Dear Colleagues,

Thank you for taking the time to review our Code of Conduct.

I am proud to lead this Company, knowing that we better the lives of our customers around the world every day. We operate in more than 200 countries and territories and our customers rely on us to help them succeed.

Western Union has a rich and diverse history. We have thrived for more than 167 years because of our determination to meet the needs of our customers and evolve our way of working.

Each of us has a responsibility to act ethically and with integrity. We all have a role in making sure our business is conducted in the right way and that we comply with our policies, our Code of Conduct, and the law. Our Code is the foundation for how we work, a statement of our principles, and a guide for navigating issues and getting help.

An important part of our job is to read and understand the Code and be familiar with resources for our questions or concerns. While our Code may not answer every question, it contains guidance and information about how to learn more. Speaking up is the Western Union way. I encourage anyone with questions or concerns to speak up.

The key to our growth is working together with integrity and succeeding in the right way. I appreciate all you do to promote our shared values and adhere to our Code. Our Code is the cornerstone of our success.

Sincerely,

Hikmet Ersek
President and Chief Executive Officer
# Table of Contents

**Our Shared Values**
- 1

## Introduction
- 2
  - Our Responsibilities
  - Manager Responsibilities
  - Asking Questions and Reporting Concerns
  - The Ethics Helpline
  - Investigations
  - No Retaliation is Allowed

## How We Treat Each Other
- 8
  - We Value Respectful Treatment
  - We Do Not Discriminate
  - We Do Not Harass
  - We Respect Each Other’s Privacy
  - We Work Safely
  - We Avoid Conflicts of Interest

## How We Treat Our Customers
- 15
  - We Treat Customers with Integrity
  - We Respect Customer Privacy

## Our Use of Property
- 18
  - We Use Company Property Appropriately
  - We Respect Confidential Information and Intellectual Property
  - We Do Not Engage in Insider Trading and Stock “Tipping”
  - We Keep Appropriate Records
  - We Collect Competitive Information Lawfully
  - Our Communications with the Community
  - We Use Social Media Responsibly
  - We All Have a Role in Data Security

## How We Work With Our Communities
- 27
  - We Work with Trusted Agents, Suppliers, and Third Parties
  - We Do Not Make or Allow Bribes
  - We Give and Receive Reasonable Gifts and Entertainment
  - Giving Gifts and Entertainment
  - Receiving Gifts and Entertainment
  - We Watch for Signs of Money Laundering and Financing of Terrorism
  - We Comply with Economic Sanctions Rules and Regulations
  - We Engage in Political Activities Appropriately
  - We Cooperate with Government Requests
  - We Compete Fairly
  - We Value Human Rights
  - We Value the Environment
  - The Western Union Foundation

## Resources for Asking Questions and Reporting Concerns
- 37
“Our shared values, to be **PURPOSE DRIVEN**, **GLOBALLY MINDED**, **TRUSTWORTHY** AND **RESPECTFUL**, are reflected in how we work.”
INTRODUCTION
INTRODUCTION

Our shared values are to be Purpose Driven, Globally Minded, and Trustworthy and Respectful. These values are reflected in how we work. Our Code of Conduct (Code) provides guidance for how we conduct business for our Company and our customers. Our Code isn’t just a statement for us to refer to on occasion; it speaks to how we act at all times.

Our Company has a long and trusted history and plays a key role every day in the lives of our customers in over 200 countries and territories. No matter the situation or difficulty we face, we trust and respect each other, our customers, this Code, and the law.

We always ask ourselves:

- Does this action harm the Company, our customers, our shareholders, or the community?
- Would we want this action to be known by others?
- Would we be comfortable explaining this action to the authorities or to our families?
OUR RESPONSIBILITIES

Our Code applies to every employee of the Company. We do not grant waivers under any circumstances. This includes all employees of The Western Union Company and its affiliates and subsidiaries (Western Union or the Company). References to “we”, “us”, or “our” in the Code include each of us as employees of the Company. The Code describes how we work, both as individuals and together as an organization.

We all follow our Code, our policies, and the law. We follow the highest standards, and in cases where a law or policy is unclear, we ask for help. There are multiple resources available to provide help, including our managers, Human Resources, the Ethics Office, and the Ethics Helpline.

Complying with our Code is a condition of employment at Western Union. Our Code applies to all Western Union employees, regardless of level or position. Failure to follow the standards of the Code or failure to report a known violation may lead to disciplinary action, up to termination of employment.

It is our responsibility to immediately report any information about a violation or a potential violation of the law to the Ethics Helpline or the Litigation group in the General Counsel’s Office.* If there are questions about how the Code applies, contact the Ethics Office, General Counsel’s Office, or the resources section of the Code.

* subject to applicable local law

Gediminas’ Tower - Vilnius, Lithuania

Resources for Asking Questions and Reporting Concerns

“ We are respected and trusted around the world. We earn this trust every day one customer at a time.”
MANAGER RESPONSIBILITIES

Our pursuit of business success must support our shared values. Managers set an example for all team members in the way they apply our Code and model our values. No business goal or need should ever come before following our Code, acting professionally, and showing trust and respect to our fellow employees, customers, third parties, and our community.

