



00.01 Hedging and Pledging Policy

Domain Owner Title:	Chief Legal Officer
Scope:	Enterprise Wide
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Mandatory Review Date:	August 8, 2015
Policy Theme:	00.0 Corporate Governance
Provision for Exception:	These provisions apply to all business units with no exceptions.





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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.

00.01 Hedging and Pledging Policy

Purpose

The purpose of this Policy is to establish certain prohibitions against trading in the Corporation's securities applicable to the designated executive officers, directors, and employees who are equity grant recipients, of Fidelity National Information Services, Inc. ("FIS" or the "Corporation").

Introduction

Hedging or monetization transactions can be accomplished through a number of possible mechanisms, including the use of financial instruments such as exchange funds, prepaid variable forwards, equity swaps, puts, calls, collars, forwards and other derivative instruments, or through the establishment of a short position in the Corporation's securities. Such hedging and monetization transactions may permit a designated executive officer, director or employee who is a grant recipient to own the securities of the Corporation obtained through the Corporation's benefit plans or otherwise, but without the full risks and rewards of ownership. When that occurs, the designated executive officer, director or employee who is a grant recipient may no longer have the same objectives as the Corporation's other stockholders.

Certain short sale or speculative transactions in the Corporation's securities by designated executive officers, directors or employees create the potential for heightened legal risk and/or the appearance of inappropriate conduct involving the Corporation's securities. In particular, short sales of the Corporation's securities (i.e., the sale of a security that the seller does not own) may evidence an expectation on the part of the seller that the securities will decline in value, and therefore have the potential to signal to the market that the seller lacks confidence in the Corporation's prospects. Also, short sales may reduce a seller's incentive to improve the Corporation's performance.

Securities held in a margin account as collateral for a margin loan may be sold by the broker without the customer's consent if the customer fails to meet a margin call. Similarly, securities pledged (or hypothecated) as collateral for a loan may be sold in foreclosure if the borrower defaults on the loan. Because a margin sale or foreclosure sale may occur at a time when the pledger is aware of material nonpublic information or otherwise is not permitted to trade in the Corporation's securities, designated executive officers and directors are prohibited from holding the Corporation's securities in a margin account or otherwise pledging the Corporation's securities as collateral for a loan.

Statement

For designated executive officers and directors of the Corporation, this Policy prohibits: (1) directly or indirectly engaging in hedging or monetization transactions, through transactions in the Corporation's securities or through the use of financial instruments designed for such purpose; (2) engaging in short sale transactions in the Corporation's securities; and (3) pledging the Corporation's securities as collateral for a loan, including through the use of traditional margin accounts with a broker.

For all other employees of the Corporation who are recipients of FIS equity grants, this Policy prohibits: (1) directly or indirectly engaging in hedging or monetization transactions, through transactions in the Corporation's securities or through the use of financial instruments designed for such purpose; and (2) engaging in short sale transactions in the Corporation's securities.



Applicability

This policy applies in its entirety to all designated executive officers and directors. The policy is applicable to all other employees of the Corporation who are recipients of FIS equity grants as specified in the Policy Statement section.

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, Human Resource representative or to the FIS Ethics Officer or FIS Chief Compliance Officer (CorporateCompliance@fisglobal.com). Violations may also be reported using the FIS Ethics Web site (www.fnisethics.com) or Hotline. 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. To report a potential security incident, you should email the FIS Security Incident Response Team (FSIRT) at FSIRT@fisglobal.com. For urgent or critical security incidents, you should call 414.357.FSIRT (3747) (U.S. and International).