13.02 Environmental, Social and Governance (ESG) Policy

Policy Owner: Ciafardini, Andrew
Contact: ESG@fisglobal.com
Domain: Corporate and External Affairs
Scope: Enterprise Wide
Published Date: March 2, 2022
Effective Date: December 11, 2020
Mandatory Review Date: December 11, 2022
Provision for Exception: Exceptions require Policy Exception Committee approval unless otherwise delegated within the policy.
### 13.02 Environmental, Social and Governance (ESG) Policy

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>13.02.01 Environmental</td>
<td>3</td>
</tr>
<tr>
<td>13.02.01.01 Environmental Protection and Awareness</td>
<td>3</td>
</tr>
<tr>
<td>13.02.01.02 Energy Efficiency and Emissions Reduction</td>
<td>3</td>
</tr>
<tr>
<td>13.02.01.03 Waste Management and Recycling</td>
<td>4</td>
</tr>
<tr>
<td>13.02.01.04 Water Usage</td>
<td>4</td>
</tr>
<tr>
<td>13.02.01.05 Biodiversity</td>
<td>4</td>
</tr>
<tr>
<td>13.02.01.06 Climate-Related Risk Management</td>
<td>4</td>
</tr>
<tr>
<td>13.02.02 Social</td>
<td>5</td>
</tr>
<tr>
<td>13.02.02.01 Human Rights and Labor Management</td>
<td>5</td>
</tr>
<tr>
<td>13.02.02.02 Inclusion and Diversity</td>
<td>5</td>
</tr>
<tr>
<td>13.02.02.03 Health and Safety</td>
<td>5</td>
</tr>
<tr>
<td>13.02.02.04 Employee Development, Training and Engagement</td>
<td>6</td>
</tr>
<tr>
<td>13.02.02.05 Modern Slavery, Forced Labor and Child Labor</td>
<td>6</td>
</tr>
<tr>
<td>13.02.02.06 Fair Wages</td>
<td>6</td>
</tr>
<tr>
<td>13.02.02.07 Community Spend and Involvement</td>
<td>7</td>
</tr>
<tr>
<td>13.02.02.08 Fostering Employee Volunteerism</td>
<td>7</td>
</tr>
<tr>
<td>13.02.02.09 Political Activities, Lobbying and Trade Associations</td>
<td>7</td>
</tr>
<tr>
<td>13.02.02.10 Political Contributions and Donations</td>
<td>8</td>
</tr>
<tr>
<td>13.02.03 Governance</td>
<td>8</td>
</tr>
<tr>
<td>13.02.03.01 Corporate Governance</td>
<td>8</td>
</tr>
<tr>
<td>13.02.03.02 Compensation and Succession Oversight</td>
<td>9</td>
</tr>
<tr>
<td>13.02.03.03 Engagement with Stakeholders Regarding ESG issues</td>
<td>9</td>
</tr>
<tr>
<td>13.02.03.04 Ethics and Compliance</td>
<td>9</td>
</tr>
<tr>
<td>13.02.03.05 Ethical Staff Behavior and Whistleblower Protections</td>
<td>10</td>
</tr>
<tr>
<td>13.02.03.06 Anti-Bribery and Anti-Corruption</td>
<td>10</td>
</tr>
<tr>
<td>13.02.03.07 Anti-Competitive Behavior</td>
<td>10</td>
</tr>
<tr>
<td>13.02.03.08 Risk, Information Security and Compliance (RISC) Training</td>
<td>11</td>
</tr>
<tr>
<td>13.02.03.09 Product Responsibility Monitoring</td>
<td>11</td>
</tr>
<tr>
<td>13.02.03.10 Data Security and Privacy</td>
<td>11</td>
</tr>
<tr>
<td>13.02.03.11 Supply Chain Management</td>
<td>12</td>
</tr>
</tbody>
</table>
The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in Best Current Practice – Key Words.

13.02 Environmental, Social and Governance (ESG) Policy

Purpose

The Environmental, Social and Governance ("ESG") Policy reflects FIS’ commitment to excellence in corporate responsibility and sustainability. This Policy applies to all employees, executives, officers and directors of FIS.