Managers have specific responsibilities. Following are some examples:

- Managers must always communicate our values and promote a culture of trust and respect
- Managers’ conduct must always reflect our values and commitment to integrity
- Managers must be prepared to advise and train employees on the contents of this Code and any policies and procedures that apply to employees’ jobs
- Managers must create and maintain a culture of open discussion where employees feel free to ask questions and express their concerns
- Managers must escalate questions or concerns when appropriate
- Managers must make sure appropriate actions are taken to address concerns that are raised
- Managers must support the Company’s prohibition of retaliation
- Managers must focus on resolving issues and never punish those who raise concerns in good faith

ASKING QUESTIONS AND REPORTING CONCERNS

Purpose Driven employees ask questions and raise concerns. We speak up if we believe there are possible violations of our policies, our Code, or the law. We have several resources including our managers, Human Resources, the Ethics Office, and the Ethics Helpline.

Resources for Asking Questions and Reporting Concerns

The Company takes employee questions and concerns seriously. The Company is committed to answering questions, reviewing reports, and when appropriate, conducting investigations. While keeping quiet or looking away from a problem may seem easier, we must never ignore any issue that needs attention.

It is our responsibility to immediately report any information about a violation or a potential violation of the law to the Ethics Helpline or the Litigation group in the General Counsel’s Office.*

* subject to applicable local law
**THE ETHICS HELPLINE**

The Ethics Helpline is a secure and confidential way for us to report issues and concerns or seek advice about ethics issues. Reports may also be made anonymously from most countries. The Ethics Helpline is administered by an independent third-party vendor.

Concerns reported on the Ethics Helpline are forwarded to the Ethics Office for review and investigation where appropriate.

Questions or concerns may be submitted online at wuethicshelpline.com. To make reports by telephone, refer to the international toll-free calling instructions available at wuethicshelpline.com.

**INVESTIGATIONS**

When issues are raised, the Company determines whether an investigation is appropriate. The Company makes reasonable efforts to preserve the confidentiality of investigations, including the identity of the person who reported the issue.*

Our responsibility as employees during an investigation is to cooperate fully and provide truthful and complete information. We may also be required to maintain confidentiality to protect the integrity of the investigation. We must not interfere with an investigation, attempt to influence another person’s participation, or suggest potential consequences for providing information.

Based on the outcome of an investigation, employees who have engaged in improper conduct may face discipline up to employment termination.

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**Q&A**

Joan’s manager asked her to offer products to customers she feels might violate Company policies or the law. Joan hasn’t spoken up because she fears her manager will get upset and she may be subject to retaliation. What should she do?

If Joan fears retaliation, she should contact her manager’s manager, Human Resources, or the Ethics Helpline and report her concerns. Her report will be investigated and any retaliation from her manager or anyone else will not be tolerated.

* subject to applicable local law
Michael has noticed that his manager speaks to other employees in an unprofessional manner, including shouting and using foul language, that seems to violate our Code and policies. He hasn’t reported it since his manager hasn’t spoken to him this way, and he is concerned that if he makes a report his manager might start speaking to him unprofessionally. Is this the right choice?

No. Michael should speak up whether the conduct that violates our Code is happening to him directly or not. Michael should not fear retaliation because our Code and Company policy prohibit retaliation. If his manager retaliates, the Company will take appropriate action.

NO RETALIATION IS ALLOWED

Retaliation against employees who ask questions or report concerns in good faith is not tolerated. This includes employees and agents who ask questions or report good-faith concerns related to money laundering or terrorist financing. If we believe that we may be facing retaliation, or if we are aware of others experiencing retaliation for making good faith reports, we notify our managers, Human Resources, the Ethics Office, or the Ethics Helpline as soon as possible.

Resources for Asking Questions and Reporting Concerns

Western Union | Our Code Of Conduct
HOW WE TREAT EACH OTHER
WE VALUE RESPECTFUL TREATMENT

We succeed by living our values. We value being Trustworthy and Respectful. We show respect to others and expect others to respect us. We build on our mutual respect to create a community of trust. We must all work to maintain an environment where our values of trust and respect are our guides. Intimidating, unprofessional, abusive, or offensive language or conduct are never acceptable.

We embrace differences and value diversity and inclusion. We judge others on their merits, not their differences. We provide opportunity based on knowledge, skills, ability, and contributions.

"We must all work to maintain an environment where our values of trust and respect are our guides."
WE DO NOT DISCRIMINATE

We do not discriminate on the grounds of race, pregnancy, color, sexual orientation, sex, gender, gender identity, religion, national origin, age, disability, marital status, military service status, citizenship, or any other category protected by law. We know there is strength in diversity. Any adverse action taken based on these categories is a violation of our policies and our Code.

Q&A

Luis is a hiring manager who is reviewing applications for his department. He notices that one candidate is a single parent of young children. Luis knows a lot of travel will be required and he is worried someone with family responsibilities won’t be successful. Should Luis remove the candidate from consideration for this reason?

No. Luis should not remove the candidate from consideration for this reason. We should only consider a candidate’s knowledge, skills, and abilities as they relate to the requirements for a position.
WE DO NOT HARASS

Respect for one another includes avoiding harassing conduct, whether spoken, written, physical, or visual. Harassment, including sexual harassment, on the basis of any protected category is prohibited. Sexual harassment includes unwelcome advances and touching, sexual requests, or any conduct that ties sexual behavior to employment or advancement.

