Western Union

Our Code of *Conduct*

A Message from Our CEO

As I reflect on Western Union's legacy, a journey that began in 1851, I am filled with pride in the trust and loyalty our customers show us every day. From connecting people across the globe through pioneering technology to making financial services more accessible to all, we have always strived to make a difference.

At the heart of that mission is our commitment to integrity. It's what earns us the trust of our customers, partners, and communities. That's why I'm excited to introduce our Code of Conduct, a guide that defines how we operate, make decisions, and uphold the highest ethical standards in everything we do.

Our Code of Conduct reflects our deep dedication to integrity, whether we're interacting with customers, partners, colleagues, or the communities we serve. It's a testament to our values, ensuring we make the right choices while fostering an environment built on diversity, inclusion, and respect. At Western Union, we know that our strength lies in our differences, and we are committed to creating a workplace where every voice is valued, heard, and empowered.

Most importantly, our Code gives each of us the tools to do what's right and the confidence to Speak Up when something doesn't feel right. No one should ever hesitate to ask questions or raise concerns.

I encourage you to take time to understand our Code of Conduct and embody its principles in your daily work. Together, we can continue to uphold the values that define us and drive our success. Let's keep pushing boundaries, innovating, and making a positive impact on the world and each other.

Thank you for your unwavering commitment to our mission.

Devin McGranahan
President & CEO

> "Our Code gives each of us the tools to do what's right and the confidence to Speak Up"

Table of Contents

1

Our Code. Our Role. Our Responsibilities.

We give people the tools to live, connect, and do business around the world. Doing this effectively requires the trust of those with whom we interact. We maintain this trust by:

- Doing business ethically and legally.
- Following our Values and Behaviors.
- Fulfilling our roles with a strong sense of accountability and purpose.

Our Code of Conduct (our "Code") is our guide for doing business in ways that inspire trust. It explains how to incorporate our values into our roles and everyday responsibilities.

Our Values

People are our purpose. Our goal is to offer accessible financial services that help people and communities prosper. Our core values guide us to serve those that matter most — our customers and each other.

Integrity

We do the right thing. It starts with us.

Respect

We honor the dignity and purpose of both our customers and each other in every interaction.

Trust

We assume best intentions, live up to our commitments, and deliver on our promises.

Innovation

We generate ideas for a better tomorrow.

Our Behaviors

The following key behaviors reflect our core values and support us in serving our customers.

Customer first
We are passionate about our customers and put them at the center of everything we do.

Drive results
We hold each other accountable and take decisive and informed action to move our strategy forward.

Reimagine everything
We innovate every day, seeking to improve and simplify.

Be bold
We make courageous decisions and follow through. We Speak Up and challenge what's possible.

Spend wisely
We responsibly manage our Company's time, money, and resources to achieve the greatest impact for Western Union.

Respect differences
We appreciate and promote diverse perspectives, recognizing their impact. We act with empathy and care.

Lead with intent
We act with clear purpose and in good faith. We motivate and inspire others through our actions.

Exceed expectations
We work together to treat every moment as an opportunity to excel.

Taking Responsibility

At Western Union, maintaining integrity is everyone's responsibility. Our Code and policies apply to all of us, and our success depends on each person upholding our standards.

What we do

- **Take responsibility.** We are accountable for our choices and actions.
- **Respect the rules.** Whether working in the office, at our stores, or remotely, we follow our Code, our policies, and the law.
- **Long-term commitment.** We do not compromise our values and behaviors for business goals.
- **Speak Up.** We ask questions and report concerns or misconduct.
- **Our managers have additional responsibilities to:**
  - Set an example — Model our values and behaviors for your team.
  - Promote compliance — Ensure your team follows the Code.
  - Maintain an open-door policy — Encourage your team to Speak Up.
  - Drive accountability — Lead by example and own your decisions.
  - Prohibit retaliation — Support good-faith reporting and participation in investigations.

Why we do it

When you work for or with The Western Union Company and its subsidiaries ("Western Union" or "our Company"), you agree to comply with our Code. It applies to directors, officers, employees, and those under contractual agreement with Western Union, regardless of level or position. We do not grant waivers to our Code under any circumstances. Violations may lead to discipline or termination of employment or service contract.

Ask Yourself

1. Am I acting legally and ethically?
2. How would this action affect our Company, our customers, or the community?
3. Is this the right thing to do?

Speaking Up

Everyone is expected to Speak Up. Asking questions and reporting concerns is everyone's responsibility. Speaking up is a critical way for us to maintain a positive work culture and support our commitment to conduct business the right way. We Speak Up with confidence, knowing our Company takes concerns seriously and prohibits retaliation for reports made in good faith.

What we do

- **Speak Up.** When something does not seem right, we ask questions and raise concerns.
- **Use reporting resources.** We report misconduct to managers, People Relations, *Business Integrity*, or the Integrity Helpline.
- **Report retaliation.** We Speak Up on behalf of ourselves or colleagues against any retaliation.

Why we do it

We all contribute to improving Western Union by asking questions, collaborating on solutions, and reporting concerns when necessary. We also understand that fear of retaliation can deter people from coming forward, which is why the Company prohibits retaliation.

Want more information? See our Speak Up and Anti-Retaliation Policy.

What is retaliation?

Retaliation is treating someone negatively for making a report, cooperating in an investigation, or attempting to enforce the Code in some way. It could include giving someone a less desirable assignment or more serious actions, like a demotion or termination.

No tolerance for retaliation

We do not tolerate retaliation against anyone for reporting concerns in good faith or cooperating in investigations.

Investigating Concerns

Our investigation process ensures all misconduct reported in good faith is reviewed impartially and addressed appropriately.

What we do

- **Cooperate fully.** When participating in an investigation, we provide accurate and complete information.
- **Respond truthfully.** When participating in an investigation, we act in good faith and avoid making false accusations.
- **Keep it confidential.** We protect confidentiality and share information on a need-to-know basis.

Why we do it

Western Union is committed to operating with integrity. Investigations help us identify issues and conduct business the right way. By creating open lines of communication and offering confidential tools for employees to raise concerns without fear of retaliation, Western Union's Business Integrity and People Relations teams help promote a positive, ethical, and inclusive work environment for everyone.

Want more information? See our Business Integrity Investigation FAQs and People Relations FAQs.

Q&A

Q: I've been asked to participate in an investigation. I know some things that may reflect poorly on my manager. I do not want to upset her because she might try to get back at me. What should I do?

A: You should Speak Up. We do not tolerate retaliation, so do not let that stop you from participating. You have an obligation to share what you know, and our policies protect you against retaliation.

2 Working with Each Other

Western Union values a diverse, global workforce to better serve our customers. We make opportunities available to all our people, regardless of differences, to foster innovative thinking and promote a culture of inclusion and belonging.

Respecting One Another

What we do

- **Lead with respect.** We live our values, work with integrity, and treat everyone with consideration.
- **Make the effort.** We value diversity, equity, inclusion, and belonging at Western Union. We provide opportunities based on knowledge, skills, abilities, and contributions.
- **Encourage others.** We support each other and encourage authenticity.
- **Recognize bias and maintain a professional environment.** We identify and counter the influence of our implicit biases, and we prohibit unprofessional behavior.
- **Ask for help.** For questions about respectful conduct in the workplace, contact your manager or People Relations.

Why we do it

We treat one another with respect and trust in order to build a positive and engaged workforce. A collegial and diverse work environment is a strategic advantage that promotes innovation and helps us deliver for our customers.

Ask Yourself

1. Am I communicating respectfully?
2. How might my words or actions reflect on me, my team, and Western Union?
3. If others could see and hear me right now, what would they think?

