



OUR GLOBAL COMMUNITY
OUR CODE OF CONDUCT



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At Western Union, we help people enjoy more prosperous and rewarding lives by giving them tools to live, connect, and do business around the world. To do that successfully, we need to maintain the trust of our employees, customers, partners, and communities. We earn that trust by operating with integrity.

This Code of Conduct provides guidance for how we conduct business. It explains how to incorporate our values – to be globally minded, purpose driven, and trustworthy and respectful – into our work.

Western Union's Shared Values

Purpose Driven

We fulfill our purpose by creating value for our consumers and businesses, connecting them through innovative products and services that facilitate global money movement.

Globally Minded

We embrace different cultures, our own and our customers'. We encourage diverse thinking, challenge the status quo to improve and grow our business, and promote a culture of equality and inclusion.

Trustworthy and Respectful

We earn trust by treating everyone with respect, both inside and outside of the workplace.

By following our Code, you are living our values and contributing to the integrity of our Company.

Taking Responsibility

As Western Union employees, we take full responsibility for our choices and actions. We respect each other, our customers, our community, and the law. No business goal or need should ever come before following our Code. Our Code is not just a statement for us to refer to on occasion; it speaks to how we act at all times.

Responsible Decision-Making

Before you act, ask yourself:

- *Could my action harm the Company, our customers, or the community?*
- *Would I be comfortable explaining my action to others?*
- *Does this feel like the right thing to do?*

If you are not sure, STOP and seek assistance from a [Speak Up Resource](#).

Compliance with our Code is a condition of employment. Our Code applies to all employees of The Western Union Company and its subsidiaries (Western Union or the Company), regardless of level or position. References to “we,” “us,” or “our” in the Code include each of us as employees of the Company. We do not grant waivers to our Code under any circumstances. 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, subject to applicable law.

Managers take responsibility and set an example for all team members in the way they apply our Code and model our values. Therefore, Western Union managers must:

- Conduct themselves in a way that reflects our commitment to integrity
- Routinely model and communicate our values
- Promote a culture of trust and respect
- Ensure their teams comply with this Code and other policies and procedures that apply to their jobs
- Maintain an “open door” policy where employees feel comfortable asking questions and expressing concerns
- Ensure that appropriate actions are taken to address raised concerns
- Escalate questions or concerns when appropriate
- Prohibit retaliation against any employee who raises concerns in good faith or cooperates with investigations



Our Speak Up Culture

Purpose-driven employees ask questions and raise concerns. It is our responsibility to Speak Up if we believe there are possible violations of our policies, our Code, or the law. While keeping quiet or looking away from a problem may seem easier, we must never ignore any issue that needs attention.

Western Union takes employee questions and concerns seriously. The Company is committed to answering questions, reviewing reported concerns and, when appropriate, conducting investigations.

Your manager or Human Resources should be your go-to Speak Up resource for most questions and concerns. Additional resources include the [People Services Portal](#) and the Ethics Office (wuethicshelpline.com or wuethics@westernunion.com).



The Ethics Helpline is a secure and confidential resource to report concerns or seek advice about ethics issues. Reports may be made anonymously from most countries.

The Helpline is administered by an independent third-party vendor, and reports are forwarded to the Ethics Office for review.

For more information or to make a report, go to: wuethicshelpline.com.



Investigating Concerns

When an employee raises an issue, the Company determines whether an investigation is appropriate. Subject to applicable law, we will make reasonable efforts to preserve confidentiality, including the identity of the person who reported the issue.

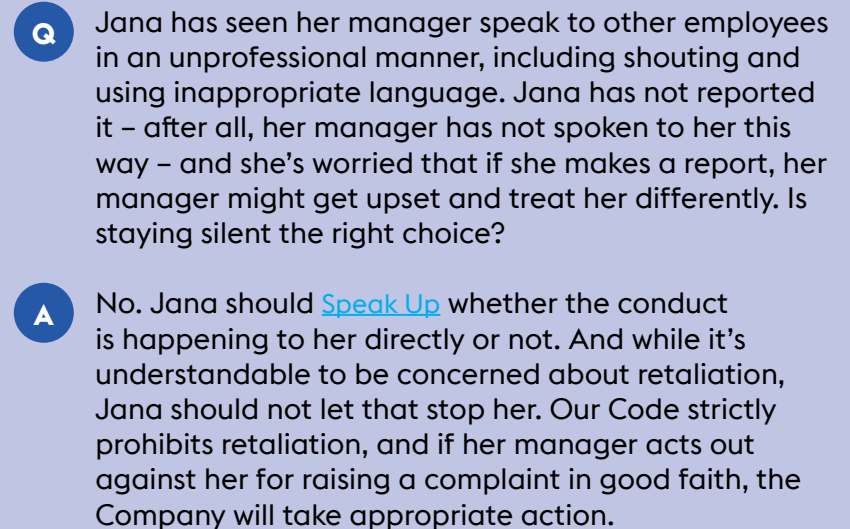
During an investigation, our responsibility as employees is to cooperate fully and provide truthful and complete information. We may also be required to maintain confidentiality to protect the integrity of the investigation. We must neither interfere with nor attempt to influence another person's participation in an investigation. At the same time, we must not knowingly make false accusations or reports.

