

# FIS Modern Slavery Act Transparency Statement

Financial Year Ending 31 December 2023

This Modern Slavery Act Transparency Statement ("Statement") is made jointly by Fidelity National Information Services, Inc. ("FIS") on behalf of itself and those U.K. and Australian subsidiaries listed in the Appendix (together, the "FIS Companies") which are deemed to meet the threshold of requiring a Modern Slavery Statement under s54 of the U.K. Modern Slavery Act 2015 or s5 of the Modern Slavery Act 2018 (Cth)<sup>1</sup>. It outlines the steps we have taken during the financial year 2023, as well as our ongoing efforts, to mitigate the risk of modern slavery in our organization and in our supply chain through our internal policies and processes.

FIS is a leading provider of technology solutions for merchants, banks and capital markets firms globally. Our employees ("colleagues") are dedicated to advancing the way the world pays, banks and invests by applying our scale, deep expertise and data-driven insights. We help our clients use technology in innovative ways to solve business-critical challenges and deliver superior experiences for their customers. Headquartered in Jacksonville, Florida, FIS is a Fortune 200<sup>®</sup> company and is a member of Standard & Poor's 500<sup>®</sup> Index. Our common stock is listed on the New York Stock Exchange under the symbol FIS.

Executive management and the FIS Board of Directors are committed to transparency around environmental, social and governance issues and this Statement is also referenced within FIS' annual Global Sustainability Report. In developing this Statement, FIS consulted the Australian FIS Company. This Statement was approved on behalf of the FIS Board of Directors.

## FIS Values and Respect for Human Rights

Modern slavery is one of the gravest forms of human rights abuses in society and presents a significant global challenge. FIS takes a zero-tolerance approach to all forms of modern slavery – including child labor, forced labor, servitude, debt bondage and human trafficking – and the violation of human rights. As part of FIS' values, we are committed to mitigating modern slavery risks across our global operations and supply chain and ensuring respect for human rights.

Our collective mission is to maximize the value of our shareholders' investment in our company while maintaining our core values for the benefit of our colleagues, clients and communities. Our core values and behaviors are embodied under the following principles:

### **WIN AS ONE TEAM**

- We work together, **connecting** to achieve outcomes with speed.

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<sup>1</sup> Worldpay UK Limited and Worldpay Limited have been included in the Appendix to this Statement because they meet the reporting threshold under s54 of the U.K. Modern Slavery Act 2015 and were U.K. subsidiaries of FIS during the financial year ending December 2023. On 1 February 2024, FIS completed the sale of a majority stake in its Worldpay Merchant Solutions business to private equity funds managed by GTCR.

- We are **inclusive** and embrace our diverse strengths.
- We make things happen and **celebrate** together.

#### **LEAD WITH INTEGRITY**

- We're **accountable** and work in a way that makes us proud.
- We **empower** one another to take ownership.
- We have the courage to be **open** and transparent – to build trust.

#### **BE THE CHANGE**

- We **challenge** each other to improve and simplify the way things are done.
- We're **innovative** and dynamic in how we develop ideas to solutions.
- We **give back** to make a positive impact on the world.

Ethics and compliance are at the core of everything we do and of the culture that defines how we operate. At FIS, we aim to conduct our business in a socially responsible manner within the letter and spirit of both the law and our [Code of Business Conduct and Ethics \("Code"\)](#). The mission of the [FIS Ethics Office](#) is to guide, inspire and support colleagues to **Lead with Integrity**. The FIS Business Ethics Program reflects – and reinforces – FIS' culture and core values supporting the highest standards of openness, fairness, honesty and ethical behavior.

People are our greatest strength. The quality of our people differentiates us and personifies our leadership position. The Ethics Office expects all colleagues to act with integrity and follow the guidance in accordance with the Code, as well as all FIS policies, applicable laws and regulations in all jurisdictions in which FIS operates in an ethical and legally compliant manner.

We expect that clients, consumers and colleagues are treated fairly with respect and dignity. FIS takes very seriously our reputation for honest, fair and ethical business dealings around the world. We seek clients and business partners whose ethical standards mirror our own, and we decline to do business with unethical entities and individuals.

