



# CODE OF BUSINESS CONDUCT AND ETHICS

Bringing Our Core Values to Life

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The rules of this Code apply across all the legal entities in FIS, subject to prior information of the employee representatives / work councils where applicable.

# A Message From Stephanie Ferris, CEO and President



As CEO and President of this great company, I'm very aware every day of the vital role we play in keeping the world's economies running. We provide the financial technology that enables our clients to operate across the entire money life cycle – whether it's money at rest, money in motion or money at work. No other competitor can match this responsibility or competitive prowess.

Our vision is to unlock financial technology to the world.

Yet how we achieve this vision is just as important as getting to the endgame.

That's why our Code of Business Conduct and Ethics (the Code) is so important. It lays out how we conduct business and make decisions with the highest of ethics. How we treat our clients, partners and vendors. How we treat each other.

This code applies to all of us, at every level of the organization, and impacts our company's reputation. No one is authorized to operate outside its guidance.

At FIS, we are on a relentless pursuit of client excellence to go above and beyond our clients' expectations. As an integral part of this pursuit, ethical business practices and behaviors are a top priority and woven into our daily operations.

We believe the quality of our people is our greatest asset, differentiating us and personifying our leadership position within the industry. You play a critical role in upholding FIS' reputation for ethical business practices and delivery of client excellence.

I encourage you to familiarize yourself with this information. Absorb it. Lean into it in your daily activities. Because at FIS, we Lead with Integrity.

Sincerely,

**Stephanie Ferris**  
CEO and President

# Bringing Our Core Values to Life

Together, we always strive to:

Our Core Values illustrate how we collaborate to deliver on our promises with a client-centric focus and to uphold our ethical business practices each and every day. We expect that colleagues, clients, and consumers are treated fairly with respect and dignity.

The Company takes our reputation for honest, fair, and ethical business dealings around the world very seriously. We seek clients and relationships with third parties whose ethical standards mirror our own and decline to do business with unethical entities and individuals.



## Win as One Team.

- We work together, connecting to achieve outcomes with speed.
- We are inclusive and embrace our diverse strengths.
- We make things happen and celebrate together.



## Lead With Integrity.

- We're accountable and work in a way that makes us proud.
- We empower one another to take ownership.
- We have the courage to be open and transparent – to build trust.



## Be the Change.

- We challenge each other to improve and simplify the way things are done.
- We're innovative and dynamic in how we develop ideas to solutions.
- We give back to make a positive impact on the world.

# INTRODUCTION TO OUR CODE

LEARN. IMPLEMENT. SPEAK UP.

[About Our Code](#) | [Colleague Responsibilities](#) | [Making Good Decisions](#) | [Using Your Voice](#)

# About Our Code

At FIS, we specialize in turning ideas into reality. With the right execution strategy, not only do our clients' groundbreaking thoughts take shape ... our Company's [Core Values](#) come to life.

To successfully **Bring Our Core Values to Life, we all** must read, understand, and honor our **Code**. It helps draw the connection between what we do through our Core Values (**Win as One Team, Lead With Integrity, and Be the Change**) and how we do it.

In it, you'll find helpful tips "to live by the Code" such as:

- Bulleted lists outlining acceptable approaches to everyday situations
- Sample dilemmas, and ethical ways to solve them
- Easy-to-understand definitions for technical terms
- Links to policies that provide additional details when you need them

The Code does not include every scenario you may face on the job. However, it does provide a list of [resources](#) if you need additional support. No matter your question, there is something or someone referenced in the Code with the answer.

Read the Code, the foundation of the FIS Business Ethics Program, and refer to it often. It's an integral tool in our shared commitment to not just innovate, but to innovate with integrity.

**We all** must follow the Code, including FIS:

- Colleagues
- Directors
- Subsidiaries
- Agents

The spirit and principles of the Code also apply to all FIS:

- Contractors
- Consultants
- Representatives
- Suppliers
- Clients
- Customers
- Vendors
- Any other third parties
- The employees, representatives, and agents of any third parties

In short, if you're reading this Code, chances are it applies to you!

**The Code**, which is available to colleagues in multiple languages, is reviewed annually and updated as needed to align with the Company’s policy management processes. In addition, 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 environment, and other relevant factors.



# Colleague Responsibilities



All colleagues should:

- Work with the goal of **Bringing Our Core Values to Life**.
- Take responsibility for following our Code, our policies, and the law.
- Understand that you're expected to uphold our Values no matter your role, location, job duties, or work environment.
- Seek clarity if any legal or ethical responsibility isn't clear.
- [Speak up](#) about any seen or suspected violation.



Additionally, all managers should:

- Model **Bringing Our Core Values to Life**.
- Learn the Code well enough to answer questions.
- Promote the Code, or topics within the Code, whenever possible.
- Be a safe space for others to speak up.
- Escalate colleagues' concerns when needed.





### If you're a Senior Financial Officer, also:

- Know and follow our disclosure controls and all applicable procedures.
- Provide full, fair, accurate, timely, and understandable disclosures to the U.S. Securities and Exchange Commission (SEC), consulting with colleagues or taking other appropriate steps for guidance when needed.
- Ensure all reports and documents filed with the SEC follow applicable securities laws and rules.
- Notify the Audit Committee of the Board of Directors with concerns regarding the recording, processing, summarizing, and reporting of financial data, including any:
  - Issue with the design or implementation of internal controls
  - Fraud that involves management or other colleagues with significant roles in finance

Note that the Audit Committee will 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 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.

### Senior Financial Officers include our:

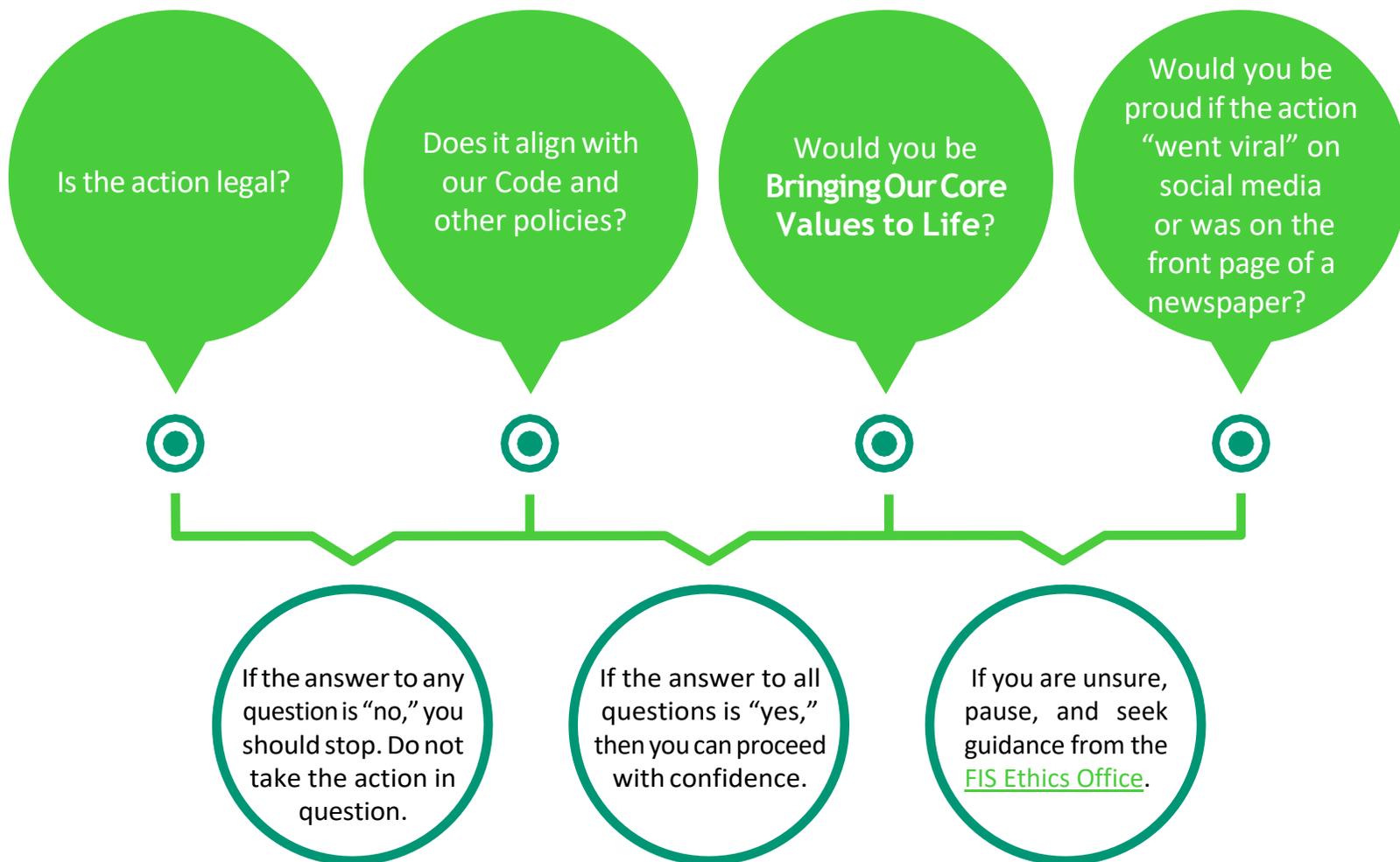
- Chief Executive Officer
- Chief Financial Officer
- Chief Accounting Officer
- Controller
- Others performing similar functions



# Making Good Decisions

Consider using the following guide to help decide if a particular action is appropriate.