Preventing Discrimination, Harassment, and Bullying

What we do

- **Promote a positive environment.** We work to build a supportive, professional environment and to prohibit discrimination. Any form of discrimination, harassment, or bullying violates this Code, whether it occurs at a business location, a Company-sponsored off-site activity, or another workplace connection.
- **Be professional.** Unprofessional conduct is not allowed in our workplace. We prohibit unwelcome conduct based on any characteristic protected by antidiscrimination laws.
- **Support each other.** We stand up for coworkers who experience discriminatory, harassing, or bullying behavior and report it.
- **Include each other.** We want everyone to feel they belong, and we do not exclude them from participating fully, especially due to a protected status.
- **Ask for help.** For questions about discriminatory, harassing, or bullying behavior, contact your manager or any senior leader, your Site Leader, or People Relations.

What is discrimination?

Discrimination may be any kind of negative, punitive, or restrictive employment decision or conduct that is based on any trait or characteristic protected by law, including, but not limited to, race (including traits associated with race such as hairstyle), color, religion or religious creed, national origin or ancestry, citizenship status, sex or gender (including pregnancy, childbirth, and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, age, physical or mental disability, military and veteran status, genetic information, and protected medical condition.

Harassing behavior could include:

- Using a discriminatory nickname.
- Telling jokes related to race, sex, gender, or other category protected by law.
- Distributing objectionable emails, pictures, or other materials.
- Pressuring a coworker to have an unwanted social or romantic relationship.
- Sending profane or sexually explicit messages or content.

Why we do it

Discrimination is not only wrong, but it also undermines productivity and performance. We want to build a supportive environment, so everyone can thrive at Western Union.

Q&A

Q: During an online team presentation, a colleague said that the text was too small for her to read. After she commented on the size of the text a few more times, her engagement dropped. If she is not saying anything, who am I to interfere? Am I right?

A: No. It is entirely appropriate to say something in her support. We want everyone to participate fully. You can talk with the presenter or report the situation to a manager or People Relations.

Working Safely

What we do

- **Work safely and responsibly.** We prioritize safety in all our work at the Company. We avoid working while under the influence of alcohol, illegal substances, or anything that impairs our judgment. We use good judgment when drinking alcohol at work-sponsored events.
- **Do not tolerate violence.** We report threats, intimidation, presence of weapons, and any form of violence, and we call emergency services when appropriate.
- **Help each other.** We look out for the well-being of ourselves and others. We get help and encourage our coworkers to do the same if there are signs of substance abuse or mental health issues.
- **Ask for help.** For questions about employee health and safety, contact our Real Estate team. Western Union also provides various employee assistance benefit programs.

Why we do it

Safe workplaces boost employee satisfaction, increase productivity, and reduce costs. We take safety policies and procedures seriously to avoid injuries or other health and safety issues.

Want more information? See our Global Policy Against Workplace Violence.

Remember

1 Work only if you are fit, competent, and properly trained.
2 Stay alert for hazards and report them.
3 Report workplace injuries, accidents, substance abuse, and safety violations.

Q&A

Q: I recently had surgery and was prescribed pain medication that makes me sleepy. I have meetings at our office that I feel I should attend, so I do not think I can stay home. Is it OK for me to come to the office?

A: No. Your safety and the safety of your coworkers and community are most important. If you are temporarily impaired by medication and it could be unsafe for you to commute to the office, you should avoid coming in until you are not impaired.

Protecting Employee Privacy

What we do

- **Keep personal data confidential.** When handling employee personal data, we protect it from unauthorized disclosure and prioritize confidentiality.
- **Engage technical controls.** We ensure that the appropriate physical, administrative, and technical protections are in place when handling personal data.
- **Share personal data carefully.** We limit disclosure of personal information to those who are authorized and have a legitimate business purpose for the information.
- **Report security risks.** If we see that personal data may be at risk of disclosure, we Speak Up.
- **Ask for help.** For questions about employee privacy, contact our Privacy and Data Governance group.

Why we do it

We care about protecting employee privacy and are committed to upholding our legal obligations to keep personal data confidential. Privacy violations can be harmful, leading to identity theft or other irreversible harm.

Personal employee data includes:

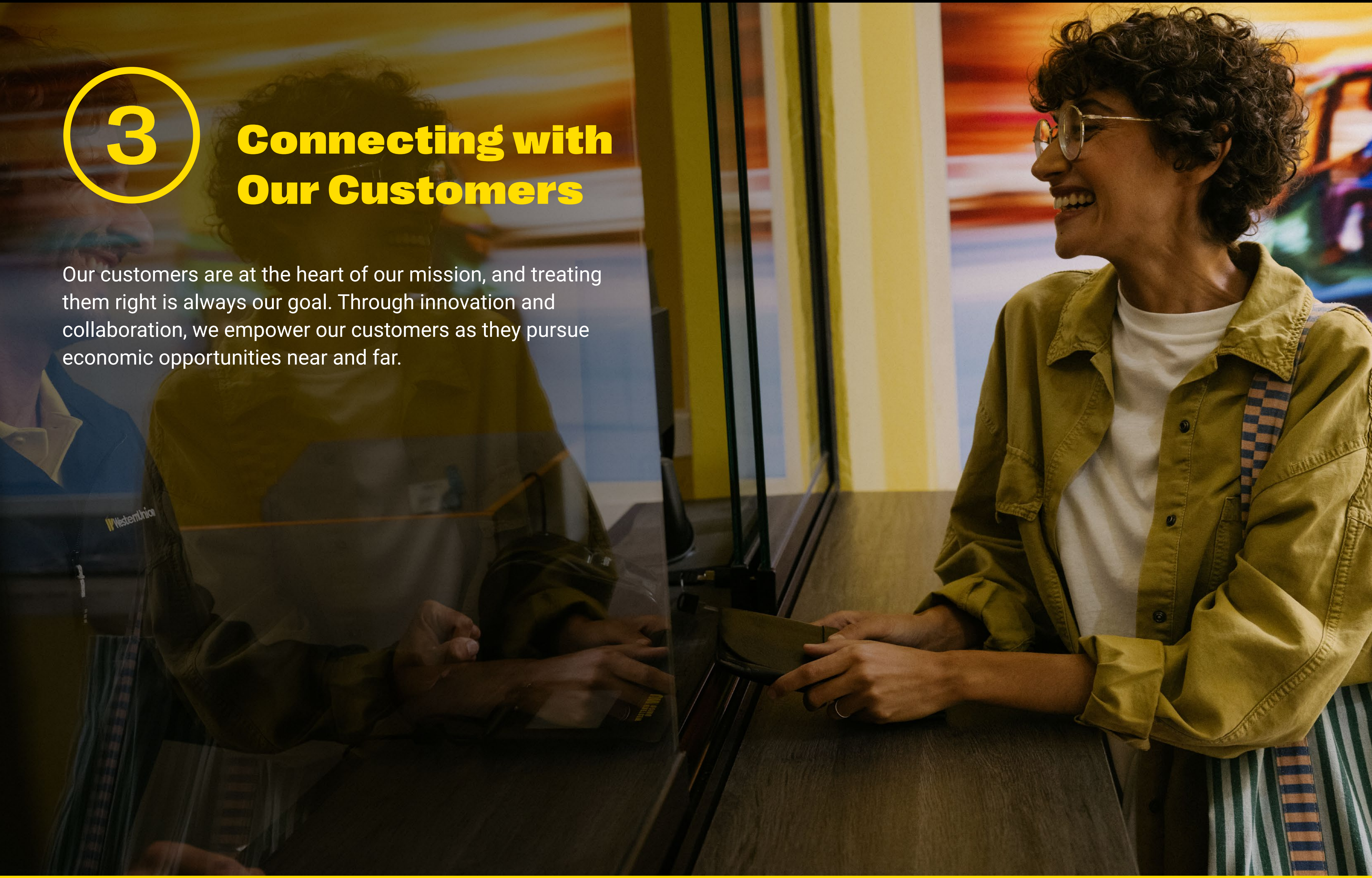
- Personnel files
- Medical records
- Financial records
- Background checks
- Other sensitive information

Want more information? See our Global Privacy and Information Governance Policies, including our Global Privacy and Data Protection Policy and Global Employee and Contractor Data Privacy Notice.