## **FIS' Commitment to Combating Modern Slavery**

FIS is committed to combating all forms of modern slavery and human trafficking. We expressly prohibit any participation in, support of, or association with the illegal and immoral practice of trafficking in persons, child labor, forced labor and slavery. FIS is committed to ensuring the highest ethical standards in its daily business practices and will continue to act in accordance with all applicable laws. We have implemented guidelines and processes to educate and sensitize our colleagues to this very important topic to support them in upholding the principles in this Statement. For example, in our mandatory anti-bribery and anti-corruption training, we highlight the harms of modern slavery. We seek to ensure that our colleagues understand their responsibility to report any incident relating to modern slavery so that appropriate remedial action can be taken without fear of retaliation.

## **Australian FIS Company's Structure, Operations, Supply Chains and Risks**

FIS Australasia Pty Ltd is a proprietary limited company incorporated in Australia (ABN 45 093 114 759) with a registered office in South Yarra, Victoria, Australia. FIS Australasia Pty Ltd is a subsidiary of FIS and



does not own or control any other entities. It employs approximately 367 colleagues. Consistent with the other FIS Companies, its principal activities involve providing technology solutions for merchants, banks and capital markets firms. Its operations are limited to Australia.

FIS Australasia Pty Ltd's supply chains comprise various services, including consultants and IT providers. Supply chains for its premises comprise office security and facilities maintenance services, including those provided by landlords. A review of supply chains and operations to identify modern slavery-related risks has been conducted during this reporting period.

## FIS' Policies and Practices to Help Combat Modern Slavery and Human Trafficking

### Compliance with Policies – Colleagues

FIS' approach to modern slavery is groupwide. To assess and address the risks of modern slavery practice in its operations and supply chains, FIS adheres to the principles and rules of its Code and the policies and programs set out in this Statement. The Code requires that FIS and our colleagues adhere to FIS policies and all laws in the countries where FIS operates, as well as all transnational doctrines concerning fundamental human rights. All colleagues are required to undertake mandatory annual anti-bribery/anti-corruption training as well as ethics and compliance training. Newly hired colleagues are required to complete these trainings as part of their onboarding process.

### Compliance with Policies – Suppliers

In our search and selection process for suppliers and partners, FIS strives to identify the most qualified supplier for a specific part of our business, focusing on the supplier's reputation for quality, innovation, process optimization and cost efficiency. We select suppliers who share our core values of integrity, risk and compliance management, cooperation and collaboration. Whenever practical, FIS prioritizes building long-term and trusted relationships with suppliers located in the communities where we operate. Approved third-party suppliers worldwide are required to comply with FIS' Supplier Code of Conduct, externally facing on [www.fisglobal.com](http://www.fisglobal.com), which is included in our online [Supplier Information Portal](#). We expect our suppliers to operate responsibly and support FIS in complying with FIS' standards and policies in the areas including inclusion and diversity, integrity and ethics, data security and privacy, and human rights. As part of the Supplier Code of Conduct, our suppliers are required to confirm that their employees understand and comply with our policies, including conducting labor practices in full compliance with local laws and regulations.

Our Supplier Code of Conduct also includes information on procedures to report concerns about noncompliance or potential violations to FIS. The FIS Supplier Code of Conduct includes an express prohibition against engaging in modern slavery and human trafficking, and our Procurement Contract Supplement requires that our vendors comply with the U.K. Modern Slavery Act 2015. FIS' vendor onboarding and assessment process involves specific due diligence questions for our highest-risk vendors, including whether the vendor has its own statement on anti-slavery and anti-human trafficking. FIS includes the potential for risk of slavery and trafficking as part of its country risk analysis when entering new markets.

As part of their compliance with the FIS Supplier Code of Conduct, suppliers with access to FIS systems must complete a set of mandatory trainings when access to sites or systems is granted and annually

thereafter to support comprehension of and compliance with relevant FIS policies. Specific training is provided on topics including, but not limited to, information security, data protection, compliance with applicable regulations, risk management concepts, anti-bribery and anti-corruption.

