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Scope: Enterprise Wide
Policy Theme: 01.0 Corporate Compliance

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Provision for Exceptions:

1. No Exceptions

These provisions apply to all business units with no exceptions. Business Units must implement the requirements of this policy.

01.02 Anti-Bribery and Anti-Corruption Policy

Purpose:

Fidelity National Information Services, Inc. and its subsidiaries (collectively, “Company” or “FIS”) are committed to conducting business ethically and in compliance with all applicable laws. Our Code of Business Conduct and Ethics and the FIS China Rules of Business Conduct require that the Company, its employees and anyone acting on behalf of the Company obey company policies and all applicable laws in any country where FIS operates, including specific anti-corruption laws.

The purpose of this FIS Anti-Bribery and Anti-Corruption Policy (“Policy”) is to help the Company comply with applicable laws relating to bribery and corruption, including but not limited to the Foreign Corrupt Practices Act (U.S.) and the Bribery Act (UK) (referred to in this Policy as “Anti-Corruption Laws”). FIS has a zero tolerance of any bribery or corruption. Anti-Corruption Laws make it illegal for the Company or anyone acting on the Company’s behalf to bribe any person or entity. The Company is also required to keep accurate and complete books and records and to maintain proper internal accounting controls.

Statement:

This Policy and the related Standards are intended to educate employees about behaviors to comply with the requirements of Anti-Corruption Laws.

Generally, employees need to know:

- Employees must not provide – or offer to provide – an improper payment or other incentive to anyone in exchange for gaining any sort of benefit.
- An improper payment can be anything of value, not just cash but also gifts, services, job offers, loans, travel expenses and entertainment. The bottom line is that you must not offer anything to improperly influence any person, regardless of whether they are in the private or public sector, or government officials. For further information on gifts, entertainment and hospitality see the Gift and Entertainment Standard within this Policy.
- FIS prohibits all facilitation payments. Facilitation payments or “grease payments” are payments or gifts offered to secure or speed up a routine government decision.

- These rules apply to actions by third parties on the Company's behalf to the same extent that the rules apply to actions of employees. For specific requirements regarding engaging third parties, see the FIS Standard for Engagement of Third Party Agents within this Policy.
- All financial records must accurately reflect the substance of all transactions by or on behalf of the Company regardless of the size of the transaction.

For additional information regarding your responsibilities for complying with this Policy, see the FIS Standard for Compliance with Anti-Corruption Laws within this Policy.

01.02.01 Scope

This Policy is intended to supplement the FIS Code of Business Conduct and Ethics and the FIS China Rules of Business Conduct (together, the Code of Conduct). Likewise, the Company has adopted standards to supplement this Policy, including the FIS Standard for Compliance with Anti-Corruption Laws, the FIS Standard for Engagement of Third Party Agents and the FIS Gifts and Entertainment Standard (collectively, "Anti-Corruption Standards"). This Policy and the Anti-Corruption Standards are required to be followed by the Company's officers, directors, employees, consultants, and joint ventures, and by agents, contractors, and sub-contractors with responsibilities that include interactions with third parties on behalf of the Company.

This Policy extends to all of the Company's domestic and international operations, including operations conducted by each and every department, subsidiary, agent, consultant or other representatives, and the operations of each and every joint venture or similar business enterprise in which the Company is a participant. This Policy also extends to all of the Company's financial record-keeping activities and is integrated with the obligations to which the Company is already subject by virtue of the federal and state securities laws, including the U.S. Securities and Exchange Act of 1934.

If an employee has any questions about the application of the anti-bribery provisions in general, or the use of this Policy or the Anti-Corruption Standards, then he or she should consult with a member of the FIS Anti-Bribery and Anti-Corruption (FABAC) Committee ("Committee") or contact the Chief Compliance and Customer Advocacy Officer via corporatecompliance@fisglobal.com.

01.02.02 Responsibilities of All Company Employees

Every Company employee is expected to read, understand, and comply with this Policy and the Anti-Corruption Standards. Periodic certifications of compliance with this Policy will be required, as will participation in Company Anti-Corruption training sessions as assigned by Company management.

Company employees who learn of a violation, or suspected violation, of Anti-Corruption Laws are required to take immediate action. If you suspect an FIS employee is violating the law or FIS policy, it is your duty as an FIS employee, officer, subcontractor or director to report this wrongdoing by contacting your manager, the People Office and the FIS Anti-Bribery Anti-Corruption (FABAC) Committee without delay via corporatecompliance@fisglobal.com.

If you prefer to remain anonymous (with certain exceptions in some European countries), FIS provides toll-free Ethics Hotline numbers (**877.364.7384 for U.S. or Canada**) for each country and an Ethics Website www.fnisethics.com that are available 24 hours a day, 7 days a week. Toll-free numbers for each country are provided in Appendix A to the [Code of Business Conduct and Ethics](#) and in the [FIS China Rules of](#)

Business Conduct, or you may obtain the toll-free numbers from the Ethics Website. **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.** If you have questions or problems concerning this Policy, you should contact the Committee at corporatecompliance@fisglobal.com or if you do not have internet access— send your concerns to:

FIS Anti-Bribery Anti-Corruption Committee

c/o Chief Compliance and Customer Advocacy Officer

Fidelity National Information Services, Inc.

601 Riverside Avenue

Jacksonville, Florida 32204

Nothing in this Policy is intended to impede an individual from communicating directly with the staff of the U.S. Securities and Exchange Commission about a possible securities law violation.

01.02.03 Standard for Compliance with Anti-Corruption Laws

It is against Company policy to bribe any person, directly or indirectly. The purpose of this Standard for Compliance with Anti-Corruption Laws (“Standard”) is to establish standards for behavior to reduce the risk of Fidelity National Information Services, Inc. and its subsidiaries (collectively, “Company” or “FIS”) acting in contravention of applicable laws relating to bribery and corruption, including but not limited to the Foreign Corrupt Practices Act (US) (“FCPA”) and the Bribery Act (UK) (referred to in this Policy as “Anti-Corruption Laws”).

Scope

This Standard applies to the Company’s officers, directors, employees, consultants, and joint ventures, as well as agents, contractors, and sub-contractors with responsibilities that include interactions with third parties on behalf of the Company.

01.02.03.01 Summary of Anti-Corruption Laws

Anti-Corruption Laws generally make it illegal to bribe any person, including but not limited to business people and government officials, in order to obtain or retain business or to secure any improper advantage.

For purposes of this Policy, a “government official” means any officer or employee of a state, local or federal government outside of the United States, government or any department, agency, or instrumentality thereof (which includes a government-owned or government-controlled state enterprise) or of a “public international organization,” any person acting in an official capacity for or on behalf of a non-US government or government entity or public international organization, any political party or party official, or any candidate for political office outside the United States. Thus, government officials include not only elected officials, but also consultants who hold government positions, employees of companies owned or controlled by non-US governments, political party officials and others.

The term “public international organization” includes such organizations as the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank.

A member of the FIS Anti-Bribery Anti-Corruption (FABAC) Committee should be contacted if there is a question

whether a person or an organization falls within the scope of the Policy.