Q&A

Q: One of my new coworkers who handles employee data left her desk with her screen displaying employee data. Although it is not a place exposed to the public, other employees can walk by and see the information. I do not work on her team or with employee information, but should I say something?

A: Yes. You should report this issue. Exposing sensitive employee data is a serious lapse in judgment and creates employee privacy risk. We all have a duty to report noncompliance, even if it's about someone on another team doing work that does not involve us.



3 Connecting with Our Customers

Our customers are at the heart of our mission, and treating them right is always our goal. Through innovation and collaboration, we empower our customers as they pursue economic opportunities near and far.

Marketing and Advertising

We ensure that our products and services are described accurately in our sales, advertising, promotions, and marketing materials. We do not exaggerate, misstate, or mislead in our claims.

What we do

- **Reflect our world.** Our marketing and advertising materials reflect the diversity of our workforce and customer base.
- **Value customer preferences.** We respect our customers' preferences in our marketing and advertising efforts.
- **Hold the supply chain accountable.** We hold our agents, suppliers, vendors, and marketing agencies to the same standards.

Why we do it

We are committed to maintaining our customers' trust. Providing accurate marketing and advertising strengthens our reputation and our brand.

Remember

Follow Company policies and marketing guidelines, including submitting materials for legal review as appropriate.

Competing Fairly

Fair competition is essential for innovation, economic growth, and customer choice. We compete fairly to further our mission to support our customers.

What we do

- **Engage carefully.** When in contact with competitors, we do not discuss business or business opportunities and we do not make any formal or informal agreements, such as agreements regarding rates, contracts, pricing, territories, or markets.
- **Gather competitive information fairly.** We gather information about the market and our competitors using lawful methods.
- **Ask for help.** Contact our Legal group:
  - Before meeting or communicating with competitors.
  - Before bundling services that require a customer to buy one service or product to obtain another.
  - If you become aware of any efforts to “control” markets.
  - If you have information about a competitor that might be considered confidential or proprietary.

Why we do it

We believe fair competition benefits our customers and the marketplace. We compete based on our merits and do not seek to gain any unfair advantage.

Want more information? See our Antitrust and Fair Competition Policy.

Q&A

Q: An agent has asked me to raise prices in coordination with a competitor, which would allow us to protect Western Union’s market share and increase revenue. Is this OK?

A: No. Collaborating with competitors on pricing — even through an intermediary — is prohibited. You should decline and immediately report the offer to Legal.

Protecting Customer Privacy

We value customer privacy and protect customer data that is entrusted to us. We collect, store, use, and share customer information for legitimate business purposes only.

What we do

- **Use appropriate safeguards.** We use appropriate physical, administrative, and technical safeguards to protect customer data in compliance with our policies and applicable laws. We do not transfer customer data to unauthorized or personal devices.
- **Report privacy lapses.** We Speak Up about actual or potential unauthorized access, use, or loss of customer information.
- **Ask for help.** For questions about privacy, reach out to our Privacy and Data Governance group.

Why we do it

Our customers trust us to handle their data properly. The inappropriate release of customer data damages customer trust and can negatively impact our business partnerships and our ability to effectively compete in the market.

Want more information? See our Global Privacy and Data Governance Policies, including our Global Privacy and Data Protection Policy, Information Classification Policy, and Acceptable Use Policy.

Personal customer data includes:

- Address, phone, email, date of birth, gender, and other identification information.
- IP address, device IDs, cookie IDs, browsing history, and individual preferences.
- Location data and transaction history.
- Other identifiable information.

Q&A

Q: I'm working with a vendor who has limited access to our database. The vendor asked to access my account to review customer data. I do not want to slow down the work process. Can I give the vendor access through my account?

A: No. We protect customer data and follow our safeguards and procedures. We do not circumvent access controls.

Protecting Our Customers

We take fraud against our customers seriously. We are committed to fraud prevention and to maintaining the highest standards of integrity.

What we do

- **Watch for signs of customer fraud.** Be on the lookout for changes in transaction behavior, out-of-the-ordinary transactions, or other red flags. Fact-check and verify.
- **Encourage customer safety.** Make sure customers always use their own cards or bank account to send money, and discourage customers from sharing Western Union digital account credentials or receipt details.
- **Ask for help.** If you suspect fraud or have questions about particular transactions, contact befraudsmart@wu.com or the Western Union Fraud Hotline at 1-800-448-1492 or westernunion.com/fraudawareness.

Why we do it

We help people around the world power their pursuits with confidence. Agent or consumer fraud can hinder our mission and undermine confidence in our products and services. People trust us with their money and their business, and we must do all we can to identify and eliminate instances of fraud.

Look out for:

- Customer transactions for emergency situations they have not confirmed.
- Customers sending money to individuals they have not met in person.
- Customers claiming lottery or prize winnings.
- Customers sending money in response to urgent demands for payment.

4 Working in Our Communities

We are leaders in the communities we serve, and we know the importance of conducting business ethically and with the interests of our communities in mind.

Engaging in the Community

For more than twenty years, the Western Union Foundation has supported economic opportunity for people who migrate in pursuit of a more prosperous future. We partner with nonprofits around the globe that provide scholarships for higher education, skill building for workforce readiness, and inclusion programs to create equitable access to employment.

