

01.01 Code of Business Conduct and Ethics

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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.

01.01 Code of Business Conduct and Ethics

Purpose

Statement

01.01.01 A Message from Gary Norcross, FIS Chief Executive Officer

A Message from Gary Norcross, FIS Chief Executive Officer

Ethical business practices are a top priority at FIS. Our unwavering commitment to ethics is critical to our success because it reflects upon and impacts every aspect of our business: reporting to our shareholders, our reputation with customers, our dealings with suppliers, our communications with regulatory agencies, our treatment of job applicants and, ultimately, our interactions with each other in the workplace.

While ethical behavior often connotes virtues such as integrity, corporate responsibility and honesty, the perception of ethics varies across cultures, especially in our highly diverse employment and supplier base. The Company's Code of Business Conduct and Ethics (the Code) is intended to help each of us understand our role, and the role of others, in good corporate conduct. The Code is a valuable tool with information about our policies, procedures and expectations, as well as examples of circumstances you may encounter on the job.

Remember that good conduct is more than just 'not doing the wrong thing' – it requires 'doing the right thing.' If you see or suspect one of our employees or one of our suppliers is violating the law or our Code, please report it to your manager and/or the chief compliance officer through our FIS Ethics Helpline or Web site at www.fnisethics.com.

Exceptional performance cannot be sustained without ethical behavior. Our Company is committed to doing the right thing and we expect each of you to do the same.

Thank you for your commitment to protecting our values and promoting ethical conduct.

Sincerely,

Gary Norcross

FIS Chief Executive Officer

01.01.02 Code of Business Conduct and Ethics

Fidelity National Information Services, Inc. and its subsidiaries (collectively, FIS or the Company) sponsor the Business Ethics and Compliance Program (Program), a shared good faith effort by the Company and its employees to conduct business in a manner that is socially responsible, values-based and in compliance with the letter and spirit of the law.

The Program includes the following main components:

- This Code of Business Conduct and Ethics (Code or Code of Conduct),

- Policies that supplement the Code, many of which are referenced herein, and
- Procedures for Program administration as may be established from time to time.

The Program applies to all employees, officers, subcontractors and, to the extent relevant, directors of the Company. All employees, as a condition of employment or continued employment, are required to acknowledge in writing that they have received copies of this Code, read it, and understand that the Code contains the Company's expectations regarding conduct in the business environment.

01.01.03 Core Values

Our collective mission is to maximize the value of our shareholders' investment in the Company while maintaining our core values, which are embodied under the following principles:

- We conduct our business in a socially responsible manner within the letter and spirit of both the law and our Code of Conduct;
- We recognize that people are our greatest strength. The quality of our people differentiates us and personifies our leadership position;
- We treat customers, consumers and employees with respect and dignity;
- We are committed to a well-established set of principles that address privacy issues, and we take pride in being a trusted steward of customer and consumer information;
- We take very seriously our reputation for honest and ethical business dealings around the world; and
- We seek customers and business partners whose ethical standards mirror our own, and decline to do business with unethical entities and individuals.

This Program includes several company policies and standards (Company Policies) with which employees must comply. Complete copies of the Company Policies and other supporting information are made available to you on the Company's intranet. Every FIS Employee should be familiar with the material provided by the FIS Enterprise Policy Office on FIS and Me. From time to time, the Company may publish revisions or supplements to the Company Policies as appropriate based upon changes in the regulatory environment, changes in the Company's business and other factors.

Employees who violate the Company Policies are subject to disciplinary action, up to and including termination of employment for cause. Specific examples of legal fines or penalties are included in this Code for illustration purposes only. Those examples are not exclusive, and are not intended to be a full description of all possible legal fines or penalties. In agreeing to comply with this Code, you are agreeing that you will comply with those Company Policies relevant to your job.

01.01.04 Compliance with Laws

Because the Company is incorporated and publicly traded in the United States, employees world-wide are often subject to U.S. laws. You are required to comply not only with specific Company Policies but also with applicable laws, rules and regulations in connection with your employment or service with the Company. If an express provision of the Code conflicts with a legal obligation, you must follow the law. Contact your supervisor, the Company's Law Department or the Chief Compliance Officer in the event you suspect such a conflict.

FIS expressly prohibits any participation in, support of, or association with the illegal and immoral practice of trafficking in persons, forced labor and slavery. We are committed to a high ethical standard in its daily business practices and will

continue to act in accordance with all applicable laws. Our employees are encouraged to report any incident relating to modern slavery so that appropriate remedies can be taken.

For more information outlining the steps we have taken and our ongoing planned efforts to ensure that modern slavery is not occurring in our supply chains or our organization, please review our FIS Modern Slavery Act Transparency Statement posted on our external website www.fisglobal.com within the Investors / Corporate Governance – Highlights webpage. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015.

01.01.05 Responsibility to the Company and Its Owners

01.01.05.01 Accounting, Auditing, Public Disclosure and Controls

The Company has established internal controls over financial reporting designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements. Internal controls have the following objectives:

- Full and accurate records of dispositions of Company assets are maintained;
- Transactions are recorded as necessary to prepare accurate financial statements;
- Receipts and expenditures are made only in accordance with official authorizations; and
- Prevention or timely detection of unauthorized acquisition, use or disposition of the Company's assets.

Employees are responsible for complying with internal controls applicable to their areas of responsibility. Also, employees need to be alert to situations, whether in their direct area of responsibility or otherwise, where internal controls could be improved. You may provide any suggestions you have for improving the Company's controls to your supervisor.

01.01.05.02 Public Disclosure

As a public company, the Company must provide full, fair, accurate, timely and understandable disclosure in the reports that the Company files with or submits to the SEC and its other public disclosures, including press releases. Such disclosures may include information generated by or related to the Company's subsidiaries located around the world. The Company has established disclosure controls and procedures to help ensure that information required to be disclosed by the Company in its SEC reports and other public disclosures is accumulated from appropriate information sources within the Company, and communicated to management as appropriate to allow timely decisions regarding disclosure and the completion of accurate SEC reports.