Anyone who experiences or observes conduct that violates our policies, our Code, or the law should speak up and report the conduct without fear of retaliation.

Harassment of a person based on a protected category can include:

- Using a degrading nickname
- Telling offensive jokes or distributing offensive emails, pictures, or other materials
- Pressuring a fellow employee to have a social or romantic relationship when that employee has indicated the conduct is unwelcome

Harassment can also include conduct that some employees consider harmless or behavior that was not intended to harm others.

Q&A

Daniel has noticed that his manager regularly makes jokes of a sexual nature about Daniel’s coworker, Natalia. Natalia doesn’t react to these jokes. Should Daniel report them if Natalia doesn’t seem to mind?

Yes, Daniel should inform management or Human Resources or make a report to the Ethics Helpline. We all have an obligation to report conduct that may violate our policies or our Code, even if it isn’t happening to us.
Q&A

Andrea found some personnel documents next to the copy machine that contain details on salaries and bonuses. What should she do?

Andrea should return the documents to Human Resources and report the discovery to Privacy and Information Governance. She should keep any information she saw confidential and not share it with anyone else.

WE RESPECT EACH OTHER’S PRIVACY

Respecting each other’s privacy means that we all have a duty to keep the personal data of our colleagues confidential. We gather and keep employee personal data for business and legal purposes and requirements. Access is limited to those who have a legitimate business purpose and have been granted authorization by the Company.

We use appropriate physical, administrative, and technical safeguards to protect employee personal data, as required by our Information Security and Privacy policies. We respect local laws and regulations regarding employee personal data. If we have a question about the management or use of employee personal data, we contact the Privacy and Information Governance group.

Privacy and Information Governance Policies
WE WORK SAFELY

We all follow our safety and security rules to create a healthy and safe environment. We perform work for which we are trained, fit, and competent. We report any accidents, injuries, or safety concerns. We cooperate with Company health or safety matters, including investigations.

While at work, we must not use alcohol, illegal substances, or anything that could impair our judgment. If we are permitted to consume alcohol at a Company-sponsored event, we do so responsibly and in compliance with all Company policies.

WE AVOID CONFLICTS OF INTEREST

A conflict of interest occurs when an employee acts, or appears to act, in their personal interest rather than in the interest of the Company. When we are making business decisions for the Company, our decisions must be in the best interest of Western Union and comply with Company policies. In some cases, we may also need to consider the interests of the customer or client.

We do not allow our personal or family relationships to affect our Purpose Driven business decisions. We disclose all potential conflicts of interest before we make any business decisions or recommendations.
Simona’s husband is a building contractor who is considering bidding on an upcoming project for our Company. What should Simona do?

Before the bid is submitted, Simona should disclose the family relationship to the Ethics Office and to the Sourcing and Procurement group.
HOW WE TREAT OUR CUSTOMERS
WE TREAT CUSTOMERS WITH INTEGRITY

“We treat our customers with integrity regardless of who or where they are, or the amount of business they do with us.”

We treat our customers with integrity regardless of who or where they are, or the amount of business they do with us. We meet customer needs fairly. This means we do not mislead our customers or misuse their confidential information.

We do not engage in unfair or deceptive acts or practices. Our sales, advertising, promotion, and other marketing materials should accurately describe our products and services and comply with Company policies and marketing guidelines. In compliance with Company policies and marketing guidelines, we submit materials for legal review. We hold our agents and marketing agencies to the same standards.
WE RESPECT CUSTOMER PRIVACY

We collect, use, store, and share customer information only for legitimate business purposes. We use appropriate physical, administrative, and technical safeguards to protect customer data in compliance with our Information Security and Privacy policies. We promptly notify the Information Security group and the Privacy and Information Governance group if we know or believe any unauthorized access, use, or loss of customer information has occurred.

We take steps to safeguard customer information by following the Company’s Information Security and Privacy policies including the following:

- We only access, use, transfer, share, or discuss customer information for legitimate business needs or where applicable law requires or permits us.
- We protect and regularly change our passwords.
- We access customer data using Company owned devices and company systems that have appropriate safeguards.
- We do not copy or view customer information for personal reasons or out of curiosity.

Q&A

Ana has just started in a new role and wants to learn as much as possible to help serve customers. She plans to work on the weekend and decides to load customer data on a flash drive to install on her personal computer. Is this okay?

No. Despite Ana’s best intentions, she should not download customer information to non-Company owned devices.

“ We collect, use, store, and share customer information only for legitimate business purposes.”

Privacy and Information Governance Policies
OUR USE OF PROPERTY
WE USE COMPANY PROPERTY APPROPRIATELY

We use Company property to conduct Western Union business and we comply with applicable policies. This means we protect Company funds, data, information, intellectual property, and equipment such as phones, laptops and computers, and other property. For more information, access the Acceptable Use Policy via SIMON through Okta.

We are responsible for preventing and reporting any damage, misuse, abuse, waste, or theft of Company property. We do not remove Company property without prior approval.

Our goal is to buy quality products and services at a fair price. We follow the purchasing processes described in the Global Sourcing and Procurement Policy.

