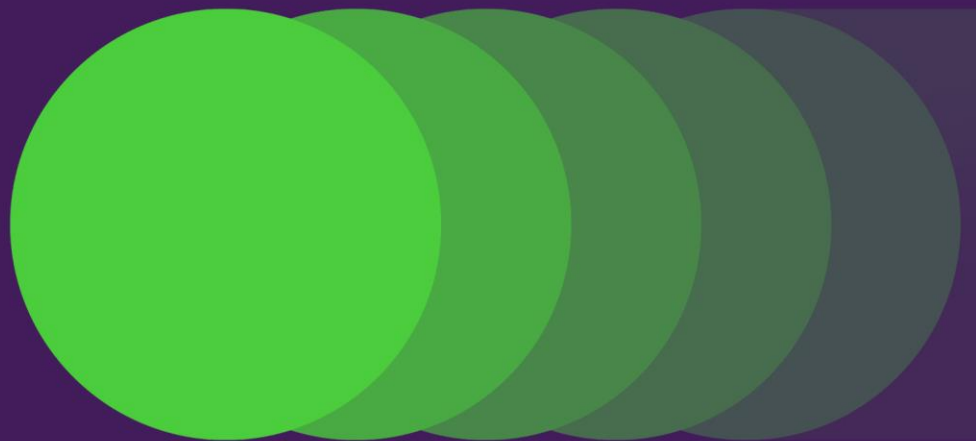




01.15 Speak-Up Policy

Policy Owner:	Gottsegen, Jennifer
Contact:	fiethicsoffice@fisglobal.com
Domain:	Corporate Legal
Level:	II
Published Date:	November 10, 2025
Mandatory Review Date:	November 10, 2026
Policy Distribution Type:	Public



01.15 Speak-Up Policy3

1. Purpose..... 3

2. Statement 3

3. Scope 3

4. Elements..... 4

 4.1 Reporting Concerns..... 4

 4.2 . Prohibition Against Retaliation and Support for Reporters 4

 4.3 Confidentiality and Anonymity..... 4

 4.4 Investigation and Outcome..... 5

5. Roles and Responsibilities..... 5

6. References 5

7. Definitions..... 6

01.15 Speak-Up Policy

1. Purpose

The purpose of this Speak-Up Policy is to protect those who raise Concerns, ensure issues are handled properly, and support FIS’s legal and regulatory responsibilities. By clearly outlining FIS’ philosophy on speaking up, the Policy reinforces our commitment to fostering a culture of integrity, transparency, and accountability.

2. Statement

At FIS, we all share the responsibility to do the right thing.

That means following the Code of Conduct, complying with Company policies and the law, and speaking up when something doesn’t seem right.

We are committed to creating a culture where everyone feels safe to raise Concerns—knowing they’ll be heard, supported, and free from Retaliation. When Concerns are raised, the company takes them seriously and works to address them promptly and appropriately.

For managers, this responsibility carries even more weight.

Managers set the tone, lead by example, and are often the first point of contact when colleagues have questions or Concerns. They take every Concern seriously, promptly refer issues through the appropriate reporting channels, and refrain from engaging in any form of Retaliation. Ignoring a problem or failing to act is never acceptable.

3. Scope

This policy applies to all FIS legal entities and affiliates (“Company”), including all employees, executives, officers, and directors. It also applies to third parties acting on behalf of FIS, such as consultants, contract labor, vendors, and suppliers. The policy is global in scope and is supplemented by local procedures where required by law.

4. Elements

4.1 Reporting Concerns

FIS encourages and empowers all colleagues to play an active role in protecting the company, its people, and its stakeholders. Speaking up and reporting Concerns helps FIS to:

- Detect and address issues before they escalate, reducing potential harm to individuals and the company.
- Promote a safe and respectful workplace where everyone feels empowered to act in accordance with our values.
- Fulfill our commitments to clients, regulators, and the public by maintaining the highest standards of conduct and risk management.

FIS is committed to maintaining accessible, confidential, and effective channels for reporting Concerns. The specific channels, requirements, and procedures for reporting Concerns are detailed in FIS' Speak-Up Standard.

4.2 . Prohibition Against Retaliation and Support for Reporters

Colleagues who raise Concerns will be treated with fairness and dignity, and support is available through TPO, Compliance, or the Ethics Office to help navigate the process.

Retaliation is strictly prohibited. This includes actions such as demotion, dismissal, harassment, or other negative treatment—or threats of such treatment—taken against someone for speaking up, facilitating the report of a Concern, or participating in an investigation. Any suspected Retaliation should be reported immediately in accordance with this Policy.

4.3 Confidentiality and Anonymity

Protecting the identities of Reporters, as well as those who may be subject to investigation, is essential to fostering a speak up culture. FIS is committed to respecting the confidentiality of individuals involved in the Speak-Up process and will handle identities with discretion, sharing them only as appropriate to support the review and resolution of a Concern.

FIS provides avenues for reporting Concerns anonymously to further support a safe environment for speaking up. The company expects all parties involved in the process to respect confidentiality requirements and to handle information responsibly.

4.4 Investigation and Outcome

FIS is dedicated to ensuring that all reported Concerns are addressed promptly, fairly, and impartially. A robust and objective investigation process is critical to upholding ethical standards, mitigating risks, and maintaining the trust of employees, clients, and stakeholders.

All Concerns raised under this policy will be reviewed and, where appropriate, investigated by qualified personnel. FIS will take appropriate action based on the findings of each investigation, which may include corrective measures or other remedial steps. The company is committed to keeping reporters informed of the status and outcome of investigations to the extent permitted by law and company policy, while maintaining necessary confidentiality.

5. Roles and Responsibilities

- **All Employees and Colleagues:** Report Concerns in good faith, cooperate with investigations, and maintain confidentiality as directed.
- **Managers and Supervisors:** Promptly escalate Concerns and foster an environment supportive of speaking up and free from retaliation.
- **FIS Ethics Office:** Oversee the Speak-Up process, maintain reporting channels, investigate Concerns, ensure compliance with this Policy and applicable whistleblowing laws, and provide training and support.
- **The People Office:** Advise on employee relations, discipline, and remedial actions; support anti-Retaliation measures; and advise on local rules, regulations, and customs.
- **Legal, Compliance, and Other Subject Matter Experts:** Provide expert guidance on legal and regulatory risks, support investigations, and help ensure remediation aligns with laws, regulations, and best practices.

6. References

This Policy is intended to act in collaboration with and in furtherance of existing FIS internal policies and standards, such as:

- 01.15.01 Speak-Up Standard
- Code of Business Conduct and Ethics
- Employee Handbook

7. Definitions

<i>Acronym/Term</i>	<i>Meaning</i>
Concern	Any activity reasonably believed, in good faith, to violate law, company policy, or the FIS Code of Business Conduct and Ethics
Reporter	Any person who raises a Concern through approved channels.
Retaliation	Adverse action or threat linked to raising a Concern, facilitating a Concern, or participating in an investigation related to a Concern