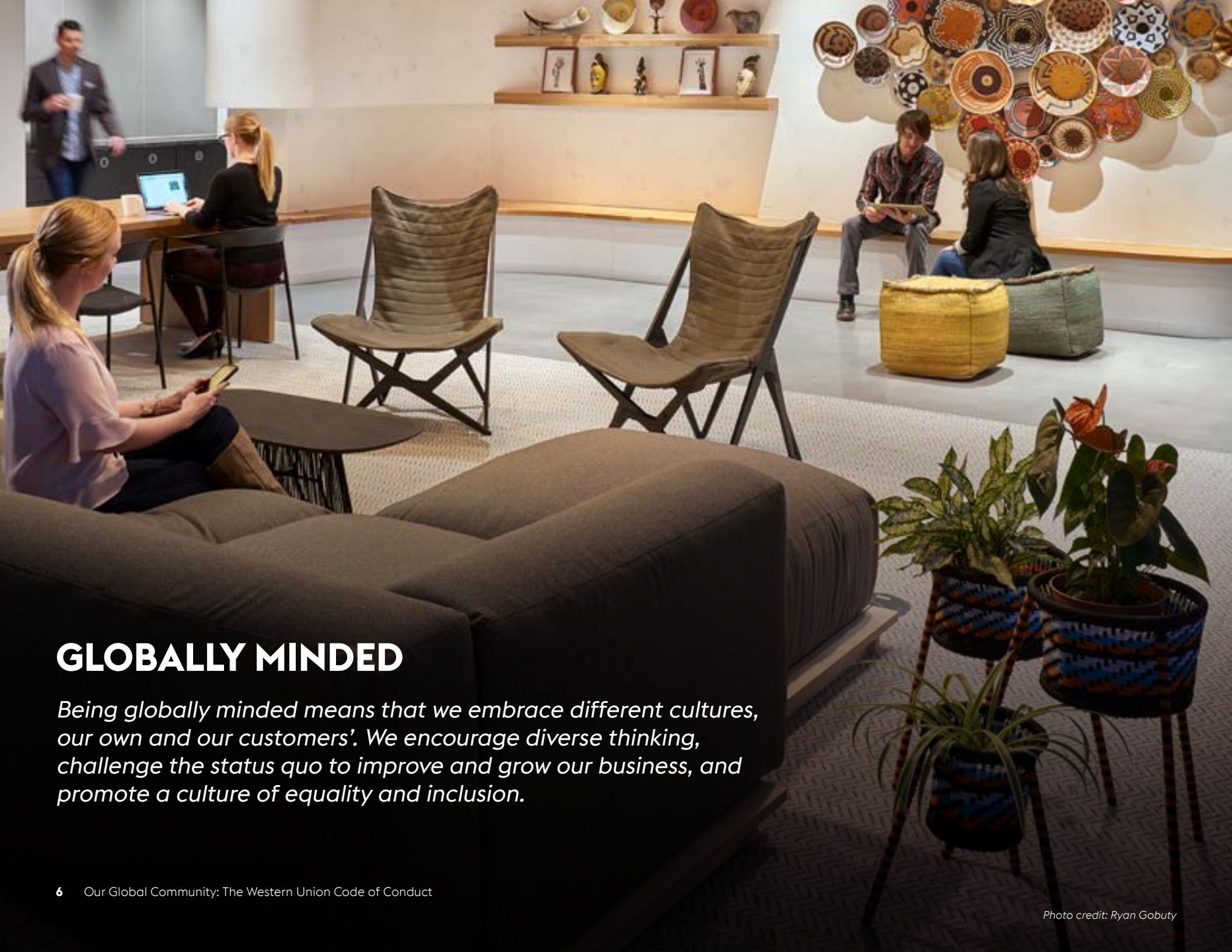
Concerns are referred to the appropriate internal resource, such as the Ethics Office or Employee Relations, for review and investigation as needed. The investigation process may include conducting witness interviews, reviewing relevant documentation, and consulting with subject matter experts. The [Western Union Ethics Office Investigation FAQs](#) also provide helpful information about the Ethics Office investigation process and are designed to help employees understand what to expect if they are involved in an investigation, subject to local law.

Based on the outcome of an investigation, employees who have engaged in improper conduct may face discipline, up to termination of employment. For privacy and confidentiality reasons, the information shared about the outcome of an investigation, including any actions taken, may be limited.

Retaliation Is Not Tolerated

Western Union does not tolerate retaliation against employees who ask questions, report concerns in good faith, or cooperate in investigations. If you believe you or others may be experiencing retaliation, you should notify your manager, Human Resources, the Ethics Office (wuethicshelpline.com or wuethics@westernunion.com), or the Ethics Helpline as soon as possible. Those who are found to have engaged in retaliation will face discipline, up to and including termination of employment, subject to applicable law.

- 
- Q** Jana has seen her manager speak to other employees in an unprofessional manner, including shouting and using inappropriate language. Jana has not reported it – after all, her manager has not spoken to her this way – and she's worried that if she makes a report, her manager might get upset and treat her differently. Is staying silent the right choice?
- A** No. Jana should [Speak Up](#) whether the conduct is happening to her directly or not. And while it's understandable to be concerned about retaliation, Jana should not let that stop her. Our Code strictly prohibits retaliation, and if her manager acts out against her for raising a complaint in good faith, the Company will take appropriate action.



GLOBALLY MINDED

Being globally minded means that we embrace different cultures, our own and our customers'. We encourage diverse thinking, challenge the status quo to improve and grow our business, and promote a culture of equality and inclusion.

02

Our Responsibility to Each Other



At Western Union, we recognize the strategic importance of supporting diversity, equity, and inclusion in our workforce, and we are dedicated to creating environments and opportunities for *all* of our people to be their best, most authentic selves.

Respecting One Another

At Western Union, we value being **trustworthy and respectful**. We live those values by working with integrity and by respecting the dignity, privacy, and personal rights of all. We are committed to treating everyone fairly and with respect and consideration.

We value diversity, equity, and inclusion. We make efforts to identify and reduce the influence of our implicit biases, and we judge others on their merits, not their differences or personal characteristics. We provide opportunities based on knowledge, skills, abilities, and contributions. We encourage all employees to bring their true selves to work.

At Western Union, we recognize the strategic importance of supporting diversity, equity, and inclusion in our workforce

Building Connections

When dealing with others, ask yourself:

- *Am I communicating and acting respectfully?*
- *How might my words and actions reflect on me, my team, and Western Union?*
- *If others could see and hear me right now, what would they think?*

We must work to maintain an environment where our values of trust and respect are our guides. Language or conduct that is offensive, bullying, intimidating, unprofessional, or abusive is never acceptable.



Preventing Discrimination and Harassment

Our success is steeped in our commitment to diversity, equity, and inclusion. We do not discriminate on the basis of race, 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 or veteran status, genetic information and protected medical condition, or any other category protected by law.

We do not engage in harassment. Any kind of written, spoken, physical, emotional, or sexual harassment – including offensive comments, obscene gestures, bullying, retaliation, unwelcome advances, unwanted touching, and sexual requests – is strictly prohibited. This includes behavior that the actor may believe is harmless. These behaviors are prohibited whether they occur at a business location, at a Company-sponsored off-site activity, or at another off-site location that has a workplace connection.

In addition, we do not ignore our concerns about possible discrimination or harassment happening around us. If we see something, we [Speak Up](#).

Harassment can include:

- Using a degrading nickname
- Telling offensive jokes
- Distributing objectionable emails, pictures, or other materials
- Pressuring a fellow employee to have an unwanted social or romantic relationship
- Transmitting unwanted explicit messages or content over social media or other digital media

Q Luis, a hiring manager, is interviewing applicants for his department. He discovers that one candidate is a single parent. Travel is required for the position, and Luis is worried that someone with family responsibilities will not be successful. Should he remove the candidate from consideration?

A No. To disqualify the candidate because of their marital status would be discrimination. Luis should consider only the candidate's knowledge, skills, and abilities as they relate to the requirements for the position.