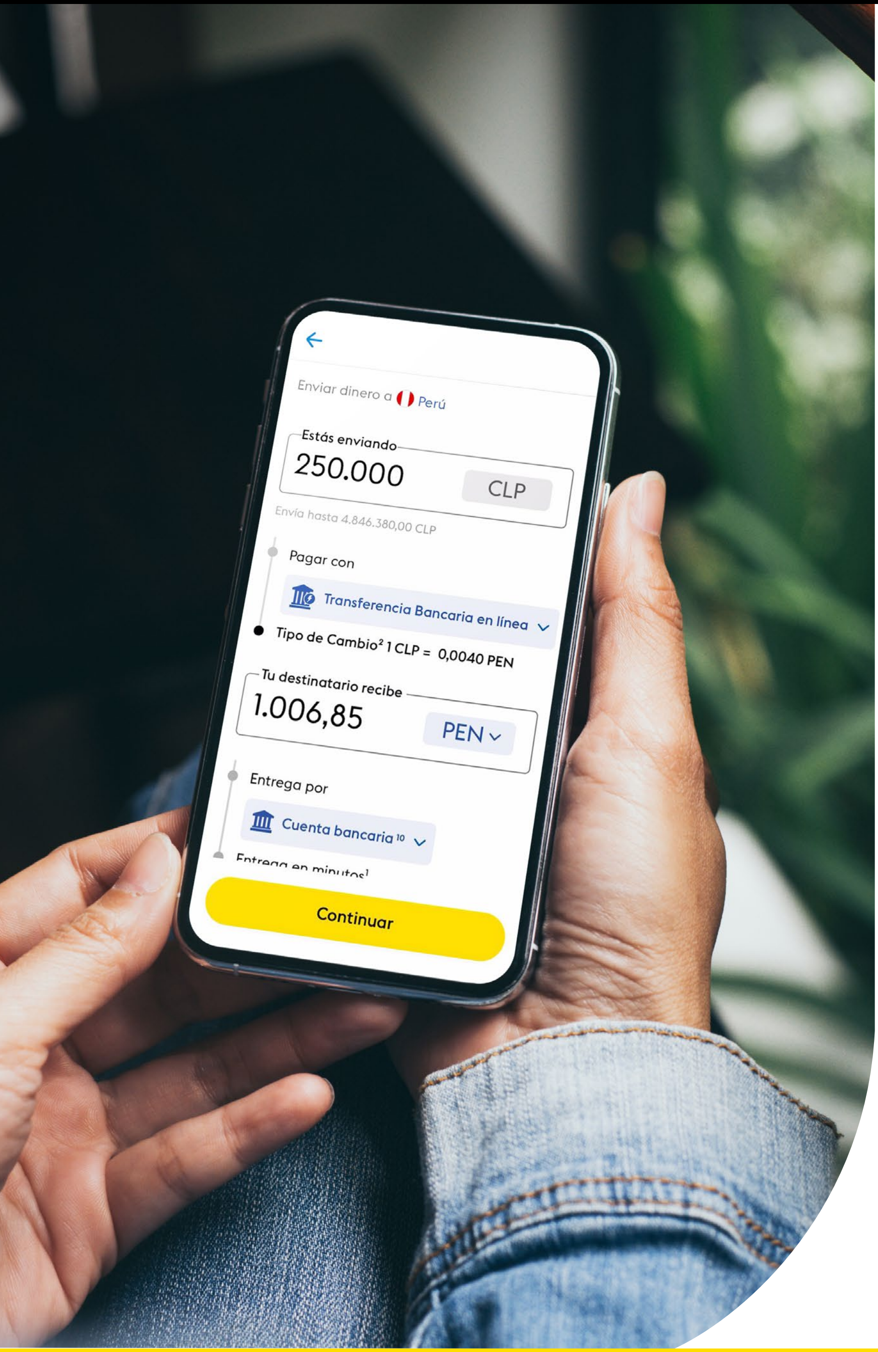
What we do

- **Give back and volunteer.** We encourage all employees to participate with local charities and community initiatives where we operate our business and where our customers are located.

Why we do it

We connect with our local communities to promote growth and prosperity. We look for ways to serve our customers and other stakeholders, because uplifting our communities helps us all thrive.

Want more information? See www.westernunionfoundation.org.



Preventing Bribery and Corruption

Conducting business ethically and transparently upholds our reputation and fosters trust in the marketplace. We prohibit the offer or acceptance of bribes and expect the same of our partners and third parties.

What we do

- **Prohibit bribes.** We never offer or accept bribes, including facilitation payments.
- **Engage with integrity.** We do not seek improper business advantages or opportunities. We do not attempt to improperly influence the decision-making of any commercial partners, third parties, or government officials.
- **Follow the rules and keep receipts.** We follow applicable anti-bribery and anti-corruption laws and expect commercial partners and third parties acting on behalf of Western Union to do the same. All employees are responsible for maintaining accurate books and records.
- **Ask for help.** Contact our Anti-Bribery and Corruption Team with questions about a transaction, expense, or relationship, or any other corruption or bribery concerns.

Why we do it

It is crucial to our business that we avoid even the appearance of impropriety. We know and follow our anti-bribery and anti-corruption policies, and we do not influence or try to influence others by offering or accepting bribes.

What is bribery?

Bribery is the act of giving or receiving something of value with the intent to encourage, induce, or reward improper performance or to obtain improper advantage.

What is something of value?

Something of value could include cash or digital payments, donations, sponsorships, gifts, favors, hospitality, and employment opportunities.

What is a facilitation payment?

Facilitation payments are those made to government officials to facilitate or speed up a process.

What is a government official?

A *government official* could include employees of a government agency or a government-controlled business, a politician, political candidate, or member of a royal family.

Q&A

Q: The vice president of a state-owned company, which is a prospective business partner, asked us to grant his daughter a summer internship at Western Union. Is it appropriate to offer the vice president's daughter an internship?

A: No, the request should be forwarded to our Anti-Bribery and Corruption Team. Offering something of value to influence or obtain an improper business advantage is considered a bribe. Therefore, offering an internship to the vice president's daughter could be viewed as a bribe to a government official.

Want more information? See our Global Anti-Bribery and Corruption Policy.

Combating Money Laundering

We must follow our policies and the law to combat money laundering, terrorist financing, and fraud against Western Union.

What we do

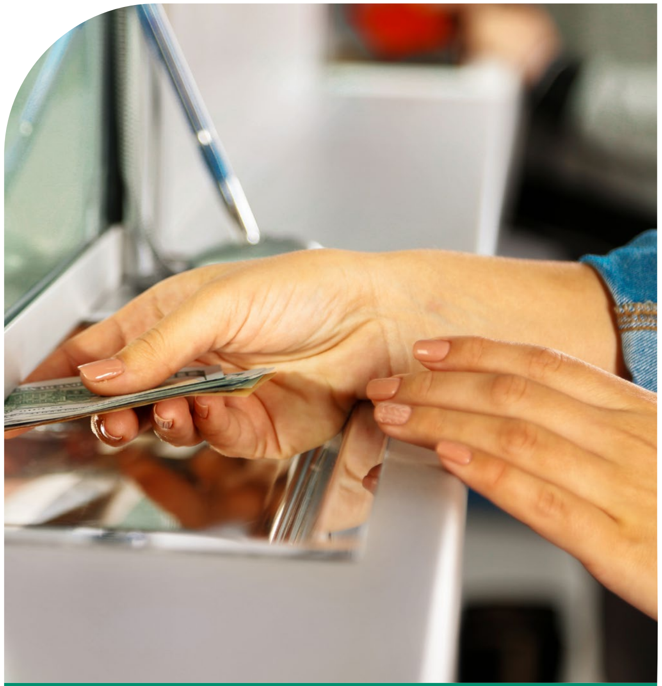
- **Look for the signs.** We watch for transactions with no obvious business purpose and reach out for help if we see signs of money laundering.
- **Support agents.** Our agents are often our first line of defense. We make sure they know the signs of money laundering, follow our policies and procedures, and are equipped to report their concerns.
- **Follow the rules.** We comply with all applicable policies, regulations, and laws related to the prevention of money laundering, consumer fraud, and terrorist financing.
- **Ask for help.** Money laundering is complicated. We have an experienced team of compliance professionals around the world who can help with questions or concerns. Contact our Legal or Compliance groups for help in any scenarios where fraud or money laundering is suspected.

Why we do it

We aspire to make financial services accessible globally, which means we face certain risks. The actions we take to prevent illicit activity and the misuse of our systems help protect our customers, partners, and communities.

What is money laundering?

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. Money launderers often use money transfers for their schemes.

