



01.02 Anti-Bribery and Anti-Corruption Policy

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01.02 Anti-Bribery and Anti-Corruption Policy 3

- 01.02.01 Responsibilities of All Company Employees and Contractors 4
- 01.02.02 Standard for Compliance with Anti-Corruption Laws..... 5
 - 01.02.02.01 Summary of Anti-Bribery and Corruption Laws 5
 - 01.02.02.02 Forms of Bribery or Corruption 5
 - 01.02.02.03 Record-Keeping, Accounting, and Payment Practices 6
 - 01.02.02.04 Risk Assessment 7
 - 01.02.02.05 Due Diligence and Selection of Third Parties and Business Partners 7
 - 01.02.02.06 Penalties 8
 - 01.02.02.07 FIS Anti-Bribery and Anti-Corruption (FABAC) Committee..... 9
- 01.02.03 Standard for Engagement with Third-Party Agents..... 9
 - 01.02.03.01 Scope of Standard..... 10
 - 01.02.03.02 Background 10
 - 01.02.03.03 When is Approval Required?..... 11
 - 01.02.03.04 Procedures for Obtaining Approval of Third Parties..... 11
 - 01.02.03.05 Procedures for Obtaining Reapproval of Previously Approved Third Parties 15
 - 01.02.03.06 Third-Party Process Exceptions 16
 - 01.02.03.07 Procedures for Charity donations and Sponsorships 16
 - 01.02.03.08 Appendix 1..... 17

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](#).

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 requires 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 set forth the requirements that support the Company's compliance 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"). See the [FIS Anti-Bribery, Anti-Corruption \(FABAC\) Brazilian Guideline](#) for further in-country guidelines to adhere to for Brazil. Note that local Business Units are required to know and understand local Anti-Bribery laws that apply to them and ensure their local business unit is kept up to date. Please see Appendix 1 for further detail.

Anti-Corruption Laws make it illegal for the Company or anyone acting on the Company's behalf to bribe any person or entity or to accept a bribe from any person or entity. FIS has zero tolerance for any bribery or corruption and has implemented training and internal controls to proactively manage corruption risks. 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 Anti-Corruption Laws and the FIS Standard for Engagement with Third-Party Agents (collectively, "Anti-Corruption Standards") are **REQUIRED** to be followed by the Company's officers, directors, and employees (collectively, "employees"), contractors (referred to as "contractors"), and by consultants, joint ventures, agents, and sub-contractors (collectively, "affiliates").

Scope

This Policy extends to all of the Company's domestic and international operations, including operations conducted by each and every department and subsidiary. 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.

Generally:

- Employees, contractors, and affiliates **MUST NOT** provide or offer to provide a payment or other incentive to anyone in exchange for gaining any sort of improper benefit. A payment or other incentive can be anything of value, not just cash, but also Business Gifts, services, job offers, loans, travel expenses and entertainment. A Business Gift is anything of value given or received from clients and others the Company does business with as the result of a business relationship, for which the recipient does not pay fair market value (referred to as "Business Gifts"). Employees, contractors, and affiliates **MUST NOT** offer anything of value in an attempt to improperly influence any person, regardless of whether they are in the private or public sector or are a government official. In addition, employees, contractors, and affiliates **MUST NOT** accept anything of value in order to provide an improper benefit. Solicitation, the act of a person asking, ordering or enticing someone else to

commit bribery [or another crime] is also prohibited. For additional information regarding Business Gifts, entertainment and hospitality see the Business Gifts and Entertainment Policy.

- Facilitation payments are strictly prohibited. Facilitation payments, also known as “expediting payments” or “grease” payments, are small, *unofficial* payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. In other words, it is an illegal payment to a Government Official to get them to do something they should have done anyway more quickly.
- There is limited exception where a government agency publicly posts price lists for expediting services, such as issuing a license, or permit that are available to the general public. Payments such as these are permitted. For example, the U.S. government has a fee schedule for standard passport processing and an increased cost for expedited processing. This increased payment is permissible because it is published, available to anyone, and is not based on the discretion of any one government employee.
- 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, contractors, and affiliates. 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 details, please see the FIS Standard for Compliance with Anti-Corruption Laws within this Policy.