We comply with the Global Travel and Entertainment Policy, including the guidelines for Company credit cards and expenses. Managers are responsible for reviewing employee expense reports to ensure compliance with the policy.

When we end our employment with the Company, we return all Company property including equipment, records, documents, and other information.

Global Sourcing and Procurement Policy
Global Travel and Entertainment Policy
WE RESPECT CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We always follow our obligations under confidentiality agreements whether with Western Union or other companies, including our former employers. As employees of Western Union, we may receive confidential information about other companies and we comply with our obligations to keep this information confidential. Our obligation to preserve Western Union confidential information continues both during and after our employment with the Company.

In addition, we respect the intellectual property rights of the Company and of third parties. We refrain from using copyrighted works or software of others without proper licensing or authorization. We don’t use Company or third party intellectual property in our marketing materials or other Company materials and we do not disclose or transmit intellectual property without prior approval from the Intellectual Property group. We also ensure that any recipients of Company intellectual property are authorized to receive it. If we suspect that Company intellectual property is being infringed, we contact the Intellectual Property group.

Intellectual property can include confidential or proprietary information such as trademarks, patents, copyrights, domain names, publicity rights, and trade secrets. Trade secrets include customer lists, agent contracts, agent commissions, sales and profit data, and strategic and business plans, such as potential mergers and acquisitions or changes in Company structure.

We contact the Intellectual Property group in the General Counsel’s Office if we have questions about use of confidential or proprietary information or intellectual property of the Company or others.

Q&A

Elisabeth has left the Company to start her own business. She is offering software services that do not compete with Western Union. She has taken a list of Western Union’s customers to contact prospects. Is this okay?

No. Even after she leaves the Company, Elisabeth has an ongoing obligation to maintain the confidentiality of Company information, such as customer lists.
WE DO NOT ENGAGE IN INSIDER TRADING OR STOCK “TIPPING”

We never buy or sell Western Union stock while in possession of material, non-public Company information. We also never buy or sell the stock of another company, such as a customer or supplier, while in possession of material, non-public information about that company.

Trading stock while in possession of material, non-public information or revealing that information to others for use in the trading of stock or otherwise is wrong and violates our Code, our policies, and the law.

In addition, we never share non-public information in casual conversations, even if we do not intend or expect to profit ourselves or others.

Material, non-public information includes any information that has not been made public by a press release or other broad dissemination for at least one trading day and that a reasonable investor would consider important in making an investment decision or that would be likely to have a significant effect on the relevant company’s stock price.

“We never buy or sell Western Union stock while in possession of material, non-public Company information.”
WE KEEP APPROPRIATE RECORDS

We retain our records, documents, and electronic information according to the Company’s records retention policies. We contact the Privacy and Information Governance group with questions about document retention.

Notwithstanding any records retention schedule, we follow Company instructions to preserve materials, including instructions from the General Counsel’s Office. We seek guidance from the Global Litigation group if we have questions about these instructions.

We ensure we produce accurate communications, documents, and reports. Company records and communications using Company platforms, such as email, instant messages, and other electronic communications must be professional, appropriate, and accurate. Making false claims in any records, including expense reports or time sheets is not acceptable. It is also unacceptable to understate or overstate assets or liabilities, to delay or accelerate the recognition of income or expenses, or to create other records that could constitute fraud.

Privacy and Information Governance Policies

Q&A

With year-end approaching, Stephanie has extra funds in her budget and wants to spend them this year. She has been talking to a vendor about paying in advance for services that will be provided next year. She asks the vendor to adjust the invoice to make it appear the work will be performed in the current year instead of next year. Is this appropriate?

No. While it may sometimes be appropriate to pre-pay for a service, the expense should be recorded in the actual period the work is performed. Also, it is inappropriate for Stephanie to ask the vendor to create an inaccurate invoice. We must report transactions in a timely and accurate manner to make sure that our financial results are accurate and reflect honestly the business we conduct.
WE COLLECT COMPETITIVE INFORMATION LAWFULLY

While we compete in the marketplace, we do not gather or use information about our competitors improperly. We use legal methods to gather competitive information. These methods include using publicly available company and industry literature and tracking industry trends, regulatory proposals, and actions of our competitors. Seeking or obtaining proprietary information from a former or current employee of another company is prohibited.

We contact the Litigation group in the General Counsel’s Office if the following occurs:

- We have or receive information that might be confidential or proprietary information of a competitor
- We have information as a former employee of a competitor that could be confidential or proprietary

Q&A

Elizabeth worked for a competitor before joining Western Union. She believes her former employer’s tools and marketing information could help her in her new role. Is it okay for her to use the information?

No. Using proprietary or competitive information that belongs to a former employer is not okay. In the same way, we do not share Western Union proprietary or competitive information with another company.
OUR COMMUNICATIONS WITH THE COMMUNITY

Our Communications group and Investor Relations group are responsible for communicating with the public. These groups ensure requests for information are handled properly and consistently. If we are contacted for an interview or comments by the media, investors, analysts, or other third parties, we refer the request to either the Communications group or the Investor Relations group.

We must not make statements about the financial performance of Western Union or any forward-looking statements about performance. Communications about the financial performance of Western Union may be made only by authorized personnel and only within guidelines set by the Corporate Governance group in the General Counsel’s Office.

