



EXPECTATIONS FOR OUR VENDORS

WESTERN UNION'S VENDOR CODE OF CONDUCT

WesternUnion \\WU



A Note from Hikmet Ersek: Why This Code Matters

At Western Union, we are proud to be **Globally Minded, Purpose Driven, Trustworthy and Respectful**. We expect our vendors to maintain the same standards, with the same focus on integrity that we value. The following Vendor Code of Conduct (“Code”) provides some guidance on those expectations.

While this Code cannot cover every situation you might face as our vendor, Western Union also expects our vendors to maintain their own effective compliance programs and to always comply with all applicable laws and regulations. Please review this Code, ask questions, and report any concerns you have, either through your organization’s internal reporting resources or directly to Western Union (<http://www.wuethicshelpline.com>).

By embracing a shared commitment to integrity with our valued vendors, we can look forward to continued beneficial relationships and mutual success.

A handwritten signature in black ink, appearing to read 'Hikmet Ersek', written in a cursive style.

Sincerely,
Hikmet Ersek
President and CEO of Western Union

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01

Making Ethical Decisions and Keeping Our Commitments



This Code is intended to be a useful set of guidelines for Western Union's vendors to follow. This Code also applies to others who are acting on Western Union's behalf or who have agreed to abide by these standards. Thank you for your commitment to following these guidelines and ensuring that your employees, subcontractors, and any other third parties you use also follow these guidelines.



You should review and follow the guidance set out in this Code as well as all applicable laws, regulations, or policies that apply to your operations and your work for Western Union. In situations where the applicable law is more stringent than this Code or any applicable policy, you must follow the applicable law. If you are ever unsure about how to proceed, please come forward with any questions or concerns.

Western Union expects all of our vendors to behave in a fair, transparent, and honest manner. Vendors should treat staff, customers, and others with respect and should always act with integrity. Vendors should make ethical decisions and carefully consider the impact of their actions.

The principles of this Code are incorporated into our contractual arrangements with vendors. Failure to meet the conditions of any contractual agreements can result in the immediate termination of our business relationship. In cases where there is concern that a law has been violated by a vendor, Western Union is obligated to contact law enforcement.

Speaking Up and Seeking Help

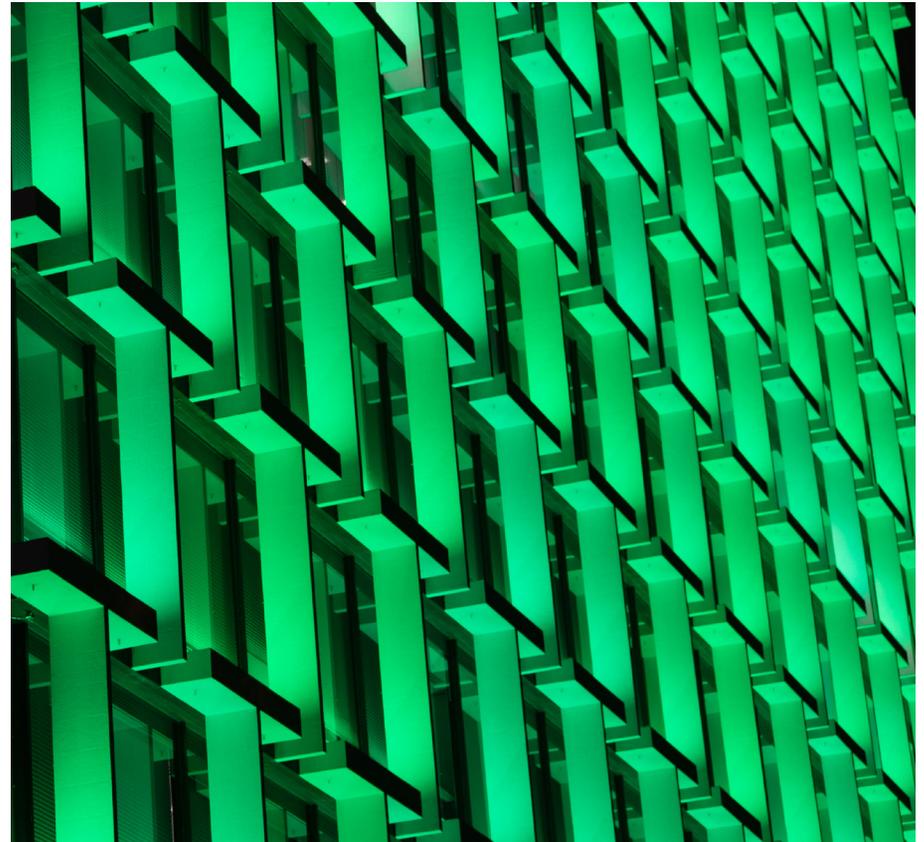


We expect vendors to provide appropriate resources that allow their employees and stakeholders to ask questions and report concerns. Vendors should also maintain a clear non-retaliation policy that protects those who report concerns in good faith.

