



SPEAK UP & ANTI-RETALIATION POLICY

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EXECUTIVE SUMMARY: This policy outlines the reporting channels for employees and others to ask questions and raise concerns, consistent with Western Union’s Speak Up culture. Western Union encourages employees and others to ask questions and raise concerns. This policy strictly prohibits retaliation against those who raise or report good-faith ethics and compliance concerns, including violations of Western Union’s Code of Conduct, policies and procedures, or any law or regulation.

PURPOSE

This Speak Up & Anti-Retaliation Policy (the “Policy”) reinforces Western Union’s Code of Conduct and encourages employees, workers, volunteers, interns, office holders, or whistleblowers (as defined by applicable local law) to ask questions and raise ethics and compliance concerns in good faith, including possible violations of Western Union policies, the Code of Conduct, or the law (a “Report” made by a “Reporter”).

The Policy strictly prohibits retaliation against Reporters who make Reports in good faith. Good-faith Reports are those made with a reasonable belief in the truth of the Report. Anyone who makes a Report in bad faith, such as when a Report is made maliciously or with knowledge that the Report is false, or who intentionally provides false or misleading information during an investigation, may be subject to disciplinary action.

To the extent permitted by law, this Policy does not form part of any contract of employment or other contract to provide services, and may be amended, replaced, or withdrawn by Western Union at any time. Western Union reserves the right to depart from the requirements of the Policy and procedures specified below where Western Union considers it is necessary or reasonable to do so and as otherwise permitted by law.

POLICY SCOPE

This is a global Policy and applies to Western Union and its affiliates.

Western Union employees, workers, volunteers, interns, office holders, or whistleblowers (as defined by applicable local law), regardless of their regular work location, should report any suspected or known wrongful conduct, including but not limited to:

- (1) violations of the Code of Conduct, policies, and procedures;
- (2) violations of law or regulations, including but not limited to illegal or improper activities regarding accounting, auditing, insider trading, corruption, bribery, misuse of public money, and fraud against Western Union;
- (3) discrimination or harassment;
- (4) environmental, health, or safety violations;
- (5) any other conduct that threatens Western Union's reputation, ethical standards, or financial well-being in accordance with this Policy; and
- (6) the deliberate concealment of any of the above.

If a Reporter is uncertain whether something is within the scope of this Policy, they should seek advice from any of the resources listed in this Policy, including Western Union's Business Integrity Office.

Additional Information for Australia:

Employees and other eligible individuals in Australia should also refer to the [Western Union Financial Services Procedure for Disclosable Matters and Protection of Whistleblowers](#) for Australia, which provides additional information regarding whistleblower protections and reporting requirements under Australian law. The Australia procedure supplements this Policy and will apply where required by applicable Australian law.

REPORTING A CONCERN OR POTENTIAL VIOLATION

Western Union takes all Reports seriously. Where appropriate, the Business Integrity Office investigates Reports and conducts its investigation of Reports as objective, fair, and impartial factfinders.

Reports may be submitted on a confidential basis by the Reporter or, to the extent permitted by law, may be submitted anonymously. The identity of the Reporter and other protected individuals will be treated as strictly confidential and disclosed only where permitted or required by law. Proper investigation may be more difficult or not possible

if the Business Integrity Office cannot obtain further information from an anonymous Reporter.

Confidential Reports can be filed with Western Union, either in writing, verbally, or in person, using any of these methods:

- (1) Any people manager;
- (2) A member of the Human Resources Department;
- (3) A member of the People Relations Team;
- (4) The Business Integrity Office: Businessintegrity@westernunion.com; or
- (5) The Western Union Helpline: <https://westernunion.ethicspoint.com/> or 1-844-893-1078.

Any people manager who receives a Report or information about retaliation, observes behavior that may violate this Policy, or has any other reason to suspect that a violation of this Policy has occurred or is occurring, must immediately report the issue to:

- (1) A member of the Human Resources Department;
- (2) A member of the People Relations Team;
- (3) The Business Integrity Office: Businessintegrity@westernunion.com; or
- (4) The Western Union Helpline: <https://westernunion.ethicspoint.com/> or 1-844-893-1078.

People managers have an obligation to comply with this Policy; failure to do so may result in disciplinary action, up to and including termination.