01.02.01 Responsibilities of All Company Employees and Contractors

An ethical culture is important to the Company and is an integral part of our core values. Annually, FIS highlights awareness campaigns through Viva Engage (aka Yammer) and our intranet, FIS & me, that educates all employees and contractors on Anti-Corruption Standards. Every employee and contractor **MUST** read, understand, and comply with this Policy and the Anti-Corruption Standards. Annual certifications of compliance with this Policy will be **REQUIRED**, as will annual participation in Company Anti-Corruption training sessions. Employees and contractors who learn of a violation or suspected violation of Anti-Corruption Laws are **REQUIRED** to take immediate action. If an employee or contractor suspects a violation of the law or FIS policy, it is their duty to report this wrongdoing by contacting their manager or the FIS Anti-Bribery Anti-Corruption (FABAC) Committee without delay via Antibribery.Anticorruption.team@fisglobal.com. Managers notified of a violation or suspected violation of Anti-Corruption Laws **MUST** promptly escalate the matter to the FABAC Committee or the FIS Ethics Helpline described in more detail below. **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 an employee or contractor prefers to remain anonymous (with certain exceptions in some European countries), violations or suspected violations **MAY** be reported to FIS’ toll-free Ethics Helpline or via the FIS Ethics Website www.fnisethics.com. Anonymous Reporting Channel in Service Now is another route for employees to speak up anonymously. These resources are available 24 hours a day, 7 days a week with the option of translation. Toll-free numbers for each country are provided on the Website and within Appendix A to the [Code of Business Conduct and Ethics](#). For more information on reporting, please see our [Responsibility to Report Wrongdoing](#) on FIS & me. Please note, affiliates **MAY** also report violations or suspected violations of Anti-Corruption Laws via FIS’ Ethics Helpline or via the FIS Ethics Website www.fnisethics.com.

To report a potential security incident, employees and contractors **SHOULD** use the following link https://rmis.fnfis.com/fsirt_archer/. For urgent or critical security incidents, employees and contractors **MAY** call 414.357.FSIRT (3747) (U.S. and International).

If employees, contractors, or affiliates need guidance or have questions about this Policy, they **SHOULD** contact the FABAC Team at antibribery.anticorruption.team@fisglobal.com or the Chief Compliance Officer at corporatecompliance@fisglobal.com. If they do not have Internet access, they **MAY** send their concerns to:

FIS Anti-Bribery Anti-Corruption Committee
c/o Chief Compliance Officer
Fidelity National Information Services, Inc.
347 Riverside Avenue
Jacksonville, Florida 32204

Nothing in this Policy prohibits any whistleblower from reporting possible violations of federal law or regulation to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the U.S. Securities and Exchange Commission or various non-U.S. country equivalents, or making other disclosures that are protected under the whistleblower provisions of any applicable law or regulation. Whistleblowers are **NOT REQUIRED** to notify the company that they have made such reports or disclosures or obtain authorization from the Company to make such reports or disclosures.

01.02.02 Standard for Compliance with Anti-Corruption Laws

The purpose of this Standard for Compliance with Anti-Corruption Laws (“Standard”) is to establish standards for behavior to reduce the risk of the Company from violating 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”).

01.02.02.01 Summary of Anti-Bribery and Corruption Laws

Anti-Bribery and Corruption (“ABC”) 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
- or any department, agency or instrumentality thereof (which includes a government-owned or government-controlled state enterprise)
- or 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, or any candidate for political office - thus, government officials include not only elected officials, but also consultants who hold government positions
- employees of companies owned or controlled by governments, political party officials and others.