The Company's SEC reports and other public disclosures must be free of material misstatements and misleading omissions. The Company's public financial information should fairly present in all material respects the Company's financial condition, results of operations and cash flows. If you suspect that any Company SEC report, press release or other public disclosure (including on the Company's web site) contains a material inaccuracy or omits a material fact that renders the disclosure misleading or if it involves a questionable accounting or auditing matter, you should immediately contact your supervisor, the Chief Compliance Officer, the Chief Audit Executive or utilize the FIS Ethics Helpline or Web site as described in the Reporting Violations section near the end of this Code to report the matter anonymously.

01.01.05.03 Statements in Connection with Audits or Investigations

No employee, officer, subcontractor or director shall, directly or indirectly, make a materially false or misleading statement, or omit to state any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading, to an internal or external auditor or investigator in connection with:

- Any audit, review or examination of the financial statements of the Company;
- The preparation or filing of any document or report required to be filed with the SEC or other local or regional agency;
- Any internal audit of the Company, or any activity of an internal auditor; or
- Any investigation conducted in connection with a reported concern or allegation, including reports made to the FIS Ethics Helpline or Web site.

01.01.05.04 Fraud or Misappropriation

The Company defines fraud as an act of misappropriation (theft) of funds, money or property. Fraud may take many forms including theft of money or property, improper sale of Company information or assets, acceptance of illegal kickbacks and unauthorized travel or expense. When fraud or theft occurs, there are often clues that illegal or improper acts are occurring. Paying attention to the work environment for things that do not fit may help detect fraud as it is taking place. Every employee, officer, subcontractor or director is required to report any fraud or wrongdoing as described in the Reporting Violations section of this Code.

The Company established a toll-free FIS Ethics Helpline and Web site to report fraud. The toll-free numbers for each country are provided in Appendix A to this Code, or you may obtain the toll-free numbers from the following web site: www.fnisethics.com. When you place a call to the helpline, the call center specialist will capture your question or report and ask you to provide detailed information. This service is available 24 hours a day, 7 days a week. You may also use the Company's Ethics Helpline or Web site to ask a question or file a report. You may choose to remain anonymous when submitting questions or reports, whether via helpline or web site; however, doing so may limit a full investigation of the matter, so you are encouraged to identify yourself. You should also be prepared to provide the names of witnesses and potential victims to increase the success of the investigation.

01.01.05.05 Confidential Information

One of the Company's most valuable assets is its body of business information, which includes information that is classified as confidential to the Company. For example, knowledge regarding card or transaction processing and consumer data analytics, intellectual property on system and applications developed by the Company, as well as client information such as the personal and financial data of their customers. Confidential information is information that is not generally known to the public or our competitors, and which would harm the Company's reputation, its financial results and its customers if it were disclosed inappropriately.

You are responsible and accountable for the integrity and protection of the Company's confidential information, and you must take all reasonable precautions to protect this information from improper disclosure. You must not disclose confidential information except when it is necessary and appropriate in connection with your responsibilities. You should handle carefully any documents containing confidential information during working hours, and properly secure them at the end of the business day.

Employees also must ensure that they do not misuse the intellectual property or confidential information of any other parties. Each employee must have a practical working knowledge of the laws and regulations that affect his or her job responsibilities. There are several U.S. federal and state laws as well as international standards that require the Company to protect and maintain the security and confidentiality of customer and consumer data. Regulators of financial institutions have also implemented numerous regulations dealing with data security in the outsourcing of data processing that involves personally identifiable financial information about a consumer. For example, if your job involves the providing of services to U.S. financial institutions or you have access to customer data, you should be aware of the Company's obligations to protect certain customer data under the Gramm-Leach Bliley Act. Additionally, if your job involves the processing of or potential access to card data, you should be aware of the Company's obligations to protect

cardholder data. Visa and MasterCard have joined with Discover and American Express in the implementation of the Payment Card Industry (PCI) Data Security Standards for the handling, security and accountability of cardholder data. The Company is required to comply with the PCI Data Security Standards in its business as processor of Visa and MasterCard branded credit and debit cards. If your job involves use or provision of consumer reporting information, you should be aware of the restrictions and protections of that information prescribed by the federal Fair Credit Reporting Act as well as related state law and regulations. Further, the Company is subject to other internationally accepted privacy principles, including those established by: the Organization for Economic Cooperation and Development (international), the European Union General Data Protection Regulation, the U.S. Department of Commerce including the EU-US Privacy Shield Principles, the Personal Information Protection and Electronic Documents Act (Canada), the Asia-Pacific Economic Cooperation Privacy Framework, and the National Privacy Principles (Australia).

The Company has established Corporate Policies to protect and secure sensitive consumer and employee data, including in particular the FIS Privacy Policy. FIS also has an Information Security Program and the Company Policies included in that program are available through the FIS Enterprise Policy Office site on FIS and Me. Each employee must strictly adhere to these policies and take seriously our shared responsibilities to ensure the safety and confidentiality of all customer confidential information and consumer information we access while performing our jobs.

You have always been subject to these policies and procedures, so it is vital that you take the time to read and understand them. These policies and procedures are posted on the Company intranet. Failure to comply with Company Policies and related procedures may result in disciplinary action and/or termination for cause.

Employees must participate in annual mandatory compliance, privacy and security awareness training offered by the Company. If you have not received information regarding such training, you should email CorporateCompliance@fisglobal.com.

01.01.05.06 Company Computers and Other Resources

All electronic and telephonic communications and computing equipment, software, services and all information transmitted by, received from or stored in these systems, are the property of FIS and, as such, are provided for official business only. All messages or information composed, sent, received or stored using the e-mail system, instant messaging tools, network, Internet, Intranet or any other company-provided or approved system or service are and shall remain the property of the Company, including passwords. All information contained in the items mentioned will be processed in line with applicable law and regulation and in accordance with our Staff Privacy Notice.

Security and risk management is a critical issue for everyone, and mitigating risk is everyone's responsibility. You are responsible for the contents of your computer and your other mobile storage devices, and you will be held accountable for any violation of Company Policies. By following Company Policies and making good decisions, we can ensure the data entrusted to us remains secure. As stated in the Company's Information Security Policies, consumer, customer and employee data should not be stored on laptop computers or on any other type of mobile media. These policies cover Social Security numbers, account numbers, credit card numbers, driver's license numbers, and dates of birth or any other personally identifiable information. If you cannot remove such files or if you are required to save data to do your job, you should not remove the device from the Company's secured premises. All such devices must be encrypted in accordance with Company Policies.

