company.

Ditto (Headquartered in France):

Energy Usage:

- Ditto is committed to make the best use of materials resources, using energy of any type in a responsible way

Swych (Headquartered in the US):

Waste Reduction:

- Swych supports the reduction of plastic waste and pollution through actively promoting digital gift card gifting, which is a main product portfolio. This effort results in less landfill items, and less plastic pollution in the seas.

Theme 4: Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Finablr operates through its group companies, UAE Exchange, Travelex, Xpress Money, Unimoni, Remit2India, Ditto and Swych. Finablr and its group companies (or “the Group”) are committed to Principle 10 of the UNGC Theme ‘Anti-Corruption’ with the following supporting points:

The Group prohibits the practice of corruption & similar acts. These include:

- wilful insubordination, disobedience, illegal strike, negligence of work,
- theft, fraud, dishonesty, unauthorized possession of lethal weapon,
- damage or loss to organisation's goods and property,
- illegal gratification, taking/giving of bribes, collection of money on behalf of organisation, without its permission, carrying on business outside organisation's premises,
- holding meetings without permission in organisation's premises, disclosing information to third party,
- breach of rules / instructions of organisation
- drunkenness, indecent behaviour, eve-teasing, sexual harassment, intoxication, indiscipline, gambling.

It follows a strict zero tolerance approach to bribery and corruption of any form. All employees, suppliers/partners are expected to conduct themselves ethically and morally, respecting the local laws, and strictly prohibits bribery and corruption in any form. Various employee training and engagement initiatives are conducted to ensure maximum awareness on key topics under anti-corruption.

UAE Exchange (Headquartered in the UAE):

- UAE Exchange ensures awareness on anti-corruption amongst all the employees and ensures mandatory compliance training for all employees through the online portal on anti-corruption. Around 75- 80% employees have completed this awareness training. To further educate the employees, an annual weeklong event is organized called 'Know Risk Week' and a quiz competition called "Risky Quizness"
- UAE Exchange has established anti-bribery and anti-corruption policy reflecting the commitment to maintaining the highest level of ethical standards in the conduct of its business affair(s). Management, directors and shareholders; person(s) engaged on temporary, and/or contract basis, vendor(s), supplier(s), contractor(s), customer(s), consultant(s), service provider(s), and/or any other people or bodies/parties who are associated or conduct business with UAE Exchange are required to read, understand, and comply with these principles in the performance of their services for or on behalf of the UAE Exchange.
- UAE Exchange assesses the risk of corruption when doing business with Customers/ Partners/ Stakeholders, which is also documented in the company's Fraud prevention policy, Anti-corruption and Anti-bribery policy.
- UAE Exchange ensures that the internal procedures support the company's commitment towards anti-corruption. Employment laws help the company to not only prohibit an employee from accepting, offering or requesting bribes, but also prohibits him from accepting any gifts from third parties unless they are symbolic advertising or promotional gifts bearing the name and emblem of the third party. The Employee Hand book which is distributed to all employees joining the company details the Code of conduct to create awareness amongst employees to exhibit the highest standards of ethical conduct in carrying out the company's business.
- UAE Exchange creates awareness on general behavior and conduct through the Induction program and the documented Employee Handbook. Consumption of, possession of, or being under the influence of alcoholic beverages or illegal drugs during working hours or on company property or accommodation, in the office or in company vehicles is strictly prohibited. Smoking and chewing of tobacco is not allowed inside the office premises or employee accommodation. This is documented in the company's Employee Hand book.
- Employees are encouraged to seek guidance or raise their concerns about any issue or suspicion or malpractice with the Compliance Officer or to whistle.blower@uaeexchange.com at the earliest possible stage/time. Employees who fail to comply with any element of the policy may be subject to disciplinary action, including termination of employment or contract.

