



01.01 Code of Business Conduct and Ethics

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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](#).

01.01 Code of Business Conduct and Ethics

01.01.01 A Message from Stephanie Ferris, CEO and President

FIS is a global organization with locations and business partners all over the world. Our company was founded on the belief that doing the right thing builds a foundation for our long-term success. As we continue to grow, one thing that will never change is our belief that maintaining our good reputation depends on each of us being personally responsible for our actions.

Each of us will face tough decisions and ethical dilemmas during our careers. When faced with different choices, it is not always easy to make the ethical decision. While achieving great results is important, it is even more important to focus on how we achieve them. The decisions you make each day have an impact on our core values – **Lead with Integrity, Be the Change** and **Win as One Team**.

At FIS, we are on a relentless pursuit of client excellence to go above and beyond our clients' expectations. As an integral part of this pursuit, ethical business practices and behaviors are a top priority, at the core of everything we do, and woven into our daily operations.

Our behavior impacts the company's reputation with clients and shareholders, dealings with suppliers, communications with regulatory agencies and interactions with others in the workplace. We believe the quality of our people is our greatest asset, differentiating us and personifying our leadership position within the industry. You play a critical role in upholding FIS' reputation for ethical business practices and performance for client excellence.

The Code of Business Conduct and Ethics (the "Code") applies to all of us, at every level of the organization. But it is only a starting point. The Code is a valuable tool with information about our policies, procedures and expectations, as well as examples of circumstances you may encounter in the workplace. If you are unsure of what to do in particular circumstances or are concerned that the Code, our policies or our regulations are being broken, you have a responsibility to **speak up**. We want to hear from you. Remember, an issue cannot be addressed unless it is brought to someone's attention. If you are ever uncertain of the right course of action, talk to your manager, your People Office representative or the FIS Ethics Office at fisethicsoffice@fisglobal.com. Colleagues may also report concerns via the FIS Ethics Helpline at www.fnisethics.com. FIS has a zero-tolerance policy for retaliation against anyone who, in good faith, reports a violation of FIS policy or the law or cooperates in an investigation.

This is an incredible time to be a part of FIS, offering us the opportunity to reshape the industry through client excellence, and we are excited for what each of you contributes to helping reach our goals. I believe the quality of our people and our commitment to ethics and compliance will not only enable us to succeed today, but will also help us to achieve long-term success. With the help of this Code, we will meet our goals and continue to be proud of how we achieve success. I am confident that wherever you may be located, you will share in FIS' commitment to creating an ethical and compliant workplace and **Winning as One Team**.

Thank you for taking this journey with me in the pursuit of client excellence through ethical business practices that keep FIS at the forefront of how the world pays, banks and invests.

Sincerely,
Stephanie
CEO and President

Ferris

01.01.02 Code of Business Conduct and Ethics

Fidelity National Information Services, Inc., and its subsidiaries (collectively, “Company” or “FIS”) sponsor the FIS Corporate Compliance Program (“CC Program”) and the FIS Business Ethics Program (“Ethics Program”) (collectively referred to as “Programs”). These Programs exemplify a shared good faith effort by the Company and all FIS Colleagues, including executives, officers, and directors of FIS (collectively, “Colleagues”) to conduct business in a manner that is values-based, in compliance with the letter and spirit of applicable law, socially responsible.

The Programs are overseen by our Board of Directors and includes the following main components:

- This Code of Business Conduct and Ethics (“the Code” or “Code of Conduct”);
- Policies that supplement the Code, many of which are referenced herein; and
- Procedures for administration of the Programs.

The Code, related policies, and the Programs’ operating guidelines are evaluated at least annually and are updated throughout the year, as necessary. Various risk assessments are an integral part of our evaluation including assessing ethical risks. The Programs apply to all Colleagues, officers, contractors and to the extent relevant, directors of the Company. All Colleagues, as a condition of employment or continued employment, are **REQUIRED** to complete mandatory annual companywide training on the Code, acknowledge that they have received a copy of the Code, have read it, and understand that the Code contains the Company’s expectations regarding conduct in the business environment.

