



01.02 Global Anti-Bribery and Anti-Corruption Policy

Policy Owner:	Myers, Kate
Contact:	kate.myers@fisglobal.com
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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](#).

01.02 Global 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 Global 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. The United Nations (UN) Convention Against Corruption requires signatory countries around the world to strengthen their legal and regulatory regimes to fight the scourge of bribery and corruption.

Laws applicable to the Company include but are 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 including accurate and complete, books and records to proactively manage corruption risks.

Statement

This Policy is **REQUIRED** to be followed by all 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. 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.
- 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.
- 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.

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. 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. Certifications of compliance with this Policy will be **REQUIRED**, as will 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 further 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. 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 the Additional Resources section 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.

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-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
- 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 and political party officials.

01.02.02.02 Forms of Bribery or Corruption

FIS prohibits 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. A kickback is type of bribe, but usually occurs after the fact. Corruption is the willingness to act dishonestly in return for money or personal gain. Individuals who abuse their power or position by participating in corruption create unfair competition, undermine a company's integrity and cause damage to business reputations.

Bribery and corruption can take many forms since anything of value is quite broad sometimes it can be not as obvious as cash (or its equivalent, i.e. gift cards, etc.). It could also be but, not limited to Business Gifts, inflated commissions, securing a job opportunity, internships or school admission, fake consultancy agreements, unauthorized rebates, or political or charitable donations, loans, personal services (i.e. chauffeurs, chefs, home decorating), use of a vacation home, offering illegal substances or sexual favors, etc.

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.

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 Anti-Corruption laws **REQUIRE** the Company to keep its books, records and accounts accurately, and such that they fairly reflect all transactions.

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, 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 Business Gifts and Entertainment

A 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 is defined as any experience 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 also includes the offering of travel, hotel, or other accommodations, including the use of personal accommodations.

Although the exchange of business courtesies such as Business Gifts or Entertainment 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 Bribery or be in violation of other laws, putting the Company and its reputation at risk. Business Gifts or Entertainment **must be proportionate, transparently recorded, and infrequent.**

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

Colleagues **MUST NOT**:

- Give or receive any Business Gifts, Entertainment during negotiation, tender, or dispute unless explicit permission is granted by the Global Head of Anti – Bribery & Anti – Corruption
- Solicit a Business Gift or Entertainment or any type of preferential treatment for a personal benefit or to influence a business decision.
- 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 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 their Line Manager and the FIS Anti-Bribery and Corruption team (please see below).
- Offer any Business Gift or Entertainment that would cause recipients to violate the policies or standards of their employer.

The following Business Gifts or Entertainment **MUST NOT** be given or accepted prior to entering them in the **Gifts and Entertainment Registry** (located on our Anti-Bribery and Anti-Corruption FIS & me page) for review and approval:

Business Gifts and Entertainment: Monetary Thresholds and Approval Process	
Item	All employees
<u>Business Gifts or Entertainment given or received to a Government Official</u>	Approval is required in all instances.
<u>Business Gifts including those of FIS branded logo items</u> (excludes Business Gifts given or received to a Government Official)	No approval required up to USD 100.00 unless a Government Official which would be any amount even under this threshold. USD 100 and above: pre-approval must be received from the Line Manager <u>and</u> the Anti-Bribery and Anti-Corruption team via registration on the Gifts and Entertainment Registry via registration on the Gifts and Entertainment Registry (located on our Anti-Bribery and Anti-Corruption FIS & me page).
<u>Entertainment</u> (excludes Business Gifts given or received to a Government Official)	No approval required up to USD 100.00 per person. USD 100 per person and above: pre-approval must be received from the Line Manager <u>and</u> the Anti-Bribery and Anti-Corruption team (located on our Anti-Bribery and Anti-Corruption FIS & me page). Please note approval is required for all Third-Party travel in China.
<u>Invitations to industry and market events where the cost of attendance is paid for by a third party.</u>	Approval is required in all instances.

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

- Continuing professional education or development opportunities paid for by FIS.
- 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.
- Business Gifts or Entertainment that is given to FIS employees and paid for by FIS. This is governed by the Employee Gifts, Prizes and Award Policy and the Global Travel, Entertainment and Business Expense Policy.

Colleagues should politely return Business Gifts or decline Entertainment that violates 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, please contact the Anti-Bribery and Anti-Corruption team at Antibribery.Anticorruption@fisglobal.com for further guidance.