Xpress Money (Headquartered in the UAE):

- Xpress Money ensures awareness on anti-corruption amongst all the employees and ensures mandatory compliance training for all employees through the online portal
- "Policy Outreach Program" a monthly employee campaign is conducted to enable employees to have access to all mandatory policies.
- Xpress Money assess the risk of corruption when doing the business with Customers/ Partners/ Stakeholders. This is documented in its Anti-Fraud Management policy, Anti-corruption and Anti-bribery policy.
- Xpress Money ensures that the internal procedures support the organizations commitment towards anti-corruption. Employment laws help the organization not only prohibit an employee from accepting, offering or requesting bribes, but also prohibits him from accepting any gifts from third parties unless they are symbolic advertising or promotional gifts bearing the name and emblem of the third party. Code of conduct create awareness on employees to exhibit the highest standards of ethical conduct in carrying out the company's business.
- Xpress Money create awareness on general behaviour and conduct through Induction/regular awareness sessions. Consumption of, possession of, or being under the influence of alcoholic beverages or illegal drugs during working hours or on company property or accommodation, in the office or in company vehicles is strictly prohibited. Smoking and chewing of tobacco is not allowed inside the office premises or employee accommodation. – This is documented in its Global Guidelines.

Travelex (Headquartered in the UK):

- Travelex has put in place a comprehensive suite of policies and procedures to address Anti-Bribery and corruption.
- There is a Group wide ABC policy enacted based on the requirements of the UK Bribery Act and US Foreign Corrupt Practices Act (FCP).
- Training is performed each year with key personnel and an annual risk assessment is also undertaken.

Ditto (Headquartered in France):

- Ditto has agreed on a specific policy regarding corruption and bribery and selects suppliers & partners accordingly.
- Ditto is subject to by-law and supervision, as such is committed to the highest levels of Anti-Bribery/ Anti-Corruption with relevant legislation, regulation and best practise obligations.
- Ditto policies set out the commitment and standards of the companies, of which all its operating entities, employees, and agents are required to adhere to at a minimum.
- A dedicated business ethics program is followed by each Ditto employee upon arrival to ensure that anti-corruption awareness has been achieved.

Swych (Headquartered in the US):

- Swych expects its suppliers/partners to conduct themselves ethically and morally, respecting local laws and strictly prohibits bribery and corruption in any form.
- Swych assesses the risk of corruption when doing business with customers by enforcing specific daily, weekly and monthly anti-money laundering limits on digital gifting to prevent fraud mitigate potential for corruption.

Additional Actions by Finablr Group in line with the UNGC SDGs

Finablr is committed to supporting the UN SDGs along with its commitment to the ten principles of the UNGC. Through the group companies and their initiatives, Finablr gives back to the people, environment and the society. As a part of the payments and foreign exchange industry, the main focusses lie on SDGs 3, 9, 10 and 17, and the Group also takes initiatives to promote the rest of the SDGs as well. Following are some of the actions taken by the Group in contribution to the UNGC SDGs mentioned:

SDG 2: Zero Hunger - End hunger, achieve food security and improved nutrition, promote sustainable agriculture

- **UAE Exchange**
 - Annually during the holy month of Ramadan, UAE Exchange associates with community partners to distribute Iftar meals (meal after fast) to the needy
 - UAE Exchange employees are encouraged to participate in the Iftar distribution across the country adding up the employee community volunteering hours
- **Remit2India**
 - At Remit2India offices, leftover edible item during any scheduled celebration/s is handed over to NGOs, in hygienic packaging for further distribution to those in need.

SDG 3: Good Health and Well-being - Ensure healthy lives and promote well-being for all at all ages

- **UAE Exchange**
 - Road safety campaign was conducted among the blue-collar workers with the support of Dubai Police. 5 campaigns have been organized so far, covering more than 20,000 blue collar workers.
 - 'No Tobacco' awareness sessions are conducted annually on the harmful effects of smoking. Necessary medical support is also provided for tobacco de-addiction.
 - Health check-up for all employees and breast cancer awareness session for female employees with free mammogram tests are periodically organised.
 - Health & Fitness Campaigns are organized regularly, which include cross-fitness exercise sessions, aerobics classes, health talk sessions, yoga and sports day.
 - Annual blood donation campaigns are conducted across the UAE in association with Dubai Health Authority
 - During the harsh summer months in the UAE, health campaigns are conducted along with community partners to educate blue collar workers on staying hydrated and healthy
 - UAE Exchange had committed to the Dubai Cares initiatives to provide education for the underprivileged children. In 2018, the initiative was funded to the education program in Sierra Leone in 2017-18 and in Uganda for the year 2018-19.