01.02.02.02 Forms of Bribery or Corruption

ABC Laws prohibit both direct and indirect bribes.

A bribe is anything of value given to an individual or their family member 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 but not limited to cash or Business Gifts, inflated commissions, securing a a job opportunity or school admission, fake consultancy agreements, unauthorized rebates, or political or charitable donations.

Also, common business practices if abused can be construed as bribes. Offering of inducements is unlawful, even if the inducement is not accepted. Giving, offering, requesting and receiving a bribe are all forms of corruption. For further information, please review the FIS Business Gifts and Entertainment Policy.

Potential indicators “Red Flags” of corruption:

- Abnormal payments
 - Excessive or inappropriate entertainment
 - Paying for the travel of spouses or family members
 - Inappropriate non-business related travel
- Pressure exerted by a third party for payments to be made urgently or ahead of schedule
- Unusual routing of payments: (e.g. goods or services supplied to country “A” but payment is being made, usually to a company in country “B”)
- Abnormally high commission percentage being paid to a particular third party
- Making unexpected or illogical decisions accepting projects or contracts. For example, awarding a contract to a business whose scope is misaligned with the contract requirements, or entering a contract unfavorable to the organization
- Unexplained preference for certain contractors during tendering period, who have previously not delivered on projects, or who are significantly more expensive than other contractors
- Vague invoices or invoices being agreed in excess of contract without reasonable cause
- Missing documents or records regarding meetings or decisions
- Purposeful noncompliance with company processes, procedures and guidelines

01.02.02.03 Record-Keeping, Accounting, and Payment Practices

The record-keeping provisions of ABC 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, ABC 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, employees and contractors **MUST** follow applicable standards, principles, laws and Company practices for accounting and financial reporting. In particular, employees and contractors **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, employees and contractors **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. Employees and contractors **MAY NOT** 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.

01.02.02.04 Risk Assessment

Annually, the Company conducts a Risk Assessment that is designed to assess the nature and extent of the inherent risks related to bribery and corruption to which the Company is exposed, and the effectiveness of controls designed to mitigate those risks. Some areas of the business **MAY** be more susceptible to acts of corruption and therefore pose a higher risk. Risk Assessment considerations include, but are not limited to:

- Countries the business conducts business in or plans to conduct business in
- Government or government-controlled clients
- Third parties and their corresponding business models, i.e., reseller, distributor, referral agent, etc.
- Gifts/Hospitality/Entertainment provided to government officials

The business **MUST** comply with FABAC's annual Risk Assessment by providing the requested information in a timely manner. The output of the Risk Assessment is shared with Senior Management to ensure appropriate actions are taken to mitigate areas of concern.

01.02.02.05 Due Diligence and Selection of Third Parties and Business Partners

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 client;
- (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 **SHALL** compete for all business opportunities vigorously, fairly, ethically, and legally, and **SHALL** negotiate contracts in a fair and open manner. Regardless of any pressure exerted by local custom in a particular region, the Company **SHALL** conduct business using only legal and ethical means. The Company **MAY** contract with a third party to act on its behalf. Third parties are defined as a prospective or contracted business associate including agents, distributors, lobbyists, brokers, consultants and other intermediaries, joint venture and consortia partners, contractors, vendors, and suppliers. Third parties can act in both on behalf of FIS with both public (government) and private clients.

The Company **MAY** 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 client 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 Company's Anti-Bribery Anti-Corruption Policy and Standards **MUST** extend to the activities of the Company's agents, consultants, representatives and business partners, particularly those third parties (individually "Third Party" and collectively "Third Parties") that are in a position to violate Anti-Corruption Laws. 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, 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, and provision of required documents and information, 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 employees and contractors will exercise due care to refrain from delegating substantial discretionary authority to individuals, within or outside the Company, who an employee or contractor knows or **SHOULD** know through the exercise of reasonable due diligence, **MAY** engage in illegal activities. Company employees and contractors **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. A Third Party **MAY** be selected only after careful consideration of appropriate information. All subcontracting provisions must be agreed by the FABAC team/committee before subcontracting activity commences and the prohibition of making corrupt payments on the company's behalf also applies to any subcontracting party. 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 upon the provision of updated documentation pertaining to the financial status of the company and any changes to the business scope or activity being undertaken for FIS.