Vendor employees can also direct questions or concerns regarding the expectations in this Code to Western Union's Helpline (<http://www.wuethicshelpline.com>).

Speaking Up and Seeking Help

Issues surrounding compliance can be complex. Vendors should reach out to Western Union's Helpline (<http://www.wuethicshelpline.com>) with any questions regarding the expectations in this Code.



Responsibility to Each Other



Respecting Each Other

At Western Union, we value inclusion and mutual respect, and we endeavor to treat everyone fairly and with consideration.

Our vendors should also foster an environment of diversity, inclusion and respect and make efforts to treat employees and stakeholders fairly by making employment-related decisions based on performance and ability, never based on personal traits or characteristics proscribed by applicable law.

Our vendors should also maintain a workplace where no harassment of any kind is tolerated. Harassment includes any kind of written, spoken, physical, emotional, or sexual harassment—including offensive comments, obscene gestures, bullying, retaliation, unwelcome advances, unwanted touching, and sexual requests.

Maintaining Health and Safety

We expect vendors to maintain a safe workplace for all. This means vendors will promote safe working habits with their employees and stakeholders, address safety hazards, and observe all applicable laws and regulations involving health and safety.

Respecting Human Rights

Vendors should share Western Union's commitment to respecting and promoting human rights, including promoting the health and well-being of all employees.

Vendors should follow all applicable laws and regulations regarding employee treatment, minimum working age, workplace conditions, and any other labor standards that apply, including laws prohibiting forced labor, child labor, slavery, human trafficking, and involuntary servitude.

04

Responsibility to Our Communities



Avoiding Bribery and Corruption

Western Union expects our vendors to conduct business transparently and to avoid bribery and any corrupt business practices. When conducting business with any entity, including government entities and government officials, you must never provide or accept anything of value to gain or retain any business, secure a business advantage, or influence others' business decisions on our behalf. "Anything of value" means just that: cash, gifts, favors, charitable donations, and any other items or services that can be seen or perceived as bribes.

This prohibition extends to making any facilitating or "grease" payments meant to speed up or facilitate a routine process. Regardless of local law or custom, vendors can neither make nor allow others to make these types of payments on their behalf or on behalf of Western Union.

Competing Fairly

As a Western Union vendor, you are expected to comply with all applicable competition and antitrust laws, to avoid seeking any unfair advantage over competitors, and to use only legal methods to gather information about the market. You must avoid any discussions with competitors about agreements to control or allocate markets or fix prices.



Complying with Economic Sanctions

Economic sanctions are foreign policy tools used by governments and multi-national bodies to accomplish national and international policy goals. They may include asset freezing requirements and trade restrictions.

Western Union's vendors are expected to abide by applicable economic and trade sanctions and to refuse to conduct prohibited business with any entities restricted by such sanctions.

Anti-Money Laundering

Money laundering is the process of hiding the illicit source of income or assets to make them appear legitimate. Our suppliers must be vigilant in identifying and reporting any signs of this activity. Red flags include instances when business partners provide vague or fictitious information, request unusual or significant changes in transactions, such as a change in frequency, or make any other out-of-the-ordinary or suspicious requests.

Protecting the Environment

Vendors should be responsible environmental stewards and must comply with all applicable laws and regulations regarding safeguarding the environment.

Keeping Accurate Records

Vendors must keep accurate, complete, and up-to-date records, documents, and electronic information in a manner that is consistent with any contractual obligations or expectations and any applicable laws. Complete and accurate records must be provided promptly when requested.



Responsibility to Western Union



Managing Conflicts of Interest

Vendors must avoid potential conflicts of interest as well as even the appearance of a conflict. A conflict occurs when a vendor's interests interfere, or appear to interfere, with Western Union's interests. Vendors must inform Western Union as soon as they recognize any potential conflicts.

Giving and Receiving Gifts and Entertainment

As a Western Union vendor, when you exchange gifts or entertainment, you must avoid any appearance of improper influence and ensure that each instance complies with the gift and entertainment policies of all the parties and organizations involved. Gifts and entertainment should be of nominal value, consistent with local standards and customs, and never in cash or cash equivalents (such as gift cards).

Protecting Confidential and Proprietary Information

Western Union vendors shall protect and not disclose any confidential or proprietary information. This includes any information shared in the course of business, such as intellectual property, trade secrets, product plans, business strategies, prices, marketing strategies, customer information, or any other information not meant for the public. If you have access to personal data and other Western Union confidential or proprietary information, you must ensure appropriate physical, administrative, and technical protections are in place to protect this information and maintain privacy. Vendors must comply with all applicable standards, laws, and policies in maintaining the security of any data and information systems used to conduct business with Western Union. Additionally, vendors must ensure that they use Western Union confidential and proprietary information only for its intended purposes.

