



Reporting Procedure for Accounting and Auditing Concerns	Policy Number: Effective Date: February 22, 2007 Last Revised: December 11, 2008 Policy Owner: Sarah Kilgore Approving Authority: Scott Scheirman Compliance Requirement References: Sarbanes-Oxley Act
Corporate Policy	

Approved by the Board of Directors on December 11, 2008

Any employee of the Company may submit a good faith complaint, concern or question regarding accounting, internal accounting controls or auditing matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Company's Audit Committee will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the Company's Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints, concerns or questions ("Concerns") regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters") and (2) the confidential, anonymous submissions by employees of Concerns regarding Accounting Matters.

Receipt of Employee Complaints

- Employees with Concerns regarding Accounting Matters may report such Concerns to the General Auditor of the Company.
- Employees may forward complaints on a confidential or anonymous basis to the General Auditor through a third-party helpline, e-mail or regular mail:
 - Third-party Helpline – Western Union Ethics Helpline – Worldwide:
+1.503.352.8189; and toll free from the United States, Canada, and Guam:
1.888.485.2254
 - E-mail – Richard.Krollman@westernunion.com
 - Mail – General Auditor
The Western Union Company
12510 E Belford Ave M22B3
Englewood, CO 80112

Scope of Matters Covered by These Procedures

These procedures relate to employee Concerns relating to any questionable Accounting Matter, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;

- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Deficiencies in or noncompliance with the Company's internal accounting controls;
- Misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- Deviation from full and fair reporting of the Company's financial condition.

Treatment of Complaints

- Upon receipt of a complaint, the General Auditor will (i) determine whether the complaint actually pertains to Accounting Matters and (ii) when possible, acknowledge receipt of the complaint to the sender.
- Complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by the General Auditor, in consultation with the General Counsel, and such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.
- The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

Reporting and Retention of Complaints and Investigations

- The General Counsel, with the assistance of the Chief Ethics Officer, will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Audit Committee. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.

Direct Reports to the Audit Committee

Employees with concerns regarding Accounting Matters may confidentially and anonymously report their concerns directly to the Audit Committee by leaving a message or sending an e-mail to the following:

Telephone: +1 720 332 3310

E-mail: wuauditcommitteechairman@westernunion.com

The Audit Committee will review the complaint with the help of any persons the Committee deems appropriate. The employees' confidentiality and anonymity will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.

Reports by Non-Employees

Parties which are not employees may submit concerns regarding Accounting Matters by submitting them to the General Auditor of the Company in the manner described in this policy.