All contracts and contract renewals within the scope of the Anti-Corruption Laws with Third Parties will contain:

1. Provisions that represent that the parties have not engaged in and will not engage in activities which violate applicable Anti-Corruption Laws
2. An agreement that the Third Party **SHALL** provide the Company with audit rights and
3. Termination if there is violation of such undertakings, representations, or agreements.

Any exceptions to such requirements **MUST** be approved by the FABAC Team prior to any business activity taking place.

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/ 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. In some instances, a Third Party may have their own anti-bribery/anti-corruption training in addition to an established compliance program and comparable policies. The FABAC Team and/or Committee has the discretion to exempt such Third Parties from training and/or certification, if applicable, on a case-by-case basis.

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

01.02.02.06 Penalties

ABC Laws are criminal statutes, and may impose severe criminal sanctions and liability on individuals and corporations that fail to prevent bribery comply with their provisions.

The Company is prohibited by the ABC Laws from indemnifying employees, contractors, 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 ABC Laws **MAY** be precluded from doing business with the U.S. and UK Government. Other penalties include denial of export licenses and debarment from programs (Public Contracts Regulations 2006) under the Commodity Futures Trading Commission and the Overseas Private Investment Corporation.

In addition to criminal or civil sanctions by government agencies, violations of ABC Laws and/or this Policy will also result in disciplinary action up to and including termination of employment.

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

The Company has established and will maintain an Anti-Bribery Anti-Corruption Committee (“Committee”). The Committee is comprised of the Global Head of Financial Crime Compliance and such other FIS employees as the Global Head of ABC should designate. The Committee **MUST** oversee this policy, its standards, and procedures. The Committee **SHALL** adopt and enforce monitoring and auditing systems reasonably designed to monitor conduct of the Company’s employees, contractors, 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 **MAY** modify the procedures adopted pursuant to the Policy and **MAY** make modifications or grant exceptions to the Policy as determined reasonably appropriate.

Additionally, the Committee supervises and reviews:

- (i) all existing Third Parties for purposes of business development in all jurisdictions
- (ii) the retention of any new person or company for purposes of business development in all jurisdictions

All due diligence shall be notified to the committee. In the absence of any red flags, due diligence will be conducted by the FABAC team and the committee notified. In the presence of red flags, due diligence **SHALL** be reviewed by the committee to ascertain 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 further business development. The due diligences conducted to verify that this oversight is effective will be maintained on the FABAC SharePoint site and/or the FABAC Third-Party Assessment Application in Archer.

Red Flags:

- Business scope of third party being misaligned to purpose of FIS activity
- Business scope or jurisdiction of the third party being misaligned to FIS geo expansion strategy
- Poor financial state of the business
- Inflated price for the activity being undertaken
- Hesitation in producing documentation
- Hesitation to incorporate FABAC provisions in contracts
- Country with a low Corruption Perception Index (“CPI”) as per [Transparency International](#)
- Any history of failure to deliver on contractual obligations
- Adverse media within a 5 year timeframe pertaining to corruption or bribery allegations

01.02.03 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 the Company in engaging a Third party who is likely to provide an improper inducement in violation of applicable U.S. and international anti-bribery or anti-corruption laws (collectively, “Anti-Corruption Laws”).

