

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ 354, 356, 358, 368(a), 1221

18 Can any resulting loss be recognized? ▶ No

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

For shareholders reporting taxable income on a calendar year basis, the reportable tax year is 2019. For shareholders reporting taxable income on a basis other than the calendar year, the reportable tax year is the tax year that includes July 31, 2019.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ 8/1/2019
Print your name ▶ **Ann Vasileff** Title ▶ **SVP & Chief Tax Officer**

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶	Firm's EIN ▶			
	Firm's address ▶	Phone no.			

Form 8937 Attachment

Part II, Item 14 *Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action*

On July 31, 2019, pursuant to the terms and conditions in the Agreement and Plan of Merger, dated as of March 17, 2019, by and among Fidelity National Information Services, Inc. ("FIS"), Wrangler Merger Sub, Inc., a wholly-owned subsidiary of FIS ("Merger Sub"), and Worldpay, Inc. ("Worldpay"), entered into an agreement and plan of merger (the "Merger Agreement"), pursuant to which, on the terms and subject to the conditions set forth therein, Merger Sub will merge with and into Worldpay (the "Merger"), with Worldpay being the surviving corporation in the Merger and continuing as a wholly-owned subsidiary of FIS.

As a result of the Merger, each share of the Class A common stock of Worldpay common stock was exchanged for \$11 in cash and 0.9287 shares of FIS common stock. FIS did not issue fractional shares of FIS common stock in the Merger. As a result, Worldpay stockholders received cash for any fractional share of FIS common stock that they would otherwise be entitled to receive in the Merger, based on a value of \$133.56 per share of FIS common stock.

Part II, Item 15 *Describe the quantitative effect of the organizational action on the basis of the security in the hands of a US. taxpayer as an adjustment per share or as a percentage of old basis*

The Merger is intended to qualify as a tax-free reorganization within the meaning of Section 368(a) of the Internal Revenue Code of 1986.

As a result, Worldpay common stockholders who exchanged their shares of Worldpay common stock for shares of FIS common stock and cash recognized gain (but not loss) on the exchange in an amount equal to the lesser of (1) the amount of gain realized (i.e., the excess of the sum of the fair market value of the shares (including any fractional shares) of FIS common stock and cash received pursuant to the Merger (excluding any cash received in lieu of fractional shares) over the shareholder's adjusted tax basis in its shares of Worldpay common stock surrendered pursuant to the Merger, or (2) the amount of cash (excluding any cash received in lieu of fractional shares) received pursuant to the Merger.

If a holder of Worldpay common stock acquired different blocks of Worldpay common stock at different times or at different prices, any gain is determined separately with respect to each block of Worldpay common stock.

A Worldpay stockholder's tax basis in the FIS shares received in the Merger is equal to the aggregate tax basis in the Worldpay common stock exchanged, decreased by the amount of cash received in the Merger (except with respect to any cash received instead of a fractional share interest in FIS common stock), decreased by any tax basis attributable to a fractional share interest in FIS common stock for which cash is received, and increased by the amount of gain recognized on the exchange (excluding any gain or loss recognized with respect to a fractional share interest in FIS common stock for which cash is received).

If a holder of Worldpay common stock acquired different blocks of Worldpay common stock at different times or at different prices, the holder's tax basis in the shares of FIS common stock received may be determined with reference to each block of Worldpay common stock and/or with reference to any express share by share designation made by the holder in the letter of transmittal.

Each holder of Worldpay common stock should consult its tax advisor to determine the proper fair market value of FIS common stock purposes of determining the amount of gain, if any, recognized in the Merger, the tax basis of the FIS shares received in the Merger and the manner in which cash and FIS common stock received in the exchange should be allocated among different blocks of FIS common stock received in the Merger.

Part II, Box 16 *Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates*

The calculation of the change in basis is described above in Part II, Box 15. The volume weighted average price per share of FIS common stock on the NYSE for the five consecutive trading days ended on the fifth trading day prior to July 31, 2019 was \$133.56.