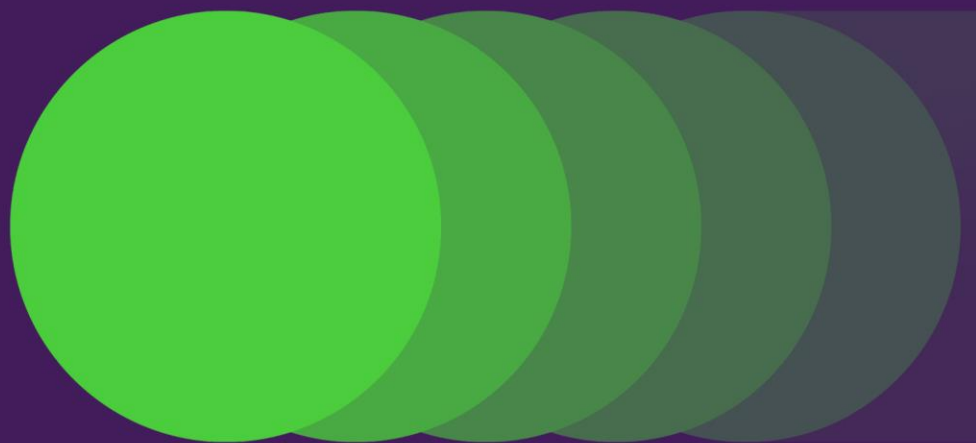




01.16 Conflicts of Interest Policy

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Domain:	Corporate Legal
Level:	II
Published Date:	December 15, 2025
Mandatory Review Date:	December 15, 2026
Policy Distribution Type:	Public



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01.16 Conflicts of Interest Policy

1. Purpose

All individuals who work for or act on behalf of FIS must be free from actual, potential or perceived conflicts of interest to ensure they exercise independent judgment and are able to objectively and effectively undertake their duties for the Company. Compliance with this Policy ensures a culture of ethical behavior, protects FIS from reputational risks and protects FIS interests.

2. Statement

This Policy:

- Sets forth requirements for avoiding potential or actual conflicts of interest; and
- Sets forth required conflicts of interest disclosure obligations to ensure transparency.

Limited exceptions to adhere to this Policy may be granted only by the Policy Owner in writing, at their discretion. Any exception must be time-bound, documented, and may be conditioned on ongoing monitoring and controls. The Policy Owner reserves the right to revoke an exception at any time.

Failure to comply with this Policy may result in disciplinary action up to and including termination of employment, termination of engagement for non-employees, removal from roles or responsibilities that give rise to the conflict, rescission or unwinding of conflicted decisions or transactions, and any other remedies available under the FIS Code of Conduct, applicable policies, contracts, or law.

3. Scope

This global policy applies to all employees, contractors, consultants, directors, job applicants and any other individuals who perform services for, or act on behalf of any FIS legal entity or affiliate who have or may have a potential or actual conflict of interest with their role or responsibility at FIS.

Individuals who become aware of potential violations of this Policy have an obligation to speak up and report potential concerns to the FIS Ethics Office at fisethicsoffice@fisglobal.com.

4. Elements

4.1 Conflicts of Interest Prohibited

A Conflict of Interest (COI) may arise when Colleagues have competing financial, personal or other interests that may interfere with their ability to exercise independent judgment in carrying out their role or responsibilities for FIS or that may conflict with business interests of FIS. Prompt disclosure of Personal relationships, including relatives and romantic relationships, may constitute a COI. Such relationships could influence or interfere with the ability to exercise independent supervisory or business judgment in a Colleague's ability to carry out their role and responsibilities for FIS.

Colleagues are prohibited from engaging in conduct that constitutes a COI, including personal relationships. Violations of this policy may result in disciplinary action, up to and including termination of employment.

4.2 Prompt Disclosure of COIs Required

Prompt disclosure of potential or actual COIs to the FIS Ethics Office is required. Colleagues are required to proactively disclose to the FIS Ethics Office conduct that potentially constitutes a COI. Actual COIs must be disclosed to the FIS Ethics Office as soon as the COI becomes known. Failure to promptly disclose a potential or actual COI may result in disciplinary action, up to and including termination of employment.

The process for disclosing COIs with the FIS Ethics Office is set forth in the Conflicts of Interests Standards. Additional information regarding COIs and disclosure requirements is available at the [FIS Ethics Office](#).

4.3 FIS Ethics Office COI Disclosure Review

The FIS Ethics Office will promptly review disclosures that are submitted via the COI Disclosure process.

Colleagues may not engage in the conduct constituting a potential or actual COI until the FIS Ethics Office has provided written approval of the conduct.

If a Colleague becomes aware of a COI that was not previously known, the Colleague must immediately disclose the COI to the FIS Ethics Office and take reasonable measures to withdraw from continued engagement in the conduct until the FIS Ethics Office issues written approval.

If the FIS Ethics Office determines that an activity is an impermissible COI, a Colleague must not engage in the conduct.

Engagement in activities deemed impermissible COIs may result in disciplinary action, up to and including termination of employment.

FIS reserves the right to revoke its approval at any time, at its sole discretion, regardless of whether circumstances have changed.

For all approved conflicts, employees must continue to adhere to the Code of Conduct, including, but not limited to, their obligations to:

- Refrain from using company resources or facilities for personal purposes
- Safeguard confidential company information and documents
- Avoid representing FIS in any capacity related to their external role
- Not solicit FIS employees, clients, vendors, or other FIS contacts for external business or employment opportunities.

5. Roles and responsibilities

Colleagues:

- Avoid conduct that constitutes an actual or potential COI.
- Promptly disclose potential or actual COI to the FIS Ethics Office.
- Report instances of suspected violations of this Policy through the FIS Speak Up process or Ethics Helpline.

FIS Ethics Office:

- Responsible for policy implementation and enforcement.
- Promptly reviews COI disclosures.
- Issues written approval or denial of proposed activity..
- Maintains records of COI disclosures and determinations.

Line Managers:

- Ensure employees and candidates understand and comply with their obligations under this Policy.
- Report suspected Policy violations through the FIS Speak Up process or Ethics Helpline.

The People Office:

- Support employees to ensure their conduct adheres to this Policy.
- Report suspected Policy violations through the FIS Speak Up process or Ethics Helpline.
- Recruiters who encounter questions and disclosures of potential COIs from candidates must ensure that candidates are directed to the FIS Ethics Office so that they may promptly disclose the potential/actual COI.

6. References

- 01.16.01 Conflicts of Interest Standard

7. Definitions

<i>Acronym/Term</i>	<i>Meaning</i>	<i>Description</i>
Colleagues	--	Employees, contractors, consultants, directors, job applicants and any other individuals who perform services for, or act on behalf of any FIS legal entity or affiliate who have or may have a potential or actual conflict of interest with their role or responsibility at FIS.
Relative	--	Spouse, domestic partner, child or stepchild, parent, parent-in-law, sibling, grandparents, a spouse's parents and grandparents, grandchildren, great-grandchildren, stepsiblings, half-sibling, uncles, aunts, nephews, nieces and cousins and anyone sharing the colleague's household.
COI	Conflict of Interest	A Conflict of Interest (COI) may arise when Colleagues have competing financial, personal or other interests that may interfere with their ability to exercise independent judgment in carrying out their role or responsibilities for FIS or that may conflict with business interests of FIS.
Candidate	--	FIS job applicant