Statement

FIS’ technology and services help businesses and communities thrive by advancing the way the world pays, banks and invests. FIS is committed to operating with integrity, contributing to our surrounding communities, promoting diversity and inclusion, empowering our employees, and preserving our natural resources. FIS is also committed to data security, protecting the privacy of our clients, and promoting a global financial system that is accessible and inclusive. The Corporate Governance, Nominating, & Sustainability Committee of the Board of Directors provides oversight FIS’ ESG strategy and program.

In order to remain in compliance with forward looking ESG disclosure requirements and best practices and to align all FIS personnel with a common set of ESG-related aspirational goals, no employee, line of business or corporate function may publicly disclose or publish aspirational goals, commitments, or other potentially material ESG information without the prior written approval of the FIS ESG Governance and Disclosure Committee as well as the express approval of the Corporate Secretary and the Chief Sustainability Officer.

13.02.01 Environmental

FIS recognizes that our planet needs to be a sustainable home for current and future generations. A commitment to environmental stewardship is part of FIS’ Code of Business Conduct and Ethics.

13.02.01.01 Environmental Protection and Awareness

The Company seeks to protect and maintain the quality of the environment, create environmental awareness and promote it among its employees, clients and the communities in which it operates. Accordingly, employees must:

- Operate in compliance with environmental laws and regulations;
- Promptly report to management any environmental violations; and
- Consider opportunities to improve environmental programs

Employees should direct any reports of actual or potential environmental violations, or any questions about responsibilities or Company Policies in these areas, to their supervisor, a People Office representative or the Ethics Helpline or Ethics Website.

13.02.01.02 Energy Efficiency and Emissions Reduction

FIS supports minimizing our environmental impact through initiatives to increase energy efficiency. As a global leader in financial technology, our primary opportunities for reducing direct environmental impact are in operating our data centers and office buildings efficiently and responsibly.
FIS may evaluate the opportunity for certification through the U.S. Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (“LEED”) program for new construction, to go along with our other LEED certified buildings. This is the world’s most widely recognized and applied benchmark for green buildings.

FIS will assess the need for building automation and energy management systems where possible to help reduce our impact on the environment. This includes using energy-efficient LED lighting and high efficiency mechanical units, where practical. Additionally, to help our colleagues reduce the environmental impact of their commute, FIS has installed electric vehicle charging stations at some of our larger locations.

Also, we will assess the use of energy efficient or sustainable products when equipment replacements are necessary or at end of life.

From time to time, FIS may perform surveys of energy usage and carbon emissions from its facilities to track the Company’s progress in minimizing environmental impact.

13.02.01.03 Waste Management and Recycling

As part of our efforts to minimize waste, FIS supports recycling programs at our facilities where it is supported by local municipalities. Our waste reduction practices include recycling computers and other technology equipment such as VPN tokens and computer printer toner cartridges in line with international guidelines and FIS’ security policies & practices. Confidential shred and recycle bins are available at many FIS locations so that paper and other materials can be shredded and recycled. FIS requires that any paper or materials containing sensitive information be shredded and disposed of in accordance with our other policies.

13.02.01.04 Water Usage

FIS supports minimizing and reducing water usage as part of our environmental protection efforts at our major existing and new-build facilities. From time to time, FIS may conduct a survey of water withdrawal from its major facilities to promote minimizing water usage.

13.02.01.05 Biodiversity

FIS supports the protection of biodiversity and is aware of the potential impact of office buildings and data centers on this vital resource. We support initiatives to protect biodiversity by pursuing green building certifications for our other major facilities, to coincide with our other LEED certified buildings such as our global headquarters in Jacksonville, Florida.

13.02.01.06 Climate-Related Risk Management

We recognize that climate change presents both risks and opportunities for our industry and our business, including disruptions to the business operations of our clients and partners. As a responsible corporate citizen, we are taking action to mitigate these risks to our company and in the communities in which we operate.

FIS measures the company’s environmental practices through internal and external data audits. From time to time, we may conduct surveys of major FIS facilities around the world to measure energy usage (including energy derived from renewable sources), GHG emissions (Scope 1 and Scope 2) and water usage. This and other data from our environmental, social and governance program audits are reported periodically to senior management and/or to the Corporate Governance, Nominating & Sustainability Committee of the FIS Board. Some of these results are also reported in our sustainability report.

