

## **TRANSPARENCY IN POLICY ENGAGEMENT AND POLITICAL PARTICIPATION REPORT AS OF December 31, 2021**

The Western Union Company ("Company" or "Western Union") engages in the democratic process and participates in forming and influencing policy to support the success of the Company and its customers, employees and investors (together, "Company Stakeholders"). All such engagement is based on the best interests of the Company and without regard for personal political preferences of its executives. As part of these efforts, the Company may (i) participate in advocacy and lobbying activities to raise awareness on public policy issues of importance to the Company and Company Stakeholders, (ii) support political candidates and elected officials, (iii) participate in trade associations, and (iv) through independent employee contributions to The Western Union Company Political Action Committee ("WU PAC"), support political candidates and elected officials on a bipartisan basis. Details regarding the Company's involvement in each of these activities are provided below.

### **GOVERNANCE OVER POLICY ENGAGEMENT AND POLITICAL PARTICIPATION**

The Company's Global Public Policy group ("Public Policy Group") is responsible for Western Union's government relations policies and activities, including formulating strategies in this area and for hiring and registering any lobbyists, and manages all political activities conducted by or on behalf of the Company. The Public Policy Group is led by the Head of Public Policy and is organized under the Company's Legal and Enterprise Risk department. The Public Policy Group reports at least annually to the Board of Directors' Corporate Governance, ESG, and Public Policy Committee ("Corporate Governance Committee") on political contribution matters and major lobbying priorities. The Company maintains compliance processes designed to ensure that the Company and its employees act in accordance with Western Union's Code of Conduct and with all relevant laws governing political contributions and lobbying activities.

### **ADVOCACY AND LOBBYING**

Western Union participates in the public policy area on a wide range of issues that might impact the Company and Company Stakeholders. The Company's Public Policy Group is primarily located in Denver, CO, and Washington, D.C. and includes Western Union employees, and lobbyists hired on a contract basis who monitor and advise the Company on proposed legislation and regulation that may impact how it serves its customers. The Public Policy Group must approve any Company funds used for advocacy or lobbying purposes. Western Union's

federal lobbying activities are disclosed under the Lobbying Disclosure Act of 1995, as amended, which requires, among other things, that the Company file reports on a quarterly basis with the Secretary of the Senate and the Clerk of the House of Representatives on its lobbying activities during such period (the "LDA Reports"). The Company's LDA Reports are available for review at the U.S. House of Representatives website located at <https://lobbyingdisclosure.house.gov/>.

**POLITICAL CONTRIBUTIONS**

Western Union supports political candidates, regardless of party affiliation, who responsibly evaluate issues of concern for the Company and Company Stakeholders. The contributions made by Western Union in 2021, if any, are listed below.

Recipient	Jurisdiction	Contributions
None	None	\$0

*Contributions to 527 Organizations*

From time to time, Western Union may contribute to entities organized under Section 527 of the United States Internal Revenue Code ("527 Organizations"). Western Union's contributions to these groups are primarily membership dues and are not earmarked to support the election of any specific candidate nor for funding specific expenditures or communications. In addition, Western Union does not consult with these groups regarding the expenditure of their funds. The 527 Organization contributions made by Western Union in 2021 are listed below.

Organization	Contributions
Democratic Attorneys General Association	\$15,000
Democratic Governors Association	\$25,000

**TRADE ASSOCIATIONS**

Western Union participates in several trade associations that provide their members a variety of services. The primary purpose of Western Union's membership is for professional development, technical assistance, tracking and monitoring policy developments and access to information regarding best industry practices. Western Union's payments for membership dues come with the recognition that Western Union may not always agree with all the positions of an organization or its individual members. In limited circumstances, some of these organizations may undertake specific projects on behalf of their members for which additional fees

and expense reimbursements may be paid in addition to membership fees disclosed below.

The list below includes membership dues paid to U.S.-based organizations in which Western Union renewed a membership or became a new member in 2021.

<b>Trade Association<sup>1</sup></b>	<b>Membership Dues</b>	<b>Portion of Dues used for Political Expenses</b>
<i>United States Chamber of Commerce</i>	<i>\$50,000</i>	<i>25%</i>
<i>Denver Metro Chamber of Commerce</i>	<i>\$25,000</i>	<i>3.25%</i>
<i>Business Roundtable</i>	<i>\$100,000</i>	<i>40%</i>
<i>Electronic Transactions Association</i>	<i>\$62,000<sup>2</sup></i>	<i>21%</i>

Trade associations utilize a portion of membership dues for non-deductible state and federal lobbying and political expenditures ("Political Expenses"). Per the requirements of Section 162(e)(1) of the Internal Revenue Code of 1986, the trade associations to which Western Union contributes must provide it with the percentage of our annual dues that are attributable to Political Expenses because that portion of dues is not a deductible business expense.

### **THE WESTERN UNION COMPANY POLITICAL ACTION COMMITTEE**

The WU PAC was organized to support candidates and elected officials whose voting records and public views on key issues indicate that they will advocate public policy that is in the best interests of the Company and Company Stakeholders. The WU PAC engages in political support activities permitted by federal election campaign laws and regulations established by the Federal Election Commission ("FEC"), and, where applicable, the WU PAC will engage in political activities permitted by state campaign laws.

<sup>1</sup> **Western Union includes those U.S. trade associations that may have participated in lobbying activity and/or in which the Company maintained a corporate membership and where its annual expenditures exceeded \$25,000. Western Union does not consider a trade association to be an organization captured in this data if its employees are members to satisfy professional licensing requirements. The list of trade association memberships has been prepared in good faith, following reasonable due diligence, and for general information purposes only. Dues payment schedules may impact the accuracy of the information shown; Western Union retains the right to revise or adjust information as needed.**

<sup>2</sup>

<sup>2</sup> **Includes fees for trade association activities related to Canadian public policy.**



The WU PAC is funded solely through voluntary contributions from eligible Western Union employees, and supports candidates, parties, and committees on a bipartisan basis. The WU PAC is governed by an advisory board comprised of senior leaders of the Company from several corporate functional and geographic areas as well as business units, each selected by the Company's Chief Executive Officer. The WU PAC Board is chaired by the Head of Public Policy.

Contributions from the WU PAC are reported in filings with the FEC and are made publicly available.

The WU PAC did not make any political contributions in 2021.