01.02.03.02 Forms of Bribery or Corruption

Anti-Corruption Laws prohibit both direct and indirect bribes.

A bribe is anything of value given in an attempt to affect a person's actions or decisions in order to gain or retain a business advantage. Bribery and corruption can take many forms, including cash or gifts to an individual or family members, inflated commissions, fake consultancy agreements, unauthorized rebates, or political or charitable donations.

Also, common business practices, if abused, can be construed as bribes. For example, excessive or inappropriate entertainment, paying for the travel of spouses or family members, or inappropriate non-business related travel. In some cases, the offering of inducements is unlawful, even if the inducement is not accepted. Giving, offering, requesting and receiving a bribe are all forms of corruption.

01.02.03.03 Record-Keeping, Accounting, and Payment Practices

The record-keeping provisions of Anti-Corruption Laws require the Company to keep its books, records and accounts in reasonable detail, accurately and such that they fairly reflect all transactions and dispositions of assets.

Thus, Anti-Corruption Laws prohibit the mischaracterization or omission of any transaction on a company's books or any failure to maintain proper accounting controls that result in such a mischaracterization or omission. Keeping detailed, accurate descriptions of all payments and expenses is crucial for compliance purposes.

Accordingly, Company employees must follow applicable standards, principles, laws and Company practices for accounting and financial reporting. In particular, employees must be timely and complete when preparing all reports and records required by management. Prior to paying or authorizing a payment on behalf of the Company to or for the benefit of any person or entity, and in particular a government official, Company employees or agents should be sure that no part of such payment is to be made for any purpose other than that to be fully and accurately described in the Company's books and records. No one may create an undisclosed or unrecorded account of the Company for any purpose. False or artificial entries may not be made in the books and records of the Company for any reason. Finally, personal or Third Party funds may not be used to accomplish what is otherwise prohibited by Company policy.

01.02.03.04 Due Diligence and Selection of Third Party Representatives and Business Partners

In operating outside of the United States, the Company frequently comes into contact with government officials and business people while attempting to secure or renew business opportunities. The manner in which the Company may obtain or retain business, whether through:

- (a) submission of a winning bid;
- (b) direct negotiation with a prospective customer;
- (c) joining an existing concession;
- (d) negotiating a joint venture; or

(e) engaging a Third Party as an agent or reseller,

will often create an environment in which the risk of bribery or other corrupt behavior is increased. The Company is dedicated to the dynamic and profitable expansion of its operations worldwide. The Company will compete for all business opportunities vigorously, fairly, ethically, and legally, and will negotiate contracts in a fair and open manner. Regardless of any pressure exerted by local custom in a particular region, the Company will conduct business using only legal and ethical means.

The Company can be liable for improper payments made by its agents or other business associates. Accordingly, corrupt behavior is not excused by inserting a Third Party between the Company and the prospective customer or government official. Nor is the Company excused where such behavior was not sanctioned by the Company, but it knew or should have known that the agent or business associate it employed was likely to engage in such activity based on readily available information. Thus, the practice of fairness and professionalism must extend to the activities of the Company's agents, consultants, representatives and business partners, particularly those third parties who are in a position to violate Anti-Corruption Laws (individually "Third Party" and collectively "Third Parties"). The Company should be careful to avoid situations involving Third Parties that might lead to a violation of Anti-Corruption Laws. Therefore, prior to entering into an arrangement with any Third Party who may act on behalf of the Company in a country or territory outside of the United States, the Company will perform a due diligence investigation and obtain assurances of compliance with the provisions of Anti-Corruption Laws. **It is important to note that the responsibility for the initiation of this process lies with the sales representatives or the business manager for the region in which the Third Party will be engaged.** For specific requirements regarding engaging Third Parties, see the FIS Standard for Engagement of Third Party Agents within this Policy.

The Company's procedures are designed such that officers, employees, and agents will exercise due care to refrain from delegating substantial discretionary authority to individuals, within or outside the Company, who an officer or employee knows, or should know through the exercise of reasonable due diligence, may engage in illegal activities. Company employees must follow the Company's requirements governing investigating, pre-qualifying, certifying and entering into agreements with Third Parties who will act on behalf of the Company in transactions outside the United States. A Third Party may be selected only after careful consideration of appropriate information. The Third Party must agree to appropriate monitoring and audit procedures by the Company or its designee.

In the event the Company merges with or acquires another company, the Company will review and evaluate all existing Third Party relationships with the acquired or merging company to bring about prompt compliance of the merged or acquired company with this Policy, the Anti-Corruption Standards and the requirements of Anti-Corruption Laws. In some cases, it may be determined that the acquired company's due diligence and approval procedures regarding Third Parties were sufficiently robust and similar to those of FIS that exceptions to this Policy may be approved by the FABAC Committee to permit continuation of relationships with Third Parties as previously approved by the acquired or merged entity where doing so is determined by the FABAC Committee to be appropriate.

All contracts and contract renewals within the scope of the Anti-Corruption Laws with Third Parties will contain provisions that represent that the parties have not engaged in and will not engage in activities which contravene applicable anti-corruption laws.

In addition, each Third Party agreement shall contain an agreement that the Third Party shall provide the Company with audit rights. Such contracts shall also provide for termination if there is violation of such

undertakings, representations, or agreements. Any exceptions to such requirements must be approved by the FABAC Committee.

Further, the Company may request that a Third Party's personnel involved in the business activities submit to a reasonable level of remote access anti-bribery and anti-corruption training. Such training will be provided at the Company's cost but is not chargeable by the Third Party for the time required to undertake the training. In addition, the Company may require an annual certification by the Third Party of its compliance with all applicable anti-bribery and anti-corruption laws, as appropriate.

The Company will determine the regions or countries that pose higher risks of corruption. It may also conduct audits of operations in such regions or countries of:

- the operating unit's books and records, with specific attention to payments and commissions to agents, consultants, contractors, and subcontractors with responsibilities that include interactions with individuals who may be considered government officials and to contributions to or by joint ventures;
- internal controls in respect to the retention of, and ongoing relationships with, selected agents, consultants, contractors, subcontractors, and joint venture partners sufficient to detect, and ensure compliance with, the Company's Third Party retention policies and procedures;
- selected Third Parties, people or companies; and
- statements of employees, consultants, agents, contractors, subcontractors, and joint venture partners.

Failure to follow Company's requirements regarding Third Parties may subject an employee to disciplinary action up to and including termination, and potential criminal sanctions.

01.02.03.05 Penalties

Anti-Corruption Laws are generally criminal statutes, and impose severe criminal sanctions and liability on individuals and corporations that fail to comply with their provisions.

For example, for individuals who violate the anti-bribery provisions of the Foreign Corrupt Practices Act (the "FCPA"), criminal penalties include fines of up to US \$250,000 or twice the amount of the gross pecuniary gain resulting from the improper payment, imprisonment of up to five years, or both. Civil penalties of up to US \$16,000 per violation may also apply. Violations of accounting privileges, the SEC may obtain a civil penalty not to exceed the greater of (a) the gross amount of the gain to the defendant as a result of the violation or (b) fines ranging from US \$7,500 to US \$150,000 for individuals and US \$75,000 to US \$725,000 for companies.