These reporting efforts provide transparency to our internal and external stakeholders and will also help measure our future progress in supporting global efforts to combat climate change, including the United Nations Sustainable Development Goals (SDGs).
13.02 Environmental, Social and Governance (ESG) Policy

13.02.02 Social

FIS seeks to earn the trust of our stakeholders by operating our global business in a responsible way to ensure the sustainability of our colleagues, our clients and our communities.

13.02.02.01 Human Rights and Labor Management

FIS endeavors to:
- protect the fundamental human rights of all individuals;
- observe fair and ethical labor practices in our business and our communities, including our relationships with third-party vendors and suppliers;
- respect the human rights of minority and disadvantaged groups; and promoting fair and ethical labor relations with all our colleagues.

As stated in the FIS Code of Business Conduct and Ethics, the Company has zero tolerance regarding illegal and immoral practices involving child labor, forced labor and modern slavery, including human trafficking. This important subject matter is addressed within the Company’s annual mandatory ethics and compliance training program. FIS supports transnational doctrines concerning fundamental human rights, including the United Nations Universal Declaration of Human Rights.

Additionally, please see the section Modern Slavery, Human Trafficking, Forced Labor and Child Labor for more information within this policy.

13.02.02.02 Inclusion and Diversity

The Company supports equal opportunity in its employment practices, including the selection, hiring, promotion, transfer, and compensation of qualified applicants and employees without regard to any characteristic protected by applicable law, including, but not limited to, race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information. Further, FIS requires its suppliers to: (i) share in FIS’ commitment to human rights and equal opportunity in the workplace, and (ii) conduct their employment practices in compliance with applicable employment and labor laws and regulations.

The Company does not tolerate harassment of any of its employees, applicants, vendors or customers, and seeks to maintain a work environment free from harassment. Any form of harassment related to an individual’s race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information, and/or any other characteristic protected by applicable law is a violation of this policy and is treated as a disciplinary matter.

13.02.02.03 Health and Safety

FIS is focused on the health, safety and well-being of our employees. We provide FIS employees with a comprehensive package of health care benefits and free access to an Employee Assistance Program and a Well-Being Program.

FIS is committed to providing a safe workplace for all employees at all Company facilities. FIS will comply with all applicable workplace health and safety requirements in our facilities. The Company has a Corporate Physical Security Policy with controls and procedures designed to keep employees safe and in line with human rights best practices.
13.02.02.04 Employee Development, Training and Engagement

FIS recognizes that our global workforce is the engine powering our mission of advancing the way the world pays, banks and invests. We support employee training and innovative career development programs that enable employees to achieve their personal career goals.

FIS established a core philosophy of “Being your own Chief Learning Officer,” which has been adopted and encouraged by our executive team and brought to life across our culture. All new employees globally are introduced to the concept, desired competency framework and array of offerings as part of their onboarding experience. This system allows all colleagues to design their own development training programs to meet their specific career development needs.

FIS provides specialized, in-depth learning focused on training and development of managerial and leadership skills, including the Lead.Explore.Aspire.Develop (LEAD) program focused on preparing high potential employees for leadership roles.

In addition to learning provided by the Company, FIS encourages and supports professional development and continuing education for employees in courses that relate to the employee’s current position or the next step in the employee’s career path. The FIS Tuition Assistance Plan (TAP) assists employees with continuing education or certifications by reimbursing tuition and related expenses.

FIS encourages regular engagement with employees. This is accomplished through regular performance appraisals and feedback as well as an annual survey to monitor employee satisfaction. The results of this survey are disclosed in our sustainability reporting.

13.02.02.05 Modern Slavery, Forced Labor and Child Labor

We maintain high ethical standards in our daily business practices and will continue to act in accordance with all applicable laws. FIS expressly prohibits any participation in, support of, or association with the illegal and immoral practices of trafficking in persons, forced labor, child labor and slavery. FIS is opposed to forced labor, child labor and modern slavery, including human trafficking, in any form not only with our employees but our third-party vendors as well. FIS reviews the potential for the risk of slavery and trafficking as part of its country risk assessments when entering new markets, and our Vendor Risk Management process works to screen our supply chain for potential violations involving these activities.