If you are aware of any Company or subcontractor laptop computer or other mobile device that is NOT encrypted, please send an e-mail to the Company's Information Security personnel. You can also anonymously report any failure to comply with Company Policies as described in the Reporting Violations section of this Code.

01.01.05.07 Electronic Communication

Each employee should be aware that electronic communications may not be private unless specifically provided for by local law. Monitoring may be carried out in line with applicable law and regulation. Records of any communications may be made and used by the Company. You should be aware that restrictions on communicating “Insider” information for securities law purposes applies to the use of electronic media as well as all other forms of communication.

01.01.05.08 Conflicts of Interest

The Company recognizes that employees have a variety of interests in their personal lives with differing social, investment and secondary business activities. At the same time, employees within the Company become exposed to proprietary and confidential information, business assets or work product about the Company or third parties not available to the public.

You are expected to avoid any activity, investment, interest or association that interferes or appears to interfere with the independent exercise of judgment in carrying out an assigned job responsibility or with the interests of the Company. If there are any questions whether or not a specific act or situation represents, or appears to represent, a conflict of interest, that employee should consult his/her supervisor and the Chief Compliance Officer or General Counsel before undertaking the action or creating the actual or apparent conflict situation.

- **Outside Financial Interests.** No employee may have any financial interest, other than as a minor stockholder (i.e., less than two percent ownership) of a publicly traded company, either directly or indirectly, in any supplier, contractor, customer or competitor of the Company, or in any business transaction involving the Company, without full disclosure to and prior written clearance from the Chief Compliance Officer.
- **Doing Business with Relatives.** No employee may engage in any business transaction on behalf of the Company with a firm in which there is a relationship with a principal, officer or representative, or supervise directly or indirectly anyone that is a relative by blood, marriage, or close personal relationship. If you have questions regarding a relationship, contact your People Office Representative or Corporate Compliance at corporatecompliance@fisglobal.com and submit a conflict of interest form.
- **Use of Company Property.** No employee may use Company property and services for personal benefit unless use of that property and those services has been properly approved for general employee or public use. You must obtain prior Company approval for the use of Company-owned land, materials, equipment, etc., under any other circumstances. You must not sell, lend, give away or otherwise dispose of Company property, regardless of condition or value, without proper authorization.
- **Corporate Opportunities.** Employees are prohibited from (a) taking for themselves personally any business opportunities that conflict with the interests of the Company that are discovered using Company property, information or position; (b) using Company property, information, or position for personal gain; or (c) competing with the Company. Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

The provisions of this Code with respect to Conflicts of Interest are intended to compliment similar provisions in the FIS Employee Handbook and other Company Policies. Employees are required to comply with the provisions of all relevant Company Policies, including this Code.

EXAMPLE

Q: *It is my job to evaluate and select suppliers for the Company. One of the businesses responding to our Request for Proposal is 50% owned by my brother. Do I treat this like any other evaluation?*

A: *Family ownership in the bidding supplier conflicts, or has the appearance of conflicting, with your responsibility to evaluate and select the best supplier. It is best to remove the family-owned business from the bidding process or remove yourself from the selection process. You should also consult with you manager or the Law Department.*

01.01.05.09 Document Retention and Destruction

The Company's corporate records are important assets. Corporate records include essentially all records you produce as an employee, whether hard copy or electronic. A record may be as obvious as a memorandum, an e-mail, a contract, or something not as obvious, such as a computerized desk calendar, computer logs, or an expense record.

The law requires the Company to maintain certain types of corporate records for a specified period. Failure to retain those records for the periods indicated could subject the Company to penalties and fines, cause a loss of rights, obstruct justice, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company has adopted a Records Management Policy to establish uniform guidance regarding the retention and destruction of information and records in conformity with applicable law. The Policy is available on the FIS Enterprise Policy Office portion of FIS and Me and is designed to provide for the retention of records of continued value and the appropriate destruction of irrelevant or unneeded records and documents. Compliance with this policy results in cost savings for the Company, and makes finding and retrieving required records easier, thereby reducing the need for expensive electronic and manual searching.

All employees must comply with the Company's Records Management Policy and its records retention schedule, subject to the general exceptions indicated in that policy. If you have any questions please contact the Law Department or the [Privacy Office](#).

01.01.05.10 Media Communications

In all our dealings with the press and other media, the Company must speak with a unified voice. Accordingly, except as otherwise designated by the Company's Chief Executive Officer, the Corporate Communications Department is the sole contact for media seeking information about the Company. Any requests from the media must be referred to the Corporate Communications Department. They will deal directly with the media and make appropriate arrangements. They must approve any articles, press releases or other public communication involving the Company prior to publication.

01.01.05.11 Intellectual Property

The Company's intellectual property includes inventions, improvements, ideas, information, software, models and programs, together with the related materials, documentation, patents, trademarks, copyrights, and other rights that go along with them. The Company will normally be the exclusive owner of all rights in intellectual property that is related to our businesses or is developed by employees and contractors in the course of their employment or service with the Company. This is true whether or not the employees or contractors make the developments during working hours, on Company premises, or using Company material or resources.

The Company's intellectual property rights are extremely valuable. They are also extremely "fragile" because they can be compromised or even forfeited if we do not vigilantly protect them. In order to protect the Company's intellectual property, all Company employees and contractors should use their best efforts to:

- Recognize and identify the Company's actual or potential intellectual property assets;
- When creating or using a new brand name for a product or service, the employee should first contact the Law Department to perform a clearance search to be certain that the name is not subject to the trademark rights of a third party;
- Notify the Company's Chief IP Counsel or another member of the Company's Law Department) of the existence and development of intellectual property assets;

- Great caution must be taken to avoid infringing the patents of others. When creating a new invention, system or process, if the employee knows of an existing third party patent in the subject area of the invention, he/she should contact the Law Department for assistance before proceeding;
- Assist in securing the Company's ownership of intellectual property assets;
- Use the intellectual property assets properly, including in licensing and other transactions; and
- Notify the appropriate personnel (the Company's Chief IP Counsel or another member of the Law Department) of any potential infringement or misuse of the Company's intellectual property, so that the Company may take appropriate action.