#### Vendor Risk Management (VRM) Program

FIS recognizes the importance of risk assessment and risk mitigation in our supply chain, and we operate a comprehensive VRM program overseen by FIS' Chief Risk Officer. The VRM program includes procedures for due diligence review, including sanctions screenings, contract establishment, Payment Card Industry (PCI) compliance (where applicable) and ongoing monitoring of third-party relationships based on risk ratings.

In assessments of risks related to financial crimes and human rights issues, the VRM team collects evidence to assess suppliers' policies and controls related to anti-bribery, anti-corruption, anti-slavery, anti-trafficking, and gifts and entertainment acceptance. We use a variety of sources to gather information, and in some cases we require suppliers to attest to compliance with FIS policies.

Through our facilitation of the Vendor Risk Management Committee, we seek to drive future process maturity and discussions around vendor risk that will lead to strengthened vendor agreements and further alignment of vendor security controls with FIS standards.

#### Products, Services and Customers

FIS has a number of compliance programs in place, including anti-bribery and anti-corruption, anti-money laundering, fraud, and sanctions, which are designed to prevent the risk of FIS products and services being used to facilitate financial crimes, including those related to modern slavery and human trafficking. In addition to the colleague reporting channels described in the "Speak Up – Reporting" section below, these compliance programs – which are designed to comply with all applicable U.S. and international laws and regulations – include policies and processes to identify and report unusual or suspicious activity, including (where relevant) raising concerns relating to modern slavery and human trafficking.

#### Speak Up – Reporting

FIS colleagues who learn of a violation or suspected violation of anti-human trafficking and anti-slavery laws (including, but not limited to, the U.K. Modern Slavery Act) or any other law or company policies are expected to Speak Up and report it immediately through established FIS internal reporting mechanisms to management, The People Office at [the.people.office@fisglobal.com](mailto:the.people.office@fisglobal.com) or the FIS Ethics Office at [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@fisglobal.com) as directed in our externally facing Code. For more information on speaking up, please review our Speak Up Policy.

In addition, colleagues who wish to remain anonymous may do so 24 hours a day, seven days a week via the FIS Ethics Helpline phone service or web portal ([www.fnisethics.com](http://www.fnisethics.com)) as per local law. Retaliation against colleagues who report a violation or suspected violation is strictly prohibited, as the company has zero tolerance for retaliation. Third parties may also report a violation or suspected violation via the FIS Ethics Helpline phone service or web portal or to the FIS Ethics Office.

## Next Steps

As we continue our unwavering commitment to highlight and focus on human rights globally throughout our Company, we consistently take pertinent actions and review and evaluate the effectiveness of those actions in addressing modern slavery risks each year. Our commitment is strong, as reflected in our progress, by advancing forward together to **Win as One Team, Lead with Integrity and Be the Change** to combat modern slavery. FIS is committed to ensuring its zero-tolerance approach to modern slavery, human trafficking, and the violation of human rights is achieved in practice. We will continue to monitor the steps we take to help combat modern slavery to achieve that goal.



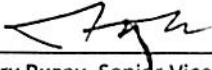
**Appendix**

**U.K. Subsidiaries**

- FIS Banking Solutions UK Limited
- Platform Securities LLP
- FIS Capital Markets UK Limited
- FIS Payments (UK) Limited
- Worldpay (UK) Limited
- Worldpay Limited

**Australian subsidiaries ("Australian FIS Company")**

- FIS Australasia Pty Ltd



**Jerry Puzey**, Senior Vice President & Chief Tax Officer, Fidelity National Information Services, Inc.  
Director, FIS Banking Solutions UK Limited and FIS Capital Markets UK Limited

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**John Beeston**

Director, Platform Securities Holdings Limited, Designated Member of Platform Securities LLP



**Jason Robinson**

Director, Worldpay (UK) Limited and Worldpay Limited

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**Scott Kendrick**

Director, FIS Payments (UK) Limited