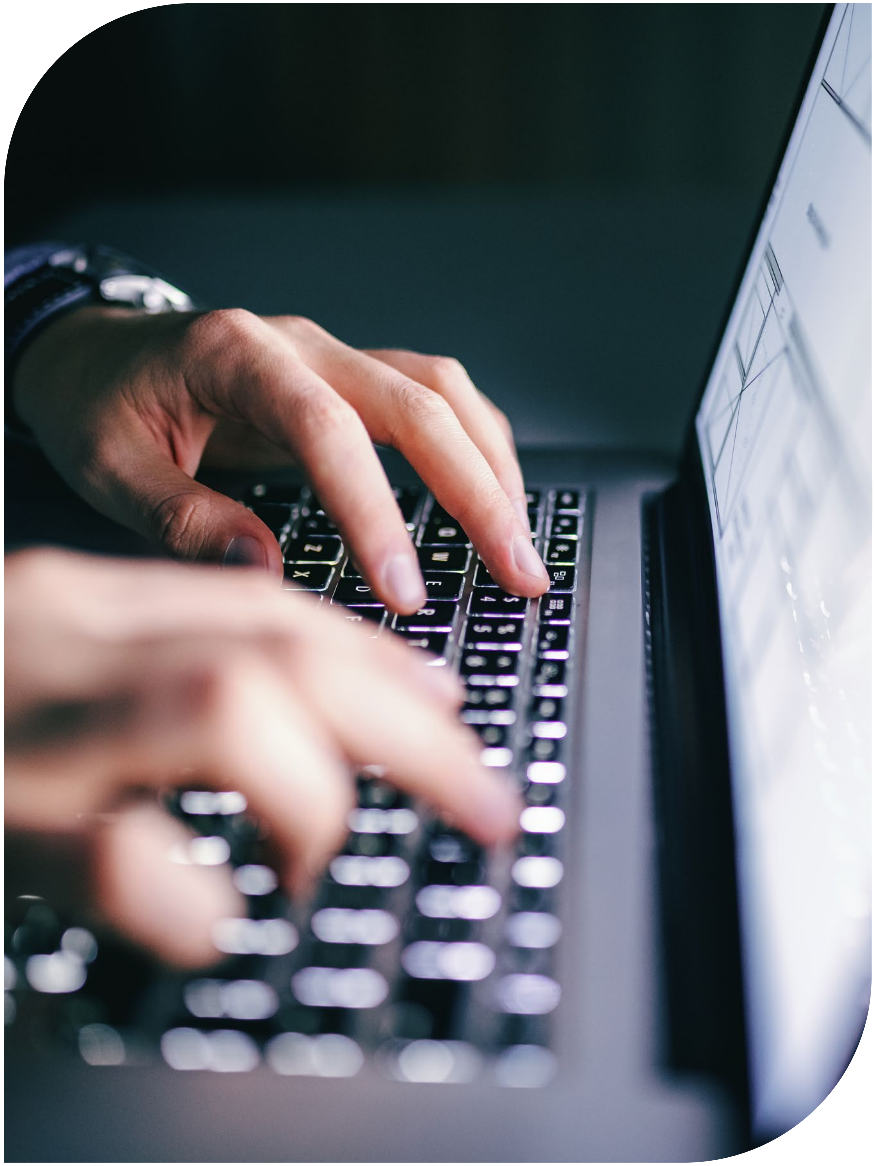


Q&A

Q: An agent reported that an account that was dormant for three years has made several large transfers over the past few days. What should I do?

A: Contact our Compliance group as soon as possible. A substantial change in activity could be a sign of money laundering, so timely reporting is key.

Signs of Money Laundering



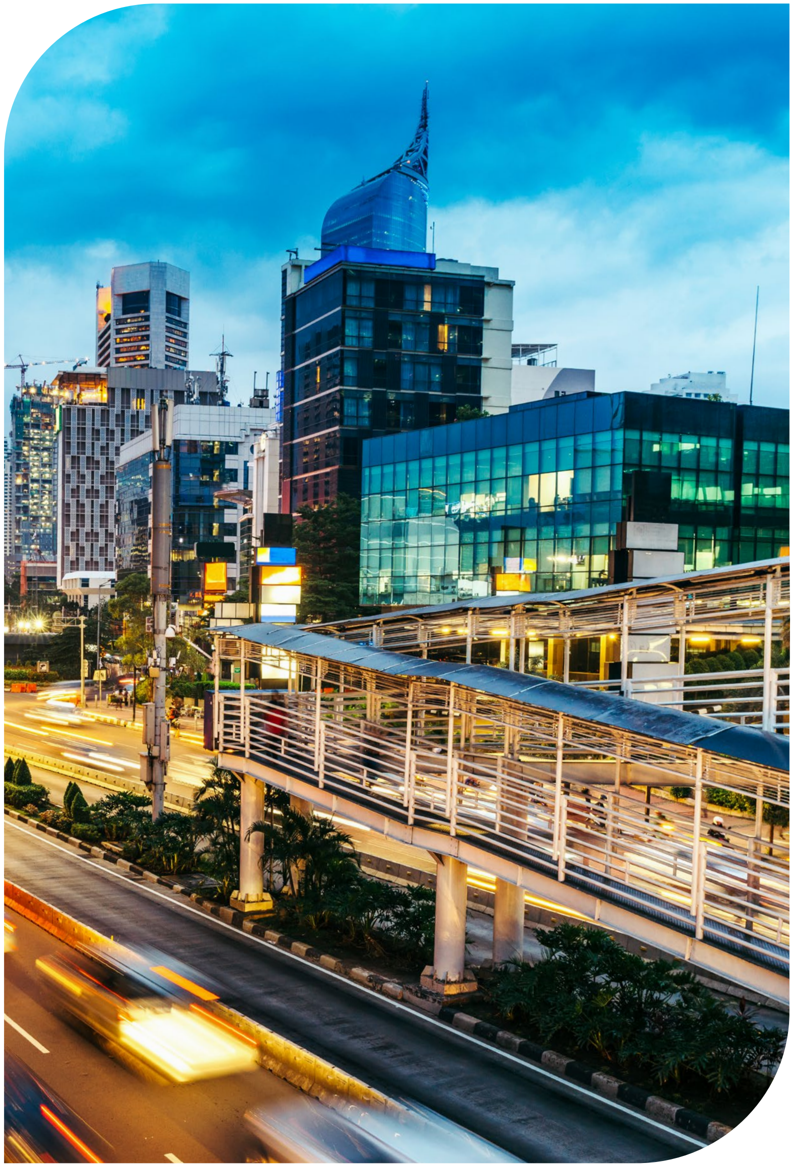
Watch for customers who

- Lack identification or provide vague or fictitious information.
- Have numerous small, incoming transactions followed by a large, outgoing transaction.
- Are in a hurry to complete a transaction.
- Change the source of the funds at the last minute.

Watch for transactions that involve

- Significant changes in transaction patterns.
- Wire transfers from multiple senders to a small number of beneficiaries in high-risk jurisdictions.
- Substantial activity over a short period of time.
- Cash amounts that are just below reporting or identification limits.
- Recently created entities.

Want more information? See our Global Anti-Money Laundering and Counter-Terrorist Financing Policy.



Complying with Global Sanctions

As a global company, Western Union complies with all economic and trade sanctions, which are typically imposed in response to threats to national security and foreign policy objectives. Western Union also requires subsidiaries to comply with U.S. and global sanctions.