The Company takes violations of the Code and instances of non-compliance with the Code very seriously. Violations of the Code or non-compliance with it **MAY** result in a disciplinary action up to and including termination of employment in accordance with local laws. Conduct which **MAY** lead to disciplinary action includes but is not limited to the following:

- Violating Company Policies addressed in the Code or standard;
- Violating local laws or regulations in jurisdictions where the Company does business;
- Engaging in criminal conduct;
- Having an interest that conflicts with the interests of the Company;
- Falsifying company records; and
- Engaging in abusive or retaliatory conduct including, making threats, discriminating against Colleagues or harassing Colleagues.

Colleagues are expected to Speak Up! when they are aware of violations of the Code or suspected violations of the Code. All reports of violations or non-compliance will be reviewed and evaluated by the Ethics Office. Where a violation or non-compliance is substantiated, it will be addressed appropriately. Ethics Helpline investigation metrics are shared with the Board of Directors Audit Committee on a quarterly basis and are utilized by the Ethics Office to track and understand global risks, trends or challenges and to identify potential mitigating measures.

In addition to our risk assessments and the Code training, we take the following measures within both Programs to deter non-compliance and reduce exposure to unethical opportunities:

- Sponsor regular training and awareness campaigns for Colleagues and contractors on important policies and subject matters;
- Provide annual anonymous Colleague ethics and anti-corruption surveys;
- Develop and administer anonymous reporting mechanism as part of the Company’s Ethics Helpline;
- Analyze and review Ethics Helpline cases and trends to assist in identifying and assessing ethical risks; and

- Administer the Self-Identified Finding (SIF) Process which is utilized by Colleagues to self-report any potential risks to the Company's business, its Colleagues, clients or FIS products and services.

01.01.03 Core Values

The collective mission of FIS and its Colleagues is to maximize the value of our shareholders' investment in the Company. Our core values are embodied under the following principles and reflect our ethical obligation to:

WIN AS ONE TEAM

- We work together, connecting to achieve outcomes with speed.
- 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 are embodied in the culture that defines how we operate. At FIS, we conduct our business in a socially responsible manner within the letter and spirit of both the law and the Code. People are our greatest strength. The quality of our people differentiates us and personifies our leadership position. We expect that Colleagues, clients, and consumers are treated fairly with respect and dignity. We are committed to a well-established set of principles that address privacy issues, and we take pride in being a trusted steward of client and consumer information. The company 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 decline to do business with unethical entities and individuals.

The Programs include several company policies and standards ("Company Policies") with which Colleagues **MUST** comply. Complete copies of the Company Policies and other supporting information are available to Colleagues on the Company's intranet site. Every FIS Employee **SHOULD** be familiar with the material provided by the FIS Enterprise Policy Office on FIS & me. The Code, which is available to Colleagues in multiple languages, is the foundation of the Ethics Program, is reviewed annually and updated as needed in alignment with the Company's policy management processes. In addition, from time to time, the Company **MAY** publish revisions or supplements to the Company Policies as appropriate, based upon changes in the regulatory environment, changes in the Company's business environment, and other relevant factors.

Colleagues who violate the Code or Company Policies are subject to disciplinary action, up to and including termination of employment. Specific examples of legal fines or penalties are included in this Code for illustration purposes only. These examples are not exhaustive and are not intended to be a full description of all possible legal fines or penalties. By agreeing to comply with this Code, you are agreeing that you will comply with both it and the Company Policies.

01.01.04 Compliance with Laws

Colleagues are **REQUIRED** to comply not only with the Code and Company Policies but also with applicable laws, rules, and regulations in connection with their employment or service with the Company. Because the Company is incorporated and publicly traded in the United States, Colleagues world-wide are often subject to U.S. laws. If you believe an express provision of the Code conflicts with a legal obligation in the United States or any other relevant country, you **MUST** contact your manager, the Company's Legal, Compliance and Corporate Affairs Department or the Ethics Office at fisethicsoffice@fisglobal.com immediately so that the conflict can be addressed.

FIS expressly prohibits any participation in, support of, or association with the illegal and immoral practices of trafficking in persons, forced labor and slavery. We are committed to a high ethical standard in our daily business practices and will continue to act in accordance with all applicable laws. Our Colleagues are encouraged to immediately report any incident relating to modern slavery so that appropriate remedies can be taken.