01.01.05.12 Code of Ethics for Senior Financial Officers

The Company's "Senior Financial Officers" (which includes the Company's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, Controller, and any other persons performing similar functions) are bound by all provisions of this Code of Conduct, particularly those provisions relating to honest and ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The Senior Financial Officers also have responsibility for full, fair, accurate, timely and understandable disclosure in the periodic reports and submissions filed by the Company with the U.S. Securities and Exchange Commission (SEC).

The CEO and the Senior Financial Officers are required to be familiar with and comply with the Company's disclosure controls and procedures applicable to him or her so that the Company's public reports and documents filed with the SEC comply in all material respects with the applicable federal securities laws and SEC rules. In addition, each such officer having direct or supervisory authority regarding these SEC filings or the Company's other public communications concerning its general business, results, financial condition and prospects should, to the extent appropriate within his or her area of responsibility, consult with other Company officers and employees and take other appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely and understandable disclosure.

Each Senior Financial Officer shall bring promptly to the attention of the Audit Committee of the Board of Directors any information he or she may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data; or any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

The Audit Committee shall determine appropriate actions to be taken in the event of violations of this Code by any Senior Financial Officer. Any waiver of or amendments to the Code of Conduct with respect to any Senior Financial Officer must be approved by the Audit Committee and will be promptly disclosed to the extent required under applicable law, rule or regulation.

01.01.06 Responsibility for Fair Business

01.01.06.01 Relationships with Suppliers, Contractors and Customers

Dealing with suppliers, contractors and customers may be sensitive, involving issues of law and ethics. In general, the Company expects all employees to conduct business honestly and ethically. The following guidelines supplement, but do not replace, specific criteria in the Company's purchasing or sales policies and procedures:

- **Treatment of Others.** Employees must treat all suppliers, contractors and customers fairly and honestly at all times. These parties should not be taken unfair advantage of through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing.

- **Accepting or Giving Money, Gifts or Entertainment.** No employee, personally or on behalf of the Company, will directly or indirectly request, accept, offer or give money, gifts (of other than nominal value, usual hospitality or entertainment), loans (except from lending institutions) or any other preferential treatment in dealing with any present or potential Company supplier, contractor, customer or competitor.
- **Payments to Purchasing Agents.** No employee, personally or on behalf of the Company, will make payments to purchasing agents or other employees of any supplier, contractor or customer to either obtain or retain business, or to realize higher or lower prices for the Company. However, unless otherwise prohibited by law, you may give gifts of nominal value on customary gift-giving occasions.
- **Government Contracts.** Additional rules apply to products and services offered or provided under contracts with federal or state government agencies. If you have any questions regarding government contracting, you should contact the Company's Law Department.

The Company has issued guidance with respect to what gifts are considered of nominal value, usual hospitality or entertainment. If you have questions regarding a specific gift that you would like to give or that has been offered to you, please contact the FIS Ethics Officer or CorporateCompliance@fisglobal.com.

01.01.06.02 FIS Anti-Bribery and Anti-Corruption (FABAC) Program

The use of FIS funds, or any other funds or anything of value given by an individual or entity for the benefit or on behalf of FIS, for any unlawful or unethical purpose is strictly prohibited. FIS expects every employee, officer and director to read the FIS Anti-Bribery and Anti-Corruption Policy ("FABAC Policy") and Engagement of Third-Party Agents Standard to understand their application to the performance of his or her business responsibilities. FIS is committed to preventing bribery and corruption and the FABAC Policy offers guidance for the complex legal and business issues which employees may face. While managers are expected to ensure that all "Agents" conform to the requirements of the FABAC Policy and Standard, it is the responsibility of every FIS employee to ensure that no one, either from FIS or indirectly on behalf of FIS, is engaging in conduct prohibited by the FABAC Policy and Standard, and to report such suspected conduct.] "Agent" means any individual or organization that acts on behalf of FIS, including contractors and resellers.

An ethical culture is important to FIS and is an integral part of our Core Values. This is why the FIS Anti-bribery Anti-corruption (FABAC) Compliance Committee reviews third-party resellers and agents with whom FIS does business with outside of the United States. If you have any questions or need to determine if a third-party should be reviewed by the Committee, contact the FABAC Compliance Committee via CorporateCompliance@fisglobal.com.

Employees and Agents may not offer, give, or cause others to offer or give bribes, kickbacks or illegal payments to any person in order to advance, promote, expedite or influence as well as retain or obtain FIS business. Such prohibited payments including but are not limited to money, charitable or political donations made on the third parties' behalf, favors, costly entertainment or gifts. All payments and disbursements must be properly recorded to ensure funds are not disbursed for these purposes. The FIS Anti-bribery and Anti-Corruption Policy does not prohibit the offering of reasonable business meals or entertainment to third parties, although should not be offered in circumstances when it could be perceived as a means of inducing any particular action by such third-party, care should be taken to ensure that such payments or expenses are in compliance with all applicable laws and government policies both local and U.S.

Generally neither FIS nor its employees or Agents should provide any gifts to government officials or prospective customers. This does not preclude the giving of gifts that are of nominal value, are for the purpose of maintaining goodwill towards FIS, and are given in accordance with local laws, so long as they are not given for the purpose of inducing any particular action by the recipient and are properly documented and recorded.

As stated above, we all need to use our best efforts to ensure that third parties do not violate the FABAC Policy. To do this, we expect that:

- No employee will ignore suspicious behavior by third-party Agents. Instead, we expect that employees will investigate suspicious behavior by third-party Agents and promptly report suspicious behavior by third-party Agents to the FIS Chief Compliance Officer.
- No employee will authorize, permit or encourage any third-party Agent to make any payments to third parties for the purpose of securing or maintaining business. We expect that employees will not condone these payments and will refuse to do business with any Agent who appears to be making these payments.
- Only those Agents who have a current written approval of the FIS Anti-Bribery and Anti-Corruption Committee may be engaged in business relationships.