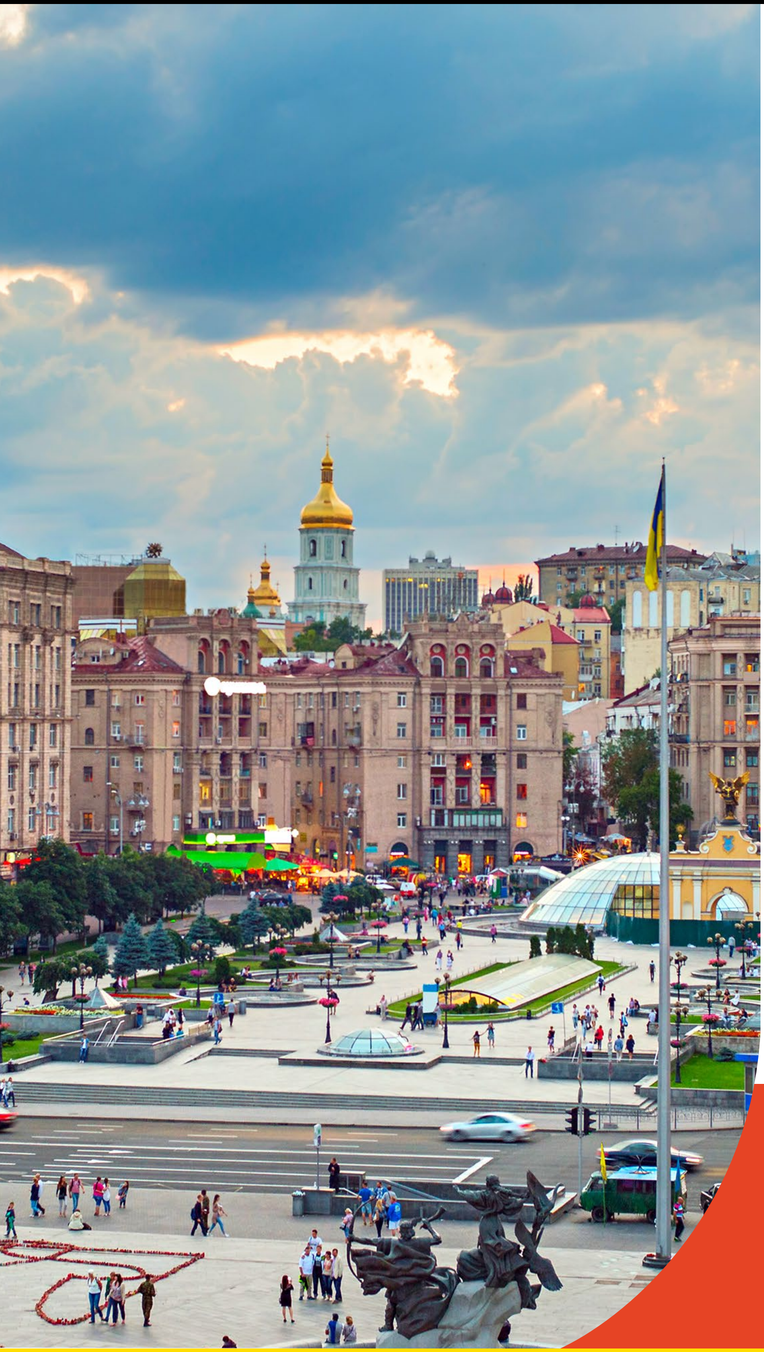
What we do

- **Screen transactions.** We screen transaction data, and we take action to freeze or reject funds and transactions where required by law.
- **Comply with sanctions and embargoes.** We comply with applicable U.S. and international economic sanctions and embargoes that restrict doing business with various countries, regions, groups, entities, and individuals. When a conflict exists between local law and U.S. law, we alert our Compliance group.
- **Ask for help.** Sanctions and trade laws can be complex and can change frequently. Contact our Legal group if you have any questions or concerns.

Why we do it

We comply with applicable economic and trade sanctions to protect our brand and support national and international security, foreign policy, and human rights interests.

Want more information? See our Global Sanctions Policy.



Working with the Government

When interacting with law enforcement and regulatory government agencies and officials, we are honest and clear, and we act in good faith.

What we do

- **Interact honestly.** We never mislead an investigator or other government official, or otherwise attempt to stop the collection of information legally requested by properly authorized officials.
- **Follow appropriate channels.** In connection with regulatory requirements and other legal obligations and requests, we make information available to certain government agencies. Only authorized employees respond to government inquiries using our established process.
- **Take care when interacting with officials.** Recognizing the heightened bribery and corruption risk, we are thoughtful in our interactions with government officials and do not offer government officials anything that could be considered a bribe. We err on the side of caution and comply with our Global Anti-Bribery and Corruption Policy.

Why we do it

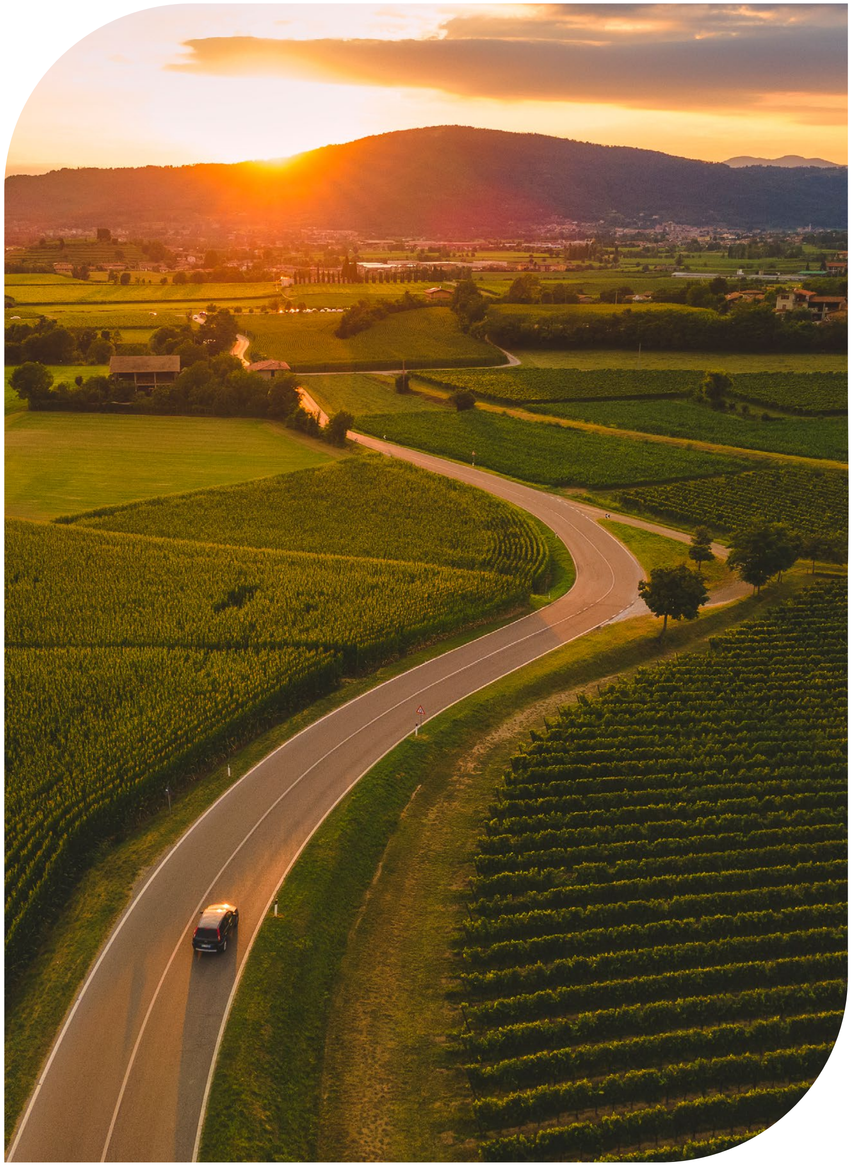
We act with integrity and follow the laws and regulations that govern our work. We have respectful interactions with government officials and maintain legal compliance in our operations.

Remember

Special care is required when interacting with government officials and negotiating contracts with government customers.

Protecting Our Environment

At Western Union, we act responsibly to protect the environment. We encourage best practices in managing waste, water conservation, and environmental awareness.



What we do

- **Maximize energy efficiency.** We look for ways to use resources responsibly and support sustainability.
- **Recycle and reduce waste.** We manage our waste responsibly, and we recycle.
- **Have ideas?** We ask what we can do to increase our sustainability and engage with our Environmental, Social, and Governance (ESG) Program Office.

Why we do it

We believe that being an environmentally responsible global entity leads to long-term, sustainable success for the Company and our stakeholders.

Want more information? See our ESG Report.

