



## 03.07 Business Gifts and Entertainment Policy

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The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in [Best Current Practice – Key Words](#).

## 03.07 Business Gifts and Entertainment Policy

### Purpose

The purpose of the Business Gifts and Entertainment Policy ("Policy") is to explain what is required by colleagues before giving or receiving Business Gifts or Entertainment and Hospitality. The requirements in this Policy help colleagues to prevent actual or perceived conflicts of interest, resist improper influence, drive responsible use of FIS' assets, and support the Company's compliance with applicable laws relating to bribery and corruption, including but not limited to the Foreign Corrupt Practices Act and the UK Bribery Act.

Furthermore, the Policy provides guidance to colleagues in conducting business in accordance with FIS' ethical standards and understanding what constitutes acceptable behavior. This Policy also assists in protecting the Company's reputation and provides the Company visibility into the intent behind Business Gifts or Entertainment and Hospitality either given to, or received by, colleagues.

### Scope

This Policy applies to all colleagues, prospective employees, independent contractors, consultants, directors, and others acting on behalf of any FIS legal entity or affiliate (the "Company").

For country specific directives for colleagues in China, please refer to the FIS China Entertainment and Marketing Expenses Guideline.

### Statement

The Policy is designed to assist colleagues in making the right decisions regarding giving or receiving Business Gifts or Entertainment and Hospitality. This Policy **does not** apply to Gifts or Entertainment and Hospitality between colleagues, which are governed by the [Employee Gifts, Prizes, and Awards Policy](#). This Policy also **does not** apply to FIS client events and marketing events, which are required to be planned and coordinated through the FIS Corporate Global Events and Marketing team. For further information, review section 15.02.17.04.05 of the [Travel, Entertainment and Business Expense Reimbursement Policy](#).

This Policy is not designed to answer every specific question or scenario but rather to provide guidance around Business Gifts or Entertainment and Hospitality. Colleagues are encouraged to seek assistance from the Ethics Office at [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@fisglobal.com) with questions or scenarios not addressed in this Policy.

Violations of this Policy may result in a disciplinary action up to and including termination of employment in accordance with local laws.

### 03.07.01 Definitions

**Bribery** is anything of value given to an individual or their family member to influence actions or decisions to gain or retain a business advantage.

**Business Gift** is any item of any monetary value given to or received from a current or potential client, customer, supplier, business partner or other third party, including trade and professional associations and others who interact with the Company on business matters.

**Entertainment and Hospitality** are experiences or activities including, but not limited to, business meals, tickets or access to sporting events, concerts or cultural events, or leisure activities such as a round of golf. Entertainment and Hospitality is also the offering of travel, hotel, or other accommodations, including the use of personal accommodations. If an FIS representative is not present at the activity or event, it is not Entertainment and Hospitality but, instead, is considered a Business Gift.

**Government Official** means:

- Any officer or employee of a state, local or federal government;
- Any officer or employee of a department, agency, or instrumentality of a state, local or federal government (which includes a government-owned or government-controlled state enterprise);
- Any officer or employee of a “public international organization,” which includes such organizations as the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank;
- Any person acting in an official capacity for or on behalf of a government or government-owned entity or public international organization;
- Any political party or party official, any candidate for political office or consultants who hold government positions; or
- Colleagues of companies owned or controlled by governments, political party officials and others.

### 03.07.02 Conflicts of Interest (“COI”) Disclosure Application

Although the exchange of business courtesies such as Business Gifts or Entertainment and Hospitality can be a great tool for building good faith in a business relationship, they should never be—or even appear to be—an attempt to influence a business decision. In some cases, inappropriate or lavish and excessive gifts may be viewed as commercial Bribery or be in violation of other laws, putting the Company and its reputation at risk. Business Gifts or Entertainment and Hospitality **must be infrequent** and **should never** exceed **500.00 USD** in a 12-month period to the same party. For meals and entertainment limits, refer to the [Travel, Entertainment and Business Expense Reimbursement Policy](#) section 15.02.17.04.05 Meals and Entertainment with Clients, External Parties, and Prospects.

It is a requirement for colleagues and those covered under this Policy to submit Business Gifts or Entertainment and Hospitality into the Conflicts of Interest (“COI”) Disclosure application in accordance with this Policy prior to giving or receiving the Business Gift or Entertainment and Hospitality.