You are strongly encouraged to ask any questions that you may have regarding the FABAC Policy or an action that you feel might be in violation of the Policy. These questions should be directed to the FIS Chief Compliance Officer. You should feel free to contact the Compliance Officer at CorporateCompliance@fisglobal.com. It is particularly important that you use your best judgment at all times and ask for advice from the Chief Compliance Officer before taking any action that you feel could be a violation of the FABAC Policy. We encourage you to always err on the side of caution.

If a co-worker or a third-party Agent is taking actions or is considering taking actions that are suspicious and that you think could be in violation of the FIS Anti-bribery and Anti-Corruption Policy, it is your obligation to report this to the Chief Compliance Officer.

01.01.06.03 Political Contributions

U. S. federal and state laws, as well as laws within certain countries, limit or prohibit the nature and extent of individual and corporate political participation. For example, U.S. federal law and that of many states prohibit corporate contributions to political candidates or officeholders. The Company will not reimburse anyone for personal political contributions. The Company also will not alter personal compensation in any way under any circumstances to reflect personal political contributions.

01.01.06.04 Insider Information and Securities Trading

The stock of the Company is publicly traded on the New York Stock Exchange (NYSE) and the Company must comply with U.S. federal and state securities laws and the regulations of the NYSE.

Securities markets, such as the New York Stock Exchange, assume that all important information about a company is publicly available to potential investors at the same time. The Company, in turn, respects this assumption by communicating to financial markets through press releases or earnings releases with broad distribution so that information is uniformly rather than selectively communicated.

In the event that an employee learns information that may affect an investor's desire to buy or sell Company stock, the employee should communicate that information to an officer of the Company so that further upward communication within the organization will follow. Examples of material information generally will involve potential liability affecting millions of dollars or events of public interest.

From time to time an employee may become aware of material information about the Company, which is not yet publicly known. It is likely that any personal trading in Company stock by an employee while in possession of that information is illegal and no such trades should be made. The Company has published a Policy Governing Insider Trading and Tipping which is available on FIS and Me. You may also consult the Corporate Secretary to determine whether you or one of your employees possess inside information. If an employee learns material confidential information about another company while in the course of employment, trading in securities of such company on the basis of the "inside" information likewise may be prohibited. Securities laws also prohibit passing along insider information to third parties, or recommending to a

third party the purchase or sale of a security based on such information. A person may be held responsible for trading activity by a friend or relative if the person is the source of insider information.

The Securities Exchange Commission and the NYSE take securities law violations seriously and are able to monitor trading activity through computerized records. Violations of law may result in civil and criminal penalties against both the Company and individual employees. If you are not certain about the application of the rules to a particular situation, seek the advice of the Company's Corporate Secretary. Do not take the chance of engaging in any illegal securities transactions.

EXAMPLE

Q: *I saw some documents at the printer that showed the Company was going to purchase a large, publicly-held company. Can I tell my father to trade securities in our Company or in the other company?*

A: *No. Trading based upon material nonpublic information is illegal and against the Code, whether you are trading in the Company's securities or those of another company. Your father could also be found liable.*

01.01.06.05 Copyright Protection

It is the policy of the Company to purchase computer software it desires to use in its business operation and not to violate copyright laws by making unauthorized copies of legally protected software. Accordingly network, site and individual software licenses should be acquired in all cases unless the Company is exempt. When licensed software is acquired, evidence of the purchase should be maintained in the form of invoices, user manuals and/or license copies as available. Your personal work area for computers should contain appropriate individual licenses or group license information.

It is the policy of the Company not to violate copyright laws by making unauthorized copies or unauthorized use of legally protected printed or electronic documents. Copyright laws are intended to provide protection to authors, creators and publishers of works. If you intend to use someone's copyrighted work, unless the use is considered a "fair use" (a technical defense to copyright infringement), you must obtain that person's written permission. Under federal law, only the copyright owner or someone acting with the owner's authority can grant that permission. Without written permission, you expose yourself and the Company to legal risks.

While not every unauthorized use of a copyrighted work is an infringement, whenever you copy another person's printed works (such as magazine or newspaper articles) or include another person's words, illustrations, photographs, charts or graphs in your work, you must be sensitive to the risk of infringing someone's copyright. If you have questions regarding copyright protection, you should contact the Company's Law Department.

EXAMPLE

Q: *Another employee in my department has a software application that I need to perform my work. There is a freeze on all asset purchases, so can I just copy the software application and then buy it when the freeze is lifted?*

A: *No. Unauthorized copying of software is a violation of copyright law and this Code.*

01.01.06.06 Antitrust and Trade Regulation

The Company complies fully with the letter and the spirit of all applicable laws governing antitrust and trade regulation. Those laws are designed to ensure free and open competition in the marketplace by prohibiting any activities that unfairly or unreasonably restrict normal competition. Antitrust violations can subject both the employee and the Company to substantial penalties, including civil, criminal, and disciplinary action or discharge from the Company. Although it is impossible to list all possible examples of antitrust violations in this Code, the following rules demonstrate the types of activities that you should avoid:

- **Relations with Competitors.** Employees must not participate in any arrangement with competitors to fix prices. Examples of price fixing include rigged or coordinated bidding and the systematic exchange of price

information. You must not take any action with competitors to divide or allocate markets, or to mutually refuse to deal with third parties. To avoid the appearance of these activities, employees must be careful to limit the exchange of information with our competitors;

- **Relations with Customers.** Employees must not require our customers to resell our products or services at specified resale prices or at prices exceeding specified minimums. (That restriction generally does not apply to agents selling our products or services on our behalf.) Under certain circumstances it may be unlawful to prohibit our customers from buying products or services from other suppliers. Although the Company has a broad right to select the customers with whom it wants to do business, that right must be exercised with caution, and any refusal to deal with a particular customer must be evaluated carefully;
- **Relations with Suppliers.** We must not enter into agreements with our suppliers to resell their products or services at specified resale prices or at prices exceeding specified minimums. Also, under certain circumstances, we may not enter into agreements with suppliers prohibiting them from selling to competitors of the Company; and
- **Trade Associations.** When representing the Company in trade association activities, employees must be careful not to share pricing or other non-public competitive information, or engage in any other activity that could reasonably be construed as price fixing or in restraint of trade.