Q Natalia, Daniel, and Omari work together on a customer care team. Natalia often makes fun of Daniel's accent during virtual team meetings. Omari senses that it bothers Daniel, but when he questions Natalia about it, she insists it is harmless and "all in good fun." What should Omari do?

A Omari could talk to Natalia and ask her to stop. He could also talk to his manager, Human Resources, Employee Relations, or the Ethics Office (wuethicshelpline.com or wuethics@westernunion.com). The one thing Omari should not do is ignore the situation. What seems like a joke to one person may feel like harassment to another, and we all have an obligation to ensure that our co-workers are treated with dignity and respect.

Protecting Employee Privacy

We keep the personal data of our colleagues confidential.

Personal data includes:

Personnel Files • Medical Records • Financial Records • Background Checks • Other Sensitive Information

When we gather such data, we must ensure that the appropriate physical, administrative, and technical protections are in place. Access should be limited to those who have both a legitimate business purpose and authorization granted by the Company.



Policies: Our Global Privacy and Information Governance Policies, including The Western Union Company Global Privacy Policy, are available on [WULife](#) and in [SIMON Onspring](#) through Okta.



Contact Resources: [Privacy and Data Governance](#) group in Legal, Compliance, and Enterprise Risk

Q

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

A

Andrea should return the documents to Human Resources and report the discovery to the [Privacy and Data Governance](#) group. She should keep confidential any information she saw and not share it with anyone else.

Working Safely

Safe workplaces have been proven to reduce business costs, increase productivity, and boost employee satisfaction. We follow all of Western Union's safety policies and procedures so we can focus on building connections with our customers.

Whether we are working onsite or remotely, 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 other Company policies.

Western Union does not tolerate any type of workplace violence. Employees are prohibited from making threats, intimidating others, bringing weapons onto Company premises, or engaging in threatening or violent activities.



Policies: [Global Policy Against Workplace Violence](#)

Remember

- ✓ Only perform work for which you are trained, fit, and competent.
- ✓ Stay alert for hazards and report them if you find them.
- ✓ Report all accidents and injuries.

03

Our Responsibility to Our Customers



Through innovation and collaboration, we strive to empower our customers as they pursue opportunities near and far. No matter who or where they are, we go the extra mile to meet their needs.

Treating Customers Fairly

We treat our customers with consideration and respect regardless of who they are or the amount of business they do with us. We meet customer needs fairly.

Remember

- ✓ Make honest representations.
- ✓ Follow through on your commitments.
- ✓ Take customer concerns and complaints seriously and address them promptly.

Through innovation and collaboration, we strive to empower our customers as they pursue opportunities near and far.



Protecting Customer Privacy

To maintain the trust of our customers, we must ensure that we do the right thing with their data. We collect, use, store, and share customer information for legitimate business purposes only. We use appropriate physical, administrative, and technical safeguards to protect customer data in compliance with our policies and applicable law. We promptly [Speak Up](#) if we know or believe any unauthorized access, use, or loss of customer information has occurred.



Policies: Our Global Privacy and Information Governance and Corporate Information Security Policies can be found by accessing [SIMON Onspring](#) through Okta or on [WULife](#), including:

- The Western Union Company Global Privacy Policy
- Information Classification and Sharing Policy
- Acceptable Use Policy
- Authentication Policy



Contact Resources: Cyber Security group | [Privacy and Data Governance](#) group in Legal, Compliance, and Enterprise Risk

Q

Alex has just started in a new role and wants to learn as much as possible to help serve customers. She's planning to do some work over the weekend, and she decides to transfer customer data onto her personal computer. Is this OK?

A

No. Despite Alex's good intentions, she should not download customer information to devices that are not Company owned.

Remember

- ✓ Protect and regularly change passwords consistent with Western Union's information security policies.
- ✓ Access customer data only by using Company-owned devices and systems that have appropriate safeguards.
- ✓ Appropriately classify documents that contain any customer data.
- ✓ Never use customer information for personal reasons.
- ✓ Follow applicable document retention schedules.