There are complex rules about our communication with investors that cover government filings, press releases, interviews, speeches, web casts, meetings, social media, marketing, and other communication. All members of the public, including analysts and investors, get access to any material information at the same time with no favored treatment for anyone.

We ask the Communications group to review our presentations and other communications with third parties to avoid improper disclosures or damage to the reputation of the Company.

We ask questions if we are unsure whether a communication requires review or authorization.

WU Social Media Guidelines
Corporate Media Policy and Procedures
Release of Financial Information Policy
Contact with Financial and Industry Analysts Policy
WE USE SOCIAL MEDIA RESPONSIBLY

When we use social media, such as professional and social websites, blogs, or other electronic communications, we comply with our Code and policies which include the following guidance:

- We use good judgment because what we post may be public for a long time.
- We are clear we are speaking for ourselves and not on behalf of Western Union unless we are authorized to do so.
- We do not disclose material, non-public information.
- We do not share confidential, restricted, or other proprietary information of the Company.
- We protect Western Union’s intellectual property and trade secrets.

WU Social Media Guidelines
WE ALL HAVE A ROLE IN DATA SECURITY

We keep Company data and information systems secure. We take the following steps to comply with our information security policies and to avoid data security breaches:

- We keep passwords secure and do not share them
- We do not download software or applications without permission
- We lock our company devices or computers when unattended
- When leaving our workspace, we secure sensitive information

If we have a question or concern relating to data security or need to report a possible data breach, we contact the Security Information team in the resource section of this Code.

The following policies can be found by accessing SIMON through Okta.

Acceptable Use Policy
End User Equipment, Email and Messaging Policy
Security Policy for Human Resources
Supplier Security and Compliance Obligations Policy

Q&A

Peter received an email on his Western Union email account from “Tech Support” asking him to download and install the latest version of Microsoft Office. The email contained a link to a non-WU internet address, with instructions to click the link and accept the installation prompt. Should Peter proceed?

No. Unusual requests to click links or enter information via email are likely scams or frauds that can lead to dangerous software being downloaded to our systems. This may also result in employees unintentionally providing private information about themselves, our clients, or our business.
HOW WE WORK WITH OUR COMMUNITIES
WE WORK WITH TRUSTED AGENTS, SUPPLIERS, AND THIRD PARTIES

Our business relationships are built on our shared value of being Trustworthy and Respectful. We trust and respect our agents, suppliers, and third parties and do business with those who share our values and respect for ethics and the law.

“ Our business relationships are built on our shared value of being Trustworthy and Respectful.”
Agents, suppliers, and third parties play a key role in our ability to provide products and services to people and businesses around the globe. We do not knowingly work with agents, suppliers, or third parties that don’t follow their obligations to Western Union or the law. We never use a third party to perform any act prohibited by our policies, our Code, or the law.

When selecting or working with an agent, supplier, or third party, we do the following:

- Follow our Procurement policies to ensure suppliers are selected through an objective process
- Avoid creating potential conflicts of interest such as offering or receiving gifts or entertainment that could affect or appear to affect our ability to make impartial business decisions

Q&A

Cheng’s manager asked him to approve a new vendor to provide services to the office. His manager told him to expedite the process and disregard our Global Procurement Policy because he knows this vendor. Should Cheng follow this direction?

No. Cheng must follow our procurement policies to ensure vendor selection processes are fair and objective.
WE DO NOT MAKE OR ALLOW Bribes

We comply with all applicable anti-bribery and anti-corruption laws and regulations, which prohibit offering or providing anything of value to government officials or others to influence their acts or decisions. We do not promise, offer, or provide anything of value, including any gift, entertainment, payment, service, or offer of employment to government officials or others or their relatives to get or keep any business or for any business advantage.

We pay careful attention when selecting agents and other business partners to ensure they do not make such promises, offers, or payments in violation of our Anti-Corruption Policy. If we believe there may be a potential violation, we contact the Anti-Corruption Program Office in the Compliance organization.

Any offers of gifts, travel, entertainment, accommodations, or other expenses to regulators, officials, or employees of state-owned entities in any country must have prior approval from the Anti-Corruption Program Office. While we may promote, demonstrate, and explain Western Union services, we must not attempt to improperly influence a business decision.

If we are asked to make any improper payments, including facilitation payments (small payments given in exchange for performing routine governmental functions), we contact the Anti-Corruption Program Office.

We maintain books, records, and accounts that accurately and completely reflect the amount and purpose of all payments. We also make sure our agents and other business partners keep accurate records of payments they make on our behalf.

Q&A

Kathy is opening a new office for Western Union and has selected a location. The local building inspector tells Kathy the necessary inspections for the location will take weeks but, if Kathy pays a small fee this process will go faster. Is this okay to pay?

No. Our policy is not to make payments to government officials. Kathy should contact the Anti-Corruption Program Office for guidance.
WE GIVE AND RECEIVE REASONABLE GIFTS AND ENTERTAINMENT

Building strong working relationships with agents, suppliers, and customers can include exchanging gifts and business entertainment. Giving or receiving gifts and entertainment is not prohibited, as long as they are moderate and reasonable. We never accept, offer, or provide kickbacks or bribes. We must always ensure our actions do not interfere with our ability to make good business decisions. Guidance on giving and receiving gifts can be found in the Gift and Hospitality Guide on WULife.