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. Contact the Company's Law Department if you have any questions about what type of activities would be considered to violate antitrust or trade regulation laws.

01.01.06.07 Email and Fax Advertising

There have been U.S. federal and state, as well as international laws and regulations passed to stem perceived abuses in using email and facsimile transmissions to advertise products and services. In promoting the Company's products and services, employees must comply with those laws to avoid significant exposure to the Company.

Email that is meant to advertise or promote a product or service must accurately disclose who it is from, must have an accurate subject line that is not misleading, must state that it is an advertisement and contain the business address of the sender. Additionally, most non-U.S. locations and certain U.S. states require consent or authorization from the recipient prior to transmission of the email advertisement. In the U.S., the email message must inform the recipient of a right to opt out of future email advertisements and provide a mechanism for doing so. Opt out requests must be honored as required by law.

Facsimile advertisement may only be sent with the express consent of the recipient or to certain customers with which the Company has a prior "existing business relationship." Facsimile advertisements must be labeled as an advertisement, contain the date and time the fax was sent, the name of the business sending the fax, and the telephone number of the sending machine or business. Additionally, it must inform the recipient of a right to opt out of future facsimile advertisements by email or a toll-free telephone number.

Make sure you are in compliance with Company Policies before you advertise and have the Company's Chief Compliance Officer answer any questions or review your advertisement if in doubt. Do not become a defendant in litigation with significant exposure to the Company.

01.01.07 Responsibility to Other Employees

01.01.07.01 Environment, Health and Safety

The Company is committed to protecting and maintaining the quality of the environment and to promoting the health and safety of employees, customers and the communities where it operates. To meet that commitment, employees must:

- Operate in full compliance with both the letter and the spirit of environmental, health and safety laws and regulations;
- Immediately report any environmental, health or safety problems;
- Consider opportunities to improve environmental, health and safety programs; and
- Be prepared to observe emergency preparedness plans if necessary.

You should direct any reports of actual or potential environmental, health or safety problems or any questions about responsibilities or Company Policies in these areas to your supervisor or your People Office representative.

01.01.07.02 Human Resources

The relationship between the Company and its employees is complex, involving rights, obligations and expectations as set forth elsewhere in this Code, in written benefit plans and in various People Office policies and procedures manuals. It is important for each employee to read and understand written materials made available so that the full extent of entitlements will be learned as well as expectations of the Company for performance and behavior.

The Company has prepared an Employee Handbook which provides a summary description of employee entitlements and other matters of importance to an employee in the employment relationship. A copy of the Employee Handbook is distributed to all Employees when employment begins and is available on the Company's Intranet. Please read the Employee Handbook thoroughly for it is the starting point in understanding your benefits and entitlements as an employee.

The Company is committed to providing equal opportunity in all of its employment practices including selection, hiring, promotion, transfer, and compensation to all qualified applicants and employees without regard 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, and/or any other characteristic protected by law.

The Company does not tolerate harassment of any of its employees, applicants, vendors or customers, and the Company's policy is to maintain a working 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 law violation of this policy and will be treated as a disciplinary matter.

The Company cannot resolve a harassment problem unless it knows about it. Therefore, it is your responsibility to bring any such problems to the Company's attention so that it can take whatever steps are appropriate to correct the problem. If a sexual harassment or other grievance occurs, the person affected may rely on the Employee Problem Resolution procedure set forth in the Company's Employee Handbook or in accordance with established local People Office procedures.

01.01.08 Responsibility to Report Wrongdoing

01.01.08.01 Reporting Violations

This Code is designed to encourage the prompt internal reporting of violations of the Code, including applicable laws, rules and regulations, and to provide a method to report conduct that is suspected may be in violation of the Code. In making a good faith report, you should not fear dismissal or retaliation of any kind.

YOU ARE RESPONSIBLE FOR REPORTING, AS PROVIDED IN THIS CODE, ANY AND ALL EVENTS, PRACTICES OR CIRCUMSTANCES THAT YOU SUSPECT MAY VIOLATE THE CODE.

01.01.08.02 What to Report

You should be alert and sensitive to situations that could result in misconduct. If you believe that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code, including any actions that violate or would violate applicable laws, rules and regulations, you are required to bring the matter to the attention of the Company.

01.01.08.03 How to Report

You should generally first bring the matter to the attention of your supervisor. However, if you do not feel that you can discuss the matter with your supervisor, you may either raise the matter with the next level of management. You can also report it to the Chief Compliance Officer or via the Company's Ethics Helpline or Web site.

When an employee submits a report directly to a supervisor or manager, the supervisor or manager should consider whether the report involves a potential violation of the Code and if so, they must report it immediately to the Chief Compliance Officer.

The Chief Compliance Officer will route the communication to the appropriate individual at the Company, such as the General Counsel or the Chief Audit Executive, based on the nature of the information reported.

The Company established a toll-free FIS Ethics Helpline and Web site. When you place a call to the helpline, the call center specialist will capture your question or report and ask you to provide detailed information. This service is available 24 hours a day, 7 days a week. You may also use the Company's ethics helpline or web site to ask a question or file a report. You may choose to remain anonymous when submitting questions or reports, whether via helpline or web site; however, doing so may limit a full investigation of the matter, so you are encouraged to identify yourself. You should also be prepared to provide the names of witnesses and potential victims to increase the success of an investigation.

The toll-free numbers for each country are provided in Appendix A to this Code, or you may obtain the toll-free numbers from the following web site: www.fnisethics.com. All calls are answered in English, however most other languages are supported. To continue a call in another language, please speak the name of your preferred language in English and an interpreter will be located to join the call.

Employees must not use the FIS Ethics Helpline and Web site in bad faith or in a false or frivolous manner. Further, employees should not use the helpline to report personal grievances not involving violations of the Code.