In addition to the above, Reports may be submitted directly to internal, local reporting channels as detailed in the Annex "Regional Reporting Channels", where a single Western Union entity employs 50 employees or more.

REPORTING A CONCERN EXTERNALLY

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, a Reporter should not find it necessary to report externally and Western Union strongly encourages seeking advice from Western Union's Business Integrity Office or Human Resources before reporting a concern externally. However, Reporters remain free to report directly to external reporting authorities as permitted by applicable law and are not required to report internally first. Additionally, Reporters may have discussions about such Reports with an attorney or disclose such information to the extent required by law. See Annex for information on external authorities available for all European Union entities.

RESOLUTION PROCEDURES

Western Union will investigate Reports in a fair, timely, and objective manner as Western Union deems appropriate in accordance with local law. The Report will be processed by Western Union staff with sufficient authority and resources. In general, Western Union anticipates that the receipt of reports will be confirmed in writing within 7 days of receipt of the Report and that no later than 3 months after receiving the report, the internal investigation team will inform the Reporter of the status of the investigation.

Employees are expected to cooperate fully and confidentially in all investigations conducted pursuant to this Policy and to provide truthful and complete information. Both the Reporter and the subject of the Report, if any, will be permitted to provide information that may be relevant to the investigation. Western Union will also gather information and speak with witnesses, as necessary.

Reports under this Policy will be kept confidential to the extent it is practicable and permitted by law or regulation. All employees must maintain the confidentiality of investigations. Further, employees must not interfere with an investigation, attempt to influence another person's participation, or suggest potential consequences for providing information during an investigation. Employees who fail to comply with these procedures may be, to the extent permitted by applicable law, subject to disciplinary action, up to and including termination of employment.

At the conclusion of the investigation, Western Union will typically review its general findings with the Reporter to the extent permitted by law, and if appropriate or required by applicable law, the subject. If the investigation reveals that an employee has engaged in improper conduct, remedial or disciplinary action may be taken in accordance with applicable law.

ANTI-RETALIATION

Western Union prohibits retaliation against any Reporter, or facilitator (as defined by local law), who makes a good-faith Report with Western Union or with any government official or agency, alleging a potential violation of the Code of Conduct, policies and procedures, or any law or regulation, regardless of whether the Report is determined to be founded or unfounded following an investigation. Western Union further prohibits retaliation against any Reporter or witness who participates in any investigation.

Retaliation occurs when an employee takes an adverse action directly or indirectly against a Reporter or witness in a work-related context that causes them unjustified detriment. Examples of adverse actions include but are not limited to:

- (1) termination, demotion, suspension, or any form of discipline or corrective action;
- (2) failing to hire, rehire, or consider for promotion;
- (3) adversely impacting working conditions or otherwise denying any employment benefit;
- (4) creating a hostile, offensive, or intimidating work environment; and/or
- (5) threatening or intimidating a Reporter or witness.

Western Union prohibits retaliation against employees, workers, volunteers, interns, office holders, or whistleblowers (as defined by applicable local law) for filing good-faith Reports with any government official or agency, or for taking part in the investigation of such Reports.

CONSEQUENCES FOR RETALIATORY BEHAVIOR

Any employee found to have retaliated against someone who has made or facilitated a good-faith Report may be subject to disciplinary action, up to and including termination of employment, in accordance with applicable law.

RECORD KEEPING REQUIREMENTS

Any records under this Policy must be retained in accordance with The Western Union Company Information Governance Retention Schedule and applicable law.

ANNEX

“REGIONAL REPORTING CHANNELS”

Western Union encourages employees to submit reports to the Business Integrity Office through the Western Union Helpline or via email at businessintegrity@westernunion.com. Submitting Reports to the Business Integrity Office allows Western Union to fully utilize its dedicated resources for addressing, investigating, and responding to concerns in a comprehensive and efficient manner. If you would prefer your concern to be received and handled locally, the following local channels are also available:

AUSTRIA

For Western Union International Bank GmbH (WUIB) employees, Reports can be filed with Western Union in Austria using any of these methods:

- (1) Western Union’s local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. when asked which entity you would like to receive the report, select “Local Entity;”
- (2) Reports to the Austrian Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#));
- (3) Email the Regulatory Compliance Officer;
- (4) WUIB Management Board; or
- (5) WUIB Chairman of the Supervisory Board.