01.02.03.01 Scope of Standard

This Standard applies to any engagement by the Company, directly or indirectly, of any Third Party who will interact with prospective clients or government officials on behalf of the Company anywhere in the world

Examples of the selected international Third Parties the Committee reviews 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
- Anyone who is in a position to influence a buying decision by clients for FIS products or services
- Introducer or referral partner
- Prime contractor
- Individual or entity that interacts with government officials on behalf of FIS
- Individual or entity that has or is believed to have participated in corrupt payments
- Individual or entity that performs services in a high-risk country NOTE: Some Third-Party service providers may not be applicable depending on their role and presence or lack thereof regarding government interaction
- Individual or entity that 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
- Individual or entity that assists with the planning of events
- Charity donations as per FIS Corporate Social Responsibility (CSR) requirements

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 clients or government officials on behalf of the Company internationally, this Standard **SHALL** control. Questions **MUST** be referred to the FABAC Team via antibribery.anticorruption.team@fisglobal.com or corporatecompliance@fisglobal.com.

01.02.03.02 Background

As discussed above, ABC 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, its employees, contractors, and affiliates **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, ABC 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.

Third Party interactions with government officials on behalf of the Company can occur in a wide variety of activities including 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 clients or government officials are:

- choose carefully its business partners, agents, consultants 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 of 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 ABC Laws to bribe any businessperson, directly or indirectly, regardless of whether the person is a government official. Employees and contractors **MUST NOT** violate any such laws or engage any Third Party agents that **MAY** violate such laws. Employees and contractors responsible for the engagement of Third Parties **SHOULD** use the procedures outlined in this Standard. If an employee or contractor has any questions about the application of the anti-bribery provisions in general, or the use of these Standard requirements, then they **SHOULD** consult with the FABAC Team at antibribery.anticorruption.team@fisglobal.com or corporatecompliance@fisglobal.com.

01.02.03.03 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 to act on its behalf in relation to a prospective client or government official. All such 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.

*Please note, 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.*

01.02.03.04 Procedures for Obtaining Approval of Third Parties

An employee or contractor 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 and promote consistency in their content, the Company has established an approval process that requires submission of certain documents. Employees and contractors **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 following documentation **MUST** be submitted to the Committee for the **RECOMMENDED** Third-Party.

- A completed Third-Party Questionnaire with the following supporting documentation:
 - Nature of the business (Industry/Scope of activity)
 - Scope of activity required by FIS (what the third party will be doing for FIS)
 - Full financial information
 - Full company history
 - A completed Report on Third-Party Candidate with supporting documentation, reviewed and approved by the Managing Director of the appropriate international region or the equivalent of the relevant business group
 - A non-disclosure agreement or equivalent protection, at the discretion of the Committee and
 - A fully negotiated, non-executed agreement with the Third Party that includes the Standard Contractual Clauses for Third-Party Agreements

Required Document	Description	Document Location
Third-Party Questionnaire	A form intended to capture the type of information REQUIRED to evaluate the fitness of the proposed Third Party, and it is to be completed by the Third Party.	FABAC Third-Party Assessment Application in Archer <u>Non-Reseller Form Available</u> – Only from FABAC upon assignment <u>Short Form Available</u> (for large publicly-traded companies) – Only from FABAC upon assignment
Nature of business	Must detail the main activities of a business and what industry(ies) in which they operate. This includes the geographical location of all business activities and any subcontractors that would be involved in any FIS activity	Supplied by the third party
Full financial information	This includes company accounts detailing: <ul style="list-style-type: none"> • Total assets • Total current assets • Total liabilities • Total current liabilities • Annual net income • Expected revenue over the next 3 years 	Supplied by the third party