01.01.08.04 Principles Applicable to Seeking Advice and Reporting

To encourage employees both to seek guidance before engaging in behavior that is inconsistent with Company Policy and to report violations, the following principles shall apply:

- **Anonymity.** Employees reporting violations have the option of remaining anonymous. If an employee requests anonymity, the Company will use reasonable efforts to keep reporter identity confidential. However, employees should be aware that in instances where they insist on anonymity, it may be more difficult (if not impossible) for the Company to follow up, investigate, and remedy the alleged wrongdoing as thoroughly as it would otherwise like to.
- **Confidentiality.** All practical steps must be taken to safeguard confidentiality. Confidentiality may not be possible, for example, in reporting harassment or certain violations of law or the nature of the investigation may be such as to cause your identity to become known.
- **No Retaliation for Reports.** FIS has a strict no retaliation policy. This means you will not be subject to discipline for reporting in good faith that you are concerned about unethical or illegal behavior. Retaliation against an individual for reporting the violation or for participating in the related investigation is a serious violation of FIS policy and, like the violation itself, will be subject to disciplinary action. However, reporting your concerns does not protect you from discipline for any misconduct on your part in connection with the conduct reported or otherwise.

01.01.08.05 Penalties

An employee who has violated the Code or otherwise committed misconduct is accountable for his or her violation. Violators may be subject to a full range of penalties of varying levels of severity. These penalties may include, without limitation, oral or written censure, training or re-training, demotion or re-assignment, suspension with or without pay or benefits or termination of employment for cause. In determining the appropriate penalty for a violation, the Company may take into account all relevant information, including the nature and severity of the violation, whether the violation involved fraud or falsehood, whether the violation was intentional or inadvertent, whether the violator cooperated with the investigation of the violation and whether the violator has committed other violations in the past. The Company reserves the right to civil action or demand for criminal action against an employee in the event the violation involves fraud.

01.01.09 Appendix A to the Code of Business Conduct and Ethics | Public Use

01.01.09.01 Ethics Helpline Toll-Free Calling Numbers by Country

Calls to the FIS Ethics Helpline should be made in good faith only. FIS has a strict no retaliation policy. This means you will not be subject to discipline for reporting in good faith that you are concerned about unethical or illegal behavior. Employees should not use the helpline to report personal grievances not involving violations of the Code.

All calls are answered in English. To continue your call in another language, please state your language in English and an interpreter will be located to join the call. During this time please do not hang up. If the telephone number listed is not functioning, please make your report online through the FIS Ethics web site www.fnisethics.com. Please indicate in the report that the telephone number did not work.

Country	Toll-free Number	Special instructions
Australia	1-800-339276	
Argentina – English	0-800-444-8084	
Argentina – Spanish	0-800-555-0906	
Barbados	1-800-5343352	
Belgium	0800-77004	
Brazil	0800-8911667	

Canada	1-877-364-7384	
Chile	1230-020-5771	
China (Northern)	10-800-712-1239	Northern China Includes: Beijing, Tianjin, Heilongjiang, Jilin, Liaoning, Shandong, Shanxi, Hebei, Henan, and Inner Mongolia.
China (Southern)	10-800-120-1239	Southern China Includes: Shanghai, Jiangsu, Zhejiang, Anhui, Fujian, Jiangxi, Hubei, Hunan, Guangdong, Guangxi, Hainan, Chongqing, Sichuan, Yunnan, Tibet Autonomous Region, Shaanxi, Gansu, Qinghai, Ningxia, Xinjiang and Autonomous Region.
Denmark	80-882809	
France	0800-902500	
Germany	0800-1016582	
Hong Kong	800-964214	
India	000-800-100-1071	
Indonesia	001-803-011-3570	
Ireland	1-800-552-070	
Israel	1-80-9214405	
Italy	800-786907	
Japan	(KDDI) 00531-11-0271 (Softbank Telecom) 0066-33-830499 (NTT) 0034-800-600131	
Korea, Republic Of	00308-13-2890	
Malaysia	1-800-80-8641	
Mexico	001-855-329-8182	
Netherlands	0800-0226174	
New Zealand	0800-447737	
Pakistan	1-877-364-7384	From outside line dial 00-800-01-001, at the prompt dial toll-free shown here
Peru	0800-52116	
Philippines	1-800-1-114-0165	
Poland	0-0-800-1211571	
Portugal	800-8-11470	
Russia	8-10-8002-6053011	
Saudi Arabia	1-877-364-7384	From outside line dial 1-800-10, at the prompt dial toll-free shown here

Serbia	800190799	
Singapore	800-1204201	
Slovakia	0800-001-544	
Slovenia	503-748-0646	
South Africa	080-09-92604	
Spain	900-991498	
Sweden	020-79-6282	
Switzerland	0800-562907	
Taiwan	00801-13-7956	
Thailand	001-800-12-0665204	
Turkey	1-877-364-7384	From outside line dial 0-811-288-0001, at the prompt dial toll-free shown here
Ukraine	1-877-364-7384	From outside line dial 0-800-502-886, at the prompt dial toll-free shown here
United Kingdom	08-000328483	
United States	1-877-364-7384	

01.01.10 Conflicts of Interest Standard

Employees are expected to avoid any activity, investment, interest or association that interferes or appears to interfere with the independent exercise of judgment in carrying out an assigned job responsibility or with the interests FIS. This Standard and the FIS' Conflicts of Interest Registry (the "Registry") are designed to provide criteria for the review of potential employee conflicts of interest. The Registry link is found on the [FIS & me Corporate Compliance page](#).

01.01.10.01 Conflicts of Interest Requirement

FIS recognizes that each of us has a variety of interests in our personal lives. We all have differing social, investment, and secondary business activities. At the same time, as FIS employees, we are often likely to be exposed to a lot of proprietary and confidential information, business assets or work product about the Company or third parties which are not available to the public. As a result of this exposure, we must honor our Code of Conduct & Ethics ("Code") by avoiding any activity, investment, interest or association that interferes or even looks like it may interfere, with the independent exercise of judgment in carrying out our assigned job responsibilities or that may conflict with the interests of the Company. All FIS employees and contractors are required to strictly abide by the FIS Code of Conduct & Ethics and the Employee Handbook regarding conflicts of interest. These policies are located on the [Policy Office page of FIS & me](#).