Corporations may be fined up to US \$2,000,000 or, alternatively, twice their pecuniary gain, for criminal violations of the FCPA's anti-bribery provisions. The U.S. Department of Justice and the U.S. Securities Exchange Commission may also obtain injunctions to prevent FCPA violations.

Individuals who willfully violate the accounting provisions of the FCPA may be fined up to US \$5,000,000, imprisoned for up to twenty years, or both per violation. A corporation may be fined up to US \$25,000,000. Alternatively, both individuals and corporations violating the FCPA's accounting provisions may be subject to fines of up to twice the amount of any pecuniary gain or loss resulting from such violation.

The Company is prohibited by the FCPA from indemnifying employees or other individuals acting on the Company's behalf from any personally-imposed fines.

In addition to civil and criminal penalties, a person or company that violates the FCPA may be precluded from doing business with the U.S. Government. Other penalties include denial of export licenses and debarment from programs under the Commodity Futures Trading Commission and the Overseas Private Investment Corporation.

In addition to criminal or civil sanctions by government agencies, violations of Anti-Corruption Laws and/or this Policy will also result in discipline by the Company that may include termination of employment.

01.02.03.06 FIS Anti-Bribery and Anti-Corruption (FABAC) Committee

The Company has established and will maintain an Anti-Bribery Anti-Corruption Committee (“Committee”) to supervise

(i) all existing Third Parties for purposes of business development in a jurisdiction outside of the United States and,

(ii) the retention of any new person or company for purposes of business development in a jurisdiction outside of the United States. The Committee also will review the suitability of all applicable prospective Third Parties, as well as the adequacy of the due diligence performed in connection with the selection of the Third Party, any subsequent due diligence relating to the continued suitability of the person/company, and any due diligence in connection with the proposed retention of those relationships for purpose of business development in a jurisdiction other than the United States. The Committee will be comprised the Company’s Chief Compliance and Customer Advocacy Officer and such other FIS employees as the Chief Compliance and Customer Advocacy Officer and the then current FABAC Committee shall designate.

The Committee will oversee the Company’s formation of business relationships with any Third Party, focusing on the reputation and qualifications of these entities for purposes of business development in jurisdictions outside the United States, and for purposes of projects for international governments or public international organizations or instrumentalities of these entities. The “due diligence” conducted to verify that this oversight is effective will be maintained in the Committee’s files.

The Committee is responsible for oversight of the policies, standards, and procedures established by this Policy. The Committee has the authority and responsibility to adopt and enforce monitoring and auditing systems reasonably designed to monitor conduct of the Company’s employees and any person or company, including the authority to retain outside counsel, investigators, and independent auditors to conduct investigations and audits. In addition, the Committee is authorized to modify the procedures adopted pursuant to the Policy, and to make modifications or grant exceptions to the Policy as determined reasonably appropriate.

The Company has established a reporting system by which officers, employees, agents, consultants, and other representatives, as well as any person or company, may report suspected criminal or improper conduct directly to the members of the Committee. Such complaints may also be made anonymously through the Company’s ethics and compliance website or hotline. The Company has zero tolerance for retaliation. 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, including and not limited to reports of a violation of this Policy or Anti-Corruption Laws.

01.02.04 Standard for Engagement with Third Party Agents

The purpose of this Standard for Engagement of Third Party Agents (“Standard”) is to establish approval levels and an implementation process to reduce the risk of Fidelity National Information Services, Inc. and its subsidiaries (collectively, “Company” or “FIS”) engaging a Third Party who is likely to provide an improper inducement in contravention of applicable U.S. and international government anti-bribery or anti-corruption laws (collectively, “Anti- Corruption Laws”).

01.02.04.01 Scope of Standard

This Standard applies to any engagement by the Company, directly or indirectly, of any Third Party who will interact with prospective customers or government officials (as defined below) on behalf of the Company anywhere in the world other than the United States.

Examples of third parties the Committee reviews (individually a “Third Party” and collectively “Third Parties”) include, but are not limited to:

- Any partner
- Agent
- Reseller
- Distributor
- Individual or entity that presents or sells or facilitates a sale of products or services to clients or customers
- Anyone who is in a position to influence a buying decision for our products or services
- Prime contractor
- Individual or entity that interacts with government officials on behalf of FIS
- Individual or entity that you have a knowledge or belief has participated in corrupt payments
- Individual or entity that performs services in a high-risk country
- Individual or entity helps FIS obtain licenses or permits
- Custom House Agent (CHA)
- Individual or entity that assists with the collection of amounts due from the government or quasi-government entities.

This Standard applies to the Company and all of its subsidiaries, affiliates, and joint ventures in which the Company holds a controlling interest.

It is understood that there are other Company policies or guidelines governing the engagement of third parties. In regards to the hiring of third parties who may interact with prospective customers or government officials on behalf of the Company outside of the United States, this Standard shall control. Questions shall be referred to the FIS Anti-Bribery Anti-Corruption (FABAC) Committee (“Committee”) defined in the FIS Anti-Bribery and Anti-Corruption Policy (“FABAC Policy”) via corporatecompliance@fisglobal.com.

01.02.04.02 Background

Anti-Corruption Laws prohibit payments of anything of value directly or indirectly to an individual or entity to secure an improper business advantage or otherwise to obtain or retain business. The Company and individual officers or employees may be liable for inappropriate payments made by a Third Party -- such as a distributor, subcontractor, consultant, agent, or joint venture partner -- of anything of value to any person even if the Company does not actually know of the payment.

In addition, Anti-Corruption Laws in some instances may restrict the Company’s ability to do business directly with “government officials” or with private companies wholly or partly owned by a “government official” or in which a “government official” has a beneficial interest. For example, granting a contract, particularly one on favorable terms, to a company in which a “government official” holds an ownership interest could be viewed as a prohibited payment under Anti-Corruption Laws. The Foreign Corrupt Practice

Act (“FCPA”) is a United States law which imposes liability if the Company, or its officers or employees, corruptly gives, pays, promises, offers or authorizes such a payment when the Company knows or has reason to know that it may be used in whole or in part to make a payment to a “government official.” This standard, which is effectively a “reason to know” standard, is aggressively enforced by U.S. enforcement officials.

The term “government officials” as used is very broadly defined. It includes part-time workers, unpaid workers, and any person “acting in an official capacity for any government or government instrumentality outside of the United States. Included as prohibited recipients are political parties, party officials, and candidates for political office. “Government officials” also includes employees of public international organizations such as the World Bank and International Monetary Fund, the United Nations, and the like.

The term “government official” also includes officers and employees of companies under government ownership or control outside the US. This means that all employees of government-owned companies and instrumentalities are “government officials,” even if the companies are operated like privately owned corporations. Many banks and financial institutions are government owned or controlled, and so their employees must be considered “government officials” for this purpose.

Third Party interactions with government officials on behalf of the Company can occur in a wide variety of activities including seeking regulatory approvals, customs clearance, litigation, tax and value-added tax (VAT) services, scheduling meetings with officials, seeking business permits and licenses, bidding for or performing prime or subcontractor services under government contracts and contracts with government owned entities, and business development with government owned or controlled entities.