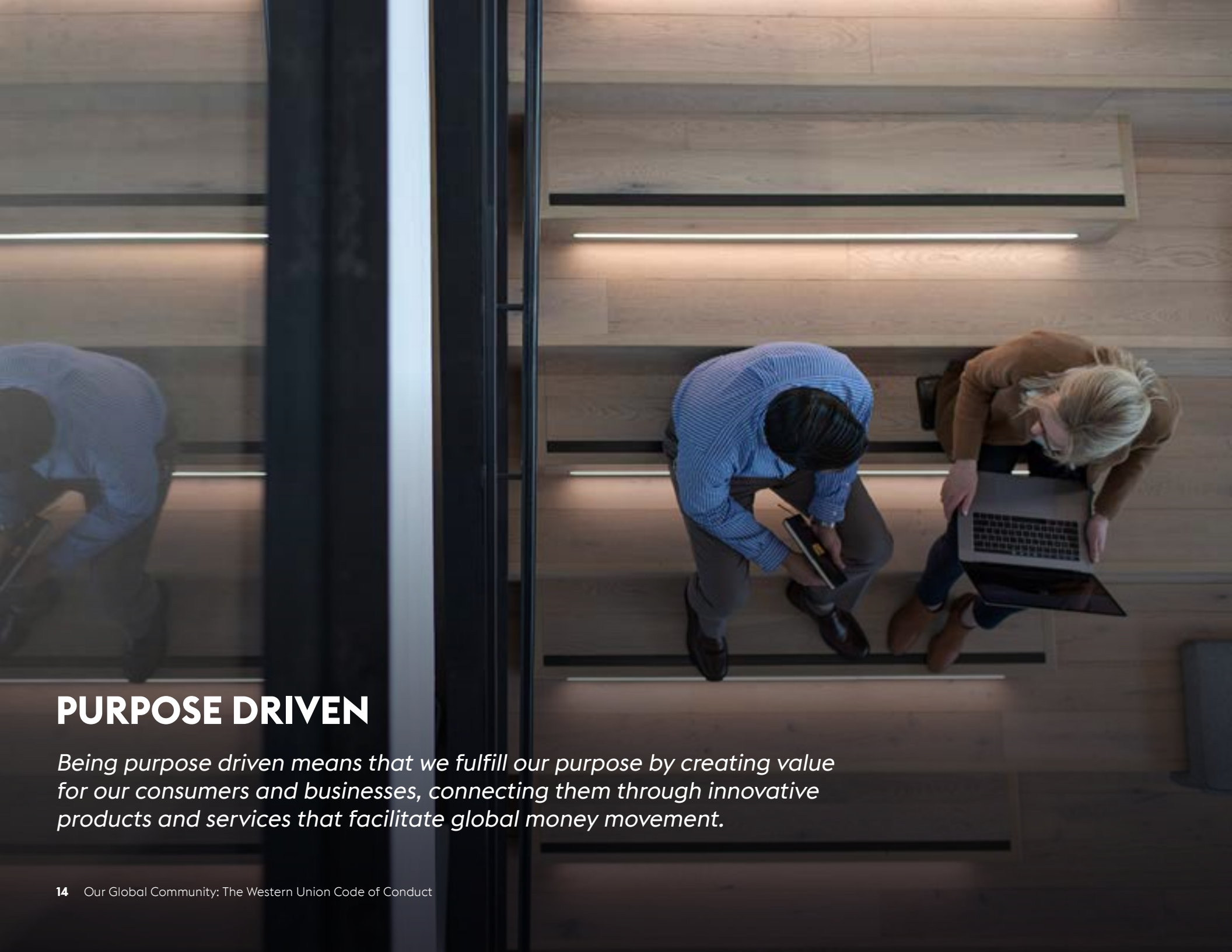
Marketing and Advertising Honestly

We do not engage in unfair, deceptive, or abusive acts or practices. Our sales, advertising, promotion, and other marketing materials must accurately describe our offers and products. We do not misstate, exaggerate, or mislead in our claims. Our marketing efforts should also reflect our goals for inclusion and representation.

Honesty allows us to maintain the trust we have built with our customers.

We comply with Company policies and marketing guidelines, and we submit materials for legal review as appropriate. We hold our agents, suppliers, vendors, and marketing agencies to the same standards.

We respect the marketing preferences expressed by our customers.



PURPOSE DRIVEN

Being purpose driven means that we fulfill our purpose by creating value for our consumers and businesses, connecting them through innovative products and services that facilitate global money movement.

04

Our Responsibility to Our Communities



Western Union is committed to operating ethically and doing business the right way. We take our commitments to the communities we serve seriously, and we act responsibly, with the future in mind.

Preventing Bribery and Corruption

Bribery and corrupt business practices undermine public trust, hamper growth, and ultimately raise the cost of doing business. We prohibit any activity that would violate applicable anti-bribery and anti-corruption laws, as well as any activities that could create the appearance of impropriety.

We never accept anything of value from or provide anything of value to commercial partners or government officials to gain or retain business, secure a business advantage, or otherwise influence their acts or decisions.

This practice also applies to anyone representing Western Union, including agents, business partners, and other third parties. If we believe a violation has occurred, or if we are asked to make any improper payments, we should [Speak Up](#) immediately. This applies even to small payments (known as “facilitation payments”) given to government officials to help facilitate or speed up a routine process.

Be sure to [Speak Up](#) if you have any questions about a transaction, expense, or relationship, or if you have concerns at all about corruption and bribery. You can contact the Anti-Corruption Office with any questions or concerns.



“Anything of value” can include payments, donations, loans, gifts, favors, entertainment, and opportunities.



Policies: [Gift and Hospitality Guide](#) | [Global Anti-Corruption Policy](#)



Contact Resources: Anti-Corruption Office (Anti-corruption@westernunion.com)

Remember

- ✓ Familiarize yourself with Western Union’s gift and entertainment policies, and seek approval from the Anti-Corruption Office before providing gifts, travel, or entertainment to government officials.
- ✓ Maintain transparent relationships with government officials and business partners.
- ✓ Keep accurate and complete records of all business expenses.



Sean is currently in tense negotiations with the vice president of a state-owned company that’s a prospective business partner. The potential partnership could be a major revenue generator for Western Union and a big win for Sean’s career if he can close the deal. The vice president mentions that his daughter is an outstanding student at a prestigious local university and that a summer internship for her at Western Union would be “a great gesture to help finalize negotiations.” Is it appropriate to offer the vice president’s daughter an internship?



No. A bribe is the offer or giving of anything of value to prompt a government official or other party to provide an improper business advantage. The offer of an internship to the vice president’s daughter in these circumstances may be viewed as a bribe to a government official. Sean should report the vice president’s request to the Anti-Corruption Office.

Giving and Receiving Gifts and Entertainment

Building strong working relationships with agents, suppliers, and customers sometimes includes exchanging gifts. Giving and receiving moderate and reasonable gifts and entertainment is acceptable, subject to Company policies. However, we must exercise good judgment to avoid the appearance of impropriety and to ensure that our ability to make good business decisions has not been compromised.



Policies: [Gift and Hospitality Guide](#) | [Conflict of Interest Policy](#) | [Travel, Gift, and Entertainment Policy](#) | [Global Anti-Corruption Policy](#)



Contact Resources: Anti-Corruption Office (Anti-corruption@westernunion.com)

Q

A vendor who works with Carter has offered him two tickets to a professional football game. The vendor cannot attend and suggests that Carter bring a friend. Carter knows that the value of the tickets is more than the equivalent of US \$100. Can he accept them?

A

No, he cannot accept the tickets for two reasons: the vendor is not attending the game, and the value of the tickets exceeds the dollar limit outlined in our Travel, Gift, and Entertainment Policy. If the vendor were going to the game with Carter, the tickets might be acceptable as business entertainment, but due to their high value, Carter still could not attend unless he received approval from his supervisor and the Anti-Corruption Office.

Remember when gifting

- ✓ Give gifts and entertainment only if allowed by both Western Union's policy *and* the recipient's policy.
- ✓ Obtain your manager's approval before providing gifts and entertainment.
- ✓ Do not give cash or cash equivalents (such as gift cards).
- ✓ Never give gifts and entertainment in an effort to improperly influence others.
- ✓ Never give anything that could be perceived as a kickback or bribe.
- ✓ Obtain written approval from the Anti-Corruption Office before offering or giving anything of value to a government official. If you are unsure of whether the recipient is a government official, contact the Anti-Corruption Office or review the Global Anti-Corruption Policy.
- ✓ Do not personally pay for gifts and entertainment in order to avoid reporting them.
- ✓ Keep accurate and complete records of all gifts and entertainment expenses.

Remember when receiving gifts

- ✓ Do not accept gifts and entertainment if they could create the appearance that your judgment has been compromised.
- ✓ Do not accept gifts and entertainment from a third party that is currently in negotiations with Western Union.
- ✓ Do not accept cash or cash equivalents (such as gift cards).
- ✓ If you cannot accept a gift but worry that refusing it might damage the business relationship, contact the Anti-Corruption Office. You may be able to accept then donate the gift to the Western Union Foundation.
- ✓ Follow the reporting requirements summarized in the chart below.