Ask yourself:



# Using Your Voice

Using your voice to **Be the Change** is one of the most effective ways to ensure we are **Bringing Our Core Values to Life**. After all, we can only address the ethical issues we are made aware of.

Look out for any behavior that violates the law or our:

- Core Values
- Code
- Policies
- General sense of what's right

It's not always easy to know when to speak up. However, if there is any question or doubt in your mind, it's best to say something. Using your voice helps us protect our Culture and **Win as One Team**. It empowers us to tackle minor issues, before they become major issues, and to create a better work life for us all.



## How to Speak Up

To report concerns or gain clarity on the right course of action, contact:

- Your manager
- The [People Office Support Center](#)
- The [Ethics Office](#)
- The [Ethics Helpline](#)

Note that all calls to the FIS Ethics Helpline are answered in English. However, most other languages are supported.



## What to Expect When You Speak Up

All reports of violations will be reviewed and evaluated by the Ethics Office so they can be addressed appropriately.

If you are contacted as part of an investigation, be sure to:

- Cooperate fully.
- Be truthful and forthright.
- Keep the process as confidential as possible.

If it is discovered that a violation has occurred, those responsible will be subject to discipline, up to and including termination, as per local law.

Results of our investigations are considered when developing additional compliance initiatives, such as training, ethical risk assessments, awareness campaigns, and other FIS programs aimed to detect, prevent, and reduce unethical situations.

Ethics Helpline investigation metrics are shared with the Audit Committee of the Board of Directors on a quarterly basis and are utilized by the Ethics Office to track and understand global risks, trends, or challenges and to identify potential mitigating measures.

## Our Stance on Retaliation

We do not tolerate any form of retaliation (such as a demotion or firing) against those who cooperate with an investigation or speak up in good faith.

Good faith means having reasonable grounds at the time a report is made, based upon the circumstances and information available, that the information in the report is true.

When we speak up, in good faith, our honesty and courage will be protected. Let's use our voices to **Shine Bright and Do What Is Right** to help ensure each one of us embodies the FIS Culture by always **Bringing Our Core Values to Life**.

### ADDITIONAL RESOURCES AVAILABLE:

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Speak-Up Policy](#)



# WIN AS ONE TEAM

INCLUDE. CONNECT. COLLABORATE.

[Diversity, Equity, and Inclusion](#) | [Respect in the Workplace](#) | [Health and Safety](#) | [Confidential Information](#)

[Intellectual Property](#) | [Data Privacy](#) | [Company Assets](#)

# Diversity, Equity, and Inclusion

Being at FIS means you belong. We value your individual characteristics, beliefs, work history, and life experiences. Your contributions make us stronger, and we want to ensure you feel supported in what you do and who you are.

By remaining committed to fair employment practices, promoting diversity and inclusion, and preventing discrimination, we create an environment where everyone has an equitable opportunity to succeed.

## Honor diversity and equity.

Our colleagues reflect a unique combination of **characteristics, including those protected by law**. These differences inform how we interpret and negotiate the world, and how we think and approach problems. To bring out the best in our team:

- Remain open to varying viewpoints and perspectives.
- Base **employment decisions** on objective criteria.
- Help ensure reasonable accommodations for:
  - Religious beliefs and practices
  - Disabilities
  - Pregnancy, childbirth, and related medical conditions

### Protected characteristics include:

- 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
- Any other characteristic protected by law

### Employment decisions include:

- Recruitment
- Selection
- Hiring
- Promotion
- Transfer
- Compensation
- Development
- Evaluations
- Advancement
- Demotions
- Discipline
- Terminations

## Foster inclusion.

Inclusion is about fairness, respect, and trust. To do your part:

- Practice empathy and understanding in your everyday actions.
- Work to uncover and correct any personal bias, implicit or otherwise. Make decisions based on legitimate business reasons.
- Celebrate the professional achievements of your coworkers. **We Win as One Team.**
- Build your own skills by taking advantage of internal training and related programs. Winning as One Team requires that we advance our skills individually and as a team.



## OUR CORE VALUES IN ACTION

**Q:** My team is interviewing two candidates with similar qualifications. My coworker suggested we select the applicant whose personality is a better fit. Good idea?

**A:** It depends. FIS is committed to providing an inclusive environment for all that harnesses the diversity of our people in our working environment. Make sure bias isn't steering your coworker in the wrong direction. Belonging at FIS isn't about fitting in. It's about being accepted for who you are. A diverse workforce that fully reflects the markets we serve allows us to better champion our clients' needs. Your decision should be based on legitimate business reasons.

## ADDITIONAL RESOURCES AVAILABLE:

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Refer to your country Employee Handbook](#)

[Refer to your country Employee Handbook's Equal Employment Opportunity \(EEO\) Policy](#)

# Respect in the Workplace

We aim to create a workspace where everyone feels safe, valued, and respected. That's why, at FIS, we do not tolerate **harassment**, bullying, or abuse.

To safeguard our colleagues, we respond quickly and consistently to mistreatment and work to always provide a pleasant and productive atmosphere.

**We Win as One Team.**

## Respect your coworkers.

We strive to always:

- Abide by a standard of mutual respect, no matter our differences.
- Use care in our interactions and treat everyone with dignity.
- Avoid harassment in all its forms. Harassment:
  - Can be verbal, visual, physical, or sexual.
  - Can be aimed at someone the same or a different sex or gender.
  - May occur either directly or indirectly, or either in person or online.
  - Could involve coworkers or anyone who works with us or on our behalf.
  - Could happen on Company property or at work-related functions.

**Harassment** is conduct that's so intimidating, hostile, or offensive that it could either:

- Interfere with how someone does their job, or
- Create a hostile work environment

### What are some potential actions of a harasser?

- Inappropriate communications (such as insults, ridicule, slurs, etc.)
- Yelling or emotional outbursts
- Profanity
- Throwing objects
- Slamming doors
- Physical or any form of intimidation or aggression
- Inappropriate gestures
- Threats made against others



## Set boundaries.

Communicating what is acceptable, and what isn't, can help us maintain a positive workplace. If you are ever in a situation where you see, suspect, or experience mistreatment, don't ignore it. Ask the person to stop.

Keep in mind that speaking directly to the offender can be a powerful first step. However, you may also use our [TPO Support Center](#) or the [FIS Ethics Helpline](#) for support.



## OUR CORE VALUES IN ACTION

**Q:** One of my colleagues repeatedly compliments my appearance. I know there is no harm meant, but I don't feel comfortable. Am I just being too sensitive?

**A:** No, you're not. Try speaking to your colleague and explain that these compliments make you feel uncomfortable, and you want them to stop. If the situation continues or if you're uncomfortable addressing the concern directly, report the problem.

## ADDITIONAL RESOURCES AVAILABLE:

[Speak-Up Policy](#)

[Refer to your country Employee Handbook's Harassment and Discrimination Free Workplace Policy](#)

[Refer to your country Employee Handbook's Respectful Workplace Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

# Health and Safety

We believe everyone at FIS is entitled to a safe, secure place to work. For us, that means not only promoting safe habits but healthy ones and speaking up about any situation that could pose a risk to ourselves or others.

We follow all applicable safety laws, regulations, and policies to maintain a workplace where each of us can be productive and successful.

## Stay alert.

We all have a stake in keeping each other safe. To help:

- Be prepared to observe emergency preparedness plans.
- Complete any required safety or security training.
- Follow the safety and security requirements that apply to you and your job.
- Watch for, and speak up about, any hazards.

## Stop violence in its tracks.

Violence has no place at our Company, and weapons are never allowed on FIS premises. Practice good physical security and report any strangers, suspicious activity, or threats in the workplace to [Corporate Security](#).

### OUR CORE VALUES IN ACTION

**Q:** I noticed that one of my colleagues has started regularly slurring their words. They don't normally talk this way, and I'm starting to wonder if substance abuse is involved. I don't want to get them in trouble, but I feel like I should say something to my manager. Should I?

**A:** Yes. Speak to your manager, another manager, or another Company resource such as The People Office or the Ethics Office about the situation. They can bring together the right resources and take the appropriate steps to address the issue. The Company permits anonymous reports through the Ethics Helpline, as per local laws, but encourages Reporters to disclose their identity if they feel comfortable doing so. Investigations are carried out sensitively with appropriate confidentiality. FIS has zero tolerance for retaliation.

## Be at your best.

Substance abuse can compromise our own performance and the performance of others. Never work under the influence of alcohol or illegal drugs.

### ADDITIONAL RESOURCES AVAILABLE:

[Speak-Up Policy](#)

[Refer to your country Employee Handbook's Drug and Alcohol Policy](#)

[Corporate Safety Policy](#)

[Corporate Security Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)



# Confidential Information



Confidential information, and the responsible management of it, is vital to our success. Protecting it protects our competitive advantage in the marketplace, so it's important to know the kinds of information considered confidential and the ways to keep it safe.

An incident involving confidential information is serious. If we're ever unsure about whether information is confidential, we ask, and until we know for sure, we treat it as though it is.

## Know what's confidential.

Confidential information is nonpublic information about FIS and other third parties. It includes:

- Intellectual property
- Personal information of clients, colleagues, and third parties
- Business and marketing plans and client lists
- Business records, financial forecasts, and pricing data

**Intellectual property** includes: inventions, improvements, ideas, information, data, software, models and programs together with the related materials, documentation, patents, trademarks, trade secrets, know-how, copyrights, and all other related rights.