It is important to note that while the FCPA concentrates on illegal payments to government officials, many applicable Anti-Corruption Laws are wider in scope and prohibit illegal payments to any person or entity. FIS is subject to both the FCPA and other applicable Anti-Corruption Laws including but not limited to the UK Bribery Act.

Two of the most important steps the Company can take to protect itself from liability for improper payments made by Third Parties who interact with prospective customers or government officials are:

- choose carefully its business partners, agents, consultants, contractors, finders, and other Third Parties and to identify in advance any concerns that a proposed relationship may raise. This includes determining if a person with a history of bribery or corruption or a government official maintains an ownership or other beneficial interest in the person or company. Thus, the Company is issuing this Standard and implementing a process to protect itself from high-risk relationships and potential legal violations arising from any Third Party actions; and
- be aware that it is quite common to have government involvement in international financial institutions and other traditional FIS clients, and so it is not appropriate to assume otherwise without investigating.

It is against Company policy and many Anti-Corruption Laws to bribe any businessperson, directly or indirectly, regardless of whether the person is a government official. Employees must not violate any such laws or engage any Third Party agents that may violate such laws. Employees responsible for the engagement of Third Party agents should use the procedures outlined in this Standard. If an employee has any questions about the application of the anti-bribery provisions in general, or the use of these Standard requirements, then he or she should consult with a member of the FABAC Committee.

01.02.04.03 When is Approval Required?

This Standard requires that each Third Party, person or company, be approved prior to entering into any agreement under which the Company is engaging a Third Party outside of the United States to act on its behalf in relation to a prospective customer or international official. All such applicable third parties must be approved first by the Managing Director of the appropriate international region or the equivalent of the relevant business group and finally by the Committee. As part of the approval process the Committee will review the Third Party compensation for reasonableness in connection with the services to be provided.

The Committee has the discretion to review any business transactions the Company is proposing to directly enter into with “government officials” or companies wholly or partly owned by a “government official” or a close relative of an official.

Any transactions with a “government official” with responsibility for decisions specifically affecting the Company, or with any high-ranking “government official” (e.g. cabinet member, minister, or top official in a state-owned company) must also be approved in advance by the Committee.

All such approvals shall be made in writing.

01.02.04.04 Procedures for Obtaining Approval of Third Parties

It is the responsibility of the managers of the non-US region or the equivalent of the relevant business group who wishes to engage a particular Third Party, person or company to determine whether such Third Party is subject to review under this Standard.

An employee of the non-US region wishing to engage a Third Party subject to this Standard must, in coordination with the relevant regional Managing Director or the equivalent of the relevant business group and the Committee, conduct a due diligence review and background check on the Third Party.

To facilitate these background checks, and promote consistency in their content, the Company has established an approval process that requires submission of certain documents. Employees may refer to the FABAC Third Party Submission Instructional Cover Sheet form located in the FIS & me Corporate Compliance [FABAC Program Section](#) for submission guidance. Prior to the initiation of the Committee’s approval process, the Managing Director of the appropriate international region or the equivalent of the relevant business group must approve and forward to the Committee the following documentation for the recommended third-party. This managerial approval and submission by the Managing Director (MD) may be delegated, if necessary, under certain circumstances as determined and directed by the MD such as they are unavailable due to travel, etc.:

- a completed “Third Party Questionnaire” with supporting documentation;
- a completed “Report on Third Party Candidate” with supporting documentation;
- a non-disclosure agreement or equivalent protection, at the discretion of the Committee; and
- a fully negotiated, non-executed agreement with the Third Party.

Required Document	Description	Document Location
	A form intended to capture the types of information required to be obtained from the	Form Available- FIS & me

Third Party Questionnaire	Third Party to evaluate the fitness of the proposed Third Party, and it is to be completed by the Third Party.	Corporate Compliance FABAC Program Section
Third Party Questionnaire – Short Form	This form is a streamlined version of the Third Party Questionnaire and is used only with the prior approval of the Committee when deemed appropriate. It is typically used for large publicly traded companies that have publicly available policies regarding compliance with anti-corruption laws.	Short Form Available- Only from the Committee upon request and approval of use
Report on Third Party Candidate	This form is to be completed by the employee proposing the retention of the Third Party and approved by the relevant regional Managing Director or the equivalent of the relevant business group.	Form Available- FIS & me Corporate Compliance FABAC Program Section
Standard Contractual Clauses for Third Party Agreements	A standard anti-corruption and audit provision that needs to be included in the unsigned business agreement between FIS and the Third Party (for example, distribution agreement, etc.) The unsigned fully negotiated draft agreement must be included in the submission.	Form Available- FIS & me Corporate Compliance FABAC Program Section
Non-Disclosure Agreement	The Third Party must execute and return to the Company the non-disclosure agreement prior to the disclosure of any Company confidential information to the Third Party. In certain instances, the Committee may waive this requirement if there is a previously executed agreement with contains confidentiality provisions consistent with the Non-Disclosure Agreement.	Form Available- FIS & me Corporate Compliance FABAC Program Section
Third Party Annual FABAC Certification	The Third Party must execute and return this form on an annual basis during the approval period. The Committee may waive this requirement if the Committee determines that sufficient documentation of the Third Party's own anti-corruption policies and practices exists.	Form Available- FIS & me Corporate Compliance FABAC Program Section
FIS Policy Statement on	This Policy Statement will be made available	

Global Anti-Bribery and Anti-Corruption Prevention	to the Third Party in connection with the Third Party Annual FABAC Certification. The Statement is FIS' expectations of the Third Party's conduct Currently, the statement is available in Chinese, Portuguese and Spanish.	Form Available- FIS & me Corporate Compliance FABAC Program Section
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The documents submitted to the Committee must also include a prepared, fully-negotiated but unexecuted agreement between the Company and the Third Party. Any Third Party engaged under the scope of this Standard shall be provided with a copy of this FIS Anti-Bribery and Corruption Policy. Each such Third Party shall agree as part of the terms of engagement to comply with the FIS Anti-Bribery and Anti-Corruption Policy. Each Third Party must also be provided with a copy of the FIS Policy Statement on Global Anti-Bribery and Anti-Corruption Prevention.

No work may be done by a Third Party until the approval of the Third Party has been secured in writing from the Committee. The form of this writing is an approval email from the Chairperson of the Committee or their designee sent to the appropriate parties. This approval email includes, if applicable, directions to provide the name and email address of the Third Party employee who has the authority to electronically sign the Third Party Compliance Annual Certification on the Third Party's behalf. The Third Party will provide, if required, the name(s) and email address(es) of the individual(s) who is providing the services on behalf of FIS to be assigned training. If for some reason the electronic version of the certification and/or training is unavailable, a manual signature certification or manual training test can be completed and recorded in the Reg-U training system. Entities that have been approved by the Committee will be asked to electronically sign the Certification of compliance on request by the Company and will be required to renew this Certification on an annual basis as long as the Third Party is approved. The Committee may waive or modify this requirement if the Committee determines that sufficient documentation of the Third Party's own anti-corruption policies and practices exist. In addition, the Committee may decide to waive the annual certification the year the Third Party is approved. Such waivers, if decided by the Committee, will be communicated in the approval email relating to the Third Party.