Regardless of value, we do not provide any gifts, travel expenses, or entertainment to government employees in any country without receiving advance approval from the Anti-Corruption Program Office.

Gift and Hospitality Guide

GIVING GIFTS AND ENTERTAINMENT

We only give gifts or entertainment if allowed by Western Union policy and the policy of the recipient. We never give a gift to improperly influence or appear to influence others. We also do not personally pay for a gift or entertainment to avoid reporting it.

When we give gifts we comply with the Anti-Corruption Policy, which includes the following guidance:

- We do not provide gifts or entertainment without our manager’s approval
- We do not offer gifts or entertainment to government officials without the prior approval of the Anti-Corruption Program Office
- We do not provide cash or cash equivalents such as gift cards to third parties
A vendor who works with Tomas has offered him two tickets to a professional football game. The vendor cannot join Tomas and suggests he bring a friend. Tomas knows that the value of these two tickets is more than the equivalent of US $100. Can he accept the tickets?

No. The tickets are only acceptable if this is normal business entertainment and the vendor and Tomas will be attending the event together. Tomas should review the Gift and Hospitality Guide for guidance and contact the Ethics Office with questions.
WE WATCH FOR SIGNS OF MONEY LAUNDERING AND FINANCING OF TERRORISM

We comply with applicable anti-money laundering, consumer fraud, and counter-terrorist financing laws and regulations everywhere we do business. Money laundering is the process of concealing or disguising the illicit nature or source of income or assets in order to make them appear legitimate. Fraud is the result of criminals operating schemes to persuade victims to send money for purposes that might sound appealing to the victim, but are only ways to convince the victim to part with their money. Terrorist financing provides material funds or support for terrorist activities through both legitimate or illegal sources.

We are committed to combatting money laundering, consumer fraud, and terrorist financing with our compliance program, which includes Anti-Money Laundering, Anti-Fraud, and Counter-Terrorist Financing. We must all follow the requirements outlined in Western Union’s Global Anti-Money Laundering and Counter-Terrorist Financing Policy and the Global Sanctions Policy to ensure we are vigilant against money laundering, consumer fraud and terrorist financing.

We have an experienced team of compliance professionals around the world who can assist us if we have any questions or have observed any red flags. If we have questions about our compliance policies or procedures or suspect a money laundering, consumer fraud, or terrorist financing risk, we contact the Global Compliance organization.

As part of our compliance program, we take mandatory compliance training and comply with our Global Anti-Money Laundering and Counter Terrorist Financing Policy. This includes successfully completing compliance training within the prescribed time period as described in Western Union’s Global Anti-Money Laundering and Counter Terrorist Financing Policy. Failure to do so may lead to disciplinary action.

Signs of money-laundering, consumer fraud, or terrorist financing may include the following:

- A customer provides minimal, vague, or fictitious information, including lack of identification
- A transaction is unusual, not customary, or has no business purpose
- Significant changes in transaction patterns
- Wire transfers sent from multiple senders to a small number of foreign beneficiaries, persons, and businesses in high-risk jurisdictions
- A customer has numerous, small incoming transactions followed by a large outgoing transaction
- Substantial transaction activity over a short period of time
- A customer is in a hurry to complete the transaction
- A customer changes the source of funds at the last minute
- A transaction involves a recently-created legal entity
- Transactions that involve cash and are just below the reporting or identification limits

Global Anti-Money Laundering and Counter-Terrorist Financing Policy
WE COMPLY WITH ECONOMIC SANCTIONS RULES AND REGULATIONS

Being globally minded means we comply with applicable economic and trade sanctions designed to deter terrorism and nuclear proliferation, promote democracy and human rights, and support other national and international security and policy interests.

As a U.S.-headquartered and incorporated entity, Western Union has developed policies, procedures and other internal controls for complying fully on a global basis with U.S. economic sanctions and embargoes, including those implemented by the U.S. Treasury Department’s Office of Foreign Assets Control, that restrict us from doing certain business involving various countries and regions, groups, entities, and individuals.

These controls include screening transaction, client, and other data, and taking action to freeze or reject funds and transactions where required by law. We implement similar measures to ensure compliance with sanctions mandated by the United Nations Security Council, the European Union, and national governments in the jurisdictions where we do business.

If we believe a conflict exists between local law and U.S. law, we alert both the General Counsel’s Office and the Global Compliance organization. Sanctions restrictions can be very complex and change frequently, and we should always ask questions and report concerns if we are unsure about any issue.

Global Sanctions Policy and Compliance Program Statement

WE ENGAGE IN POLITICAL ACTIVITIES APPROPRIATELY

While employees should feel free to participate in the political process, political participation must not occur on work time or in Company facilities and must not include the use of the name of Western Union business units, subsidiaries, or the Company’s independent not-for-profit Foundation.

At the direction of the Global Public Policy group in the General Counsel’s Office, the Company may support political candidates on limited occasions. Under no circumstances should corporate funds be used to support political candidates without approval from the Global Public Policy group.