## Keep it confidential.

We follow our policies and procedures to lock down confidential information. Our policies address safeguards such as:

- Labeling it properly
- Using it only as needed for your work at FIS
- Sharing it only with those who are authorized to see it and have a legitimate business need for it
- Making sure anyone outside of FIS has a signed nondisclosure agreement in place before sharing it
- Never discussing or displaying confidential information in public places (such as elevators, restaurants, and public transportation)

## Use your voice.

If you suspect that confidential information has been compromised, or mismanaged in any way, report it immediately to your manager, the [FIS Privacy & Data Protection Office](#), or the [Ethics Office](#).

## OUR CORE VALUES IN ACTION

**Q:** One of my colleagues used to work for a competitor and offered to tell me about some new services being developed by their former employer. Is that OK?

**A:** No, it's not. It's OK to share general knowledge and skills learned from an old job. But new product or service ideas (including but not limited to data, documentation, ideas, together with the related materials – called “work product”) would be confidential, and your new colleague has a responsibility to protect that information – just as you would have a responsibility to protect our confidential information should you ever leave FIS.

## ADDITIONAL RESOURCES AVAILABLE:

[Acceptable Use Policy](#)

[Data Protection Policy](#)

[Information Classification Policy](#)

[Records Management Policy](#)

[Records Retention and Management Standard](#)

[Records Retention Schedule](#)



# Intellectual Property

FIS' intellectual property ("IP") rights are among our most valuable assets. Unauthorized use or disclosure can lead to their loss or serious loss of value. Consistent with FIS' Core Values, all colleagues are entrusted to become stewards of protecting the Company's valuable information. This means following the policies and procedures in place regarding FIS' IP.

IP is often intangible. We must ensure that we take the utmost care in protecting and securing our Company's IP, which includes identifying and safeguarding that information.

## Recognize IP.

Be able to identify the Company's actual or potential IP, keeping **common examples** in mind, so that you can protect it accordingly.

## Keep IP safe and secure.

We protect our IP by:

- Notifying our [Chief IP Counsel](#) or the [Ethics Office](#) about:
  - The existence and development of IP assets
  - Any potential infringement or misuse of IP assets
- Preventing unauthorized use and disclosure, including by never transferring it to a personal account or any other third-party account.

- Using IP properly, including in licensing and other transactions.
- Immediately requesting a clearance search from our Chief IP Counsel or the Ethics Office when creating or using a new brand name for a product or service to be certain that the name is not subject to the trademark rights of a third party.
- Contacting our Chief IP Counsel or Ethics Office for assistance before creating a new invention, system, or process, when we know of an existing third-party IP right in the subject area of the invention.
- Helping to protect the intellectual property of others as if they were our own.

### Common examples of IP include:

- |  |   |
|--|---|
| - Inventions   | - Documentation                           |
| - Improvements   | - Patents                                 |
| - Ideas  | - Trademarks                              |
| - Information  | - Trade secrets                           |
| - Data   | - Know-how                                |
| - Software   | - Copyrights and all other related rights |
| - Models and programs, together with the related materials |   |

## Understand IP rights.

Keep in mind that FIS will normally be the exclusive owner of all rights in IP developed by colleagues and contractors in the course of their employment or service with the Company when it is related to our business. This is true whether or not the colleagues or contractors make the developments during working hours, on Company premises, or using Company material or resources. In addition, colleagues must also respect third parties' IP rights.

### OUR CORE VALUES IN ACTION

**Q:** Another colleague 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 not permitted.



# Data Privacy

As part of our jobs, many of us have access to personal data about our clients, colleagues, and other third-party relationships. In providing this information, individuals trust us to keep it safe from unauthorized use and disclosure. We have an obligation to maintain that trust. We follow the law and our policies to preserve privacy.

## Be aware of the personal information you handle.

We use our clients' personal information to help them choose the best services and to make informed decisions for their organizations. We use our colleagues' personal information in ways that support their employment at FIS. And we use third parties' personal information to facilitate our working relationship. In every case, for every individual, we honor, respect, and protect their **personal data**.

## Protect it the right way.

Personal data is [confidential information](#), so treat it with the same high standard of care. Make sure you collect, access, use, share, store, retain, and delete personal data in accordance with all applicable data privacy laws, regulations, and FIS policies.

## Identify and report privacy incidents.

Privacy incidents occur when personal data has been either:

- Used for an unauthorized purpose, or
- Accessed by an unauthorized person

They lead to accidental or unlawful destruction, loss, alteration, or disclosure of personal data.

**Personal data** is any information that can directly or indirectly identify a person, including:

- A phone number
- An employee ID number
- A bank account number
- A credit card number
- An email or IP address

## OUR CORE VALUES IN ACTION

**Q:** I received an email that wasn't meant for me. It includes a list of colleague names and salary information. I don't want to get anyone in trouble, but I know this is personal data that was sent to the wrong person. What should I do?

**A:** Don't read it or share it with anyone else. Let the sender know that the email was not sent to the intended recipient and delete the email. You should also immediately report it (and any actual or potential privacy incident you become aware of) to the Privacy Incident Response Team (PIRT). To do so, click the Quick Links tab on our [home page](#), and then select "Report a Privacy Incident." If you have any technical issues or any other privacy-related question, you may contact PIRT directly via [email](#).

## ADDITIONAL RESOURCES AVAILABLE:

[Acceptable Use Policy](#)

[Data Protection Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Information Classification Policy](#)

[Records Management Policy](#)

[Records Retention and Management Standard](#)

[Records Retention Schedule](#)



# Company Assets

We rely on a vast network of Company assets to help us run our business and build our future. Office supplies and furniture, equipment, computer hardware, and software – even our access to the internet, the FIS intranet, and business software programs – are all Company assets.

We use our Company assets appropriately and protect them from fraud, waste, and abuse. Our good stewardship of these assets today will keep them available for use tomorrow and beyond.

## Protect our physical assets.

For us, being a good steward means using FIS assets to carry out FIS work, not for personal purposes. Use of FIS assets should never violate the law or our policies, and never interfere with our work.

Records of any communications may be made and used by the Company. You should have no expectation of privacy of electronic communications when using FIS systems unless specifically provided for by local law. Anything created on our systems is FIS property and, where permitted by law, we may monitor usage which will be carried out in line with applicable law and regulation.

## Protect our electronic assets.

Hardware, software, and network access are vital to our operation. They are the tools that connect us to our clients, our third-party relationships, and each other. Safeguard them by practicing good cybersecurity:

- Create strong passwords, and don't share them with anyone inside or outside of FIS.
- Use only software that's been properly licensed. Don't download any programs without approval.
- Be alert to phishing attacks. Don't open email attachments from unknown senders or click on suspicious links.
- Don't send FIS files to your personal email or use unauthorized flash drives or devices to transfer them.
- Don't let others, including colleagues or family members, use the assets assigned to you.
- Lock your computer anytime you step away and log off at the end of your workday.
- Immediately report a lost or stolen device or a suspected data incident to [Corporate Security Team](#).



## OUR CORE VALUES IN ACTION

**Q:** Sometimes at lunch, I visit websites that some people might consider obscene or inappropriate, but I never let this activity interfere with my work, and I would never forward a link or information about these websites to any of my colleagues. Is that OK?

**A:** No. It's never OK (at lunch or at any other time) to use FIS computers or network systems to visit or view inappropriate content. FIS counts on every colleague to use our systems responsibly.

### ADDITIONAL RESOURCES AVAILABLE:

[Acceptable Use Policy](#)

[Corporate Security Policy](#)



# LEAD WITH INTEGRITY

BUILD. DEVELOP. INSPIRE.

Anti-bribery and Anti-money Laundering | Business Gifts and Entertainment | Conflicts of Interest | Insider Trading  
Fair Competition | Trade Compliance | Honest Advertising | Responsible Communications  
Third-party Relationships | Investigations and Audits | Accurate Records

# Anti-bribery and Anti-money Laundering

Corruption harms citizens and communities, so combating **bribery** and **money laundering** is critical. Let's work together to vet all of our third parties carefully and lead our industry with integrity.

## Avoid bribes and kickbacks.

At FIS, we never bribe – or accept bribes – and we avoid even the appearance of anything improper. We also steer clear of kickbacks, which are items of value given after a deal is finalized. To do your part, keep in mind that bribes and kickbacks are not limited to cash. Watch out for the exchange of anything of value, including:

- Business gifts
- Entertainment
- Meals
- Discounts
- Favors
- Jobs or internships
- Cash or cash equivalents (like gift cards or gift certificates)
- Charitable or political contributions

## Interact carefully with government officials.

The rules for what we can give or offer to government officials, and even their relatives, are very strict. Before you offer anything of value, get approval from the [FIS Ethics Office](#).

FIS prohibits facilitation payments or “grease payments” offered to a person in government or other individual to secure or speed up a routine, discretionary government process or decision, such as expediting a license or permit. However, a narrow exception for facilitating or expediting

payments exists if it's made to further a routine government action that involves non-discretionary acts, such as expediting a passport.

**The term government official is broad and not only applies to elected officials, but also to employees of government agencies and government-controlled companies or entities, like public schools and others as described in our [Anti-Bribery and Anti-Corruption \(FABAC\) Policy](#).**

**Bribery** is offering, giving, receiving, soliciting, or accepting anything of value to get or keep a business advantage.

**Money laundering** happens when criminals move funds made from illegal activities through a legal business (like ours).