The following Business Gifts or Entertainment and Hospitality **MUST NOT** be given or accepted prior to entering them in the **COI Disclosure application** (located on our Business Gifts and Entertainment FIS & me page) for review and approval:

- Business Gifts exceeding 100.00 USD.
- Any Business Gifts or Entertainment and Hospitality to a Government Official, except those given in accordance with the FIS China Entertainment and Marketing Expenses Guideline, regardless of the value.
- Business Gifts, including Business Gifts of FIS branded logo items, exceeding 100.00 USD individually or 500.00 USD collectively.
- Entertainment and Hospitality exceeding 250.00 USD per person inclusive of all benefits relating to the Entertainment and Hospitality.
- Invitations to industry events and marketing events where the cost for attendance is paid by a party other than FIS.

The following are **NOT** considered Business Gifts or Entertainment and Hospitality, and therefore, **do not need to be entered** in the COI Disclosure application:

- Continuing professional education or development opportunities paid for by FIS.
- Reasonable business meals as defined within section 15.02.17.04.05 of the [Travel, Entertainment and Business Expense Reimbursement Policy](#).
- Mementos or service awards with a value less than 100 USD.
- Invitations to industry events and marketing events where multiple clients or potential clients are invited or which are open to the public unless the cost for attendance is paid by a party other than FIS.
- FIS client events and marketing events, which are required to be planned and coordinated through the FIS Corporate Global Events and Marketing team.

### 03.07.03 Prohibited Conduct

Colleagues should never:

- Solicit a Business Gift or Entertainment and Hospitality or any type of preferential treatment for a personal benefit or to influence a business decision.
- Exchange Business Gifts or offer Entertainment and Hospitality with anyone who represents a company that is currently in contract negotiations with FIS.
- Offer or accept cash or cash equivalents such as gift cards, gift certificates, or gas card.
- Give or receive discounts not available to the general public.
- Offer or accept loans on terms not generally available to the public at large.
- Give Business Gifts or Entertainment and Hospitality that are unsavory or sexually oriented, including entertaining or hosting events at adult entertainment venues.
- Offer anything of value to a Government Official without prior approval from the Ethics Office.
- Make, offer, promise, or authorize payments of money for the purpose of obtaining, retaining or furthering business activities or to influence or compromise the conduct of the recipient.
- Offer any Business Gift or Entertainment and Hospitality that would cause recipients to violate the policies or standards of their employer.
- Offer any anything of value, including any payments prohibited under the [FIS Anti-Bribery Anti-Corruption \(FABAC\) Policy](#).

### 03.07.04 Returning Gifts

Colleagues should politely return Business Gifts or decline Entertainment and Hospitality that violate this Policy with an explanation that Company policy does not permit acceptance. If returning the gift would cause embarrassment or would otherwise adversely affect the FIS business relationship with the offeror, a colleague may accept the gift on behalf of FIS and contact the Ethics Office at [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@fisglobal.com) for further guidance.

### 03.07.05 Speak Up! And How to Speak Up

An ethical culture is important to the Company and is an integral part of our core value, **Lead with Integrity**. Colleagues who learn of a violation or suspected violation of this Policy are **REQUIRED** to **Speak Up** by reporting the conduct to:

- Their manager;
- The FIS Ethics Office at [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@fisglobal.com);
- [TPO Support Center](#); or
- The FIS Ethics Helpline.

For more information on obligations to report wrongdoing, please see the Speak-Up Policy and the Company's [Responsibility to Report Wrongdoing](#) page on FIS & me. FIS does not tolerate retaliation against anyone who, in good faith, reports a violation of FIS policy or the law or cooperates with an investigation.

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All FIS Colleagues, contractors, and applicable third-parties are required to adhere to established policies, procedures, and standards. Violation of Company Policies, procedures and/or standards **MAY** result in disciplinary action up to and including termination of employment, as permitted by local law. Any suspected violation of Company Policies, procedures, or standards **SHOULD** be reported to either an FIS manager or the Ethics Office at [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@fisglobal.com) in accordance with the Code and Company Policies. Suspected violations of the Code **MAY** also be reported, through the FIS Ethics Helpline utilizing the phone numbers within the Code of Business Conduct and Ethics (Appendix A) or through the website at [www.fisethics.com](http://www.fisethics.com). Concerns raised to the Ethics Helpline can be made anonymously where permitted under local laws. FIS does not tolerate any retaliation against anyone who, in good faith, reports a suspected violation of the Code, Company Policies, or the law or who cooperates with an investigation. Colleagues also have the option of raising employee relations concerns through [TPO Support Center \(Raise a Concern, Grievance or Complaint - Employee Service Center \(service-now.com\)\)](#). Concerns related to information security can be reported using **Service Now (SNOW): Technology Service Catalog > Security Services > FIS Security Incident Reporting Form**. For urgent or critical information security incidents, please call +1.414.357.FSIRT (3747) (U.S. and International). In addition, privacy incidents can be reported through FIS & me Workplace Services > RISC Resource Center > Report a Privacy Incident.