As a responsible and engaged corporate citizen, Western Union may speak out on public issues of importance to the Company. The Global Public Policy group is responsible for formulating strategies in this area and for hiring and registering any lobbyists. If we are aware of a political issue where lobbying may be appropriate, we contact the Global Public Policy group.

WE COOPERATE WITH GOVERNMENT REQUESTS

Western Union cooperates with reasonable requests for information from government agencies, including investigations of our company activities. We never mislead an investigator or other government regulatory official or otherwise attempt to obstruct the collection of information requested by properly authorized officials. We contact the General Counsel’s Office before responding to any non-routine government inquiries, inspections, subpoenas, or requests.
WE COMPETE FAIRLY

Strong and fair competition benefits customers. While we compete in the market, we do not harm competition nor violate our policies, our Code, or the law. Antitrust and fair competition laws and regulations are generally designed to promote fair competition. These laws can be complex and vary by country. If we encounter potential antitrust or competition issues, we contact the Litigation group in the General Counsel’s Office.

We do not make formal or informal agreements with competitors on bids, contracts, prices (such as price-fixing or setting pricing formulas), exchange rates, the dividing of geographic territories and markets, or any other matter which could negatively impact the competitive environment. We do not tie the sale of our services to a condition that requires the customer to buy another service or product without first consulting the Litigation group. We also do not engage in discussions about these topics with our competitors, whether in a formal or informal setting.

If we believe a competitor is engaging in potential anti-competitive behavior, we make it clear that any suggestion of anti-competitive behavior is inappropriate, leave the discussion, and report it to the Litigation group in the General Counsel’s Office.

We contact the Litigation group in the following circumstances:

- Before meeting with competitors
- Before entering into agreements with competitors regarding marketing or service arrangements, joint ventures, mergers, or acquisitions
- Before tying or bundling different services together that would require a customer to buy one service or product to obtain another
- If we hear comments from employees about “controlling” a market with pricing or marketing plans, regardless of our ability to actually do so

Q&A

Claudia received a call from a competitor who asks her to dinner to discuss mutual business. Is it okay for Claudia to meet with the competitor to see what they are planning?

No. Claudia should not attend without first getting approval from the Litigation group in the General Counsel’s Office. Meetings with competitors, no matter how well-intended, can create situations that violate our policies, our Code, or the law.
WE VALUE HUMAN RIGHTS

Our commitment to promote human rights is consistent with our dedication to respect each other and give back to the global communities we serve. This commitment benefits both our employees and the global communities in which we operate.

We condemn human rights abuses, we prohibit human trafficking, human smuggling, or any form of modern slavery. We do not use forced or involuntary labor of any type. We also do not condone exploitation of refugees.

We observe applicable local, state and national laws regarding the employment of minors. We support the use of legitimate workplace apprenticeships and internships. Western Union expects our suppliers and those involved in procurement processes for the company to comply with these values.

WE VALUE THE ENVIRONMENT

We all must act responsibly and respectfully to protect the environment. We seek to minimize our environmental impact by reducing, recycling, and reusing. Western Union has water and energy reduction initiatives and waste and electronic recycling programs at multiple locations. We encourage programs that reduce greenhouse emissions.

THE WESTERN UNION FOUNDATION

The Western Union Foundation funds programs and grants that promote economic opportunity around the world through the support of The Western Union Company, its employees, agents, and business partners. The Foundation also funds relief and human aid organizations during times of disaster and emergency. The Western Union Foundation is a separate §501(c)(3) recognized United States charity. To learn more visit foundation.westernunion.com.

“Our commitment to promote human rights is consistent with our dedication to respect each other and give back to the global communities we serve.”
RESOURCES FOR ASKING QUESTIONS AND REPORTING CONCERNS
RESOURCES FOR ASKING QUESTIONS AND REPORTING CONCERNS

Your managers or Human Resources are usually your first resource for most questions and concerns. The additional resources listed below are also available.

WESTERN UNION ETHICS OFFICE

The Ethics Office manages the Ethics Helpline. Questions or concerns about possible violations of company policies, our Code of Conduct, or the law may be submitted confidentially to the Helpline. The Ethics Office assists with questions about Company policies and our Code of Conduct, including questions about conflicts of interest or receiving gifts.

Ethics Office Email
wuethics@westernunion.com

Ethics Office
Nancy Reynolds
Chief Ethics Officer
nancy.reynolds@westernunion.com

ETHICS HELPLINE

If you have a question or concern about a situation that may compromise our Code of Conduct, our policies, or the law, reports can be made to the Ethics Helpline, and can also be made anonymously, unless prohibited by applicable local law. The Company makes reasonable efforts to preserve the confidentiality of investigations, including the identity of the person who reported the issue.* The Helpline is hosted on external, non-Western Union servers administered by an independent third-party. Reports to the Ethics Helpline may be made online or to the call center. Ethics Helpline reports are forwarded to the Ethics Office for review and management. Employees who report issues on the Ethics Helpline are encouraged to create log-in credentials for their report and to regularly check on their report after filing it.

Ethics Helpline
wuethicshelpline.com

Global Calling Instructions
wuethicshelpline.com

Frequently Asked Questions About the Helpline
WULife

WESTERN UNION INTRANET - WULIFE

Western Union policies, the Code of Conduct, information about the Ethics Helpline, and information about various Western Union functional groups is available on the Company’s intranet, WULife.