- **Unimoni**
 - Unimoni conducted a blood donation camp on 14th June 2019 on World Blood Donor Day for both Chennai & Kochi offices and almost 75 employees have donated blood.
 - Unimoni also organizes free health check-ups on regular basis at few offices, where the company witnesses participation from approximately 60% of employees of those offices.
 - Unimoni organised a free eye test camp in association with Alsalama Eye Clinic (India). Unimoni also conducted a free eye check-up camp for its existing customers, with a special feature of getting a life-long treatment free of cost. Around 48 customers enrolled for the camp and were entitled to avail the membership of a lifetime eye check-up with the clinic.
 - Healthy and hygienic habits were inculcated in children at health camps
 - Inhabitants of old age homes are served with food on special occasions in Kochi, India
 - Relevant initiatives are undertaken for the support of Cancer patients. Financial aid is provided where necessary for surgery and treatment of patients.
 - Installation of water dispensers at old age/specially-abled homes for clean drinking water on World Health Day

- **Xpress Money**
 - Employees are provided with a Medical Insurance plan to take care of their health-related issues
 - Employees are insured under life & personal accident which takes care not only in cases of death but also on temporary and permanent disability
 - As part of the CSR program, several free medical check-ups which includes check of Sugar, Cholesterol, BMI, etc., are conducted occasionally for employees.
 - Xpress Money has partnered with NMC (New Medical Centre) to provide Breast Cancer & Prostate cancer awareness training to male & female staff.
 - The company has undertaken a Corporate Annual Membership at United Pro Sports (in, Dubai) reinforcing its belief that a healthy workforce is more productive. Sports also increases engagement, camaraderie & fosters healthy competition amongst cross-functional teams.
 - In addition to the initiatives taken for the employees, free Yoga classes are conducted for the blue-collar workers across the UAE. High stress levels are common among these workers, who stay away from their homes and work long hours in different climatic conditions. Through this, the company hopes to help them find a sense of physical, mental and spiritual harmony within themselves. Over the past 3 years, Xpress Money has provided this training to hundreds of workers, during which they are taught breathing, meditation & simple exercises that would reap long-term benefits, if practiced regularly.

- **Travelex**
 - Travelex's well-being policy highlights its support for health, wellbeing and work life balance. Travelex has introduced a concept called 'The Deal' that talks about mutual benefit to both the company and its employees. One of the pillars of 'The Deal' is 'Reward Beyond' which recognizes the importance of health and well-being, and outlines its commitment to both implementing and encouraging employees to participate in workplace health and wellbeing initiatives to assist with healthy lifestyles.
 - Travelex provides support, ease of access to information and resources to employees, encouraging knowledge awareness around key health issues.
 - Travelex provides access to information and resources that increase employees' knowledge and awareness around key health areas.

- **Remit2India**
 - Remit2India arranges for periodical blood donation camps, health checkups, health talks to promote a healthy living. Employees are covered under group health insurance by Remit2India to support for expenses arising out of the hospitalization of self & family.

SDG 4: Quality Education - Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

- **UAE Exchange**
 - UAE Exchange has committed AED 10 million in support of Dubai Cares global programs. This commitment will support Dubai Cares' overarching mission to positively impact the lives of underserved children and young people in developing countries through the transformative power of education. UAE exchange believes the act of 'giving' starts a domino effect to impact positive change.
 - A corporate funded leadership development program (SALT program) was organized at the National Charity School, Dubai to provide quality education to students.