Receiving Gifts and Entertainment	
Value of Gift/Entertainment (USD Equivalent)	Must Report and Receive Approval From
Less than \$100	Supervisor
\$100 – \$250	Supervisor and the Anti-Corruption Office
More than \$250	Not acceptable without written approval of the Anti-Corruption Office



Building strong working relationships with agents, suppliers, and customers sometimes includes exchanging gifts.

Competing Fairly

Fair and honest competition benefits customers. When we compete as a business, we use legal methods to gather information about the market, and we never seek to gain an unfair advantage over our competitors.

When to contact Legal, Compliance, and Enterprise Risk:

- Before meeting or entering into agreements with competitors
- Before bundling services that require a customer to buy one service or product to obtain another
- If you become aware of efforts to “control” markets
- If you have information about a competitor that might be considered confidential or proprietary
- When required by the [Antitrust and Fair Competition Policy](#)



Policies: [Antitrust and Fair Competition Policy](#)



Contact Resources: Legal, Compliance, and Enterprise Risk

Q

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

A

No. Milena should not attend without first getting approval from Legal, Compliance, and Enterprise Risk. Meetings with competitors, no matter how well intended, can create situations that violate our policies, our Code, or the law.

Remember

- ✓ Learn and follow all fair competition laws and policies.
- ✓ Do not make any formal or informal agreements with competitors on bids, contracts, pricing, territories, or markets.
- ✓ Only use legal methods to gather market information, including using publicly available company and industry information.
- ✓ Be mindful when speaking to competitors, and do not discuss the business or business opportunities with them without the approval of Legal, Compliance, and Enterprise Risk.
- ✓ Immediately report any conversations, proposals, or agreements with competitors to your manager and Legal, Compliance, and Enterprise Risk.



Combating Money Laundering

The actions we take to prevent illicit activity and the misuse of our systems protect our customers, partners, and communities. We comply with all applicable policies, laws, and regulations enacted to combat money laundering, consumer fraud, and terrorist financing.

Our Global Compliance program focuses on detecting and disrupting illicit activity. We have an experienced team of compliance professionals around the world to assist us if we have questions or concerns regarding a money-laundering, consumer-fraud, or terrorist-financing risk.



Money laundering is the process of hiding the illegal source of income or assets to make them appear legitimate.



Terrorist financing is the use of assets to fund or otherwise support terrorist activities.



Policies: [Global Anti-Money Laundering and Counter Terrorist Financing Policy](#)



Contact Resources: Legal, Compliance, and Enterprise Risk

The actions we take to prevent illicit activity and the misuse of our systems protect our customers, partners, and communities.



Signs of money laundering or other illegal activity may include:

- A customer who lacks identification or provides vague or fictitious information
- An unusual transaction with 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 who has numerous small incoming transactions followed by a large outgoing transaction
- Substantial transaction activity over a short period of time
- A customer who is in a hurry to complete a transaction
- A customer who changes the source of funds at the last minute
- Transactions involving recently created legal entities
- Transactions that involve cash and are just below the reporting or identification limits

Complying with Trade Law

Being globally minded means we comply with applicable economic and trade sanctions designed to support national and international security, policy, and human rights interests.

As an entity headquartered and incorporated in the U.S., Western Union fully complies with U.S. economic sanctions and embargoes that restrict doing business with various countries, regions, groups, entities, and individuals.

We screen transaction, client, and other data, and we take 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 must alert the Global Compliance group.

Trade laws can be very complex and can change frequently. We should not hesitate to [Speak Up](#) if we have any questions or concerns.



Policies: [Global Sanctions Policy and Compliance Program Statement](#)



Contact Resources: Legal, Compliance, and Enterprise Risk



Engaging in Political Activities

Western Union employees are encouraged to engage in the political process, as long as they make it clear that support for a political cause or candidate is their own and does not reflect the position of Western Union. In addition, political participation must not take place on work time or in Company facilities unless such participation is done in coordination with the Global Public Policy group to advance the Company's interests.

As a responsible and engaged corporate citizen, Western Union may occasionally support political candidates, speak out on public issues, or otherwise engage on public policy matters. The Global Public Policy group is responsible for formulating strategies and allocating funds in this area. Under no circumstances should corporate funds be used to support political candidates without prior approval from the Global Public Policy group.



Contact Resources: Global Public Policy group in Legal, Compliance, and Enterprise Risk

Observing Government Regulations

Western Union cooperates with reasonable and appropriate requests for information from government agencies, including investigations of Company activities. We never mislead an investigator or other government regulatory official or otherwise attempt to obstruct the collection of information legally requested by properly authorized officials. When cooperating with government requests, we maintain the privacy of our customers to the greatest extent possible.

We contact Legal, Compliance, and Enterprise Risk before responding to any non-routine government inquiries, inspections, subpoenas, or requests. Any request for a significant volume of data or for information that is not related to a specific investigation or purpose should be considered non-routine.



Contact Resources: Legal, Compliance, and Enterprise Risk

Western Union cooperates with reasonable and appropriate requests for information from government agencies, including investigations of Company activities.

Supporting Human Rights

Guided by internationally recognized standards, such as the Universal Declaration of Human Rights, we are committed to respecting and promoting human rights, and we expect our partners to do the same. This commitment benefits both our employees and the global communities in which we operate.

We condemn human rights abuses and work to disrupt human trafficking, human smuggling, or any form of modern slavery. We do not use forced or involuntary labor and prohibit it in every part of our business and supply chains. We observe applicable local, state, and national laws regarding the employment of minors.

Western Union expects our suppliers, vendors, agents, and other business partners to share these values.



Policies: [Modern Slavery and Human Trafficking Statement](#)



Contact Resources: Legal, Compliance, and Enterprise Risk



Protecting Our Environment

We are committed to acting responsibly to protect the environment and minimize our footprint. Throughout the organization, we encourage best practices in waste reduction, water conservation, and environmental awareness.

Everyday Actions

- Recycle and reduce waste.
- Maximize energy efficiency and consume fewer resources.
- Utilize video conferencing to lessen dependence on business travel.
- Ask yourself how you could do daily tasks in a more sustainable manner.