<p>Full company history</p>	<p>Information about persons of significant control, any regulatory investigations, any changes to scope and/or nature of the business</p>	<p>Supplied by third party</p>
<p>Report on Third-Party Candidate</p>	<p>This form is to be completed by the employee or contractor proposing the retention of the Third Party and approved by the relevant Regional Managing Director or the equivalent of the relevant business group.</p> <p>Detail of what is required of the third party, and detail as to how they were selected as the best partner to carry out the activity</p>	<p>-</p> <p>FABAC Third-Party Assessment Application in Archer</p>
<p>Standard Contractual Clauses for Third-Party Agreements</p>	<p>Standard anti-corruption and audit provisions that need 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.</p>	<p>Provisions Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>
<p>Non-Disclosure Agreement</p>	<p>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. NOTE: There is a preferred FABAC NDA version available on FIS & me. The Committee MAY chose to waive having this specific NDA version if another NDA was previously signed or if the Standard Contractual Clauses for Third-Party Agreements are included in the draft unsigned contract.</p>	<p>Form Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>
<p>Third-Party Annual FABAC Certification</p>	<p>The Third Party MUST execute and return this form on an annual basis during the approval period. The FABAC Team and/or Committee MAY waive this requirement as well as anti-corruption training if the FABAC Team and/or Committee determines that sufficient documentation of the Third Party's</p>	<p>Form Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>

	own anti-corruption policies, training, and practices exists.	
<p>FIS Policy Statement on Global Anti-Bribery and Anti-Corruption Prevention</p>	<p>This Policy Statement will be made available to the Third Party in connection with the Third Party Annual FABAC Certification through online completion. The Statement is FIS' expectations of the Third Party's conduct. Currently, the statement is available in English, Chinese, French, German, Portuguese and Spanish.</p>	<p>Form Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>

Employees and contractors **MUST** log into Archer to submit the **REQUIRED** documentation accordingly. Archer FABAC Third-Party Assessment instructions are available in the FIS & me Corporate Compliance [FABAC Program Section](#). See the [Line of Business User Manual](#) and the [Regional Manager User Manual](#) for further details.

Any Third Party engaged under the scope of this Standard **SHALL** be directed via the Third-Party Questionnaire, within the Certification portion, to review our FABAC Policy at <http://www.fisglobal.com/> within the Investors/Corporate Governance section. Each Third Party **SHALL** agree as part of the terms of engagement to comply with the FIS Anti-Bribery and Anti-Corruption Policy. Approved Third Parties chosen to electronically sign an annual certification of the FIS Policy Statement on Global Anti-Bribery and Anti-Corruption Prevention will be provided this statement via a link to download the Statement when certifying.

No work **MAY** be completed by a Third Party until their approval 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 the client 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 FABAC Team and/or Committee **MAY** waive or modify this requirement if the FABAC Team and/or Committee determines that sufficient documentation of the Third Party's own anti-corruption policies and practices exist. In addition, the FABAC Team and/or Committee **MAY** decide to waive the annual certification the year the Third Party is approved. Such waivers, if decided by the FABAC Team and/or Committee, will be communicated in the approval email relating to the Third Party.

All employees and contractors 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 where necessary, the Global Head of Financial Crime Compliance.

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 ABC 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:

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

If the employee or contractor involved in the engagement obtained approval of the Third Party from the Committee in the past, resubmission to the Committee is only **REQUIRED** if the approval has expired or the employee or contractor 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 submitted to the FABAC team 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.

01.02.03.05 Procedures for Obtaining Reapproval 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 review validity period will be communicated in the Third Party's approval email from the Committee Chairperson or their designee. The review period is typically 1 year (12 months) for a high risk third party, three years (36 months) for a medium risk third party, and 5 years (60 months) for a low risk third party, 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 **MUST** be sent to the approved Third Party within sixty (60) days or less before the approval expiration date and requires all documentation as noted above and **MUST** be returned to FIS to be reviewed by the Committee before the Third Party's approval expiration date.

Employees and contractors **MUST** log into Archer to submit the **REQUIRED** reapproval documentation accordingly. Archer FABAC Third-Party Assessment instructions are available in the FIS & me Corporate Compliance [FABAC Program Section](#). See the [Line of Business User Manual](#) for further details.

Work **MUST 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 FABAC Team and/or Committee if the reapproval process is still active and underway.

01.02.03.06 Third-Party Process Exceptions

The 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.