All Company personnel involved in the process are expected to act promptly so that the due diligence process will not delay business negotiations and operations. The Committee will act as pragmatically as possible to ensure that the Company is sufficiently protected and that the negotiations are not unduly delayed.

Any unresolved issue regarding the legal or business risks of retaining a particular Third Party hereunder shall be addressed in coordination with the relevant Managing Director of the international region or the equivalent of the relevant business group, and if necessary the Company's Chief Compliance and Customer Advocacy Officer or, ultimately, the Committee.

In addition to this required documentation, the Committee may consult counsel to confirm the consistency of any proposed agreement with all applicable laws, including any applicable anti-corruption laws and, in the case of transacting with a "government official" (or a company in which a "government official" has an ownership or other beneficial interest), any local laws restricting "government officials" from engaging in commercial activities. At the discretion of the Committee, in consultation with the Chief Legal Officer or his or her designee, the Committee may also consult counsel for advice regarding any risks posed by the proposed agreement under Anti-Corruption Laws.

The Committee shall have the discretion to require more or less in the way of disclosure during the above approval process depending on the circumstances in each case and taking into account:

1. the country or region in which the Third Party resides or will be doing business;
2. the nature of the business that they will be undertaking on behalf of the Company;
3. whether the Third Party is a wholly owned subsidiary of a company which is itself subject to the Foreign Corrupt Practices Act (U.S.) or the Bribery Act (UK) and has sufficient anti-corruption processes in place; or
4. there are sufficient contractual safeguards in place and there is credible preliminary evidence to suggest that the Third Party at issue and its proposed customers do not represent a significant risk of corruption or bribery and that further submission materials are not required.

If the employee involved in the engagement obtained approval on the Third Party from the Committee in the past, resubmission to the Committee is only required if the approval has expired or the employee has knowledge or reason to believe the Third Party has participated in corrupt payments since the last approval by the Committee. In addition, if the approval email specifies the approval is only valid for the activity described in the submission, then any new activity must be presented to the Committee with a new report on the Third Party Candidate describing the new activity, together with the proposed unsigned negotiated new contract containing the Standard Contractual Clauses for Third Party Agreements.

01.02.04.05 Procedures for Obtaining Re-approval of Previously Approved Third Parties

FIS is committed to maintain the highest standards of business conduct and ethics worldwide and is why the Committee routinely reviews approved third parties. The applicable review validity period will be communicated in the Third Party’s approval email from the Committee Chairperson or his/her designee. The review period is typically three years (36 months), but may be less as directed by the Committee. In addition, the Committee may choose to periodically review any approved Third Party at their discretion, and may therefore change the approval expiration date at any time. The review package is typically sent to the approved Third Party within sixty (60) days or less before the approval expiration date. A FABAC Approved Third Party Review Package Instructional Cover Sheet form is available in the FIS & me Corporate Compliance [FABAC Program Section](#) for submission guidance.

The following documents must be returned to FIS to be reviewed by the Committee before the Third Party’s approval expiration date: FABAC Approved Third Party Review and a signed Third Party Annual FABAC Certification. Work may not continue by the Third Party past the approval expiration date unless the renewed approval of the Third Party has been secured in writing from the Committee. An extension may be permitted by the Committee.

Required Document	Description	Document Location
FABAC Approved Third Party Review	New questionnaire to be filled out by the Third Party to update information.	Form Available- FIS & me Corporate Compliance FABAC Program Section

Third Party Annual FABAC Certification	The Third Party must execute and return this form on an annual basis during the approval period. The Committee may waive this requirement if the Committee determines that sufficient documentation of the Third Party's own anti-corruption policies and practices exists or as otherwise decided by the Committee. This form may be assigned and completed by the Third Party electronically, or completed manually with the completion recorded in the Reg-U training system.	Form Available- FIS & me Corporate Compliance FABAC Program Section
FIS Policy Statement on Global Anti-Bribery and Anti-Corruption Prevention	This Policy Statement will be made available to the Third Party in connection with the Third Party Annual FABAC Certification. It can be provided either manually or made available to the Third Party to download when the Third Party electronically signs the annual FABAC certification on the Reg-U system. The Statement is FIS' expectations of the Third Party's conduct.	Form Available- FIS & me Corporate Compliance FABAC Program Section

01.02.04.06 Third Party Process Exceptions

The FIS Anti-Bribery Anti-Corruption (FABAC) Committee may grant exceptions to the requirements for the documentation required to be submitted pursuant to this Standard. All such exceptions will be documented in writing.

No exceptions shall be granted for the requirement that all third parties subject to this Standard be approved by the relevant regional Managing Director or the equivalent of the relevant business group and the Committee.

01.02.05 Gifts and Entertainment Standard

The purpose of this Standard is to recognize FIS' responsibility to maintain good relationships with its customers and others with whom the Company does business while at the same time preventing gift-giving from interfering with and inappropriately influencing FIS' employees and its business. The Standard is designed to assist employees in making the right decisions regarding giving or receiving gifts, hospitality and/or entertainment during the course of conducting business on FIS' behalf. The Standard will also explain the documentation process of utilizing the FIS Gift and Entertainment Registry. The Registry link is found on FIS & me under the Corporate Compliance section, on the [Code of Business Conduct and Ethics webpage](#).

For any gifts, hospitality or entertainment to be provided in or relating to business in China, see also the FIS China Rules Concerning Entertainment and Marketing Expenses found on FIS & me under the Corporate Compliance section, which are Appendix 1 to the FIS China Rules of Business Conduct on the [Code of Business Conduct and Ethics webpage](#). In the event of a conflict between this Standard and the FIS China Rules Concerning Entertainment and Marketing Expenses, those Rules shall control with respect to any gift, hospitality or entertainment to be provided on behalf of FIS in China.

01.02.05.01 Requirements Summary

No employee, either personally or on behalf of the Company, will directly or indirectly request, accept, offer or give money, gifts, hospitality, entertainment or loans, or participate in any other preferential treatment in dealing with any current or potential Company suppliers, contractors, customers or competitors except in accordance with the requirements of this Standard. The information contained within this Standard will apply at all times and does not change during traditional gift-giving seasons or during the planning of a Company event.

Not every circumstance can be anticipated or described in relation to gifts, hospitality and entertainment. For additional information on entertainment, please also review the Global Travel and Entertainment Policy found on the [Policy Office FIS & me](#) webpage. Note that even if a gift would otherwise fall within the acceptable nominal gift values designated in this Standard, you may not give or accept any gift, service or entertainment if you reasonably believe that such gift, service or entertainment may be intended to inappropriately influence business judgment, obligate the person or entity offering or accepting such item or otherwise affect decisions relating to such person or entity. Remember that all gifts, hospitality and entertainment to be offered or provided to a “government official”, regardless of value, and all gifts, hospitality and entertainment valued over \$75.00 USD to any person, either given or received, are to be registered and approved through the FIS Gifts and Entertainment Registry. The only exception to that mandatory registration requirement for gifts, hospitality and entertainment provided to “government officials” is for certain gifts, hospitality, and entertainment provided to government officials of China. When “designated employees” of FIS China provide gifts, hospitality and entertainment to government officials of China strictly in accordance with the established pre-approved limits for the person providing the gift, hospitality, or entertainment, then the gift, entertainment or hospitality does not need to be registered in the FIS Gifts and Entertainment Registry. Such pre-approved limits are set forth in the FIS China Rules Concerning Entertainment and Marketing Expenses, which are Appendix 1 to the FIS China Rules of Business Conduct. Gifts and entertainment given in accordance with such pre-approved limits by designated employees doing business in China are not required to be registered in the FIS Gifts and Entertainment Registry.

