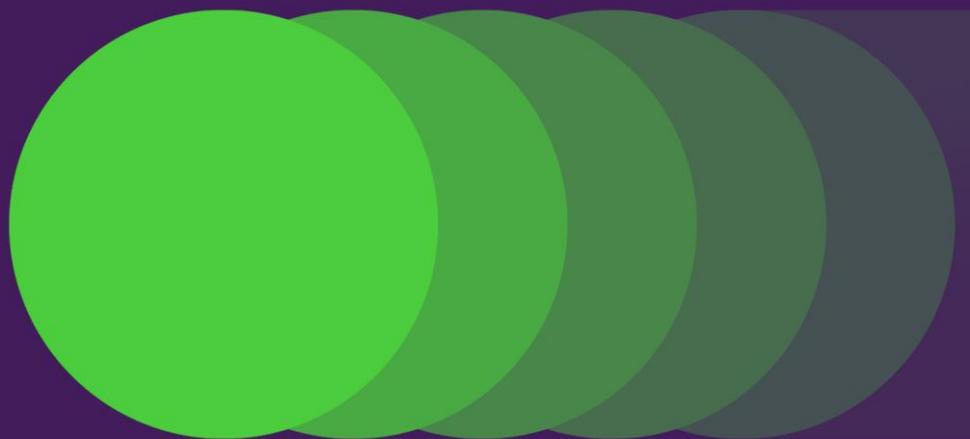




01.17 FIS Political Activities Policy

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01.17 FIS Political Activities Policy

1. Purpose

The FIS Political Activities Policy (the “Policy”) establishes the compliance framework for political engagement, inclusive of lobbying, political contributions, and the political action committee (the “PAC”) by Fidelity National Information Services, Inc. and for the directors, officers, and employees of the Company and its subsidiaries and affiliates worldwide (collectively, the “Company” or “FIS”).

The objective of this policy is to ensure that directors, officers and employees of FIS engage in these activities in a responsible manner and in full compliance with applicable laws and regulations. By establishing clear expectations, the outcome of this Policy reinforces the Company’s commitment to transparency in its lobbying and political activities.

Related topics, such as gift rules, conflict of interest, and compliance with anti-bribery requirements, including the U.S. Foreign Corrupt Practices Act provisions, are covered by other Company policies. This Policy should therefore be read in conjunction with other Company policies and guidelines.

2. Statement

Global legislative and regulatory decisions affect the Company’s business, direction, and growth. FIS believes that active engagement in public policy and political activities is an important part of responsible corporate citizenship and the democratic process. The Company engages with policymakers, public officials and regulators at the national/federal, provincial/state, and local levels to strengthen the financial system, reduce systemic risk, and to support dynamic, healthy markets, competition and innovation. FIS is committed to transparency in its lobbying and political activities, including disclosing all political campaign donations by the Company’s PAC, known as the FIS Good Government Fund.

This Policy sets out to ensure activities undertaken (as defined below) comply with laws concerning participation in the political processes, including lobbying and political contributions. For example, within the United States, there are federal, state and local reporting and/or registration/disclosure requirements that may need to be satisfied prior to engaging in any such activities (or shortly thereafter), as applicable under the relevant law. Failure to register and/or report these activities in accordance with the relevant laws can result in fines and penalties for the Company in addition to individual liability.

Violation of Company policies, procedures and/or standards may result in disciplinary action up to and including termination of employment, as permitted by law. There are no exceptions to this Policy unless permitted by law and as approved by the Policy Owner. Exceptions must be sought by contacting the Policy Owner.

3. Scope

This policy applies to the entire organization, including directors, officers, and employees of FIS and its subsidiaries and affiliates worldwide. Contractors and applicable third-parties are also required to adhere to FIS-established policies, procedures, and standards.

4. Elements

4.1 Communicating with Government Officials

The Company believes in the importance of building and maintaining relationships with governments around the world by communicating its views and concerns to elected officials and policymakers. Lobbying activity and other forms of political engagement on behalf of Company interests are regulated by a number of laws and regulations. Consequently, the centralized and coordinated management of these activities is critical to the Company's compliance with these laws.

Accordingly, with respect to political engagement in any jurisdiction, the Public Policy team:

- Pre-approves, in writing, the Company's retention of outside lobbyists or consultancies retained to provide advice related to the Company's interaction with government or otherwise facilitate interaction with such officials and regulators;
- Supervises the Company's attempts to influence government actions, whether through legislative, executive, or administrative action;
- Remains informed of meetings with government officials where policy or regulatory matters are discussed and provides pre-clearance for non-Public Policy Team personnel engagement with government officials or politicians in relation to issues that relate to laws, government policies, regulations, other government action, or the generation of goodwill with officials (other than routine meetings with clients that do not involve policy discussions, such as client meetings with a state-owned issuing bank, or engagements involving payment system security, routine supervision, or other legal or law enforcement matters); and
- Oversees the Company's compliance with applicable registration, reporting and other laws governing lobbying activity, together with legal counsel. Refer to the FIS "Political Activities" Standard document for more information.