WULife
westernunion.jiveon.com

* subject to applicable local law
COMMUNICATIONS

The Communications group should be contacted regarding requests from external parties for information or statements about Western Union.

Communications
Claire Treacy
Director, Communications
claire.treacy@westernunion.com

COMPLIANCE

The Global Compliance group is available for questions or concerns regarding Western Union’s anti-money laundering and counter-terrorist financing policies and compliance programs.

Global Compliance
Jacqueline Molnar
Chief Compliance Officer
jacqueline.molnar@westernunion.com

COMPETITION

The Litigation group is available for questions or concerns regarding anti-trust and fair competition.

Litigation
Charlene Yaneza
Deputy General Counsel,
Global Head of Litigation & Regulatory Affairs
charlene.yaneza@wu.com

HUMAN RESOURCES

The Human Resource representative for your work location is available to assist with human resources-related issues.

Human Resources
Richard Williams
Chief Human Resources Officer
richard.williams@westernunion.com

INFORMATION SECURITY

The Information Security group should be contacted if you need to report a potential data breach or if you have a question or concern relating to data security.

Email
InfoSec-Ops-L1@westernunion.com

24/7 Support
+1 909-343-6287

Report Phishing
“PhishMe” button in Outlook or by forwarding the message to spoof@westernunion.com

Information Security
Mike Kalac
VP, Information Security
mike.kalac@westernunion.com
INSIDER TRADING

The Corporate Governance group is available for questions or concerns regarding insider trading issues.

Corporate Governance
Darren Dragovich
Associate General Counsel
darren.dragovich@westernunion.com

INTERNAL AUDIT

The Western Union General Auditor is available for questions or concerns regarding accounting, internal accounting controls, and auditing matters.

Internal Audit
Cherie Axelrod
General Auditor
cherie.axelrod@westernunion.com

INVESTOR RELATIONS

The Investor Relations group should be contacted regarding any requests from analysts, investors, or other parties interested in our company’s performance, financial statements, recent events, new services, and other related inquiries.

Investor Relations
Mike Salop
SVP, Investor Relations
mike.salop@westernunion.com

INTELLECTUAL PROPERTY

The Intellectual Property group is available for questions or concerns regarding the use of Western Union trademarks, copyrights, patents, domain names, trade secrets, and third-party intellectual property.

Intellectual Property Group
Scott Paintin
Senior Counsel
scott.paintin@westernunion.com

LITIGATION

The Litigation group is available for questions or concerns regarding subpoenas, inquiries from governmental or regulatory agencies, and other litigation-related matters.

Litigation
Charlene Yaneza
Deputy General Counsel,
Global Head of Litigation & Regulatory Affairs
charlene.yaneza@wu.com
PRIVACY AND INFORMATION GOVERNANCE

The Privacy and Information Governance group is available for questions or concerns regarding the use of customer or employee information, management of electronic and paper records, or suspected loss or theft of personal data.

Privacy and Information Governance
William Min
Deputy General Counsel & Chief Privacy and Data Governance Officer
william.min@westernunion.com

PUBLIC POLICY

The Global Public Policy group should be consulted with questions or concerns regarding Company communications with governments, regulatory bodies, and non-governmental organizations.

Global Public Policy
Tim Daly
SVP, Global Public Policy
tim.daly@westernunion.com

SANCTIONS

The Sanctions, Interdiction and Anti-Corruption group is available for questions or concerns regarding Western Union’s sanction, interdiction and anti-corruption programs.

Global Sanctions, Interdiction & Anti-Corruption
Tyler Hand
VP, Global Head of Sanctions, Interdiction & Anti-Corruption
tyler.hand@westernunion.com

SECURITY

The Global Security group should be contacted regarding a crisis or incident that poses a threat to employees, facilities, systems, assets, or operations.

Global Security Operations Center
24-Hour Operator
+1 720 332 4202

Crisis Helpline, 24-Hour Operator
+1 720 332 5200

Security
Davin Ripley
Director, Security
davin.ripley@westernunion.com
SOURCING AND PROCUREMENT

The Sourcing and Procurement group should be contacted for questions or concerns regarding vendors and suppliers and procurement policies and procedures.

Sourcing and Procurement  
Scott Coad  
SVP, Global Business Risk  
scott.coad@westernunion.com

GENERAL COUNSEL’S OFFICE

There are regional and subject matter experts within the General Counsel’s Office available to answer questions and respond to concerns. If you have a legal question or concern that you do not feel you can address through any of the above-listed resources, or through your regional and functional business leaders, you may contact the General Counsel’s Office.

Caroline Tsai  
EVP, General Counsel and Secretary  
caroline.tsai@wu.com

EXECUTIVE MANAGEMENT

If you have a question or concern that you do not feel you can address through any of the above-listed resources, or through your regional and functional business leaders, you may contact the Office of the Chief Executive Officer.

Hikmet Ersek  
President and Chief Executive Officer  
hikmet.ersek@westernunion.com

AUDIT COMMITTEE

The Chairman of the Audit Committee of the Western Union Board of Directors has oversight for issues involving accounting, internal accounting controls, auditing matters or financial statements.

Richard Goodman  
Audit Committee Chairman  
wuauditcommitteechairman@westernunion.com