You can locate the link for the Registry on the [Corporate Compliance page of FIS & me](#). This should be done before either accepting or giving the item in question.

It is prohibited for any FIS employee or contractor to authorize or permit any person, including a vendor, agent or other Third Party, to provide or offer gifts, entertainment or hospitality to the representative of any client that would be in violation of this Standard if provided or offered by the FIS employee or contractor. If any employee or contractor becomes aware of any such gift, entertainment or hospitality offered given or proposed by a vendor, agent or other Third Party with relationship to FIS business that would violate this Standard if offered by the employee or contractor, that information must be reported promptly to the FIS Chief Compliance and Customer Advocacy Officer.

01.02.05.02 Definitions

Business Gifts:

A “business gift” is anything of value given or received as the result of a business relationship, for which the recipient does not pay fair market value. A gift can be in any form. Gifts include not only material goods, but also services, favors and promotional premiums or discounts. Examples of business gifts include, but are not limited to, the following:

- Tickets to cultural and sporting events (i.e., theater, opera, museum, etc.) without the attendance of the supplier or customer
- Discounts not available to the general public
- Loans
- Stocks
- Use of a vacation home property
- Compensation
- Offers of future employment or for the employment of a family member
- Personal services such as chauffeurs, chefs, or home decorating
- Donations to a customer or customer's employees' charitable foundations or political groups
- Facilitating or securing the acceptance of another's child to a private school
- Gift certificates
- Gift cards
- Use of another company's plane or accommodations
- Travel and travel accommodations for business or vacation purposes
- "All expense paid" trips
- Golf green fees
- Promotional items
- Vendor product samples for personal use
- Food
- Wine/alcohol
- Non-business travel
- Any other merchandise or services

Non-gift items

Following are items that are not considered gifts. These items may be accepted or given within reason. Depending upon the circumstances, if you believe any of these items may be intended to: (a) influence business judgment; (b) to obligate the person or entity offering or accepting such item; or (c) if you believe the item may otherwise affect the decisions of the person or entity giving or receiving such items, you are to refrain from giving or accepting such non-gift items. Items that will not be considered gifts and for which no pre-approval is required under this Standard are:

- Continuing professional education or development opportunities.
- Reasonable meals provided by or paid for by vendors or suppliers during traditional business hours where business discussions or negotiations are the main purpose.
- Mementos or other similar awards provided or paid for by vendors in recognition for service on a particular matter where such memento or award has no intrinsic value.
- Invitations to Industry events and marketing where multiple clients or potential clients are invited or which are open to the public.
- Promotional items of modest value under US \$10.00 bearing the Company's permanently affixed logo, such as a pen, coffee mug, or calendar.

Hospitality and Entertainment

Hospitality and entertainment are frequently an important part of building relationships with representatives of customers, vendors and others that are important to FIS business. Hospitality and entertainment are

meals and events that you attend with the representatives of the customer, vendor or other party. Examples of business hospitality and entertainment include, but are not limited to, the following:

- Having lunch or dinner with a person with whom you are discussing a business transaction for FIS
- Inviting your contact at a client or vendor to join you for a sporting or cultural event
- Hosting a meeting between your team and a client's team to celebrate a project completion
- Hosting a representative of a client or vendor for a round of golf, a tennis match or similar

If the provider of the meal or tickets does not attend the event with the recipient, the event tickets or other hospitalities are considered to be a gift and subject to the provisions of this Standard for exchanging gifts. Even if the ticket or hospitality provider does attend the event with the recipient, the availability of such experiences can inappropriately influence our business relationships if excessive or lavish. Business hospitality and entertainment is required to be reasonable and proportionate given the parties involved. Business hospitality and entertainment should never improperly influence, or ever appear to improperly influence, FIS' business relationships.

Unacceptable Gifts, Hospitality, and Entertainment

You must not provide or accept any gift, favor, business courtesy, or entertainment that may create a feeling of obligation, compromise your judgment, or that may lend the appearance of trying to influence the recipient. The following are examples of unacceptable gifts, hospitality, and entertainment.

- Cash
- Cash equivalents, such as gift cards, stored value cards, vouchers, gift certificates and pre-paid gas cards
- Items or entertainment of any kind that is illegal in the location where provided
- loans, stocks, stock options or gifts of any type redeemable for cash (for example, gift checks)
- Items or entertainment that could reflect negatively on the Company's reputation or your reputation
- Gifts or entertainment of any kind from a competitor of FIS
- Gifts or entertainment that is unsavory, sexually oriented or otherwise violates Company policies
- Business meals or business functions at establishments featuring sexually suggestive or otherwise inappropriate entertainment
- Any gift or activity that you know would cause the person giving or receiving the gift or entertainment to violate his or her own employer's standards

The Company has a zero-tolerance policy for giving or receiving gifts and entertainment when any question exists that the purpose is to improperly influence the recipient, violate the Company's policies, or violate the law. Even where you believe that individual gifts or hospitalities comply with the provisions of this Standard, you should not repeatedly give or receive gifts or entertainment, especially in excess, to or from a single customer, vendor or source of business referrals.

01.02.05.03 Receiving Gifts, Hospitality, or Entertainment

You must not solicit business courtesies. You are allowed to accept unsolicited meals, refreshments, and tickets to cultural and sporting events provided that you attend such events with the existing or prospective suppliers or customers and such attendance at these types of events is only occasional. If the aggregate value of the event exceeds the equivalent of \$75.00 USD you must register your receipt through the FIS Gifts and Entertainment Registry found on the Company's intranet (FIS & me). Contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com.

When accepting such unsolicited business courtesies, you should also be confident that your acceptance will foster goodwill and the ensuing benefit of a successful business relationship. Be certain that under the circumstances, the entertainment is not lavish, that the entertainment or hospitality is not included in the definition of Unacceptable Gifts, Entertainment and Hospitality above, and that your acceptance or participation in attending such events is not part of an actual or perceived pattern of frequently accepting courtesies from the same entities or persons. A general rule of thumb is that you should be comfortable discussing the hospitality or entertainment with your manager or in disclosing the entertainment to the public if required.

You are also permitted to accept unsolicited gifts from existing or prospective suppliers or customers within certain limits. Provided that the gift offered is not included in the definition of Unacceptable Gifts, Entertainment or Hospitality provided above, it may be accepted so long as either (i) the gift, entertainment or hospitality offered is valued at less than the equivalent of \$75.00 USD, or (ii) if more than \$75.00 USD, pre-approval to accept or retain the gift, entertainment or hospitality has been documented by submission through the FIS Gifts and Entertainment Registry found on the Company's intranet (FIS & me). Contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com. Gifts included in the definition of Unacceptable Gifts, Entertainment and Hospitality above may never be accepted or retained.