FIS includes this important topic in trainings and has controls to assist our business in compliance with these laws and human rights commitments. For more information outlining the steps we have taken and our ongoing planned efforts to prevent modern slavery in our organization and supply chain, please review FIS’ Modern Slavery Act Transparency Statement posted on our external website www.fisglobal.com within the Investors / Corporate Governance – Highlights webpage.

In addition, our employees are encouraged to report any incident relating to modern slavery urgently so that appropriate remedies can be taken.

13.02.02.06 Fair Wages

It is the policy of the Company to comply with applicable laws and regulations concerning fair or minimum wages.

FIS recognizes that it is crucial to provide a competitive and comprehensive total compensation and benefits package to attract and retain talented and high-performing employees. Our benefits programs include an Employee Stock Purchase Plan (ESPP) available in most countries, a Student Loan Repayment program to support U.S. FIS University colleagues who join the company with student loan debt, and in the U.S., a 401(k) retirement savings plan. Most non-U.S. countries may also provide a form of pension benefit, dependent upon the laws and regulations within the region.
13.02.02.07 Community Spend and Involvement

FIS supports giving back to the communities where we live and work. FIS provides financial support to our communities through the FIS Charitable Foundation, a 501(c)(3) non-profit corporation that serves as a way for FIS to provide donations to qualified organizations operating in our areas of focus. FIS reports on community spend in its sustainability reporting and the FIS Gives Back report.

In addition to grants provided by the FIS Charitable Foundation, FIS’ individual business units and employees provide both donations and volunteer time to non-profit and community development groups in our local communities.

In the aftermath of natural disasters such as earthquakes, flooding and hurricanes, FIS employees also often aid our communities through donations of money and supplies and by volunteering with relief organizations.

FIS seeks to have a positive impact on communities. As such, we monitor the use of our products to promote financial inclusion and report on these efforts in our sustainability reporting.

13.02.02.08 Fostering Employee Volunteerism

The FIS Volunteer Policy encourages community involvement by providing eligible employees up to eight hours per year as paid time off. The Policy encourages many types of civic involvement, including volunteer work, committee or board of director positions, or participation in fundraising events. Employees may request time off to volunteer for charities of their choosing, and the charity does not need to be an FIS-sponsored or coordinated volunteer event.

13.02.02.09 Political Activities, Lobbying and Trade Associations

Lobbying activities are subject to laws and regulations at the local, state/provincial, and federal levels, including various anti-bribery and anti-corruption laws applicable to the Company. Generally, “lobbying” is defined as an interaction with a government official (including regulators) to influence their position on a public policy matter (e.g., law or regulation).

It is the policy of the Company to comply with the laws concerning lobbying activities. For example, within the United States, there are federal, state and local reporting and/or registration/disclosure requirements prior to engaging in any such activities. Failure to register and/or report lobbying activities in accordance with the relevant laws can result in fines and penalties for the Company in addition to individual liability.

Because the centralized and coordinated management of these activities better enables the Company to comply with these laws, the Government Relations Department is responsible for coordinating all lobbying registrations (entities and/or individuals) and reporting requirements – including the retention of outside lobbyists or public affairs consultants. As appropriate, the Legal and Compliance Departments will assist in leading these efforts in coordination with Government Relations.

FIS belongs to various trade associations that advocate for public policy issues of importance to the Company and industry peers. Membership in trade associations or similar organizations that actively engage in advocacy for public policy issues must be reviewed and approved by Government Relations to determine that FIS’ participation is consistent with relevant public policy objectives and with the Legal and Compliance Departments to achieve compliance with the FIS Anti-Bribery and Anti-Corruption (FABAC) Policy. However, FIS’ membership in such trade associations does not necessarily mean the Company endorses or supports all public policy positions or issues that these associations support.

Government Relations shall maintain a list of the trade associations for these compliance purposes and may be required to provide an accounting of membership costs used toward association lobbying activities. Certain jurisdictions, including the United States, require disclosure of these expenses.
13.02.02.10 Political Contributions and Donations

In accordance with our internal policies, FIS may not use corporate funds to contribute to candidates, political party committees or political action committees, including Super PACs and political committees organized under Section 527 of the U.S. Internal Revenue Code (IRC) to promote the election or defeat of candidates for office in the United States as well as globally.