- **Unimoni**
 - In order to build a better future, Unimoni has assisted schools with school bag, study materials, computers, video conferencing equipment, infrastructures and other classroom facilities for quality education in Government Schools, in 2018.
 - Educational scholarships and cash awards were distributed to the outstanding students of Government Schools in Kerala.
 - School bags, umbrellas and study materials were distributed to indigent students and computers were offered to multiple disabled students of Adarsh Charitable School in India

- **Xpress Money**
 - Xpress Money has been participating in the Dubai Marathon for the past 5 years, to raise funds for a Special Needs Center in Dubai. Over the years, the team size has remarkably increased from 10 to 46, clearly showing that employees see this not just as a means to improve their own fitness but of giving back to the community.
 - The company also trains its employees on developing their skills for using software like MS- Excel, etc. It has a program called Gurukul for knowledge sharing sessions by employees. TED Talks sessions are hosted where talks by internationally renowned persons speaking on topics which can help the employees develop different types of skills, are broadcasted.
 - Xpress Money launched a Mother's Day campaign in 2017 for the benefit of abandoned Filipino street children. The impact of the campaign was measured through the change in brand awareness scores and increase in transactions (though the campaign was not launched with a business objective)
 - Xpress Money has helped several children, whose parents have been unable to support their continued education due to mounting debts, to return to school.

- **Remit2India**
 - As one of the segment of leave policy, Remit2India offers study leave to employees who are pursuing further education and skill based trainings during their employment.

SDG 5: Gender Equality- Achieve gender equality and empower all women and girls

Finablr Group hires without gender bias, and also makes a collective effort to empower women at work. Female staff are not encouraged/permitted to work beyond the daily work hours, unless there is a critical business requirement and relevant security measures for their safety. Gender equality is observed and enforced across the Group.

- **UAE Exchange**
 - UAE Exchange has created a 'Network of Women (NoW)' group, leading engagements and promoting interaction to discuss the various issues faced by women at workplace and ideate to solve them. With this the company intends to lead by example.

- **Unimoni**
 - Complying to the Government of India's legislation - The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), Unimoni constituted the POSH Act and the Internal Complaints Committee in 2017 in two of its offices in India (Chennai and Kochi), and has been active since then. The Chennai office has 7 members in the POSH Committee whereas Kochi office has 4 committee members. As on date, preliminary communication mandated by the Government of India has been made to the employees informing them the existence of the committee, with plans of enrolling an external member shortly. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") was enacted as a comprehensive legislation (by the Government of India) to provide a safe, secure and enabling environment, free from sexual harassment to every woman. Accordingly, the law requires any organization that has 10 or more employees, must constitute an internal committee ("IC") to receive and redress complaints on sexual harassment at workplace.

- **Remit2India**
 - Remit2India is compliant with the Employment Exchange Act and POSH Act, practicing towards the gender equality in the work place.

SDG 6: Clean Water and Sanitation - Ensure availability and sustainable management of water and sanitation for all

Finablr Group ensures clean drinking water is made available to all employees and office visitors, RO and UV system is installed to collect clean water, with periodic inspections and updates. A few of the group companies only use recycled water for flushing system, while sensors are used to dispense only the required quantity of water in washrooms.

SDG 8: Decent Work and Economic Growth - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Finablr Group constantly upgrades its platform to modern day technologies to service the internal & external customers - employees and associates. With the constant churn of the talent pool, diverse roles are designed to open up opportunities for existing talent as well as to encourage inflow of new talent. The applicable labour rights (as per the country of operation), secure work environment and healthy provisions ensures that employees and associates can fulfil their duties without any discrimination.

SDG 9: Industry, Innovation and Infrastructure - Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

Finablr Group truly believes that innovation is key to its progress and the Group constantly keeps innovating through in-house initiatives or partnerships with the brilliant startups from the ecosystem. Finablr has partnered with Plug and Play (Abu Dhabi) to promote Startups and fintech ecosystem. Finablr has partnered with Fintech Galaxy to promote entrepreneurship in the region.