For more information outlining the steps we have taken and our ongoing planned efforts to prevent modern slavery in the Company and its supply chain, please review [FIS' Modern Slavery Act Transparency Statement](#) posted on our external website www.fisglobal.com within the Investors / Corporate Governance – Highlights webpage.

01.01.05 Responsibility to the Company and Its Shareholders

01.01.05.01 Accounting, Auditing, Public Disclosure and Controls

The Company has established policies and internal controls designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements. Internal controls are intended to ensure the following:

- Full and accurate records of dispositions of Company assets are maintained;
- Transactions are recorded as necessary to prepare accurate financial statements;
- Receipts and expenditures are made only in accordance with official authorizations; and
- Unauthorized acquisition, use or disposition of the Company's assets are prevented or detected.

Colleagues **SHALL BE** responsible for complying with policies and procedures applicable to their areas of responsibility. Also, Colleagues **MUST BE** alert to situations, whether in their direct area of responsibility or otherwise, where a policy may have been violated or internal controls could be improved. Colleagues are **REQUIRED** to report known or suspected violations of any company policy as described in the Reporting Violations section of this Code. Colleagues are also encouraged to provide any suggestions they have for improving the Company's internal controls to their managers and through the Self-Identified Finding (SIF) Process through the [Issues Management \(sharepoint.com\)](#) page on the FIS & me intranet.

01.01.05.02 Public Disclosure

As a public company, the Company **MUST** provide full, fair, accurate, timely and understandable disclosure in the reports that the Company files with or submits to the SEC and its other public disclosures, including press releases. Such disclosures **MAY** include information generated by or related to the Company's subsidiaries located around the world. The Company has established disclosure controls and procedures to help ensure that information required to be disclosed by the Company in its SEC reports and other public disclosures is accumulated from appropriate information sources within the Company, and communicated to management as appropriate to allow timely decisions regarding disclosure and the completion of accurate SEC reports.

The Company's SEC reports and other public disclosures **MUST** be free of material misstatements and misleading omissions. The Company's public financial information **SHOULD** fairly represent in all material respects the Company's financial condition, results of operations and cash flows. Colleagues who suspect that any Company SEC report, press release or other public disclosure (including on the Company's website) contains a material inaccuracy or omits a material fact that renders the disclosure misleading or if it involves a questionable accounting or auditing practice **SHOULD** immediately contact their manager, the Chief Audit Officer or report such concerns to the Ethics Helpline (see *Appendix A for country numbers*) or by entering the concern on the Helpline website at www.fnisethics.com.

01.01.05.03 Statements in Connection with Audits or Investigations

All Colleagues and contractors of the Company are **REQUIRED** to cooperate with any investigation, audit, review, examination, or test, as directed by the Company. Refusal to cooperate **MAY** result in disciplinary action up to and including termination in accordance with local employment laws.

A Colleague, officer, contractor or director **SHALL NOT**, directly or indirectly, make a materially false or misleading statement, or omit to state any material relevant fact, to an internal or external auditor, regulator or internal or external investigator in connection with:

- Any audit, review or examination of the financial statements of the Company;
- The preparation or filing of any document or report required to be filed with the SEC or other local or regional agency;
- Any internal or external audit of the Company, or any activity of an internal or external auditor; or
- Any investigation conducted in connection with a reported concern or allegation, including reports (whether by phone, via the website or otherwise) made to the FIS Ethics Helpline.

01.01.05.04 Fraud or Misappropriation

Fraud occurs when Colleagues engage in intentional conduct or other unethical practices involving wrongful or criminal deception intended to result in personal or financial gain. Fraud may take many forms including theft of money or property, improper sale of Company information or assets, acceptance of illegal kickbacks and unauthorized travel or expenses. When fraud or theft occurs, there are often clues that other illegal or improper acts are occurring. Paying attention to the work environment for suspicious activity may help detect fraud as it occurs. Every Colleague, officer, contractor or director is **REQUIRED** to report any fraud or wrongdoing as described in the Reporting Violations section of this Code.

Colleagues are **REQUIRED** to report known or suspected fraud as described in the Reporting Violations section of the Code with the option to remain anonymous, unless prohibited by local laws. The Company maintains a toll-free FIS Ethics Helpline (see *Appendix A for country numbers*) and a website (www.fnisethics.com) through which Colleagues can report fraud or other suspicious activity.