FIS is committed to compliance with all laws on political contributions and has various policies that address these activities, including the FIS Political Activities Engagement Policy, Code of Business Conduct and Ethics and our Employee Handbooks.

FIS maintains a federal, state and local political action committee in the U.S. (the “PAC”), which is registered with the Federal Election Commission. The PAC, designated as the FIS Good Government Fund, is funded through employees’ voluntary personal contributions and makes contributions on a bipartisan basis in support of public policy consistent with FIS’ interests.

As required by law, all political contributions accepted or made by the PAC must be reported to relevant federal, state and local campaign finance agencies and must be publicly available.

The Head of Government Relations is responsible for administration of the PAC and works closely with FIS’ Finance and Legal Departments to ensure all PAC contributions and disbursements are made in accordance with applicable laws and Company policies.

FIS discloses U.S. political donations made by our PAC.

13.02.03 Governance

FIS is committed to operating our Company with integrity and the highest ethical standards and has implemented comprehensive governance structures and practices that meet or exceed the requirements of applicable laws, regulations and rules, including the NYSE’s listing standards.

13.02.03.01 Corporate Governance

FIS maintains robust corporate governance policies to ensure accountability and transparency, manage operational risks and uphold compliance with applicable laws, regulations and rules governing business conduct and ethics.

Our Corporate Governance Guidelines, along with the charters of the committees of our Board, provide a framework for the functioning of our Board and its committees. The Corporate Governance Guidelines address, among other things, the composition of our Board, the selection of directors, the functioning of our Board, the committees of our Board, the evaluation and compensation of directors and the expectations of directors, including ethics and conflicts of interest.

Among the provisions of our Corporate Governance Guidelines are:

- Board appointment of a Lead Independent Director when the role of Chairman and CEO is combined.
- A mandatory retirement age of 75 to enhance Board refreshment.
- A limit on the number of public company boards on which a director may sit to ensure directors have adequate time to devote to FIS.
- Requirement that a majority of the members of our Board be independent directors who meet the independence criteria established by the NYSE and any other applicable independence standards.

The Corporate Governance Nominating, & Sustainability Committee of the Board reviews these guidelines and other aspects of our governance at least annually.
13.02.03.02 Compensation and Succession Oversight

FIS' Board and the Board's Compensation Committee proactively oversee executive compensation by reviewing executive compensation trends, listening to stakeholder feedback and considering current best practice recommendations from independent compensation consultants, retained by the committee, with the goal of continually improving our approach to executive compensation.

FIS is committed to a compensation approach that enables the Company to attract and retain talented and high-performing executives and employees. Our approach aligns the total compensation of our executive officers with our focus on achieving long-term financial performance and increasing shareholder return. FIS has formal stock ownership guidelines for all corporate executive officers and members of our Board, to align their individual economic interests directly with the interests of our shareholders.

In our incentive plans, FIS reserves the right to recover any incentive-based compensation from our executive officers if we are required to prepare an accounting restatement due to material noncompliance with financial reporting requirements, including an act of fraud or willful misconduct, where the incentive-based compensation paid during the preceding three-year period would have been lower had the compensation been based on the restated financial results.

The Board is committed to director succession and refreshment, as well as succession planning for the CEO and other members of the executive management team.

13.02.03.03 Engagement with Stakeholders Regarding ESG issues

FIS seeks to maintain ongoing, proactive engagement with a wide range of stakeholders, including but not limited to, shareholders, fixed income investors, prospective shareholders, rating agencies and ESG rating firms. Through this engagement, we discuss topics of interest to our stakeholders, including our commitment to ESG, performance, strategy, executive compensation and corporate governance practices. Our executive management team and Board regularly consider feedback from our shareholders and other stakeholders and incorporate this feedback in the design and implementation of our ESG strategy, programs and practices.

13.02.03.04 Ethics and Compliance

Ethics and Compliance is at the core of what we do. It is the culture that defines how we operate. The company takes seriously its reputation for honest, fair and ethical business dealings around the world. We seek customers and business partners whose ethical standards mirror our own and decline to do business with unethical entities and individuals.