Engaging in Political Activities

We believe in the importance of political participation and encourage employees to do so in a lawful manner and on their own time.

What we do

- **Own our opinions.** We make it clear that our support for a political cause or candidate is our own and does not reflect the position of Western Union. The Company's positions and communications are managed by our Global Public Policy group.
- **Use our own time and resources.** We participate in political activities outside of work time and Company facilities. We do not use Western Union property or resources for political activities unless explicitly preapproved by our Global Public Policy group.

Why we do it

We recognize that engaging in the political process is valuable, and we understand that the Company supports our personal involvement. However, we also understand that we must take care not to suggest Western Union's endorsement of or participation in a particular political matter.

Want more information? See our Employee Social Media Guidelines.

Q&A

Q: I am running for the local school board and printed out a few flyers over my lunch break to provide to some colleagues who live in the same district. Since I did this on my own time, is this OK?

A: No. You should not use Western Union resources or conduct any political activities in Company facilities.

Supporting Human Rights

What we do

- **Respect human rights.** We uphold and promote human rights and the dignity of each person in our business practices, and we expect our partners to do the same.
- **Report human rights abuses.** If we notice signs of human trafficking, human smuggling, or any form of modern slavery, we report it.
- **Never tolerate child labor.** We comply with local, regional, and national laws regarding the employment of minors.
- **Comply with labor laws.** We maintain lawful working conditions, respect free association, and follow wage and hour laws, reporting any noncompliance.
- **Avoid human rights abuses throughout our supply chain.** We do not work with suppliers, vendors, agents, and other business partners who engage in human rights abuse, and we evaluate them to ensure compliance.
- **Ask for help.** For questions about human rights, contact our Legal group.

Why we do it

Our mission to empower people and connect our world depends on the mutual recognition of human rights from our suppliers, vendors, agents, and other business partners.

Want more information? See our Modern Slavery and Human Trafficking Statement.

5 Supporting Our Company

While we act boldly and seek to drive results, we never make choices that are unethical and understand that the best way to support our Company is to act with integrity.

Managing Conflicts of Interest

We manage conflicts of interest to maintain trust, integrity, and transparency in our business practices.

What we do

- **Protect Western Union's interests.** We make business decisions based on what is best for Western Union and our customers, partners, and stakeholders, not on what benefits us personally.
- **Avoid potential conflicts.** Certain situations, such as significant personal relationships with vendors, other business partners, anyone in our reporting line, or candidates for employment, can raise potential conflicts, and we should do our best to avoid them.
- **Disclose proactively.** We disclose potential conflicts of interest, including significant personal relationships, board service, certain investments outside the Company, or opportunities for secondary employment, to Business Integrity. Conflicts can often be managed, but they must be disclosed to ensure approval and appropriate handling. We can disclose potential conflicts of interest by following the link on We@WesternUnion.
- **Ask for help.** If you have questions about potential conflicts of interest, contact Business Integrity or our Anti-Bribery and Corruption Team.

Why we do it

A conflict of interest, or even just the appearance of a conflict, can impede our ability to perform our duties for Western Union. We are transparent and accountable for our actions and decisions in order to protect our reputation and brand.

What is a conflict of interest?

A *conflict of interest* may occur when an employee's personal interests interfere, or appear to interfere, with the interests of the Company or with the employee's duty to Western Union.

What is a significant personal relationship?

A *significant personal relationship* can include spouses, domestic partners, children, siblings, parents, in-laws, stepchildren and stepparents, significant others (as in significant dating or romantic relationships), and persons sharing a household.

Want more information? See our Conflicts of Interest Policy.

Remember

1. Do not seek personal advantage from customers or other third parties. Get approval before accepting gifts, hospitality, or other benefits, as required.
2. Do not accept secondary employment or board service without prior approval.

Q&A

Q: My brother owns a financial stake in one of the vendors my team is considering using. Should I disclose this?

A: Yes. Promptly disclose any significant personal relationship you have with current or potential vendors to your supervisor, Business Integrity, or our Global Sourcing group so the conflict can be reviewed and appropriately addressed.

Q&A

Q: My partner is being transferred into my department and will be one of the employees I supervise. In the past we have not worked together. Should I disclose our relationship?

A: Yes. Any significant personal relationship between supervisor and subordinate must be disclosed. Promptly disclose the situation to your supervisor or Business Integrity, so the conflict can be reviewed and appropriately managed.

Giving and Receiving Gifts and Hospitality

Giving and receiving appropriate gifts and hospitality can strengthen business relationships, but any gift or hospitality we provide or receive must follow our policies.

What we do

- **Never give or accept cash.** We never provide cash or digital equivalents.
- **Know when to say "no."** We do not offer or accept gifts or hospitality that create the perception of compromised decision-making.
- **Be cautious with government officials.** Gifts or hospitality offered to government officials are subject to strict approval requirements. We ensure any engagement with government officials complies with our Global Anti-Bribery and Corruption Policy.
- **Keep the receipts.** We keep accurate records of gifts and hospitality expenses and never pay for gifts or hospitality with personal funds to avoid reporting the expenses.
- **Ask for help.** If you have questions regarding gifts or hospitality, contact our Anti-Bribery and Corruption Team.

Why we do it

Gifts and hospitality can be used to build goodwill and support business relationships. If we exchange gifts and hospitality, we do so appropriately and avoid the appearance of improper influence on decision-making.

Want more information? See our Global Anti-Bribery and Corruption Policy, Travel, Gift, and Entertainment Policy, and Conflicts of Interest Policy.

Q&A

Q: A vendor sent a gift basket valued over $150 USD. May I accept it?

A: Potentially. Our global policy takes a risk-based approach and requires preapproval of gifts over certain value thresholds. You should contact our Anti-Bribery and Corruption Team to determine if the gift basket can be accepted or, if not, donated to the Western Union Foundation.

Protecting Western Union Property

We protect our property, keeping it safe and secure, so we can use it to support our business and customers. Our property includes tangible items as well as intellectual property.

What we do

- **Use it right.** We use Company property solely to conduct Company business, not for our own purposes. We do not transmit, remove, sell, or dispose of Company property — including intellectual property — without prior approval.
- **Respect others' property.** We refrain from knowingly using other entities' trademarks, copyrighted works (for example, software), inventions, or trade secrets without proper licensing or authorization.
- **Ask for help.** If you have questions about the use or protection of Company property, contact People Relations, Cybersecurity, Business Integrity, or our Intellectual Property group.

Why we do it

We secure Western Union property assets to effectively operate and safeguard our business.

Want more information?
See our Intellectual Property Policy.

What is intellectual property?

Western Union's *intellectual property* includes trademarks, domain names, patents, copyrights, publicity rights, trade secrets, and other proprietary information.

What is a trade secret?

A *trade secret* is any information that has independent economic value for a company that the organization takes reasonable efforts to keep secret. Examples of trade secrets include customer lists, agent lists, commission arrangements, pricing algorithms, strategic plans, and risk and financial models.

Q&A

Q: I'm leaving the Company to start a new business that does not compete with Western Union. Is it OK for me to use items I created while at Western Union?

A: No. Current and former employees have an ongoing obligation to protect Western Union's intellectual property, including anything created while employed at Western Union, and to use it only for the Company's benefit. Employees also have a responsibility to return all Company property when employment ends.

Protecting Confidential Information

We protect confidential information that we handle in our roles and keep it safe from unauthorized use or disclosure.

What we do

- **Keep it safe.** We follow physical and data security procedures and raise concerns when we see the possible inappropriate disclosure of confidential information. We do not inappropriately disclose confidential information during employment — including sending such information to personal email accounts. We uphold these obligations after we leave the Company.
- **Maintain confidentiality.** We never share confidential information with anyone, either internally or externally, unless there is a legitimate business purpose and disclosure is authorized. We follow confidentiality agreements made with Western Union or other companies, including former employers.
- **Ask for help.** Reach out to Legal or our Privacy and Data Governance group if you have questions or concerns or you receive a request from a third party for confidential information.