Reporters may report directly to external bodies defined by the Austrian Whistleblower Act. With regards to WUIB, the most relevant external bodies are:

- Austrian Financial Market authority: www.fma.gv.at
- Austrian Geldwaeschemeldestelle (FIU): A-FIU@bmi.gv.at
- Auditor Oversight Authority: <https://www.apab.gv.at/whistleblowerE>
- Financial Reporting Authority: <https://www.wko.at/site/bilanzbuchhaltung/start.html>

FRANCE

For Western Union Payment Services Ireland Limited (France Branch) employees, Reports can be filed with Western Union in France using any of these methods:

- (1) Western Union’s local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like

- to receive the report, select “Local Entity;” or
- (2) Reports to the French Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to the following external French agencies, in accordance with applicable law:

- Anti-Corruption Agency: <https://www.agence-francaise-anticorruption.gouv.fr/fr>
- Autorité de la concurrence (Competition Authority): <https://www.autoritedelaconcurrence.fr/fr>
- Autorité de contrôle resolution et de resolution (ACPR, Prudential Supervisory and Resolution Authority): <https://acpr.banque-france.fr/>
- Autorité des marchés financiers (AMF, Financial Markets Authority): <https://lautorite.qc.ca/grand-public>
- Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF, General Directorate for Competition, Consumer Affairs and Fraud Prevention): <https://www.economie.gouv.fr/dgccrf>

GERMANY

For Western Union Retail Services Germany GmbH employees, Reports can be filed with Western Union in Germany using any of these methods:

- (1) Western Union’s local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like to receive the report, select “Local Entity;” or
- (2) Reports to the German Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to the following external German agencies, in accordance with applicable law:

- Federal Office of Justice (Bundesamt für Justiz, BfJ, External Reporting Office): <https://www.bundesjustizamt.de>
- Federal Financial Supervisory Authority (BaFin): <https://www.bafin.de>
- Federal Cartel Office (Bundeskartellamt, Competition Authority): <https://www.bundeskartellamt.de>
- Federal Anti-Discrimination Agency (Antidiskriminierungsstelle des Bundes): <https://www.antidiskriminierungsstelle.de>
- Financial Intelligence Unit (FIU Germany): <https://www.zoll.de/fiu>

- Customs Authority, Financial Control of Undeclared Work (Finanzkontrolle Schwarzarbeit, FKS): <https://www.zoll.de>
- Federal Data Protection Commissioner (BfDI, Federal Commissioner for Data Protection and Freedom of Information): <https://www.bfdi.bund.de>

IRELAND

For Western Union Payment Services Ireland Limited employees, Reports can be filed with Western Union in Ireland using any of these methods:

- (1) Western Union's local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like to receive the report, select "Local Entity;" or
- (2) Reports to the Irish Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to external Irish agencies, such as the Office of the Protected Disclosures Commissioner using <https://www.opdc.ie/>.

ITALY

For Western Union Retail Services Italy S.r.l. and Maccorp Italiana S.r.l. employees, Reports can be filed with Western Union in Italy using any of these methods:

- (1) Western Union's local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like to receive the report, select "Local Entity;" or
- (2) Reports to the Italian Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to external Italian agencies, such as the National Anti-Corruption Authority using <https://www.anticorruzione.it/>.

LITHUANIA

For Western Union Processing Lithuania, UAB employees, Reports can be filed with Western Union in Lithuania using any of these methods:

- (1) Western Union's local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like to receive the report, select "Local Entity;" or

- (2) Reports to the Lithuanian Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to external Lithuanian agencies, such as the Prosecutor General's Office using <https://www.prokuraturos.lt/lt/praneseju-apsauga/5954>.

SPAIN

For Western Union Retail Services Spain S.A. employees, Reports can be filed with Western Union in Spain using any of these methods:

- (1) Western Union's local Business Integrity Ambassador using <https://westernunion.ethicspoint.com/>. When asked which entity you would like to receive the report, select "Local Entity;" or
- (2) Reports to the Spanish Business Integrity Ambassador may also be made in person, via mail, phone, or email ([List of Current Business Integrity Ambassadors](#)).

Reporters may report directly to external Spanish agencies, such as the Autoridad Independiente de Protección del Informante using <https://www.defensa.gob.es/ministerio/canal-interno/>.