FIS seeks to protect our reputation by operating our business with the highest ethical standards and in compliance with all applicable laws and regulations. Our Code of Business Conduct and Ethics applies to our directors, executive officers, contractors and employees globally and addresses various subject areas such as but not limited to compliance with applicable laws, conflicts of interest, use and protection of Company assets, confidentiality, fair dealing, discrimination, harassment, and health and safety.

FIS seeks to maintain compliance with our Code of Business Conduct and Ethics and all company policies and has a Corporate Compliance Program that is overseen by our Chief Compliance and Customer Advocacy Officer. The Code of Business Conduct and Ethics, related policies and the Program's operating guidelines are evaluated at least annually and are updated throughout the year, as necessary. Various risk assessments are an integral part of our evaluation. The program includes the following essential elements: Clear Accountability, Risk Assessments, Written Policies and Standards, Training and Education, Operational Controls, Monitoring and Reporting, Independent Testing, Investigations and Response, Anonymous Reporting Mechanisms and a Non-Retaliation Policy.
In addition, we also maintain the following measures to deter non-compliance and reduce exposure to unethical opportunities:

- Training and awareness campaigns for employees and contractors on various policies and subject matter;
- Annual anonymous employee ethics and anti-corruption surveys;
- Anonymous reporting mechanism as part of the Company’s Ethics Helpline with a non-retaliation policy;
- Regular reviews of our Ethics Helpline cases and trends to assist in identifying new and emerging risks and;
- Self-Identified Risk Issue Process (SIRI-P) which is utilized by employees to self-report any potential risks to FIS’ business, employees, clients or products and services.

Our commitment to ethical behavior and compliance is overseen and regularly monitored by our Board and Executive Management. The Board’s Audit Committee provides oversight of the Company’s compliance with our Code of Business Conduct and Ethics as well as legal and regulatory requirements.

13.02.03.05 Ethical Staff Behavior and Whistleblower Protections

Our Corporate Governance Guidelines, Code of Business Conduct and Ethics and overall corporate governance structure reflect our commitment to a robust Corporate Compliance Program and whistleblower protections. In addition to our open door approach to raise potential or suspected employee misconduct to management and/or the Chief Compliance and Customer Advocacy Officer, we also provide employees, through a third-party, an FIS Ethics Helpline (telephonically and a Website) to report anonymously any potential or suspected misconduct as well as suggestions or concerns. FIS does not tolerate any retaliation against anyone who, in good faith, reports a violation of FIS policy or law or cooperates with an investigation.

13.02.03.06 Anti-Bribery and Anti-Corruption

FIS operates its business ethically and in compliance with all applicable laws and regulations, including compliance with applicable anti-bribery and anti-corruption laws. These laws, as detailed in the FIS Anti-Bribery and Anti-Corruption (FABAC) Policy, include, but are not limited to, the Foreign Corrupt Practices Act (FCPA) in the U.S. and the Bribery Act in the UK. Our policy applies to all FIS operations globally and to FIS’ suppliers and contractors.

All FIS employees are required to complete mandatory anti-bribery and anti-corruption training and testing upon being hired and annually thereafter. This training and testing, which covers receiving and giving gifts, conflicts of interest and proper record-keeping, as well as regular awareness campaigns executed throughout the year, promotes our company’s cultural commitment to ethical behavior and compliance.

13.02.03.07 Anti-Competitive Behavior

FIS supports free and open competition in the marketplace by complying with applicable laws governing antitrust and trade regulation. The Code of Business Conduct and Ethics requires employees to comply with all applicable antitrust laws and to avoid certain types of activities with competitors, customers, suppliers or trade associations that could lead to antitrust violations.

FIS is committed to competing fairly and promoting ethical behavior in our industry. In addition to complying with U.S. and foreign antitrust laws, employees must comply with a number of laws governing trade regulation in general. Those laws require that all employees refrain from any unfair or deceptive methods of competition, including false or misleading advertising, making false statements concerning competitors or their products, or inducing our competitors’ customers or employees to breach their contracts with our competitors.
Our commitment to ethical practices and policies regarding anti-competitive behavior is supported by a mandatory training course for all employees.