- **UAE Exchange**
 - UAE Exchange has partnered with various accelerators such as Dubai International Financial Centre (DIFC) Fintech Hive, Abu Dhabi Global Markets (ADGM), StartAD NYU and Dubai Technology Entrepreneurship cell (DTEC) to foster innovation.
 - UAE Exchange is a “Corporate Mentor” for the Fintech initiatives at the StartAD New York University.
 - With DTEC partnership, UAE Exchange supports entrepreneurial ecosystem, related to startups in the fields of fintech, block chain, money transfer services and e-payments solutions.
- **UAE Exchange, Xpress Money, Remit2India**
 - The Global Risk and Compliance team has been actively promoting initiatives to ensure maximum awareness amongst the employees to promote a risk resilient infrastructure. Since 2017 the Group launched a KNOW RISK initiative across UAE Exchange, Xpress Money and Remit2India companies that included initiatives comprising of fun games and interactive workshops. The key was to drive the risk culture and engagement across the network, promoting the risk management framework.

SDG 10: Reduced Inequality - Reduce inequality within and among countries

SDG 11: Sustainable Cities and Communities - Make cities and human settlements inclusive, safe, resilient and sustainable

Finablr is a global platform for payments and foreign exchange. Its network reach across 170+ countries ensures seamless and convenient Payments and Foreign Exchange solutions. Through its portfolio of category renowned brands, the Group serves more than 23 million consumers and over 1,500 corporate and institutional partners.

In 2018, Finablr processed more than 150 million transactions managing ~US\$115 billion in volumes for its customers. The Group's omni-channel proposition enabled it to serve customers the way they want to be served. The Group has a direct presence in 44 countries through licensed operations complemented by a network reach spanning 170 countries.

Finablr companies in the cross-border payments space, namely, UAE Exchange and Xpress Money, have been serving migrant workers to send money to their families in their home countries, enabling their families to receive money when needed and to meet expenses for food, shelter and education, enabling financial inclusion and empowering people. They provide customers instant, secure and convenient ways to transfer money anywhere in the world through innovative technology, superior customer service and its extensive global network.

The Group's existing policy governs & welcomes job applicants across the globe and discourages any bias behavior against sex, caste, creed, gender and community in place. Adopted from the local policies, this policy ensures the opportunities, remunerations and benefits are extended without any discriminations to achieve equality.

SDG 12: Responsible Consumption and Production - Ensure sustainable consumption and production patterns

The Finablr Group understands that natural resources are limited and need to be utilized wisely. Various sustainable practices have been adopted in accord with local policies. To quote, the Group works consciously to save on electric energy, use water judiciously and employs effective waste management processes promoting recycling at all Group companies.

SDG 13: Climate Action - Take urgent action to combat climate change and its impacts

The Finablr Group encourages employees and associates to volunteer for help & support to the impacted lives and zones arising out of any natural calamity.

During the 2018 Kerala floods, Finablr through its brands donated generously to support the redevelopment cause.

- **Unimoni**
 - In the aftermath of the deadly floods in Kerala in 2018, the company supported efforts to restore lives through on-ground volunteering efforts and actual contribution of individual time, in addition to donating money.
 - Unimoni employees also volunteered their efforts to rebuild a house in Aluva district (Kerala) devastated by the deadly floods. In collaboration with Habitat for Humanity India, Unimoni helped reconstruct the house which is 500 square feet built with a functional sanitation system.

SDG 14: Life Below Water - Conserve and sustainably use the oceans, seas and marine resources for sustainable development

SDG 15: Life on Land - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

- **Remit2India**
 - Remit2India encourages employees and associates to practice ecofriendly modes of utilising the natural resources and abide by the advisory circulars released country wide towards various measures on prevention of environment.
 - As a standard practice, Remit2India office opts for ecofriendly celebrations and purchases for festivals or community events.