Why we do it

Keeping our Company information confidential and safe allows us to compete and succeed in the market. The public disclosure of our confidential information can harm our business and reputation.

Want more information? See our Global Privacy and Data Governance Policies.

What is confidential information?

Confidential information includes any nonpublic information that would be useful to competitors or harmful to us or our stakeholders if disclosed. It includes, but is not limited to, financial data, trade secrets, customer and employee information, and strategic plans.

Working with Third Parties

We select third parties that are committed to working in an ethical, transparent, and compliant way.

What we do

- **Evaluate third parties.** We expect third parties to follow this Code, the Vendor Code of Conduct, applicable policies, and the law. We work with third parties that share our respect for ethics and the law.
- **Watch for corruption red flags.** Certain third-party intermediaries may raise a greater bribery and corruption risk and must be preapproved by our Anti-Bribery and Corruption Team.
- **Comply with applicable laws.** We do not assist others in noncompliance (e.g., evasion of taxes), and we report any suspicious transactions or requests to alter normal business processes to hide income.
- **Ask for help.** Only employees with properly delegated signature authority sign contracts with third parties. If you have questions about the selection of third parties, or if you experience or hear of concerning behavior by a third party, contact our Global Sourcing and Procurement group and our Anti-Bribery and Corruption Team.

Why we do it

We rely on third parties to conduct our business, so we ensure they share our values. We follow our vendor selection process and avoid conflicts of interest in selection to obtain quality products and services at a fair price.

What is a third party?

Third parties include our agents, suppliers, vendors, and any other business partners with whom we conduct business.

What is a third-party intermediary?

A *third-party intermediary* is a third party engaged to perform services for Western Union or on the Company's behalf. For example, their duties can include:

- Obtaining licenses or permits.
- Introducing new business or customers to Western Union.
- Negotiating contracts or other business matters.
- Representing the Company in court or to regulators or government agencies.

Want more information? See our Vendor Risk Management and Oversight Policy, Global Sourcing and Procurement Policy, Signature Authority Policy, Global Anti-Bribery and Corruption Policy, Conflicts of Interest Policy, and Vendor Code of Conduct.

Protecting Western Union Data and Systems

We use Company data and systems appropriately and avoid unauthorized uses. We are familiar with the privacy and cybersecurity policies that apply to our role.

What we do

- **Lock it down.** We keep passwords confidential, lock unattended computers and devices, secure sensitive or confidential information when leaving our workspace, limit access to our systems, and do not share our data with external parties without proper approvals.
- **Think before we click.** We are careful about the emails that we open and the links that we click to ensure they are from trusted parties.
- **Are careful with what we use and what we share.** We do not download software or applications without permission. We use artificial intelligence (AI) and other technology carefully and do not upload confidential information to external AI or other sites where it could become available outside our Company.
- **Ask for help.** If you have questions about data security or need to report a concern, contact our Cybersecurity or Privacy and Data Governance group.

Why we do it

Handling our data and systems properly is critical to our operations, and we must protect them whether we are in the office, traveling, or at another location.

Want more information? See our Global Privacy and Data Governance Policies and Corporate Information Security Policies.

Q&A

Q: I received an email that looks like it is from Marketing, asking me to download a video file, but the link in the email appears suspicious. What should I do?

A: Do not click on the link. You should report this to the Cybersecurity group via the "Report Phish" button in Outlook or by contacting the Cybersecurity group directly. Unusual requests to click links or enter information via email are likely scams that can lead to dangerous software being downloaded to our systems.

Preventing Insider Trading

We do not engage in insider trading, which is the buying, selling, or otherwise disposing of any securities, such as a company's stock, while in possession of material nonpublic information regarding those securities.

What we do

- **Trade appropriately.** We do not buy or sell stocks or securities of any company, including Western Union, while we are in possession of material nonpublic information about that company.
- **Maintain a close hold.** We do not share with others any material nonpublic information about Western Union or any other company — an illegal practice known as "tipping."
- **Keep financial information confidential.** We do not share any information about mergers or acquisitions, changes in leadership, product or marketing plans, or other significant business transactions that are nonpublic.
- **Ask for help.** If you have questions about our policy or trading, please contact our Corporate Governance group.

Why we do it

We do not share confidential information outside the organization, and we do not use any material nonpublic information to enrich ourselves or anyone else. Insider trading is prohibited because trading in a company's securities while in possession of material nonpublic information about that company is against the law and our Code.

Want more information? See our Insider Trading and Confidentiality Policy.

What is material nonpublic information?

Information is considered *material* and *nonpublic* if a reasonable investor would consider it important in making an investment decision and if it has not been made public for at least one trading day.

Q&A

Q: We released our earnings report last week, which showed strong growth, and I think now is a great time to buy our Company stock. Can I tell my cousin that?

A: Yes, because the earnings report has been public for more than one full trading day, sharing this information does not violate insider trading laws. But be careful that you do not share any material nonpublic information.

Keeping Accurate Records

We keep accurate, complete, and timely records consistent with our policies and the law. We are familiar with the recordkeeping and record-retention procedures that apply to our role.

What we do

- **Expense correctly.** We follow all guidelines for Company credit cards and expenses and ensure that employee expense reports are properly reviewed by managers.
- **Make complete, accurate, and timely records.** We do not conceal mistakes or enter false or inaccurate information into any record, including expense reports and time sheets.
- **Ask for help.** Promptly report mistakes or errors in records, and contact Internal Audit or our Anti-Bribery and Corruption Team if you have questions about recordkeeping procedures.

Why we do it

Our records are used in reporting and making financial disclosures. Keeping accurate records is vital to maintaining the trust and confidence of our stakeholders, as well as complying with the law.

Want more information? See our Global Anti-Bribery and Corruption Policy, Travel, Gift, and Entertainment Policy, and Information Governance Retention Schedule.

Q&A

Q: I reviewed a vendor invoice that inaccurately describes the services provided, but I know that the fee paid is accurate. Do I need to do anything?

A: Yes. You should contact our Anti-Bribery and Corruption Team for guidance. We must maintain records that accurately reflect transactions. False or misleading service descriptions in invoices may indicate improper activity.

Communicating Appropriately

We communicate appropriately and act consistently with our Code and values. We follow our communication policies, including our Social Media Guidelines.

What we do

- **Obtain authorization to speak for the Company.** We do not speak on behalf of Western Union unless we are specifically authorized to do so. We obtain approval from Communications, Investor Relations, and Global Public Policy groups for any public Company communications or presentations.
- **Think before we post.** Our communications, including email and messaging, must be professional and appropriate. We show good judgment when communicating in any format, including on social media.
- **Contact the right person.** We refer media, investors, analysts, or any other third-party requests for information, comments, or interviews to Communications or Investor Relations.
- **Ask for help.** If you have any questions about communicating externally, responding to media or third-party questions, or using social media, contact our Communications, Investor Relations, or Global Public Policy groups.

Why we do it

At Western Union, we are committed to being honest, accurate, and thoughtful in our communications. We strive to speak with one voice and to make sure that only approved messages are attributed to the Company.

Want more information? See our External Speaking and Media Policy, Social Media Guidelines, Release of Financial Information Policy, and Contact with Financial and Industry Analysts Policy.

At Western Union, we are ready and willing to Speak Up using any of the following resources:

- Our Managers
- People Relations
- Business Integrity
- Integrity Helpline

For What's Next

Western Union

Our Code of Conduct