13.02.03.08 Risk, Information Security and Compliance (RISC) Training

FIS provides robust mandatory training programs to ensure annual compliance with FIS policies and procedures governing Risk, Information Security and Compliance (RISC). The Company utilizes an online training platform to deliver robust customized RISC training for all employees and contractors with system access, as well as our Board of Directors. We record completion of training and any applicable testing at the completion for compliance and audit purposes, which are reviewed by management and by the Board’s Risk and Technology Committee and Audit Committee. The training is also utilized as an acknowledgement tool to record that employees have received a copy of the Policy, have read it, and understand that the Policy contains the Company’s expectations regarding conduct in the business environment. Employees who violate Company Policies are subject to disciplinary action up to and including termination in accordance with applicable employment laws.

13.02.03.09 Product Responsibility Monitoring

FIS supports having a positive impact on our clients and communities, and as such, we monitor the responsible use of our products. We provide products and services that ensure access to finance, and we work to promote financial inclusion to ensure that underserved populations have education and access to financial tools.

FIS supports responsible marketing of our products and services. The FIS Code of Business Conduct and Ethics requires employees to comply with laws governing trade regulation. Employees must refrain from any unfair or deceptive methods of competition, including false or misleading advertising or making false statements concerning competitors or their products.

13.02.03.10 Data Security and Privacy

FIS respects the right to privacy and is committed to being a trusted steward of customer and consumer information, and as such complies with all applicable data protection and privacy laws wherever we do business. FIS obtains user data solely through legal and appropriate means, seeking explicit consent where required. All FIS employees and contractors with system access are required to complete annual Information Security and Privacy Awareness Training, which includes specific education on personal data protection, compliance, and risk management topics. FIS is committed to making strategic investments in information security to protect our clients and our information systems. FIS has formal processes in place to be able to notify clients in the event of a breach of non-public information as soon as possible following determination of such breach, and in compliance with all federal and state laws regarding non-public information. We also participate in industry and governmental initiatives to improve information security for our clients. This commitment and strategy are overseen by the Board’s Risk and Technology Committee and Audit Committee.

FIS recognizes that any failure to deliver reliable, effective and secure services to our clients exposes us to significant business risks, including additional development and remediation costs, potential loss of clients, negative impact to our reputation, and potential liability claims. FIS is committed to limiting our exposure to these risks through the implementation of our Global Business Resilience (GBR) program, which encompasses Business Continuity Plans, Crisis Management Plans, and Information Technology Disaster Recovery Plans. FIS is further committed to controlling risks related to disruption of operations through programs to provide system redundancies and security controls, to regularly measure and assess our capabilities to recover critical operations, and to provide mandatory employee training on business continuity and disaster recovery procedures. FIS expects third-party partners to comply with the company’s data security and privacy policies and maintain the same standards.
13.02.03.11 Supply Chain Management

FIS is committed to managing and mitigating operational and reputational risk associated with third-party vendors. FIS has a Supplier Code of Conduct that all suppliers must follow. We implement a Vendor Risk Management program with key elements, including due diligence review, contract establishment, ongoing monitoring practices related to third-party relationships, and adequate risk assessment activities at all stages of the vendor life cycle. As part of our procurement and vendor management programs, we are committed to building processes that ensure FIS’ vendors and suppliers are diverse, prioritize inclusion and minimize their impact on the environment.

All FIS employees, contractors, and applicable third parties are required to adhere to established policies and standards. Violation of FIS policies and/or standards may result in disciplinary action, up to and including termination. Any suspected violation of an FIS policy or standard should be reported to either a management representative or the FIS Chief Compliance Officer (CorporateCompliance@fisglobal.com). Violations may also be reported, with the option of remaining anonymous (with certain exceptions in some European countries, using the FIS Ethics Helpline Web site (www.fnisethics.com) or the FIS Ethics Helpline telephonically. FIS does not tolerate any retaliation against anyone who, in good faith, reports a violation of FIS policy or law or cooperates with an investigation. Use the link (https://rmis.fnfis.com/fsirt_archer/) to report a potential security incident. For urgent or critical security incidents, you should call +1.414.357.FSIRT (3747) (U.S. and International).