- **Swych**
 - Swych launched a #CutThePlastic campaign in April 2019, a global event designed to boost awareness for climate change and help end plastic pollution, protect endangered species, and activate a global environmental movement.
 - “#CutThePlastic” is designed to encourage consumers to upload their gift cards to Swych’s app, recycle them, and then migrate completely to digital gift cards. By eliminating redundant plastic, the campaign will play a role in not only broadcasting the next wave of technological innovation but also contribute to environmental sustainability and a small step closer to zero waste. This effort results in less landfill items, and less plastic pollution in the seas.
 - The majority of physical gift cards are made from a plastic resin called PVC, 75 million pounds of which enters the waste stream each year. This type of plastic is, for the most part, still not accepted by household waste disposers, making the process of disposing gift cards highly inconvenient. Over a billion gift cards are printed every year, equating to roughly 9,000 tons of plastic that end up in the oceans, potentially being ingested by marine life.

SDG 17: Partnerships to achieve the Goal - Strengthen the means of implementation and revitalize the global partnership for sustainable development

The Finablr Group has identified a number of goals under Corporate Sustainability and it understands the need for strong partnerships and networks to help achieve these goals. Finablr is a partner of World Economic Forum and its Group CEO is a member of the steering committee of the PGFI, WEF (Promoting Global Financial Inclusion)

- **UAE Exchange**

- UAE Exchange has partnered with 'Gulf Madhyamam' and NMC Healthcare to build 51 houses for select deserving artists/ excellent students / differently abled / economically backward under 'Project Aksharaveedu' in Kerala, India. As on date, 31 houses have been constructed and handed over to.
- UAE Exchange has partnered with Emirates Foundation, which is a pioneer in the region for Youth empowerment initiatives. Emirates Foundation partnership has not only helped us accelerate the initiatives in Financial Inclusion and Empowerment but also supported in enhancing the Groups reach to a wider audience.
- In the spirit of the Year of Giving 2017, UAE Exchange and Dubai Cares signed a Memorandum of Understanding (MOU) where the company committed AED 10 million to the UAE-based philanthropic organization. UAE Exchange completed two successful years of this commitment and contributed to the efforts of Dubai Cares in Sierra Leone and Uganda in 2017 and 2018.
- UAE Exchange tied up with Road and Transport Authority (RTA) to drive safety initiatives and campaigns across Dubai, UAE
- UAE Exchange is a member of the Global Compact Network UAE, active partner and recognized as SDG pioneer 2017
- UAE Exchange partnered with EEG for Waste Management
- UAE Exchange is a member Dubai Chamber Sustainability Network advocating on sustainability practices in the UAE
- To promote financial inclusion UAE Exchange partnered with the Innovations for Poverty Action, a non-profit corporation based out of the US, on a research to report with labelled remittance.
- UAE Exchange partnered with PeoplePro & National Charity School (SALT Program for students) for quality education.

- **Remit2India**

- Remit2India has a tie up with the State Bank of India the largest national bank in India to support & lead the vision of the Indian Prime Minister in making India a cashless economy and his mission to empower 100 million Indians to go cashless.

3. MEASUREMENT OF OUTCOMES

Human Rights

- Finablr Group has a clean record of treating all employees with respect and fairness, without any discrimination.

Labour

- UAE Exchange has been awarded Great Place to Work for the past consecutive 4 years.
- 98% of salaries within the Finablr brands in the UAE are routed through the Wage Protection System (of the UAE), enabling fair compensation for all.
- The Group respects the diversity of people (currently more than 50 nationalities working) and ensures to not discriminate on the basis of gender, race, marital status, physical disability or culture.
- UAE Exchange introduced the first ever women powered retail store at Dubai Airport Free Zone (DAFZA).
- UAE Exchange also has an Emirati women-powered customer contact centre for serving the Arab community.
- At Travelex, the 2019 Diversity and Inclusion survey results showed -
 - 85% - There is a culture of diversity and inclusion at Travelex.
 - 80% - Travelex welcomes and accommodates the different needs of all employees.
 - 74% - I feel emotionally and socially supported at work.
 - 84% - I feel that men and women have equal opportunities at Travelex.
 - 80% - I feel that employees with family commitments have equal opportunities at Travelex

