

Extract from the Strategic report of Western Union Payment Services GB Limited for the year ended 31 December 2023 (from pages 10-12):

SECTION 172 (1) STATEMENT

This section is the s172(1) statement in accordance with the Companies Act 2006 (the “Act”) and encompasses stakeholder engagement. Directors are required to explain how they had regard to the interests of key stakeholders and the broader matters set out in section 172(1)(A) to (F) of the Act when performing their duty to promote the success of the company for the benefit of its members as a whole. This includes considering how stakeholder interests have an impact on the long-term success of the company. The Directors of the Western Union Payment Services GB Limited (the “Company”) have acted in accordance with their obligations codified in law, including the matters set out in section 172(1) of the Act.

The Company is part of the Western Union group of companies (the “Group”, “Western Union”). Some of the matters to which the directors must have regard under section 172(1) of the Act are addressed by policies, procedures and practices set by the Group on an enterprise-wide basis which apply to the Company and its Board.

The regulatory requirements and expectations to which the Company is subject provide a framework to demonstrate how the Board makes decisions for the long-term success of the Company and its stakeholders. The Board is accountable for overall oversight of the Company and has responsibility to ensure that the Company acts in accordance with the strategy, values, standards, and controls of the wider Group. Western Union is committed to operating with honesty and integrity and maintaining a culture of ethics and compliance. These values are embodied in our Code of Conduct and guide how we treat our customers, employees, agents and members of the public.

The Directors consider the impact of the Company’s activities on a broad range of stakeholders including our immediate and ultimate shareholders, affiliated group subsidiaries, employees, regulators, partners, suppliers, and customers when making decisions. All matters which under the Company’s governance arrangements are reserved for decision by the Directors are presented at quarterly or ad hoc board meetings. During the year, information was provided to the Board in a range of formats, including through reports on strategy, financial and business performance, risk, outsourcing, compliance, internal audit, privacy, technology, legal and corporate governance matters. The Board is briefed on any potential impacts and risks for our key stakeholders and how they are to be managed. The Directors take these factors into account before making a final decision which collectively they believe is in the best interests of the Company in line with our mission, values, and strategic objectives. The Board recognizes the importance of engagement effectively with our stakeholders in ensuring the delivery of our strategy. The Board acknowledges however, that due to competing priorities, not every decision will necessarily result in a positive outcome for all stakeholders.

The Board may delegate certain levels of authority to management, however, retains responsibility for providing effective oversight of the Company. The Board has adopted Terms of Reference to enhance its corporate governance framework and assist in ensuring the Board continues to meet its duties and responsibilities to its stakeholders, which it reviews regularly. A review of Board composition was undertaken during 2023, with consideration given to the balance of skills and experience appropriate to the requirements of the business, resulting in an additional director being appointed to enhance the existing skillset of the Board. The annual Board training was held in 2023 in line with the Board’s commitment to collectively have the necessary up to date knowledge and understanding of the business, risks, and material activities of WUPSGL to carry out their duties to the Company and its stakeholders. The interests of our members are balanced against the needs of our employees, customers, other stakeholders and the community to ensure we are conducting all our business relationships with integrity. The long-term sustainability of the Company is at the forefront of decision-making.

While the Board may sometimes engage directly with the Company's stakeholders on certain issues, the size and distribution of our stakeholders and of Western Union means that stakeholder engagement often takes place at an operational or group level. This allows us to achieve a greater positive impact on environmental, social, and other issues. At a group level, stakeholders are routinely engaged with on a wide range of matters including delivery of group strategy, compliance with group policies, corporate governance, regulatory and operational matters in relation to the delivery of the Western Union's services, to ensure we provide the appropriate level of service to our clients and that the Group operates high standards of business conduct and governance. For details on how the Western Union group engages with its stakeholders and how stakeholder interests are considered in reaching certain key strategic decisions please see The Western Union Company Annual Report and Accounts. The Board will continue to review how the Company can improve engagement with its employees and stakeholders and further enhance its decision-making processes in line with section 172(1) of the Companies Act 2006.