01.02.03.07 Procedures for Charity donations and Sponsorships

As per the [FIS Political Activities Policy](#), all requests for sponsorships or contributions for political-related activities or organizations, based in any country, must be submitted for review and approval prior to committing company funds determine if they are consistent with these policies and are consistent with the Company’s public policy goals.

FIS permits the act of donating to charities and sponsoring events via services, knowledge, time, or direct financial contributions (cash or otherwise) and will disclose all charitable contributions when required.

Charities can be used to conceal acts of bribery, be a front for money laundering, or a method of financing terrorist activities. To ensure FIS is not used to facilitate financial crime, therefore due diligence **MUST** be undertaken before any promises to a client or charity or committal of company funds is made. There are no exceptions and completing appropriate due diligence ensures that all charitable donations and sponsorships made are legal under local laws and practices, are ethical, and in line with FIS values.

Activity type	Due diligence required	Approval required
Charitable donations	Are FIS in tender, negotiation, or dispute with the charity? Country Risk: Is the charity in a high risk country? Registration: Is the charity registered with appropriate bodies (e.g. UK charity commission) Screening: Have the board members of the charity been screened? Is the charity linked with any sanctioned entity? Government Affiliation: Does the charity have a Politically Exposed Person (“PEP”) connection or connection to a government entity? Adverse Media Search: Are there any allegations or convictions or bribery or corruption in the last 5 years? A review of money flow to ensure funds are legitimate	Low Risk: up to \$10,000 Head of requesting department Global Head of Anti – Bribery & Corruption High Risk: >\$10, 000 Head of Financial Crime
Sponsorship (non political)	Screening: Have the board members of the entity receiving sponsorship been screened? Sanctions status (if	Low Risk: up to \$10,000 Head of requesting department

	<p>they are owned by sanctioned entities) must be known</p> <p>Government Affiliation: Does entity have a Politically Exposed Person ("PEP") connection or connection to a government entity?</p> <p>Adverse Media Search: Are there any allegations or convictions or bribery or corruption in the last 5 years?</p> <p>Are FIS in tender, negotiation, or dispute with the entity receiving sponsorship?</p> <p>Country Risk: Is the event in a high risk country?</p> <p>Documentation detailing sponsorship activities: What is the sponsorship for? What is FIS exposure? Who is attending? What does the sponsorship buy?</p>	<p>Global Head of Anti – Bribery & Corruption</p> <p>High Risk: >\$10, 000</p> <p>Head of Financial Crime</p>
<p>Sponsorship (political)</p>	<p>FIS must not use corporate funds to contribute to candidates, political party committees and/or political action committees in any jurisdiction globally, including Super PACs and political committees organized under Section 527 of the U.S. Internal Revenue Code (IRC).</p>	<p>Government Relations</p> <p>Corporate Compliance</p> <p>Chief Legal Officer</p>

01.02.03.08 Appendix 1

Links to Anti -Bribery & Anti – Corruption legislation where FIS operates. Please note that this list is not exhaustive, and local Business Units are required to know, understand, and apply (where not contravening FCPA or UK Bribery Act) regulations in their local market. If a local law is not listed here, please contact the FABAC team: antibribery.anticorruption.team@fisglobal.com

Canada: <https://laws-lois.justice.gc.ca/eng/acts/c-45.2/index.html>

China: <https://cms.law/en/int/expert-guides/cms-expert-guide-to-anti-bribery-and-corruption-laws/china>

EU: https://home-affairs.ec.europa.eu/policies/internal-security/corruption/eu-legislation-anti-corruption_en

France: <https://www.coe.int/en/web/human-rights-intergovernmental-cooperation/-/anti-corruption-measures-in-companies>

UK: <https://www.legislation.gov.uk/ukpga/2010/23/contents>

US: <https://www.justice.gov/criminal/criminal-fraud/foreign-corrupt-practices-act>

All links are correct at time of publication of this policy.

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 fishethicsoffice@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. 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.