

# 00.01 Hedging and Pledging Policy

**Policy Owner:** Lane, Jennifer  
**Contact:** Jennifer.Lane@fisglobal.com  
**Domain:** Corporate Legal  
**Scope:** Enterprise Wide  
**Published Date:** March 5, 2019  
**Effective Date:** April 23, 2013  
**Mandatory Review Date:** March 5, 2020  
**Provision for Exception:** These provisions apply to all business units with no exceptions.

---

**00.01 Hedging and Pledging Policy ..... 3**

*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 executives, and directors of the Corporation 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, and director of the Corporation 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, and director of the Corporation 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 executives, and directors of the Corporation 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 executives and directors of the Corporation are prohibited from pledging the Corporation's securities as collateral for a loan, including through the use of traditional margin accounts with a broker.

### Statement

**For designated executives 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 purposes of this policy, Designated Executives will include the Corporation's executive officers, directors and those individuals receiving this policy through Regulatory University.

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 management, the People Office ([The.People.Office@fisglobal.com](mailto:The.People.Office@fisglobal.com)), the Global Employee Relations Team ([Employee.Relations@fisglobal.com](mailto:Employee.Relations@fisglobal.com)), or the FIS Chief Compliance Officer ([CorporateCompliance@fisglobal.com](mailto:CorporateCompliance@fisglobal.com)). Violations may also be reported using the FIS Ethics Web site ([www.fnisethics.com](http://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. Use link (<https://rmis.fnfis.com/>) to report a potential security incident. For urgent or critical security incidents, call +1.414.357.FSIRT (3747) (U.S. and International).