Policies: [Environmental, Social, and Governance Reports](#)

Western Union Foundation

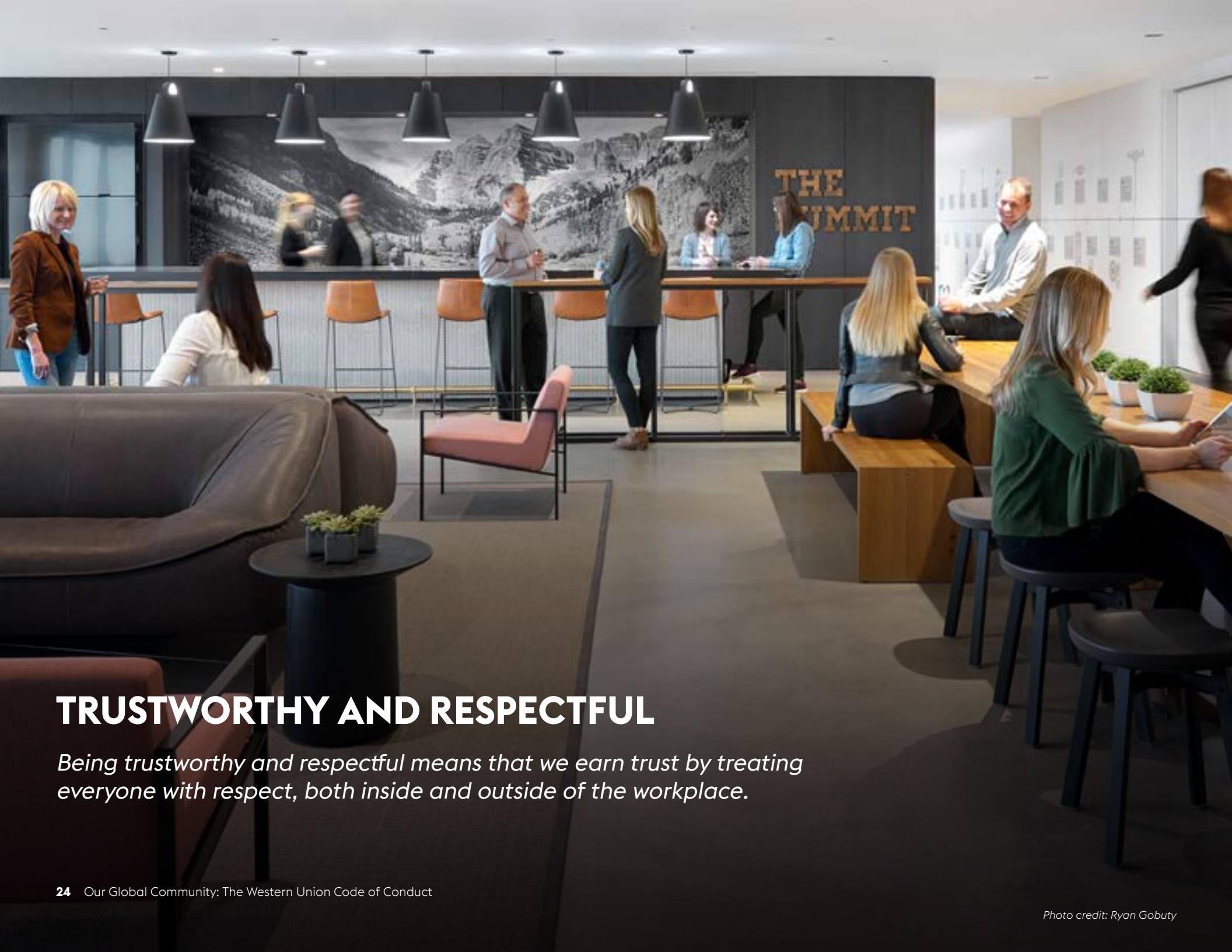
The Western Union Foundation believes education is the surest pathway to economic opportunity. The Foundation collaborates with nonprofits around the world to empower forcibly displaced and marginalized youth by providing them with the training and education needed to succeed in today's technology-driven global economy. The Foundation also provides funding to communities in crisis due to natural disasters – a key reason for forced migration – through disaster relief and other humanitarian efforts.



For more information, visit: foundation.westernunion.com



Contact Resources: The Western Union Foundation
(wufoundation@westernunion.com)



TRUSTWORTHY AND RESPECTFUL

Being trustworthy and respectful means that we earn trust by treating everyone with respect, both inside and outside of the workplace.

05

Our Responsibility to Western Union



Ethical employees are the bedrock of Western Union. When you act with integrity, you lay the foundation for who we are and how we do business.

Managing Conflicts of Interest

A conflict of interest occurs when an employee's personal interests interfere, or appear to interfere, with the interests of the Company or with the employee's duties or obligations to the Company. Conflicts of interest can make it difficult for us to perform our jobs objectively and effectively. We do not allow our personal interests or relationships to affect our purpose-driven business decisions.

A conflict of interest occurs when an employee's personal interests interfere, or appear to interfere, with the interests of the Company or with the employee's duties or obligations to the Company.

We handle conflicts of interest appropriately. This includes avoiding conflicts where possible, disclosing conflicts that arise, and seeking approval when required.

Conflicts of interest can often be managed, but they *must* be disclosed in advance.

It is important to note that even the appearance of a conflict of interest can be detrimental to the Company and to the reputation of the individual, so be sure to ask questions and disclose any and all potential conflicts.



Policies: [Conflicts of Interest Policy](#)



Contact Resources: Ethics Office ([wuethicshelpline.com](https://www.wuethicshelpline.com) or wuethics@westernunion.com) | Anti-Corruption Office (Anti-corruption@westernunion.com)



Remember

- ✓ Deal with customers and third parties fairly and without seeking any personal advantage.
- ✓ Disclose significant personal relationships as required in our Conflicts of Interest Policy, including those that you have with potential business partners or vendors that you interact with or could potentially interact with professionally.
- ✓ Avoid significant personal relationships with employees who are in your reporting line or who are in a position to influence your employment activities.
- ✓ Follow our talent acquisition process and disclose any significant personal relationships with candidates for employment, if you wish to recommend them for hiring.
- ✓ Get approval before accepting a gift, entertainment, or other benefit from a third party.
- ✓ Do not use Company time, assets, or other resources for personal reasons beyond reasonable limited personal use without receiving approval from your supervisor.
- ✓ Get approval before taking on secondary employment, leadership roles, or financial interests in other organizations as explained in our Conflicts of Interest Policy.

Q Priya's significant other is a building contractor who is planning on bidding on an upcoming project for our Company. Since Priya is not married to this person, does she still need to disclose the relationship?

A Yes, significant personal relationships as defined in our Conflicts of Interest Policy must be disclosed. Before the bid is submitted, Priya should report the relationship to the Ethics Office (wuethicshelpline.com or wuethics@westernunion.com) and to the Global Sourcing and Procurement group.