The same rules set forth in this Standard for the acceptance of gifts by FIS employees and contractors also apply to acceptance of a gift for the benefit of any specific group or department at FIS. Groups and departments of FIS are prohibited from soliciting gifts from any person or entity doing business with or seeking to do business with FIS. And the same monetary limits, registration and approval requirements apply with respect to receipt of a gift by an FIS group or department. For example, it is prohibited to accept a gift from a vendor valued over the nominal limit of \$75.00 USD (without prior approval and documentation discussed below) for a departmental party or event. This would include even when the gift is to be included as a prize for distribution at that party or event.

There are some situations where refusal of a gift would be a cultural insult to the person offering it or cause professional embarrassment. This is particularly true when you are a guest in another country and the gift is something from that country offered as part of a public occasion. In these cases, the best practice is to discuss the FIS policy with government officials or vendors prior to the meeting. In the event you feel compelled to accept a gift on behalf of the Company that would not be permitted under this Standard without pre-approval, report it to your manager and turn it over to the Company immediately.

01.02.05.04 Giving Gifts, Hospitality, or Entertainment to Persons Not Government Officials

For the giving of gifts, hospitality, or entertainment of behalf of FIS to any person who may be considered a "government official", see the next section of this Standard entitled Giving Gifts, Hospitality, or Entertainment to Government Officials. Remember the term "government official" includes employees of government owned or controlled companies, even if they are operated as a commercial business.

Do not provide any gifts, hospitality or entertainment included in the definition of Unacceptable Gifts, Hospitality, and Entertainment above under any circumstances.

Entertainment and hospitality that are not included above as unacceptable may be provided on behalf of FIS to persons who are not government officials so long as they are reasonable, proportionate given the parties involved and not lavish. Business hospitality and entertainment should never improperly influence, or ever appear to improperly influence, FIS' business relationships. If you have any question whether the

entertainment or hospitality you are planning will be considered excessive or inappropriate in violation of this Standard, contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com.

Gifts that are not included in the definition above as unacceptable may be provided on behalf of FIS to persons who are not “government officials” if (i) they are of nominal value not exceeding the equivalent of \$75.00 USD, or (ii) the value is greater than the equivalent of \$75.00 USD but pre-approval has been obtained by submission through the FIS Gifts and Entertainment Registry found on the Company’s intranet (FIS & me). The information and request for approval must be entered into the Registry for review, and the approval received, before you offer any gift that exceeds the equivalent of \$75.00 USD in value. Contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com.

01.02.05.05 Giving Gifts, Hospitality or Entertainment to Government Officials

Extra care and caution must be taken when dealing with government employees and officials.

For purposes of this Policy, a “government official” means any officer or employee of a non-US government or any department, agency, or instrumentality thereof (which includes a government-owned or government-controlled state enterprise) or of a “public international organization,” any person acting in an official capacity for or on behalf of a non-US government or government entity or public international organization, any political party or party official, or any candidate for political office outside the United States. Thus, government officials include not only elected officials, but also consultants who hold government positions, employees of companies owned or controlled by non-US governments, political party officials and others.

The term “public international organization” includes such organizations as the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank.

In the case of offering or providing gifts, hospitality or entertainment to a government official, such entertainment may only be provided in connection with a bona fide business purpose and must be limited to reasonable expenditures that are directly related to that business purpose. No one may offer or provide gifts, hospitality or entertainment of a lavish nature to any government official. Moreover, no one may offer any gift, hospitality or entertainment to a government official with the intent of attempting to influence official behavior or that might otherwise create an appearance of impropriety. When dealing with a government official, you must disclose in the FIS Gift and Entertainment Registry any proposed type of offering including, but not limited to, meals, entertainment, travel, accommodations or gifts for review *regardless of the value*. The information and request for approval must be entered into the Registry for review, and the approval received, before you offer any gift, entertainment or hospitality to a government official. Contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com.

The only exception to that mandatory registration requirement for gifts, hospitality and entertainment provided to “government officials” is for certain gifts, hospitality, and entertainment provided to government officials of China. When “designated employees” of FIS China provide gifts, hospitality and entertainment to government officials of China strictly in accordance with the established pre-approved limits for the person providing the gift, hospitality, or entertainment, then the gift, entertainment or hospitality does not need to be registered in the FIS Gifts and Entertainment Registry. Such pre-approved limits are set forth in the FIS China Rules Concerning Entertainment and Marketing Expenses, which are Appendix 1 to the FIS China Rules of Business Conduct. Gifts and entertainment given in accordance with such pre-approved limits by designated employees doing business in China are not required to be registered in the FIS Gifts and Entertainment Registry.

01.02.05.06 Incentives, Prizes and Contests

Sometimes vendors run contests or provide door prizes at their events. Whether or not you may accept such prizes depends on the facts and circumstances. Considerations include factors such as the value of the prize, the method for determining the winner, and your relationship to the vendor, which also includes your ability to influence decisions relating to that vendor. If you win or otherwise receive such a prize it must be treated as a gift for purposes of this Standard, including the registration and approval requirements for gifts received. Please contact corporatecompliance@fisglobal.com if you have any questions.

FIS occasionally offers internal prizes, incentives, or awards to employees that are purchased with company funds (collectively referred to as “awards”). Some of these awards may be subject to state or federal taxes for which the employee is responsible, and the employee may be required to fill out and submit a Taxable Prize or Award/Gift Form. These prizes and awards have a separate approval process. You can find the information on these requirements by accessing the [FIS Prizes & Awards Policy](#).

- However, if an internal prize or award is given by FIS to an employee that has a value over \$75.00 USD, it should also be entered in the FIS Gift and Entertainment Registry for documentation.
- If a gift is given by an FIS employee to another FIS employee and is purchased with personal funds, this purchase is not required to be documented.

01.02.05.07 Conflicts of Interest

Employment by the Company carries with it a responsibility to be constantly aware of the importance of ethical conduct. Business gifts or entertainment that compromise or even appear to compromise our ability to make objective and fair business decisions are inappropriate and, in severe cases, may be viewed as commercial bribery, putting FIS and its employee at risk. Employees must refrain from taking part in, or exerting influence in, any transaction in which their own interests may conflict with the best interests of the Company. Inappropriate or excessive gifts and gratuities may create conflicts of interest, violate laws and regulations and may also violate FIS policies and standards. Conflicts of interest occur if an exchange of gifts or gratuities can reasonably be perceived as an inducement to secure preferential treatment. All FIS employees are required to strictly abide by policy, standards, and guidelines concerning conflicts of interest. The Conflicts of Interest Standard is contained within the FIS Code of Business Conduct found on the [FIS & me Policy Office webpage](#). Please submit conflicts of interest situations for review into the Conflicts of Interest Registry found on the [Corporate Compliance page](#) on FIS & me.