## Know your clients.

To prevent money laundering, it's important to ensure payments come from legitimate sources and are used for

**Questionable transactions** can include:

- Attempts to pay in cash
- Requests to ship to a country other than where the payment originated
- Attempts to avoid recordkeeping requirements
- Payments made by individuals or companies who are not parties to the transaction
- Any suspicious change in the pattern of a client's transactions

## OUR CORE VALUES IN ACTION

**Q:** A seemingly unrelated third party recently began making payments on behalf of one of our long-time distributors. I do not want to accuse the distributor of wrongdoing, but I'm concerned about the payments. What should I do?

**A:** Contact the distributor for details. If the responses you receive do not make sense or are unsatisfactory, report it to your manager or the [FIS Ethics Office](#).

## ADDITIONAL RESOURCES AVAILABLE:

[Anti-Bribery and Anti-Corruption \(FABAC\) Policy](#)

[Global Anti-Money Laundering and Counter-Terrorism Financing Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Sanctions Compliance Policy](#)

[Speak-Up Policy](#)



# Business Gifts and Entertainment

The occasional exchange of business courtesies can promote goodwill. However, offers that are too frequent or extravagant in nature can send the wrong message. We never want to distract from the exceptional quality of our people and performance with unethical business practices. That's why we use good judgment and ensure that anything we give or receive is consistent with FIS policies and the law in jurisdictions in which we operate.

## Recognize when offers are acceptable.

We only offer or accept business gifts and entertainment when doing so would be considered legal, ethical, and customary. This includes items of nominal value such as promotional items, chocolates, or flowers.



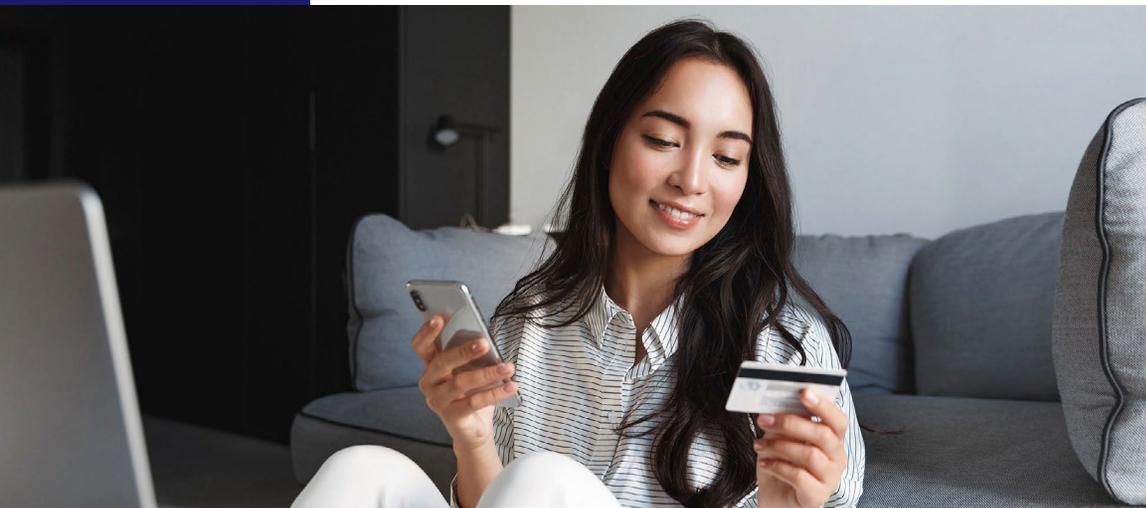
## Know when to disclose offers.

Disclose and register the following offers of business gifts, entertainment, meals or other items into our COI Disclosure application (within the Business Gifts and Entertainment [FIS & me](#) page):

- For non-government officials: any item that meets or exceeds US\$100, either collectively or individually.
- For government officials: any item, regardless of value.

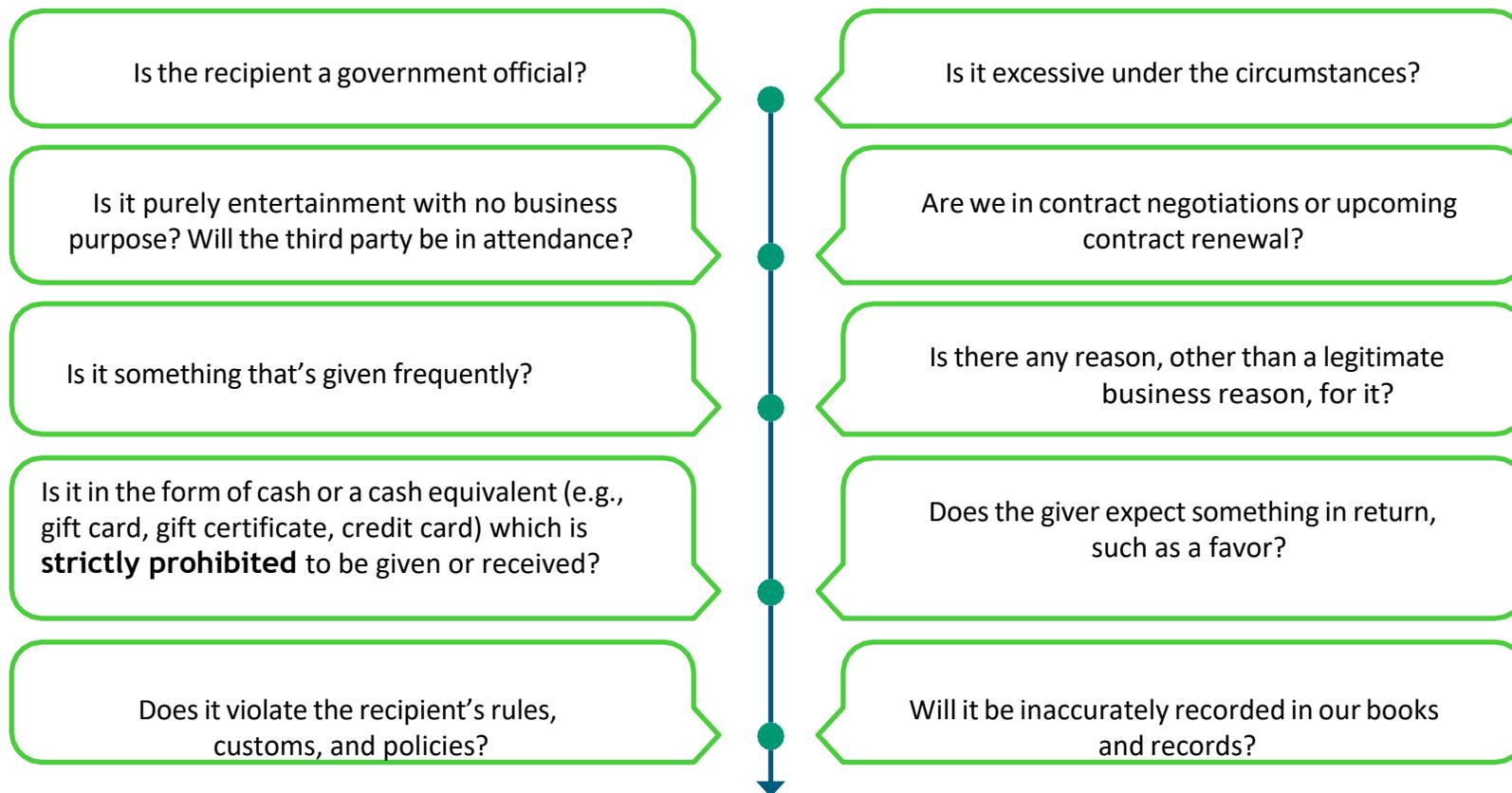
Never offer **anything** of value to a government official, including state-owned entities, without obtaining permission from the [FIS Ethics Office](#) first.

For potential exceptions and additional country guidance, review the [FIS China Entertainment and Marketing Expenses Guideline](#).