Q Rachel and Sam are in a significant dating relationship and work at the same Western Union location in different departments. Rachel has been notified that her division is being restructured and in the coming weeks her role will become a senior manager position. Sam's supervisor will become one of Rachel's direct reports after the reorganization becomes effective. What are Rachel's and Sam's obligations under the Conflicts of Interest Policy?

A Under this policy, Rachel and Sam cannot be in a direct or indirect supervisor/subordinate relationship. Because they have an ongoing disclosure obligation under our Conflicts of Interest Policy, Rachel and Sam will now need to disclose their dating relationship to their supervisors, who will help determine next steps to ensure that Sam is not in Rachel's chain of command when the change becomes effective.

Working with Third Parties

Our business relationships are built on our shared values. The agents, suppliers, and third parties we work with must be trustworthy and share our respect for ethics and the law.

When purchasing, we follow our Global Sourcing and Procurement Policy to ensure we obtain quality products and services at a competitive price.



Policies: [Global Sourcing and Procurement \(GSP\) Policy](#) | [Travel, Gift, and Entertainment Policy](#) | [Conflicts of Interest Policy](#)



Contact Resources: [Global Sourcing and Procurement group](#)



Remember

- ✓ Follow our procurement policies to ensure vendor selection occurs fairly.
- ✓ Avoid conflicts of interest that could affect your ability to make impartial business decisions.
- ✓ Do not knowingly allow a third party to perform any act prohibited by our policies, our Code, or the law.
- ✓ [Speak Up](#) if you experience or hear about any concerning actions taken by a third-party provider.

Q

Mateo needs to engage a new vendor. He knows of a great company that he worked with at a previous job. Since he has experience with this vendor, can he skip the usual procurement steps and hire them immediately?

A

No. Mateo must follow our procurement policies to ensure vendor selection processes are fair and objective.

Protecting Western Union Property

Because we need Western Union's property to properly conduct business, we must protect it from loss or misuse. Western Union property includes tangible items, such as tools, materials, supplies, furniture, fixtures, equipment, and electronics, as well as intellectual property.

We are responsible for preventing and reporting any damage, misuse, abuse, waste, or theft of Western Union property. We do not remove, sell, or dispose of Company property without prior approval. When we end our employment with the Company, we return all Western Union property, including equipment, records, and documents.

We respect the intellectual property rights of the Company and of third parties. We refrain from using any other entity's copyrighted works (for example, software), inventions, or trade secrets without proper licensing or authorization. We never use, publish, disclose, or transmit Western Union intellectual property without prior approval from the Intellectual Property group.



Policies: Our Acceptable Use Policy is available in [SIMON Onspring](#) through Okta.



Contact Resources: [Human Resources](#) | Technology, Intellectual Property, Procurement, and Real Estate group in Legal, Compliance, and Enterprise Risk | [Privacy and Data Governance](#) group in Legal, Compliance, and Enterprise Risk



Fatima 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 customer emails that she plans to use to contact prospective clients. Is this OK?



No. Even after she leaves the Company, Fatima has an ongoing obligation to respect (and not misuse) Western Union's intellectual property, including customer lists.



Intellectual property includes trademarks (including domain names), patents, copyrights, publicity rights, trade secrets, and other proprietary information.



A **trade secret** is any information that is valuable to the Company and is not known outside of the Company. Examples of trade secrets include customer lists, agent contracts, agent commissions, sales reports, profit data, strategic plans, and business plans; confidential information regarding mergers, acquisitions, or changes in Company structure; and any technology, processes, or systems.

Protecting Confidential Information

The inappropriate release of confidential or sensitive information can damage our Company, our business partnerships, and our ability to effectively compete in the market. Therefore, it is essential that we protect the information to which we have access.

Our obligation to preserve Western Union's confidential information continues both during and after our employment with the Company.



Policies: Our Global Privacy and Information Governance Policies are available in [SIMON Onspring](#) through Okta and on [WULife](#).



Contact Resources: Technology, Intellectual Property, Procurement, and Real Estate group in Legal, Compliance, and Enterprise Risk | Cyber Security group | [Privacy and Data Governance](#) group in Legal, Compliance, and Enterprise Risk

The inappropriate release of confidential or sensitive information can damage our Company, our business partnerships, and our ability to effectively compete in the market.

Remember

- ✓ Ensure that any confidential information you handle in your role is protected.
- ✓ Use appropriate trademark and copyright notices to protect our assets.
- ✓ Do not give confidential information to customers or third parties unless the disclosure is properly authorized.
- ✓ Abide by any confidentiality agreements you made with Western Union or other companies, including former employers.
- ✓ Do not share confidential information or intellectual property inappropriately.
- ✓ Seek help to manage requests for confidential information.





Preventing Insider Trading

We do not use or disclose to others (through “tipping”) any material nonpublic information about Western Union or about any other company for the purpose of buying or selling stock.

Material nonpublic information includes any information that has not been made public for at least one trading day and that a reasonable investor would consider important to know if he or she were trading securities.

Do not share with anyone pending financial information or information about mergers or acquisitions, changes in leadership, product or marketing plans, or other significant business transactions that are nonpublic. In addition, do not purchase or sell stock while in possession of such information. To do so would violate our Code, our policies, and the law.



Policies: [Insider Trading Policies](#)



Contact Resources: Corporate Governance group in Legal, Compliance, and Enterprise Risk

We do not use or disclose to others (through “tipping”) any material nonpublic information about Western Union or about any other company for the purpose of buying or selling stock.

Keeping Accurate Records

We keep accurate, complete, and up-to-date records, documents, and electronic information in a manner that is consistent with our established procedures and any applicable laws.

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



Policies: [Global Anti-Corruption Policy](#) | [Travel, Gift, and Entertainment Policy](#)

Our Global Privacy and Information Governance Policies can be found by accessing [SIMON Onspring](#) through Okta and on [WULife](#), including:

- The Western Union Company Global Privacy Policy
- Information Classification and Sharing Policy
- The Western Union Company Information Governance Retention Schedule



Contact Resources: Internal Audit | Anti-Corruption Office (Anti-corruption@westernunion.com)



Jiang is reviewing a vendor invoice with a single line item: “Marketing Services and Related Expenses.” Jiang investigates and learns that although the vendor was properly onboarded, the services actually performed involved obtaining a permit for a Western Union office. Should Jiang approve the payment and record the expense as described in the invoice?



No. Western Union must maintain books and records that accurately reflect the true nature of a transaction. False or misleading services descriptions in invoices may indicate that improper activity has taken place. Although the vendor met onboarding requirements, Jiang should understand why Western Union is being billed for services that do not accurately describe the true nature of the vendor engagement. If Jiang is unable to get clarity, he should refer the matter to the Anti-Corruption Office.