4.2 FIS Political Contributions

In the United States, FIS sponsors a non-partisan PAC pursuant to the Federal Election Campaign Act and the regulations promulgated by the Federal Election Commission. The FIS PAC makes contributions to federal, state and local candidates as allowed by law. Eligible associates and directors of FIS and its subsidiaries who are U.S. citizens or green-card holders may voluntarily contribute to the PAC, and to have those voluntary contributions donated, by approval of the PAC Advisory Committee, to federal candidates and office holders. Employees may not be directly or indirectly reimbursed for PAC contributions. PAC support is predicated on the interests of the Company and does not mean the Company or PAC supports or agrees with a candidate's position on all issues nor is it based on personal political preferences of PAC contributors or administrators. Previous support does not mean the PAC will support a candidate in the future. The PAC does not contribute to presidential campaigns.

The FIS PAC is governed by an internal, cross-functional Advisory Committee, comprised of Company executives. The Advisory Committee supervises and directs the PAC's administration, solicitation campaigns, contributions, and compliance with applicable laws and the PAC Bylaws. The Committee advises on donation strategy decisions based on alignment with FIS' business interests.

PAC contributions and expenditures are publicly disclosed on the Federal Election Commission's website (www.fec.gov), where they can be accessed by searching "FIS Good Government Fund" in the Committee name field.

4.2.1 Corporate Contributions to Federal Candidates or Political Parties

United States federal law prohibits companies from making corporate contributions or providing anything of value directly to any political candidate, campaign committee or national party committee in connection with any federal election. Accordingly, FIS shall not make any such contributions. All contributions are made through the FIS PAC.

No Company resources, including the use of Company premises, equipment or property, or Company funds, may be contributed (in cash or in-kind) to any federal, state or local political candidate, political committee (other than for the administrative and solicitation expenses of the FIS PAC, as permitted by law), political party, state ballot measure committee or to any other organization for the purpose of attempting to influence elections or ballot measures.

Additionally, the Company may make contributions to established and recognized entities organized under section 501(c)(4) and 527 of the Internal Revenue Code when doing so will advance policy or business interests of the company. All contributions to 501 (c)(4) and 527 organizations require written approval of the Advisory Committee.

4.2.2 Corporate Contributions to State and Local Candidates

When approved under this Policy, FIS may contribute corporate funds to state or local candidates and committees or ballot initiatives in the United States where permissible and within the limits designated by state and local laws and regulations, including limitations governed by "pay-to-play" rules that may be applicable in jurisdictions where FIS holds or may in the future bid for a government contract.

4.2.3 Corporate Contributions Outside the United States

The Company does not make contributions to individual political candidates and political parties outside of the United States.

4.3 Personal Political Activities or Contributions

When engaging in political activities, employees must make it clear that they are acting in their personal capacity and not as a representative of the Company. If a FIS employee participates in a political campaign as a candidate, volunteer, financial sponsor or otherwise, the employee must make clear they are participating as an individual citizen and not as a representative of FIS. Additional compliance requirements are covered within the FIS "Political Activity" Standard.

4.4 Government Contracts

Various jurisdictions may have laws that limit or restrict contracts that a business may have with government officials, particularly those that are engaged in bidding on public contracts. In connection with a bid or the award of a contract, these laws may require the business to disclose if an employee or other family member serves as an elected or appointed official in that jurisdiction. These bidding processes may also trigger a blackout period where lobbying activity related to this issue is prohibited.

4.5 Anti-Bribery Compliance

Employees must engage the Anti – Bribery & Anti-Corruption team prior to providing gifts, entertainment, sponsorships, or donations to any government official regardless of value.

4.6 Trade Association Activities

FIS belongs to a variety of trade associations, coalitions, and industry organizations in the U.S. and abroad and pays regular dues to these groups. FIS' public policy positions are often communicated through the lobbying efforts of these organizations, which allows the Company to engage relevant policymakers more efficiently and in concert with industry peers. FIS' participation as a member of these trade associations comes with the understanding that it may not always agree with all the positions of an organization or its members.

Employees interested in accepting a board-level or leadership position with a trade association should consult with the FABAC team (antibribery.anticorruption.team@fisglobal.com) prior to accepting the role.

As part of our annual Political Contributions and Expenditures Report, the company publishes a list of the non-deductible portion of payments to trade associations engaged in advocacy of \$50,000 or more and payments to other tax-exempt organizations that may be used for political purposes. The report is reviewed annually by the Corporate Governance, Nominating and Sustainability Committee of the Board of Directors.

5. Roles and responsibilities

The Vice President of Global Public Policy and Sustainability serves as the Policy Owner and is responsible for approving any exceptions to this Policy.

The Policy is administered by FIS' Global Public Policy team, which is responsible for:

- Implementing the Policy;
- Developing and maintaining supporting procedures;
- Monitoring the Policy's operation and effectiveness; and
- Ensuring directors, officers, and employees receive appropriate communication and training.

To support compliance, the Global Public Policy team conducts annual training to ensure Political Activities are carried out in accordance with applicable laws and company policies.

The FIS Board of Directors, through the Corporate Governance, Nominating and Sustainability Committee, oversees the Company's lobbying activities and political contributions as outlined in this Policy. This oversight occurs at least annually.

6. References

- [01.17.01 Political Activities Standard](#)
- [01.17.02 Pay-to-Play Standard](#)
- [Global Anti-Bribery and Anti-Corruption Policy \(FABAC\)](#)
- [Code of Business Conduct and Ethics](#)
- [Political Contributions and Expenditures Report](#)

7. Definitions

No definitions applicable.