Western Union is a global leader in cross-border, cross-currency money movement and payments. Western Union's platform provides seamless cross-border flows and its leading global financial network bridges more than 200 countries and territories and approximately 130 currencies. We connect consumers, businesses, financial institutions, and governments through one of the world's widest reaching networks, accessing billions of bank accounts, millions of digital wallets and cards, and a substantial global network of retail locations.

Western Union strives to respect and promote human rights. This commitment benefits our employees, customers, and the communities where we operate.

Our Code of Conduct applies to all employees and describes how we work, both as individuals and together as an organization. It addresses areas including our prohibition against discrimination, harassment, and retaliation; disclosing conflicts of interest; treating customers with integrity and respecting customer privacy; respecting confidential information and intellectual property; working with stakeholders; and complying with all applicable anti-bribery and anti-corruption laws and regulations. The Code also describes our shared values—integrity, respect, trust, and innovation. Complying with the Code of Conduct is a condition of employment, and all employees receive relevant training at least annually.

All Western Union employees, including those employed by the Company, are encouraged to participate in employment engagement surveys which are conducted regularly and provide real-time feedback to help leaders and management understand employee concerns and values.

Under the Financial Conduct Authority ("FCA") Principles, a firm must deal with regulators in an open and cooperative way and must disclose to the FCA appropriately anything relating to the firm of which the regulator would reasonably expect notice. In adhering to this Principle, the Company's Directors and senior management regularly engage with the FCA and other UK regulators such as HM Revenue & Customs ("HMRC") providing relevant advance notification of all notifiable events and fostering an open relationship with the regulators. Senior compliance staff hold regular touch points to discuss issues and raise specific concerns or provide responses to the regulators. This interaction helps the Company learn first-hand from regulators about matters of importance to them and their expectations of the Company. It also gives the Company's Board and management a forum for keeping our regulators well-informed about the Company's performance and business practices.

In compliance with the UK Modern Slavery Act 2015, the Company has a Modern Slavery and Human Trafficking Statement, which is updated and approved by the Board annually. We condemn modern slavery and human trafficking and expect all those involved in procurement or other parts of our business, including suppliers, to comply with these values. We are committed to acting ethically, demonstrating high professional standards, and complying with applicable laws and regulations.

We expect the same high standards from those with whom we do business. Our Code of Conduct also explicitly condemns human rights abuses and prohibits the use of forced or involuntary labor.

Western Union puts the customer at heart of everything we do. The Company strives to consistently treat all customers fairly with all decisions taken with the customer in mind. Western Union is committed to acting in good faith towards our customers, offering a product/service that meets customers' needs at a competitive price, and complies with all applicable consumer protection laws and regulations. Western Union's products and services are designed to avoid foreseeable harm to all customers, including our vulnerable customers, while providing products and services to support their needs and financial objectives. Quarterly reports are provided to the Board on the Consumer Duty outcomes culminating in an annual report. The first of which will be presented for the Board's approval in 2024.

Western Union believes we can be more successful when we operate according to the highest ethical standards, address unmet social needs, and promote the well-being of our consumers, their communities, and the environment. In recognition of these values, Western Union publishes an annual Environmental Social and Governance report to highlight the Group's work in areas including connecting people to the global economy, fostering a culture of ethics and inclusion, moving money with integrity, governing, and managing for success, safeguarding our shared environment, and advancing global opportunity through the Western Union Foundation.

Western Union recognizes that the costs of corruption often impact the communities we serve. Western Union is committed to conducting business with integrity and adhering to the highest ethical standards. This includes a zero-tolerance approach to bribery and corruption in any form, either direct or indirect. Western Union, its employees, Agents, and third parties are prohibited from engaging in Bribery or Corruption and has a Global Anti-Bribery & Corruption Policy in place which is applicable to all group entities, employees, and third parties performing services on our behalf which may involve bribery or corruption risk.

Western Union's Conflicts of Interest Policy is designed to encourage openness, transparency, and objectivity in our work for Western Union. It is intended to help the Group avoid potential and/or actual conflicts. This matters to employees and to customers because it builds trust and supports ethical behavior.

For further information on the corporate governance disclosures made by the Group, please see <http://ir.westernunion.com/investor-relations/corporate-governance/>

A copy of this statement is available on <https://www.westernunion.com/gb/en/home.html>