01.02.05.08 Designated Board Members and Senior Executive Management-Discretion or Exceptions

Designated FIS Board members or Senior Executives may authorize an exception to the current Standard with the approval of the Chief Compliance and Customer Advocacy Officer (or his/her designee). This exception may mean approval for giving or receiving higher value gifts and business amenities provided that the gifts and business amenities are not prohibited by law or known client, business partner or supplier business practices. However, gifts above \$250.00 USD threshold will not generally be approved. The Chief Compliance and Customer Advocacy Officer will review and approve any such exception(s) on behalf of the designated senior executive. Upon reviewing requested exceptions relating to higher value gifts, entertainment and hospitality. Consideration by the Chief Compliance and Customer Advocacy Officer will be given to several factors, including the importance of client relationships that are particularly vital to FIS operations, the success of the client relationship and the seniority levels of the beneficiary or recipient of the gift.

Gifts greater than \$75.00 USD received by FIS employees from business partners and service providers are more likely to be perceived as a potentially improper attempt to influence FIS decision-making. This is why all gifts valued above the equivalent of \$75.00 USD are required to be disclosed through the FIS Gifts and Entertainment Registry found on the Company's intranet (FIS & me). Contact FIS Corporate Compliance for further guidance via e-mail at: corporatecompliance@fisglobal.com.

All employees are required to strictly abide by this Standard, the FIS Employee Handbook and the FIS Code of Business Conduct with regard to gifts. These policies are located on the [Policy Office page of FIS & me](#).

01.02.05.09 Gifts and Entertainment Registry

As a method for employees to self-disclose any business courtesies they may have received and/or seek to provide to vendors, suppliers, customers, etc., FIS provides the FIS Gifts and Entertainment Registry, which can be found on FIS & me under the Corporate Compliance section, specifically listed on the [FIS Code of Conduct & Ethics webpage](#). The intent of the FIS Gifts and Entertainment Registry is to aid in reducing the risk of bribery across the enterprise, and to consistently capture potential violations for review and investigative follow up.

When to Disclose Gifts, Hospitality and Entertainment:

- The total value of the exchange is greater than \$75.00 USD.
- Any time you are considering or proposing to offer or give a government official, including but not limited to employees of state-owned business enterprises, anything, regardless of form or value (this means even below \$75.00 USD), prior to making the offer or giving the item. As previously described in Section 01.01.05.05 above, the only exception to that mandatory registration requirement for gifts, hospitality and entertainment provided to "government officials" is for certain gifts, hospitality, and entertainment provided to government officials of China. When "designated employees" of FIS China provide gifts, hospitality and entertainment to government officials of China strictly in accordance with the established pre-approved limits for the person providing the gift, hospitality, or entertainment, then the gift, entertainment or hospitality does not need to be registered in the FIS Gifts and Entertainment Registry. Such pre-approved limits are set forth in the FIS China Rules Concerning Entertainment and Marketing Expenses, which are Appendix 1 to the FIS China Rules of Business Conduct. Gifts and entertainment given in accordance with such pre-approved limits by designated employees doing business in China are not required to be registered in the FIS Gifts and Entertainment Registry.
- You are offered an item, meal, or entertainment that exceeds in value the equivalent of \$75.00 USD. Please note that it is never appropriate to accept cash or cash equivalents (e.g., gift checks) or any other item listed in this Standard as Unacceptable Gifts, Hospitality, or Entertainment from a Third Party.
- You propose to offer or give a gift to a business contact who is not a government official that exceeds the value in this Standard of \$75.00 USD.

You are required to disclose the gifts you propose to give or that you receive valued above \$75.00 by entering the gift information into the FIS Gifts and Entertainment Registry for review and approval by Corporate Compliance. NOTE: All gifts, entertainment and hospitality that involve government officials must all be submitted regardless of value.

01.02.05.10 Gift Returns

If you are offered a gift that exceeds the limits set forth in this Standard and that has not been approved as an exception to the Standard, you may:

- Return the gift with a polite explanation that Company policy does not permit you to accept such gifts; or
- Give the gift to the Company, so that the gift can either be donated to a charity or otherwise disposed of.

To assist you in returning a gift, please refer to our Gift Return Letter Template, which appears at the end of this Standard. This letter template may be modified, if necessary, depending upon the particular circumstances. If the letter is edited or changed in any way from the template at the end of this Standard, you must seek approval for such edits from Corporate Compliance prior to sending.

If neither of the options listed above seem appropriate for specific circumstances, you should contact Corporate Compliance for assistance via corporatecompliance@fisglobal.com

Any suspected violation of an FIS policy or standard should be reported to a supervisor, management representative, a People Office representative or to the FIS Chief Compliance and Customer Advocacy Officer (corporatecompliance@fisglobal.com).

If you are aware of or suspect a security incident, you should immediately report the incident to the FIS Security Incident Response Team (FSIRT) by calling 866.950.9986 or 414.357.3000, option 1, then 1; or by e-mailing fsirt@fisglobal.com.

Suspected violations may also be reported using the [FIS Ethics Website](http://www.fnisethics.com) (www.fnisethics.com) or Hotline.

01.02.05.11 No-Retaliation

You should know that FIS will not tolerate any kind of retaliation against anyone who, in good faith, reports a suspected violation of its policies and standards, or any applicable laws governing the locations in which FIS conducts business.

01.02.05.12 Applicability and Duty to Report Violations.

Any suspected violation of an FIS policy or standard should be reported to a supervisor, management representative, a People Office representative or to the FIS Chief Compliance and Customer Advocacy Officer (corporatecompliance@fisglobal.com).

01.02.05.13 Violations of FIS Policies and Standards

Violation of FIS policies are grounds for disciplinary action, up to and including termination of employment. All FIS employees and contractors are required to strictly abide by the FIS Code of Business Conduct, FIS' Anti-Bribery Anti-Corruption (FABAC) Policy, and the FIS Travel and Entertainment Policy with regard to business hospitality. This information can be accessed on the Policy Office page of FIS & me.

01.02.05.14 APPENDIX

GIFT RETURN LETTER TEMPLATE

Date

Name of Gift Giver

Company

Address

City, State, Zip Code

Dear *[Gift Giver]*:

Thank you for your well-intentioned gesture of giving me *[enter name of gift here]*.

While we appreciate your thoughtfulness, I will have to respectfully decline your gift at this time as it exceeds the terms described in our Gift and Entertainment Standard. Please be advised that under the FIS Anti-Bribery and Anti-Corruption (FABAC) Policy and our Code of Business Conduct, FIS employees are required to adhere to the FIS Standard. Our Standard advises FIS employees when it is appropriate to accept, directly or indirectly, certain gifts, entertainment, services, money, or any other consideration of any kind from a vendor / client / supplier that exceed the maximum threshold of \$75.00 USD. Please share this threshold with your staff.

If you have any questions or concerns, feel free to contact our corporate compliance office via e-mail at corporatecompliance@fisglobal.com.

Sincerely,

[Print Name]

Title, Company

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 a management representative, Human Resource representative or 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 Hotline. FIS does not tolerate any retaliation against anyone who, in good faith, reports a violation of FIS policy or law or cooperates with an investigation. 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).