Environment

- Energy efficiency through conversion to energy efficient lighting – 100% conversion. By converting into energy efficient lighting, UAE Exchange has saved 105,666.41KW energy in 2017.
- Fuel conservation - 15% of office transportation has been shifted to carpool model.
- 10% of the overseas calls are now routed through conferencing facility (Cisco Webex)
- Paper recycling – 100% recycling of waste paper generated. UAE Exchange has recycled 217,278 kgs of paper in 2017 & 32,645 kgs in 2018.
- UAE Exchange has been the top contributor in the UAE for the last 3 years in the Emirates Environmental Group's (EEG) Paper Recycling Campaign.
- UAE Exchange has planted 117 trees as part of "For Our Emirates We Plant" campaign of EEG
- Over the last two years, Xpress Money have saved around 61.9 trees (calculation based), as reported by Shred IT.

Anti- Corruption

- Financial Literacy & Crime Awareness in the UAE: In the absence of adequate access to banking and financial services many of the expatriate workers in the UAE were seen resorting to using informal channels like "Hundi" and "Hawala". This coincided with widespread instances of fraud and financial malpractices. Often these workers had limited legal recourse to recover their money and mostly ended up losing their hard-earned wages. UAE Exchange employees voluntarily conduct awareness sessions for blue collar employees on the importance of financial inclusion and savings and use of legal money transfer channels. More than 100 sessions were conducted in the last one year.
- The financial literacy campaign targeting Bangladeshi workers achieved direct outreach to roughly 75% of the Bangladeshi expatriates in the UAE. As a direct consequence of the campaign, remittance volume growth to Bangladesh from UAE witnessed a staggering 26% increase thus, making UAE the largest remittance sending country to Bangladesh. This campaign was celebrated with UAE Exchange awarded the SDG pioneer for Prosperity 2017 in the UAE.

SDG 3

- Unimoni conducted a blood donation camp on 14th June 2019 on World Blood Donor Day for both Chennai & Kochi offices and almost 75 employees has donated blood.
- Unimoni organised a free Eye Test Camp in association with Alsalama Eye Clinic (India). Unimoni also conducted a free eye check-up camp for its existing customers, with a special feature of getting a life-long treatment free of cost. Around 48 customers enrolled for the camp and were entitled to avail the membership of a lifetime eye check-up with the clinic.

SDG 4

- Xpress Money been participating in the Dubai Marathon for the past 5 years, to raise funds for a Special Needs Center in Dubai. Over the years, the team size has increased from 10 to 46, clearly showing that employees see this not just as a means to improve their own fitness but of giving back to the community.

SDG 10, 11

- Through its portfolio of category renowned brands, Finablr serves more than 23 million consumers and over 1,500 corporate and institutional partners.
- In 2018, Finablr processed more than 150 million transactions managing ~US\$115 billion in volumes for its customers. The Group's omni-channel proposition enables it to serve customers the way they want to be served.
- The Group has a direct presence in 44 countries through licensed operations complemented by a network reach spanning 170 countries.

SDG 17

- UAE Exchange has partnered with 'Gulf Madhyamam' and NMC Healthcare to build 51 houses for select deserving artists/ excellent students / differently abled / economically backward under 'Project Aksharaveedu' in Kerala, India. As on date, 31 houses have been completed.
- With Emirates Foundation as a partner, UAE Exchange has pioneered workshops in Financial Literacy and Soft Skills Development for its Retail Operations Staff.
- UAE Exchange contribution of AED 10 million to the Sierra Leone Program through Dubai Cares commitment, has enabled children to attend safe and predictable schools, and gain the reading, writing, and socio-emotional skills.
- To be a part of a larger community working together towards sustainable development, UAE Exchange engages with multiple organizations. UAE Exchange is an active member of various working groups under Dubai Chamber's Centre for Responsible Business and is a winner of CSR Label for the last 7 consecutive years. EEG has honored UAE Exchange with opportunities to be part of various tree planting initiatives and the company was the highest contributor to the paper recycling campaign of EEG for the last three years. The company is continuously improving its sustainability practices which is evident from the recognition by Arabia CSR (Special appreciation in 2017 & 2nd runner up in 2018).