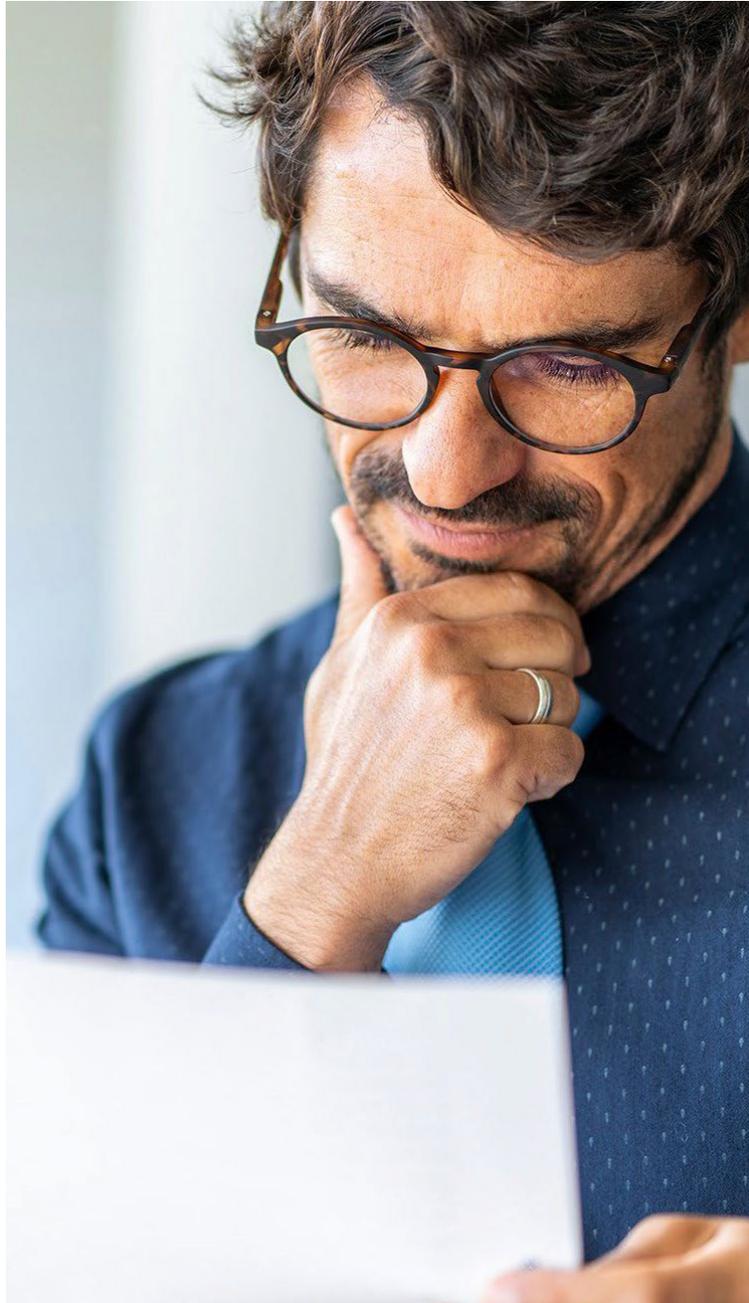
## Making Ethical Decisions

If you are unsure whether giving or accepting a gift, offer of entertainment, or other item of value would be appropriate, ask yourself:



If you answered “**yes**” to any of the questions, **STOP** and seek additional guidance. If you answered “**no**” to all of the questions, then it may be **OK** to give or accept the item of value.

Visit our Business Gifts and Entertainment page on [FIS & me](#) for more information including how to register business gifts and entertainment in our COI Disclosure application (within our Business Gifts and Entertainment FIS & me page). Reach out to the [FIS Ethics Office](#) if you’re still unsure.



### OUR CORE VALUES IN ACTION

**Q:** I'm hosting an event where government officials will be in attendance, and I want to provide lunch to everyone at the event. I don't want to violate our policies. What should I do?

**A:** You should seek guidance from the Ethics Office. The rules that apply to giving business courtesies to government officials can be complex. Remember, seek assistance with government officials regarding **anything of value** (even under US\$100). In general, if you're unsure of what to do in a given situation, you should always ask the Ethics Office for guidance before proceeding.

### ADDITIONAL RESOURCES AVAILABLE:

[Employee Gifts, Prizes and Awards Policy](#)  
[Travel, Entertainment and Business Expense Reimbursement Policy](#)

# Conflicts of Interest

What makes our culture great? The diverse strengths our colleagues use to make an impact. We gain our strengths in part from our personal pursuits. However, we make sure our interests outside of work never interfere with our business decisions. That would be a conflict of interest. Even the appearance of a conflict violates our Code and our overall sense of what's right.

## Spot conflicts.

Because we each have a stake in our Company's success, we also have a responsibility to protect it. To avoid conflicts of interest, ensure all business decisions are made objectively.

It's impossible to list all the circumstances that might signal an actual, perceived, or potential conflict of interest, but there are certain kinds of situations where conflicts often occur. They include:

- **Business opportunities** – competing with FIS or taking advantage of opportunities discovered through your connection with us
- **Company assets** – using Company property, information, logos, or other assets for your personal advantage
- **Financial interests** – having a financial interest other than as a minor shareholder or conducting outside work with a third party, competitor, or any other entity that does, or seeks to do, business with us

- **Business gifts and entertainment** – exchanging inappropriate business gifts or other offers
- **Outside employment** – second jobs that interfere with your ability to perform your work for FIS
- **Outside leadership** – acting as a member of a board, panel, directorship, or advisory membership for another organization
- **External communications** – participating in consulting engagements or speaking opportunities (e.g., podcasts) or writing industry articles or books for external publications
- **Personal relationships** – supervising or making employment decisions about a relative or someone else with whom you have a close personal relationship
- **Improper benefits** – using the services of a business owned by a relative or someone else with whom you have a personal relationship, or other instances when you or a relative or someone with whom you have a personal relationship receives improper benefits based on your work with FIS



## Disclose conflicts.

The moment you become aware of potential conflicts of interest, disclose them. We have a COI Disclosure application for conflicts and perceived or potential conflicts to be reviewed by the Ethics Office. Visit our Conflicts of Interest page on [FIS & me](#) for more information on how to register an actual, perceived, or potential conflict. If you are unsure if you have a conflict, reach out to the [Ethics Office](#) for additional guidance.



### OUR CORE VALUES IN ACTION

**Q:** Through my role at FIS, I have recognized a need the Company has for specialized technology talent. I have a lot of friends in the industry and could start my own business to provide top-notch talent efficiently to the Company as a vendor at a lower cost. Wouldn't this be great to help the Company?

**A:** No. You have discovered a business opportunity through your role and are starting a business to take advantage of this information for personal gain as a vendor of FIS.

### ADDITIONAL RESOURCES AVAILABLE:

[Conflicts of Interest Policy](#)

[Refer to your country Employee Handbook](#)

# Insider Trading

We foster trust in the marketplace by ensuring everyone has equal access to information when investing. That's why we never buy, sell, or hold ("trade") securities (such as stock) when in possession of inside information. We also never share ("tip") inside information with others so they can trade.

## Understand inside information.

As part of our jobs, we often work with or are exposed to inside information. Inside information is both:

- Material, meaning it could affect the price of a security (often stock) of a Company, and
- Nonpublic, meaning it hasn't been released to the public yet

Trading and tipping on inside information, whether it deals with FIS or another company, are illegal forms of insider trading.

To combat insider trading, first know how to spot inside information. Some examples include nonpublic information about pending:

- Legal proceedings
- Earnings releases
- Changes in leadership
- New services or solutions
- Updates to rates

Keep in mind that inside information can take many forms. If you are unsure whether something would be considered inside information, treat it as though it is until you confirm otherwise. You may reach out to the [Corporate Secretary](#) or [Ethics Office](#) with questions.

### OUR CORE VALUES IN ACTION

**Q:** My coworker shared that our recent acquisition has finally gone public. May I now purchase additional stock in FIS?

**A:** It depends. First confirm that this material information has indeed been published. You may search for associated press releases or other publicly available resources. If you find that the news of the acquisition is publicly available, you can proceed with your purchase.

### ADDITIONAL RESOURCES AVAILABLE:

[Hedging and Pledging Policy](#)

[Securities Trading Policy](#)

# Fair Competition

Fair competition pushes everyone to be their best, allowing merit – not unethical business practices – to rise to the top.

Being a part of FIS means competing for clients in ways that are vigorous, but ethical. We strive to continuously improve the quality of our services and solutions, while avoiding even the appearance of anything improper.

That way it's clear that our success comes from our drive and innovation – nothing more, nothing less.

## Promote fair competition.

We avoid any activity that could restrict competition.

With our competitors, we avoid agreements or even conversations about:

- Fixing prices (e.g., rigging bids)
- Divvying up clients, markets, or territories
- Mutually refusing to deal with third parties
- Preventing others from entering the market

Instead, we:

- Remain objective and fair.
- Record significant interactions with third parties.
- Protect our competitive information.
- Gather competitive information about others from public sources.

Seek guidance from the [Ethics Office](#) before entering into **any** agreements with competitors.



## OUR CORE VALUES IN ACTION

**Q:** I am at an industry conference and a couple of our competitors approached me to meet with them for dinner later. They said that we should all discuss “pricing strategy” so we can get through a current slump in sales. How should I respond?

**A:** You should decline the invitation. We never discuss pricing or other nonpublic competitive information with competitors because it would violate our policies and likely the law. Share your objection to the discussion with the competitors, then report their request to your manager or the [FIS Ethics Office](#).

## ADDITIONAL RESOURCES AVAILABLE:

[Enterprise Conduct Risk Policy](#)

# Trade Compliance

At FIS, our ideas and technologies are transforming the future, and the world. Although our position as a global market leader allows for many exciting pathways, it also requires increased care and attention.

Wherever we do business, we stay on top of all applicable import, export, and other trade compliance laws. That way we can continue our global operations, advancing the way the world pays.

## Follow the law.

We take global trade regulations seriously. If a particular import or export is not compliant with all relevant rules, regulations, and protocols, it can be delayed, confiscated, or destroyed. Trade violations can result in reputational damage, fines, and other penalties. In severe cases, the organization or individual responsible could also be heavily fined or face jail time.

## Provide accurate information.

Regardless of your role, entering accurate data in our databases is important. Be especially careful to enter proper legal entity names for clients and suppliers, and accurate countries of origin and prices for parts and other items.

## Follow FIS' procedures.

Always follow our policies and procedures – they are there to protect you and the Company.

### OUR CORE VALUES IN ACTION

**Q:** We received a purchase order from a company based in a country that may be subject to trade sanctions. Can we accept their order?

**A:** It depends. Trade sanctions rules change continuously. To ensure compliance with the latest rules, we must conduct screening of the proposed transaction first. While most countries are not subject to comprehensive trade embargoes, specific individuals, businesses, and/or industries may be subject to sanctions. Reach out to the [Export & Trade Sanctions Compliance Team](#) for next steps.

