

MoneyGram Ethics Line Frequently Asked Questions

Why do we need an Ethics Line?

You may discuss with your supervisor any potential ethical issues or concerns at any time. You may also contact the Ethics Line directly to report issues or ask questions about ethics topics.

MoneyGram's Audit Committee has procedures for handling accounting and auditing concerns that allow employees to submit complaints or concerns related to accounting, internal auditing controls or auditing matters, and the Ethics Line can be used for submitting concerns in these areas as well.

At MoneyGram we believe an effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

May I report using either the Internet or the telephone?

Yes. With the MoneyGram Ethics Line, you have the ability to file a confidential, anonymous report via the telephone or the Internet. EthicsPoint, our Ethics Line provider, can be visited at www.moneygram.ethicspoint.com from any computer, globally. Important phone numbers also are available on this website.

What type of situations should I report?

The MoneyGram Ethics Line is designed for employees to report any violation of our Code of Conduct, accounting, internal controls or auditing complaints you may have.

If I see a violation, shouldn't I just report it to my supervisor, security or human resources and let them deal with it?

When you observe some behavior that you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns to your direct manager or other member of your management team. We recognize, however, that there may be circumstances when you are not comfortable with or able to report the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

What is our Code of Conduct?

MoneyGram's Code of Conduct is delineated in the company's Code of Ethics and Compliance Manual. It embodies our commitment to conduct our business with integrity and high ethical standards and in compliance with all applicable laws, rules and regulations. It is also about doing the right thing, acting honorably and treating each other with respect.

Why should I report what I know? What's in it for me?

We all want to work in a positive environment. Our Code of Conduct requires each MoneyGram employee to act in an ethical manner and inform the appropriate people if you believe a person is acting inappropriately. Corporate misconduct can threaten the livelihood of an entire company. Working together, we can maintain a healthy and productive environment.

Does management really want me to report?

Yes, we certainly do. In fact, we *need* you to report questionable behavior and activities. Each of us is aware of what is happening in our respective departments and functions and may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Ethics Line system strips away Internet addresses and anonymity is maintained.

I am concerned that the information I provide on the Ethics Line will ultimately reveal my identity. How can you assure me that will not happen?

The Ethics Line is operated by EthicsPoint, which has a system designed to protect your anonymity. However, if you wish to remain anonymous, you—as a reporting party—have to make sure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..." Every reasonable effort will be made to ensure the confidentiality of those furnishing information, unless we are required by law to disclose the information. Also, our policies prohibit retaliation against any employee who in good faith reports or participates in an investigation of a possible violation of our Code of Conduct.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. The Ethics Line can help you prepare and file your report so it is properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unreported because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Ethics Line report distribution is designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at with the Ethics Line, the EthicsPoint service provides a unique user name and you are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail, answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue" where situations are not only identified but can be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Ethics Line correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

You can file an Ethics Line report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the Ethics Line toll-free in the U.S. at 800-494-3554, which is available 24 hours a day, 365 days a year. You may also use the country specific numbers noted below. A full listing of available phone numbers is provided on www.moneygram.ethicspoint.com.

Australia	1-800-339276
Belgium	0800-77004
Brazil	rbollampalli@moneygram.com

China	10-800-120-1239
France	rbollampalli@moneygram.com
Germany	rbollampalli@moneygram.com
Greece	00800-12-6576
Hong Kong	800-964214
India	000-800-100-1071 or 000-800-001-6112
Indonesia	rbollampalli@moneygram.com
Ireland	1-800615403
Italy	800-786907
Japan	0066-33-112505 or 00531-121520
Kenya	rbollampalli@moneygram.com
Kingdom of Saudi Arabia	rbollampalli@moneygram.com
Libya	rbollampalli@moneygram.com
Malaysia	rbollampalli@moneygram.com
Mexico	001-800-840-7907 or 001866-737-6850
Morocco	rbollampalli@moneygram.com
Nigeria	0-708-060-1816 – at the English prompt dial 800-494-3554
Peru	rbollampalli@moneygram.com
Philippines	rbollampalli@moneygram.com
Poland	0-0-800-1211571
Portugal	8008-12499
Romania	0808-03-4288 – at the English prompt dial 800-494-3554
Russia	8-10-8002-6053011
Singapore	800-1204201
South Africa	080-09-92604
South Korea	00798-14-800-6599 or

	00308-110-480 or 00798-1-1-009-8084
Spain	900-991498
Sweden	020-79-8729
Switzerland	0800-562907
The Netherlands	0800-0226174
Turkey	0811-288-0001 – at the English prompt dial 800-494-3554
Ukraine	0-800-502-886 – at the English prompt dial 800-494-3554
United Arab Emirates	8000-021 (du) 8000-555-66 (Military -USO and Cellular) 8000-061 – at the English prompt dial 800-494-3554
United Kingdom	0800-032-8483
United States	1-800-494-3554