01.01.10.02 Avoiding Conflicts of Interest

Since conflicts of interest take many forms, it is important to understand what constitutes a conflict of interest. A conflict of interest is created when a person has competing interests and may not be able to exercise independent or objective judgment as a result of those competing interests. These types of competing interests include things like investment in a competitor's stock, use of company property for personal reasons, using the services of a business owned by your relatives to perform work for FIS, acceptance of gifts from a vendor. A conflict of interest can exist even if a situation can only be perceived by others as a possible conflict, and sometimes, even when no unethical or improper behavior has occurred.

Although not all conflicts of interest are not necessarily prohibited or harmful to FIS, employees, and contractors must provide full disclosure of all actual and potential conflicts of interest to their supervisor and the chief compliance officer (“CCO”) in a timely manner using the Registry. This disclosure is required to evaluate if a conflict of interest does exist and if so, how to avoid, resolve or mitigate the conflict. This Standard is designed to identify the type of conflict of interest, direct the employee on how to document and disclose the conflict through the Registry, and how to resolve an actual or perceived conflict of interest within the Company.

01.01.10.03 Identify –Types of Conflict of Interest

The categories below are a broad overview and are not intended to be a complete list of all circumstances an employee may encounter that may cause the appearance of or actual conflict of interest, and should be entered into FIS’ Conflict of Interest Registry. Please seek guidance from the corporate compliance team via corporatecompliance@fisglobal.com if the situation in question is not addressed below.

- **Outside Financial Interests:** No employee may have any financial interest, other than as a minor stockholder. A minor stockholder is defined as someone having less than 2 percent ownership in a publicly traded company. This includes any direct or indirect interests in any FIS vendor, third-party supplier, contractor, customer, or competitor of the Company. Any such business transactions must be fully disclosed to and approved by the FIS Corporate Compliance via use of the Conflicts of Interest Registry.
 - **Doing Business with Relatives:** No employee may engage in any business transaction on behalf of the Company with a firm in which there is a relationship with a principal, officer or representative, or supervise directly or indirectly anyone that is a relative by blood, marriage, or close personal relationship. If you have questions regarding a relationship, contact your People Office Representative, or Corporate Compliance at CorporateCompliance@fisglobal.com and submit a conflict of interest form.
 - **Corporate Opportunities:** Directors and employees are prohibited from (a) taking for themselves personally any business opportunities that conflict with the interests of the Company that are discovered through the use of Company property, information or position; (b) using Company property, information, or position for personal gain; or (c) competing with the Company. Directors and employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.
 - **Outside Employment:** The Company recognizes your right to engage in activities outside of your employment, which are of a private nature and unrelated to Company business. Therefore, an employee may hold an outside job, whether paid or unpaid, as long as he or she meets the performance standards of the job held with the Company. Outside position includes holding a second job (i.e. director, officer, associate, etc.), appointed to any position (i.e. Board member) or acting as a consultant with or regarding a current or potential outside business, firm, vendor, supplier, or a competitor of the Company. Employees are expected to not perform responsibilities associated with outside employment during Company time or using Company resources. All employees will be judged by the same performance standards and will be subject to the Company’s scheduling demands, regardless of any outside work requirements or obligations.
 - If the Company, in its sole discretion, determines that an employee’s outside job interferes with performance or the ability to meet Company requirements and/or obligations, as they may be modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain employed by the Company. Further, any outside employment that constitutes a conflict of interest may be prohibited. This includes, but is not limited to, work for an actual or potential competitor, vendor or customer.
- Note:** In certain countries, such as India, this approach may not necessarily align with local law. Please contact Corporate Compliance at corporatecompliance@fisglobal.com, if you have any questions.
- **Gifts and Entertainment:** Inappropriate or excessive gifts, gratuities and entertainment may cause conflicts of interest, violate laws and regulations and may also violate the Code of Business Conduct and Ethics, the

Employee Handbook or related FIS policies or standards. For example, a conflict of interest can occur if an exchange of gifts or gratuities can be reasonably perceived as an inducement to secure preferential treatment.

For further information on gifts giving and receiving, please refer to the Gifts and Entertainment Standard within the FIS Anti-Bribery Anti-Corruption (“FABAC”) Policy as well as and the FIS Travel and Entertainment Policy, if applicable.

01.01.10.04 Resolution – Ways to Mitigate a Conflict of Interest

The first option to mitigate a conflict of interest is to avoid them entirely. Once you have entered your potential conflict of interest into the Registry, corporate compliance will review your submission and determine whether or not a conflict of interest exists. If corporate compliance determines that there is a conflict of interest, you will most likely be required to comply with the following recommendations:

- **Removal:** Depending on the facts and circumstances revealed by the employee during the disclosure phase, an employee may be asked to resign or step down from a position if it is in the best interest of FIS and there is not a viable alternate resolution.
- **Recusal:** Employee may be asked to recuse themselves from any decisions where a conflict exists. The imperative for recusal may vary depending upon circumstances, ethics, or statute.
- **Final Decision and / or Alternate Resolution:** The FIS chief compliance officer (“CCO”) has sole discretion to determine whether or not a conflict of interest exists. The CCO may or may not choose to provide consideration for an alternate resolution. The decision to opt for an alternate resolution may depend upon the CCO’s review of the facts and circumstances presented by the employee, or other evidence collected during the course of investigating the potential conflict. Once the CCO has reviewed all the facts and has completed their due diligence in this matter, then they will decide on a case-by-case basis whether or not the submission merits alternate resolution. Decision of the CCO will be considered final and will be communicated to the employee via e-mail. Disposition of such decisions by the CCO will be recorded in the Conflicts of Interest Registry.
- **Present and Future Conflicts of Interest:** It is your responsibility input the issue into the Registry and consult with your supervisor or the CCO before undertaking the action or creating the actual or apparent conflict situation. You must inform corporate compliance through the Registry if the conflict of interest circumstances have changed. This includes if a final determination has already been made on a conflict of interest you submitted previously, and then you must provide all the changes by entering a new submission into the Registry with the updated information.

01.01.10.05 Applicability and Duty to Report Violations

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, 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 Helpline. 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).

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 or the FIS Chief Compliance Officer (<mailto:CorporateCompliance@fisglobal.com>). Violations may also be reported 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 link (https://rmis.fnfis.com/fsirt_archer/) to report a potential security incident. For urgent or critical security incidents, call +1.414.357.FSIRT (3747) (U.S. and International).