### ADDITIONAL RESOURCES AVAILABLE:

[Enterprise Conduct Risk Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Sanctions Compliance Policy](#)

[Supplier Code of Conduct](#)

# Honest Advertising

Our clients need to know they can rely on FIS to deliver on our promises and stay true to our word. We can't expect to earn their trust if we're not honest in our promotions.

That is why we take an approach to marketing and advertising that aligns with our Core Values and beliefs. We engage in open and honest communication, backing up the claims we make, and making sure everything FIS says is truthful.

## Highlight truth in advertising.

The things we say about FIS reflect on us as a Company. They also impact our relationships with clients, stakeholders, and the public. To enhance those relationships and our reputation:

- Follow applicable advertising laws and regulations.
- Never make false statements about our solutions or our competitors.
- Be helpful – never defamatory, misleading, or malicious.
- Never exaggerate or make promises we can't keep.

## Follow our processes.

Careful promotion is effective promotion. For every advertisement, claim, or promotion for FIS, regardless of the **advertising format**, be sure to:

- Obtain proper reviews and approvals.
- Be able to back up any claims you make with solid, unbiased documentation.
- Work with the proper internal partners to verify facts and answer questions.

### Advertising formats include:

- Digital marketing
- Television
- Radio
- FIS-sponsored websites
- Endorsed bloggers and brand ambassadors
- Email blasts
- Social media
- Brochures

Pay particular attention with email and fax advertising as **special rules** apply.



## OUR CORE VALUES IN ACTION

**Q:** I am interested in promoting our new services via email. Are there any special considerations to keep in mind?

**A:** Yes, any email advertisement must accurately disclose who it is from and what it is for, as well as include the sender's business address and inform the recipient of their right to opt out. For many locations you also must get consent or authorization from the recipient first. Refer to the Brand Policy for additional guidance.

## ADDITIONAL RESOURCES AVAILABLE:

[FIS Brand Policy](#)

# Responsible Communications

Building the value of the FIS brand and preserving our reputation is the responsibility of every colleague and involves careful consideration when sharing information and communicating publicly about our Company.

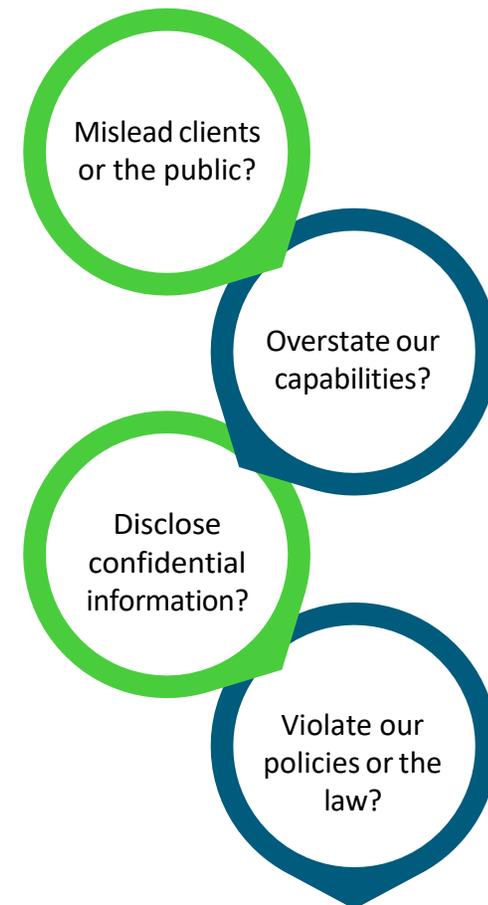
## Never speak for FIS.

We are proud of our Company and may discuss our business or share comments about FIS with others outside of work. However, we always remember to:

- Allow designated representatives to speak for FIS.
- Never falsely claim to represent FIS, either online, in writing, or in person.
- Either send all media inquiries to [Corporate Communications](#) or receive prior authorization before discussing FIS business with media representatives.
- Refer outside parties requesting information about current or former colleagues to the [People Office](#). Colleagues should never provide employment references or employment verifications for any current or former colleague.
- We do not provide references for third parties unless it is approved by Corporate Communications.
- Refer any request from a party claiming to be an attorney, law enforcement official, or investigator to the [Ethics Office](#), immediately.

## Should I share it?

When in doubt, ask yourself – could my communication:



If you say “**yes**” or even pause at any question, stop and reconsider before communicating.

## Use care on social media.

We know social media posts can take on a life of their own and be seen by anyone. As individuals and as a business we strive to maintain a responsible social media presence. Do your part. If you comment about FIS on social media:

- State that you are an FIS colleague, but that you are speaking in your own personal capacity.
- Remember to protect all Company confidential information.
- Comments made on social media should comply with FIS' Social Media Policy.

## Protect confidential information.

If your work gives you access to [confidential](#) or [nonpublic information](#) about FIS or any other Company, never share it with anyone outside of our Company. That includes [personal information](#) about our colleagues, clients, or third parties.



### OUR CORE VALUES IN ACTION

**Q:** A reporter called me looking for some basic information about our Company. May I answer their questions?

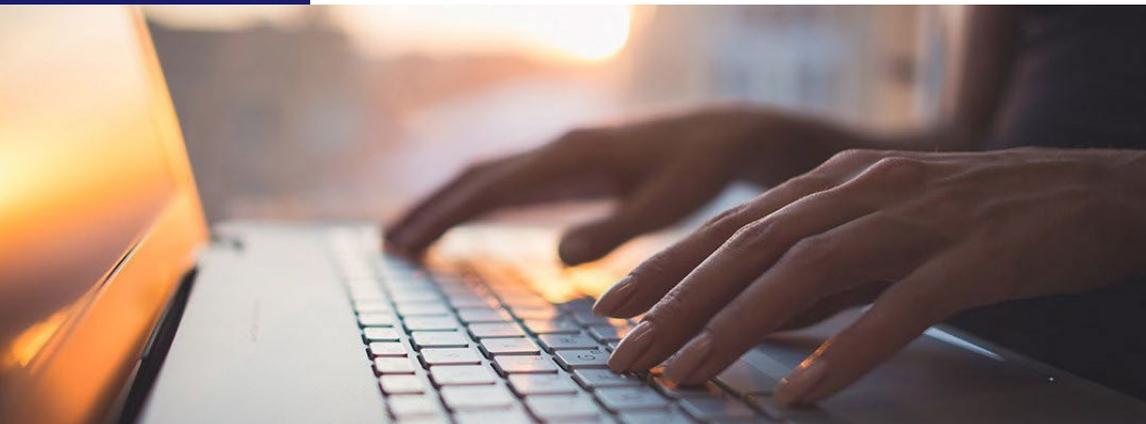
**A:** No. Even simple questions should be rerouted to [Corporate Communications](#). We want to avoid any unintentional consequences, such as releasing information at the wrong time or disclosing something confidential. Forward your inquiry to be sure we are communicating responsibly.

### ADDITIONAL RESOURCES AVAILABLE:

[FIS Brand Policy](#)

[FIS Media and News Release Policy](#)

[Social Media Policy](#)



# Third-party Relationships

Everyone who contributes to FIS impacts our business and our good name, including our clients, customers, vendors, suppliers, business partners, and other third parties. To build positive and productive relationships with these partners, we ensure they uphold our high standards and the laws that apply to us.

## Choose third parties wisely.

If your job involves choosing third parties for FIS:

- Evaluate all parties fairly and without bias.
- Base your selection on:
  - Our business needs
  - The third party's reputation and track record
  - The specific products and services offered
  - Quality and price

## Interact ethically.

When working with our partners:

- Be fair and honest in every interaction.
- Avoid even the appearance of [conflicts of interest](#).
- Never accept business gifts, entertainment, or favors from third parties that violate our policies or theirs.

## Watch their work.

We may be responsible for the actions our third parties take. To make sure they represent FIS with integrity:

- Regularly monitor the work they do.
- Help them understand what's required and uphold our policies.
- If you see any third-party behavior that violates our Code or policies, [speak up](#) immediately.

### What should I watch for?

Stay alert for behavior that goes against our policies, including violations of:

- Financial integrity
- Data privacy
- Bribery or conflicts of interest
- Human rights
- Child labor
- Environmental protection



## OUR CORE VALUES IN ACTION

**Q:** My good friend and neighbor owns a company which I believe is perfect for our vendor. Since I am a decision maker, I am going to go ahead and give them our business since we need their services quickly. Would this be an efficient and great business move since I am also a reference by knowing them personally?

**A:** No. This may be a conflict of interest. You can suggest the vendor but you need to remove yourself from the decision-making process and disclose your relationship with the vendor. The vendor selection process should proceed as per Company policy. For further transparency, report this matter to the Ethics Office.

## ADDITIONAL RESOURCES AVAILABLE:

[Anti-Bribery and Anti-Corruption \(FABAC\) Policy](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[FIS Brand Policy](#)

[Procurement Policy](#)

[Vendor Risk Management Policy](#)

# Investigations and Audits

We take violations of our Code, policies, and the law seriously and work quickly to uncover them through internal, external, and government investigations and audits.

The investigation process empowers FIS to address wrongdoing, minimize potential damage, and demonstrate our Company's commitment to working with integrity.

## Cooperate fully.

Whether you are an FIS colleague, contractor, or director, you are expected to:

- Cooperate with any required investigation, audit, review, examination, or test.
- Recognize that refusal to cooperate or interference with an investigation may lead to disciplinary action – even termination.
- Immediately notify your manager if you have been asked to participate in a government investigation or inquiry.