Remember

- ✓ Be familiar with the record-keeping and record retention procedures that apply to your role.
- ✓ Do not enter false or inaccurate information into any record, including expense reports and time sheets.
- ✓ Do not conceal any mistakes or errors or otherwise tamper with records.
- ✓ Promptly report any mistakes to your manager.

Communicating Appropriately

At Western Union, we are transparent, honest, and accurate in our communications with each other – and in our communications outside of the Company. You should never speak for the Company unless authorized to do so.

Company records and communications using Company platforms (such as email and instant messages), or other electronic communications must be professional and appropriate.

Communications and Investor Relations are responsible for communicating with the public. These groups ensure requests for information are handled properly and consistently. If the media, investors, analysts, or other third parties contact you for an interview or ask you for comments, you should refer those requests to Communications or Investor Relations.

Presentations and other formal communications with third parties should be reviewed and approved by the Communications, Investor Relations and Global Public Policy groups to avoid improper disclosures or damage to the reputation of the Company.

Social media is a valuable tool that must be used carefully. Be sure to show good judgment, honor Western Union's shared values, and know that what you post online or on social media is permanent.



Policies: [Corporate Media Policy and Procedures](#) | [Social Media Guidelines](#) | [Release of Financial Information Policy](#) | [Contact with Financial and Industry Analysts Policy](#)



Contact Resources: Communications group | Investor Relations group | Global Public Policy group

Remember when using social media

- ✓ Before posting, review our Social Media Guidelines, then carefully consider the potential impact of your words and whether your post is consistent with our Code and our values.
- ✓ Do not speak for, or appear to speak for, the Company unless specifically authorized to do so.
- ✓ Do not reveal proprietary, confidential, restricted, or material nonpublic information.
- ✓ When in doubt, do not post.



Protecting Western Union Data

We keep Company data and information systems secure. We comply with our information security policies to avoid data security breaches and ensure that Company data is used only for its intended purposes.



Policies: Our Global Privacy and Information Governance and Corporate Information Security Policies can be found by accessing [SIMON Onspring](#) through Okta or on [WULife](#), including:

- The Western Union Company Global Privacy Policy
- Information Classification and Sharing Policy
- Acceptable Use Policy
- Authentication Policy



Contact Resources: [Privacy and Data Governance](#) group in Legal, Compliance, and Enterprise Risk, Cyber Security group

We keep Company data and information systems secure. We comply with our information security policies to avoid data security breaches and ensure that Company data is used only for its intended purposes.

Remember

- ✓ Keep passwords secure and do not share them.
- ✓ Do not download software or applications without permission.
- ✓ Lock Company devices and computers when unattended.
- ✓ Secure sensitive information upon leaving your workspace.
- ✓ Do not send confidential data to external parties without first getting the proper approvals.
- ✓ Only provide access to systems as required for the job.



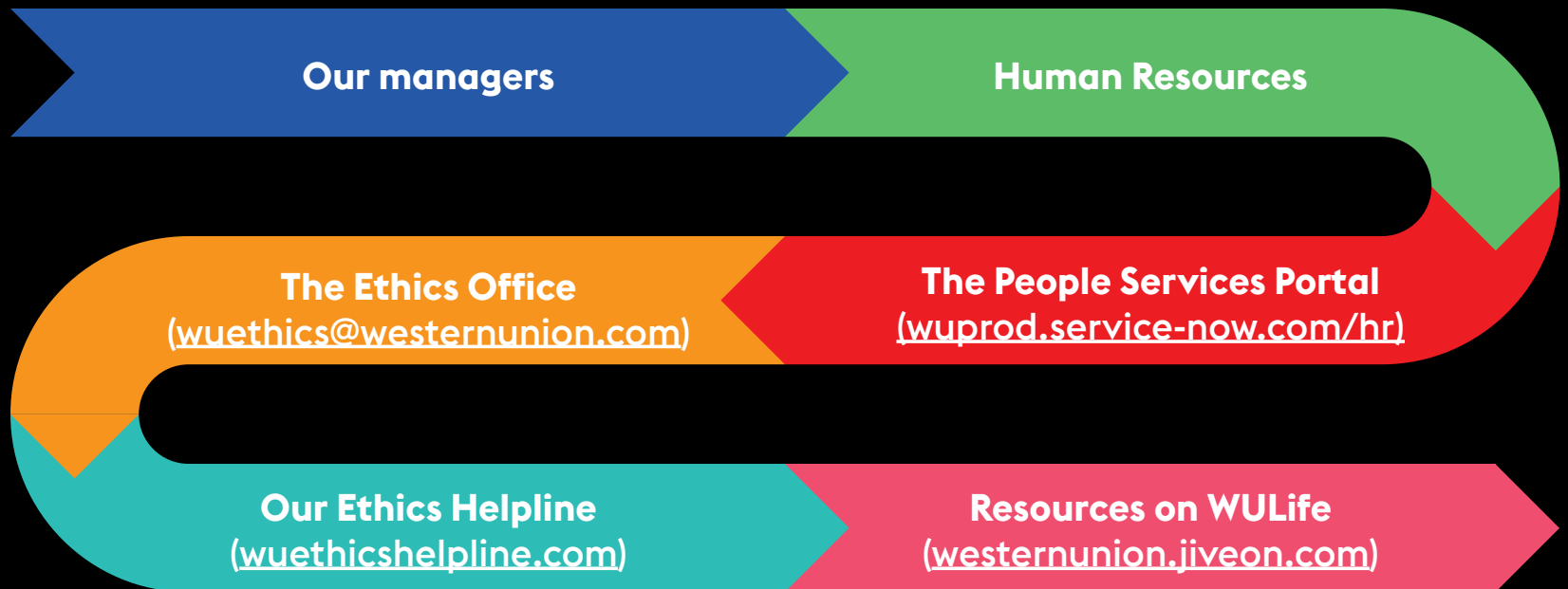
Peter received an email on his Western Union email account from “Tech Support” asking him to download and install the latest version of Microsoft Office. The email contained a link to a non-Western Union internet address, with instructions to click the link and accept the installation prompt. Should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



No. Unusual requests to click links or enter information via email are likely scams 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.

Remember, the practice of asking questions and raising concerns is a part of our culture and a key component of our Code.

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



The Chair 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, and can be contacted at wuauditcommitteechair@westernunion.com.

Remember

- ✓ Reach out to appropriate resources when you need further guidance or have questions, including questions about our Code or policies.
- ✓ Immediately report any known or suspected violations of our Code, our policies, or the law.
- ✓ Take initiative – do not assume that someone else will make a report.