01.02.02.05 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.
- Business Gifts and 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.

01.02.02.06 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.

Third parties are defined as a prospective or contracted business associate including agents, distributors, resellers, 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 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.

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 Global 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.

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 identification of the applicable Third Party, 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.

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. For specific requirements regarding engaging Third Parties, see the FIS Standard for Engagement of Third-Party Agents within this Policy.

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/Committee 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, as allowed by local law and potential criminal sanctions.

01.02.02.07 Penalties

Anti-Corruption 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 Anti-Corruption 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 Anti-Corruption 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 Anti-Corruption Laws and/or this Policy will also result in disciplinary action up to and including termination of employment, as allowed by local law.

01.02.02.08 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 ABAC 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

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
- Inadequate qualifications or experience for the business scope
- Businesses with little to no social media history
- The minimal employee base is not scalable to the business sought.

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.

Third parties are defined as a prospective or contracted business associate including agents, distributors, introducers, 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. Please see Appendix 2 for further detail of the types of third parties within the scope of the Standard.

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.

01.02.03.02 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, 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.

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.

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.	<p>FABAC Third-Party Assessment Application in Archer</p> <p>Non-Reseller Form Available – Only from the FABAC team upon assignment</p> <p>Short Form Available (for large publicly-traded companies) – Only from the FABAC team upon assignment</p>
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	Supplied by the third party

	activities and any subcontractors that would be involved in any FIS activity	
Full financial information	<p>This includes company accounts detailing:</p> <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
Full company history	Information about persons of significant control, any regulatory investigations, any changes to scope and/or nature of the business	Supplied by third party
Report on Third-Party Candidate	<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>
Standard Contractual Clauses for Third-Party Agreements	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>Provisions Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>
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. NOTE: There is a preferred	<p>Form Available- FIS & me</p> <p>Corporate Compliance FABAC Program Section</p>

	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.	
Third-Party Annual FABAC Certification	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 own anti-corruption policies, training, and practices exists.	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 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.	Form Available- FIS & me Corporate Compliance FABAC Program Section

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 Global 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.

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.

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.

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 ABAC 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 they are owned by sanctioned entities) must be known Government Affiliation: Does entity 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?	Low Risk: up to \$10,000 Head of requesting department Global Head of Anti – Bribery & Anti-Corruption High Risk: >\$10, 000 Head of Financial Crime

	<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>	
Sponsorship (political)	<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 Corporate Compliance Chief Legal Officer</p>

01.02.03.08 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:

1. Their Line Manager;
2. The FIS Ethics Office at fisethicsoffice@fisglobal.com;
3. The Anti-Bribery and Anti-Corruption team at Antibribery.Anticorruption@fisglobal.com;
4. [TPO Support Center](#); or
5. 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.

01.02.03.09 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.

01.02.03.10 Appendix 2

The table below details examples of third party relationships which fall within the scope of the Standard. Please note this list is not exhaustive.

Type of Third Party	Description
Agent	Is a third party who acts for FIS and can also legally bind the company through its actions. This can include legal firms, intellectual property firms, accountancy and tax firms, marketing agencies and commercial consultants.
Distributor	Is a third party who sells FIS products and services to another party.
Reseller	Is a third party who will purchase products or services and market or sell them to another end customer.
Consultant	Is a third party who will provide specialist advice on a particular subject area.
Introducer or Referral Partner	This is a third party who refers new potential customers, suppliers or new business activity to FIS in exchange for a fee.
Lobbyist or other third party who interacts with government officials	This is a third party who interacts with government officials in order to influence legislation or achieve a business outcome for FIS.
License Partner	An individual or entity that helps FIS obtain licenses or permits.
Prime Contractor	A third party who is responsible for the completion of a project by FIS.
Customs House Agent (CHA)	Is a third party who specializes in customs clearance and ensures compliance with customs regulation.
Logistics Provider	Is a third party who provides supply chain management in relation to the warehousing and distribution of a company's assets.
Debt Collection Agency	Individual or entity that assists with the collection of amounts due from customers, suppliers or other third parties. This includes the government or quasi-government individuals.
Marketing or Trade Event agency	Individuals or entities that assist with the planning of events.
Charities	Third parties to whom FIS is considering making donations as per FIS Corporate Social Responsibility (CSR) requirements.

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.