## Be honest and accurate.

To ensure effective and transparent investigations, you must:

- Never make false or misleading statements related to:
  - Audits or reviews of our financial statements
  - Internal or external audits of our Company
  - Activities of auditors or investigators
  - Documents we file with the SEC or other local or regional agencies
  - Reported concerns, including reports to the Ethics Helpline
- Give complete information – never omit details that are relevant to an auditor or investigator.
- Refrain from pressuring others to give incomplete, false, or misleading statements.



### If misconduct is occurring ...

We need to know:

- Who was involved
- What happened
- When it happened
- Where it occurred
- How we can prevent it in the future

An investigation or audit helps us gather those facts and get to the bottom of the situation.

### Keep in mind...

Unless you are specifically authorized to do so, do not directly interact with regulatory agencies on FIS matters.

Instead, direct all regulatory agency requests to the [Ethics Office](#).

Centralized and coordinated management of interactions with regulatory agencies is critical to ensuring timely and accurate disclosure of sensitive information.

### OUR CORE VALUES IN ACTION

**Q:** What if I did not report any concern but am asked to cooperate in an internal investigation? Must I participate?

**A:** Yes. At times, we may need to reach out to additional potential witnesses or parties to an incident in order to gather necessary information. As an FIS colleague, we ask that you cooperate in all internal investigations, so that we may carry out our commitment to working with integrity.

### ADDITIONAL RESOURCES AVAILABLE:

[Speak-Up Policy](#)



# Accurate Records

Our records are critical to FIS. They provide evidence of how we are performing as a business, inform our decisions, and help us show compliance with policies and laws.

Whether we are colleagues or third parties, we all contribute to FIS records. It's up to each of us to handle our records with care and make sure they accurately reflect the work we do.

## Focus on accuracy.

To help ensure our records are reliable at all times:

- Record entries accurately (including time, cost, or expenses).
- Follow generally accepted accounting practices.
- Never alter, destroy, or falsify any record or make misleading entries.
- Be ready to support your entries with documentation, including receipts or invoices.
- Watch for and speak up to the [Ethics Office](#) immediately if you see suspicious activity, such as:
  - False entries
  - Unrecorded funds or payments
  - Omissions
  - Misleading statements

## What are our records?

Records take many different forms, but they include:

- Invoices
- Purchase orders
- Capital expenditure approvals
- Expense reports
- Regulatory filings
- Time sheets
- Sales data
- Quality reports

## Make honest disclosures.

If you help FIS provide information to the government or regulatory authorities:

- Follow our policies and internal controls.
- Make sure any information you provide gives an accurate picture of our financial position.
- Ensure our disclosures are complete, fair, accurate, timely, and clear.
- Cooperate fully with any government audit or investigation.

## Practice good records management.

Our records must be readily available when we need them. To do your part:

- Carefully follow our policies and schedules for storing, retaining, and disposing of our records, no matter what form they take.
- Properly destroy documents that are scheduled to be disposed of.
- Give special consideration to documents that may be subject to a litigation hold notice and retain them in a secure place. Never dispose of such documents unless you have proper authorization to do so. Contact the [Ethics Office](#) for guidance.
- Remember that the law requires us to maintain certain types of corporate records for a specified period. If you are unsure about which records to retain or how long to retain them, seek guidance from your manager.



### OUR CORE VALUES IN ACTION

**Q:** I pointed out an accounting irregularity to a colleague – payments being made to a supplier without corresponding invoices. My colleague offered to take care of it and told me to forget about it. Should I?

**A:** No, you shouldn't. It's possible you have uncovered activity that violates our policies and the law, and it's important we know about it. Don't feel pressured to ignore it. [Speak up](#) immediately to your manager and contact the Ethics Office.

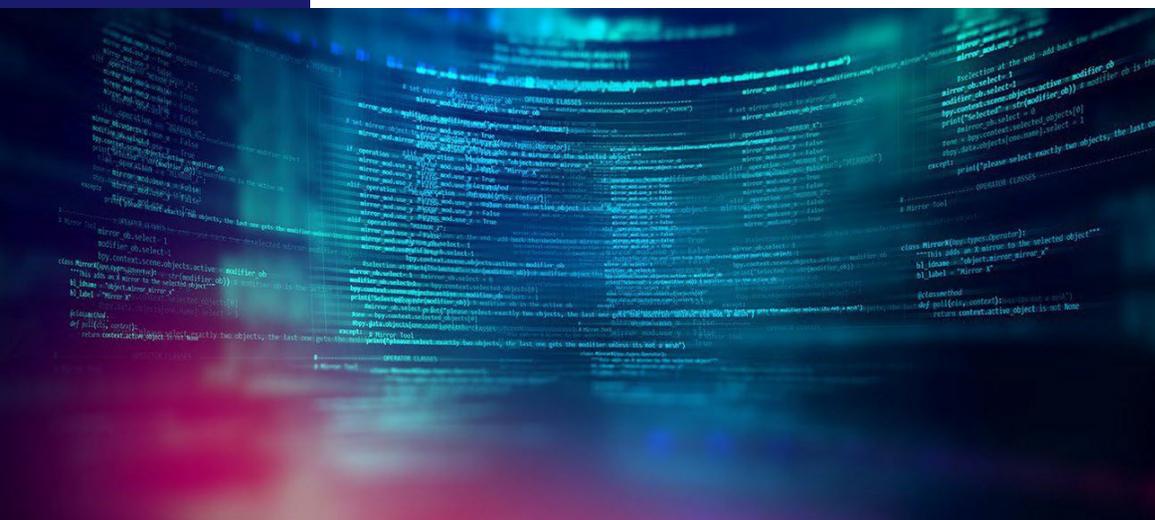
### ADDITIONAL RESOURCES AVAILABLE:

[Speak-Up Policy](#)

[Anti-Bribery and Anti-Corruption \(FABAC\) Policy](#)

[Records Management Policy](#)

[Refer to your country Employee Handbook](#)





# BE THE CHANGE

ENGAGE. EDUCATE. ADVOCATE.

Human Rights | The Environment | Political Activities | Philanthropy and Volunteerism

# Human Rights

We are committed to human dignity and fair employment practices in all parts of our business. We expect the same level of commitment from those in our third-party networks, too.

We do not knowingly conduct business with any individual or Company that participates in human rights abuses.

## Help us protect human rights.

We support efforts around the world to protect human rights, and we prohibit all forms of slavery, including involuntary, forced or prison labor, child labor, and human trafficking. [Speak up](#) if you see or suspect an abuse of human rights in our workplace or in the workplaces of our third parties.

## Abide by labor laws.

FIS conducts business ethically, responsibly, and in compliance with the employment laws of the countries in which we do business (which apply to pay, benefits, and working conditions), and we expect no less from our third parties. Again, speak up if you see or suspect a violation of applicable laws, anywhere we conduct business.

### OUR CORE VALUES IN ACTION

**Q:** I saw an article online about a company that FIS is considering partnering with. The article referred to the company's "questionable labor practices." I'm not part of the selection process, but I think those who are making the sourcing decision for this company should be aware of this information. Should I say something?

**A:** Yes. Let your colleagues who are involved in the decision know what you've learned, so they may investigate further. We should always do our due diligence in ensuring that our third parties meet our high standards. You should also raise your concern to the [FIS Ethics Office](#).

### ADDITIONAL RESOURCES AVAILABLE:

[FIS Modern Slavery Act Transparency Statement](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Procurement Policy](#)

[Refer to your country Employee Handbook](#)

[Respectful Workplace](#)

# The Environment

No matter who we are or where we are, we've all got something in common – the planet we call home. At FIS, we recognize the importance of protecting our planet, and we leverage our position as a world fintech leader to make a difference.

We are committed to helping mitigate climate change effects and reducing the environmental impact of our operations to protect the environment. FIS colleagues, contractors, directors, and third-party partners can support our initiatives.

## Limit FIS waste.

In line with our commitment to minimizing the amount of waste from our facilities that is sent to landfills, we provide recycling programs at our facilities where supported by local municipalities.

Our practices include recycling reclaimable material, such as computer paper and plastic, as well as computers and other technology equipment, such as Virtual Private Network tokens and printer toner cartridges, in line with international guidelines and FIS' security policies and 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.



## Limit third-party waste.

Help us encourage our banking and financial services clients to use sustainable materials in the production of payment cards, paper collateral, envelopes, and mailers. Also, promote the use of recycled plastic payment cards, digital wallets, and eDelivery to reduce plastic production and paper statements.

## Take accountability.

Comply with all applicable environmental laws and regulations and immediately report any suspected or actual environmental violations.

### OUR CORE VALUES IN ACTION

**Q:** I received a questionnaire from a client regarding FIS' environmental strategy. Who can I reach out to for guidance on these topics?

**A:** FIS has resources dedicated to handling Environmental, Social, and Governance (ESG) matters, including our publicly available Global Sustainability Report. Feedback or questions about the report or any of our ESG disclosures should be sent to [ESG@fisglobal.com](mailto:ESG@fisglobal.com).

### ADDITIONAL RESOURCES AVAILABLE:

[Environmental, Social, and Governance \(ESG\) Policy](#)



# Political Activities

We respect and celebrate individuals who support political causes they are passionate about. It's important, however, that support of a candidate or campaign is done on a colleague's own time. We must always make it clear that our personal political views and actions do not represent those of FIS, and we must never use Company resources to support our political activities.

## Keep it personal.

Never give the impression that your personal involvement in the political process represents an FIS endorsement, unless authorized and approved. Make sure:

- Your actions are lawful.
- You don't use FIS time, your position, or our assets (including the FIS name) to support your political activities.
- Your activities don't suggest even the appearance of a conflict with your role at FIS, especially if you are planning to seek, accept, or hold any political office.

## Know what's permitted.

FIS has a Political Action Committee (PAC), which colleagues are welcome, but not obligated to contribute to, but:

- There are very strict rules and reporting requirements around contributions, so consult with the [Public Policy team](#) to make sure you understand the process.

- If you choose to contribute, be aware that FIS will not reimburse you for any contributions you make.

Speak to the Public Policy team if you have any questions about political involvement, the PAC, or lobbying.

### OUR CORE VALUES IN ACTION

**Q:** I am considering running for public office. Is that allowed under our policies?

**A:** Inform your manager of your intentions in order to discuss whether the activity might present a conflict of interest or violate the law or our policies. Then, raise the matter to the Public Policy team for guidance and enter the matter into the COI Disclosure application (within our Conflicts of Interest FIS and me page) for review and a decision. Contact the Ethics Office with any questions.

### ADDITIONAL RESOURCES AVAILABLE:

[Environmental, Social, and Governance \(ESG\) Policy](#)

[Political Activities Policy](#)

# Philanthropy and Volunteerism

We understand the relationship between commerce and community and just how deeply we're all connected. We have a commitment to doing more than what's right, today. We make decisions for a better tomorrow as well.

That's why we support philanthropy and volunteerism on both personal and professional levels, investing resources where and when they're needed most, and serving where and when we're needed most.

## Give with FIS.

When we pool our time, talent, and resources together as a team, we can do more. Giving with FIS means helping communities thrive. Ways we do so include:

- Advancing financial inclusion and literacy
- Promoting STEM education
- Protecting our planet
- Improving health and human services
- Combating hunger
- Supporting community development

To find out more about how to give with FIS, contact [FIS Gives Back](#).

## Give on a personal level.

Because we are such a diverse group, we understand that we may differ in our support of charitable causes. If giving on a personal basis, make sure to:

- Avoid [conflicts of interest](#).
- Use your own time and resources.
- Never pressure coworkers.
- Make it clear your views are your own.

## Know that FIS cares.

Our FIS Cares program helps colleagues facing significant financial challenges as a result of natural disasters or serious illnesses. This program is made possible through the generous donations of FIS colleagues. Funding helps cover a range of essential expenses, such as: utility bills, property repairs, temporary housing, unexpected childcare expenses (situation-dependent), etc. FIS Cares cannot cover any past, present or future medical expense. If you are enrolled in an FIS health plan, to ensure you are maximizing your FIS benefits coverage, please contact [Corporate Benefits](#). If you would like to donate to the FIS Cares Fund or receive information about aid, please reach out to the [People Office Support Center](#).



## OUR CORE VALUES IN ACTION

**Q:** I am going to attend a town meeting with members of a charity for which I volunteer. I would like to ask the town’s mayor a question and identify myself as a representative of FIS to get his attention. Is this OK to do if it’s for a good cause?

**A:** No. If FIS is not directly involved with this charity and you are not an approved representative, it would be dishonest to present yourself that way. Speak on your own behalf for personal charitable activities.

### ADDITIONAL RESOURCES AVAILABLE:

[APAC & Continental Europe Giving Guidelines](#)

[Environmental, Social, and Governance \(ESG\) Policy](#)

[UK Charitable Giving Guidelines](#)

[US Charitable Giving Guidelines](#)

[Volunteer Policy](#)

# Deliver on Our Promises

Ethics and compliance are at the core of everything we do and are embodied in the culture that defines how we operate through our [Core Values](#). At FIS, we conduct our business in a socially responsible manner within the letter and spirit of both the law and the Code.

We don't just deliver fintech – we **Lead With Integrity** to deliver the world's most innovative fintech, and it all starts with you. **Be the Change** for us to **Win as One Team**.

People are our greatest strength. The quality of our people differentiates us and personifies our leadership position. We are lucky to have the best and brightest in the industry helping us continue to drive growth for clients, while uplifting economies and communities.

Thank you for applying your deep expertise, for innovating with purpose, and for offering experiences that are efficient, collaborative, client-centric, seamless, purpose driven, and secure in an ethical and compliant manner.

Most importantly, thank you for leading with integrity. It's not just your work ethic that has gotten us to where we are today, it's your honesty that has brought us unparalleled success for over 50 years and many more to come.

With your continued commitment to our Core Values, our Code, and our culture, we will continue to grow and **Bring Our Core Values to Life**.

## Remember, Shine Bright and Do What Is Right.

This Code does not form part of the terms and conditions of your employment and if there is a conflict between the content of this Code and the terms and conditions of your employment under your employment contract, the employment contract shall prevail.

# Additional Resources

Resource:	Contact:
For questions or concerns regarding the <a href="#">Code of Business Conduct and Ethics</a> , <a href="#">Responsibility to Report Wrongdoing, Conflicts of Interest</a> , and <a href="#">Business Gifts and Entertainment</a>	<a href="#">FIS Ethics Office</a> <a href="#">FIS Ethics Helpline</a> <a href="#">Country-specific Helpline Numbers</a>
To report a security incident	<a href="#">FSIRT</a>
For questions about insider trading	<a href="#">Corporate Secretary</a>
For urgent or critical information security incidents	+1.414.357.FSIRT (3747) (U.S. and International)
To discuss IP assets	<a href="#">Chief IP Counsel</a>
For questions about Public Policy and Political Activities	<a href="#">Public Policy Team</a>
For questions on privacy and record retention	<a href="#">Privacy and Data Protection Office</a>
For any questions about environmental matters	<a href="#">ESG Team</a>
For questions about Corporate Safety	<a href="#">Corporate Safety Team</a>
For questions about benefits or colleague performance and behavior	<a href="#">The People Office</a>
For questions about whether a third party should be reviewed by the FIS Anti-Bribery and Anti-Corruption (“FABAC”) Committee	<a href="#">FABAC Team</a>
For questions about understanding and complying with the laws and regulations applicable to our business, products and services	<a href="#">Corporate Compliance Team</a>
For questions about security regarding – protecting people, physical assets and information	<a href="#">Corporate Security Team</a>
For questions about Corporate Communications	<a href="#">Corporate Communications</a>
For questions concerning trade compliance	<a href="#">Export &amp; Trade Sanctions Compliance Team</a>

# Country-specific Helpline Numbers

Country	Toll-free Number	Special Instructions
Australia	1-800-339276	
Austria	0800-291870	
Argentina – English	0-800-444-8084	
Argentina – Spanish	0-800-555-0906	
Barbados	1-800-5343352	
Belgium	0800-77004	
Brazil	0800-891 1667	
Canada	1-855-350-9393	
Channel Islands	0800-032-8483	
Chile	1230-020-5771	
China	0800-032-8483	
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.
Colombia	01800-9-155860	
Czechia (Czech Republic)	800-142-550	
Denmark	80-882809	

Country	Toll-free Number	Special Instructions
France	0800-902500	
Germany	0800-1016582	
Hong Kong	800-964214	
India	000-800-001-6112	
Indonesia	007-803-011-0160	
Ireland	1-800-552-070	
Israel	1-809-21-4405	
Italy	800-786907	
Japan	(KDDI) 00531-11-0271 (Softbank Telecom 0066-33-830499) (NTT) 0034-800-600131	
Kenya	503-748-0646	
Korea, Republic of	00308-13-2890	
Luxembourg	800-27-114	
Malaysia	1-800-80-8641	
Mexico	001-855-329-8182	
Netherlands	0800-0226174	
New Zealand	0800-0226174	
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	

Country	Toll-free Number	Special Instructions
Poland	0-0-800-1211571	
Portugal	800-8-11470	
Romania	0808-03-4288	
Russia	8-10-8002-6053011	
Saudi Arabia	888-309-1552	From outside line dial 00-800-10, at the prompt dial toll-free shown here
Senegal	503-748-0646	
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	
Tunisia	503-748-0646	
Turkey	0811-288-0001	From outside line dial 0811-288-0001, 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 Arab Emirates (du)	8000-555-66	

Country	Toll-free Number	Special Instructions
United Arab Emirates	8000-021	
United Arab Emirates (U.S. Military Bases)	8000-061	
United Kingdom	08-000328483	
United States	1-877-364-7384	
Vietnam	120-11067	

The Company takes violations of the Code and instances of noncompliance with the Code very seriously. Violations of the Code or noncompliance with it may result in disciplinary action up to and including termination of employment in accordance with local laws.

Conduct which may lead to disciplinary action includes but is not limited to the following:

- Violating Company Policies addressed in the Code or standard;
- Violating local laws or regulations in jurisdictions where the Company does business;
- Engaging in criminal conduct;
- Having an interest that conflicts with the interests of the Company;
- Falsifying Company records; and
- Engaging in abusive or retaliatory conduct including, making threats, discriminating against colleagues or harassing colleagues.

By agreeing to comply with this Code, you are agreeing that you will comply with both it and the Company Policies.

**IMPORTANT:** Nothing in this Code prohibits any colleague from reporting possible violations of law or regulation to any governmental agency or entity, including but not limited to, the U.S. Department of Justice, the U.S. Securities and Exchange Commission or various non-U.S. equivalent law enforcement agencies, or making other disclosures that are protected under the whistleblower provisions of any applicable law or regulation. Colleagues are not required to notify the Company that they have made such reports or disclosures or obtain authorization from the Company prior to making such reports or disclosures.