01.01.05.05 Confidential Information and Personal Data

One of the Company's most valuable assets is its body of business information, which includes information that is classified as confidential to the Company. Confidential Information is information that is not generally known to the public or its competitors, and which would harm the Company's reputation, its financial results, and/or its clients /or consumers if it were used or disclosed inappropriately.

Client confidential information is defined as information received and retained in any form for and on behalf of FIS clients. Generally, client confidential information is information or data entrusted to the company for the performance of contractual services. Client Confidential information may also be further specified and defined within the client contract. In addition,

personal data is treated as confidential information and **MUST** be protected in accordance with Company Policies and all applicable laws, rules and regulations. For additional information, refer to the Information Classification Policy.

Confidential information includes but is not limited to the following:

- client information such as the personal and financial data of client's customers and consumers;
- data related to card or transaction processing; and
- intellectual property of systems and applications developed by the Company.

Colleagues are responsible and accountable for the protection of the Company's Confidential Information, and **MUST** take all reasonable actions to protect this information from improper disclosure. Colleagues **MUST NOT** disclose confidential information except when it is necessary and appropriate in connection with their Company responsibilities. Colleagues **SHOULD** carefully handle all artifacts and equipment containing confidential information, and always properly secure them from unauthorized disclosure.

Several U.S. federal, state and international laws require the Company to protect and maintain the confidentiality, integrity and availability of client and consumer data. Regulators of financial institutions have also implemented regulations addressing data security in the outsourcing of data processing that involves personal data about a client or consumer. Colleagues **MUST** have a practical working knowledge of the laws and regulations that affect their responsibilities. For example, if Colleagues' jobs involve the provision of services to U.S. financial institutions or they have access to client or consumer data, they **SHOULD** be aware of the Company's obligations to protect certain client data under the Gramm-Leach Bliley Act. Additionally, if Colleagues' jobs involve the processing of or potential access to card data, they **SHOULD** be aware of the Company's obligations to protect cardholder data. Visa and MasterCard have joined with Discover and American Express in the implementation of the Payment Card Industry (PCI) Data Security Standards for the handling, security and accountability of cardholder data. The Company is **REQUIRED** to comply with the PCI Data Security Standards in its business as processor of Visa and MasterCard branded credit and debit cards. If Colleagues' jobs involve the use or provision of United States' consumer reporting information, they **SHOULD** be aware of the restrictions and protections of that information prescribed by the federal Fair Credit Reporting Act as well as other related US state law and regulations.

The Company is subject to various privacy and data protection laws in the jurisdictions in which it operates. These laws require FIS to be transparent about how it collects, uses, and discloses personal data. Personal data is any information relating to an identified or identifiable natural person, information that **MUST** be protected by appropriate security controls to protect it. If personal data may have been improperly disclosed, misused or subjected to unauthorized access or misuse, the law identifies appropriate actions that must be taken. In addition, several laws grant individuals some degree of control over how FIS processes their personal data. All requests for personal data from any law enforcement or government authority **MUST** be referred to FIS' Chief Privacy Officer at PrivacyOffice@fisglobal.com. The Company has established Company Policies to protect and secure personal data, including in particular the FIS Privacy Policy. FIS also has an Information Security Program and the Company Policies included in that program are available through the FIS Enterprise Policy Office site on FIS & me. Colleagues **MUST** strictly adhere to these policies and take seriously the shared responsibilities to ensure the safety and confidentiality of all client confidential information, consumer information and personal data accessed while performing Company jobs.

Colleagues are **REQUIRED** to understand each of these policies and procedures. These policies and procedures are posted on the Company intranet. Failure to comply with Company Policies and related procedures **MAY** result in disciplinary action up to and including termination. To report a privacy incident, go to FIS & me Workplace Services > RISC Resource Center > Report a Privacy Incident.

Colleagues **MUST** also complete annual mandatory compliance, privacy & data protection, and security awareness training administered by the Company. Any Colleague who has not received information regarding such training, **SHOULD** notify Risk Education & Awareness through RISCAcknowledgementStatus@fisglobal.com.

01.01.05.06 Company Computers and Other Resources

All electronic and telephonic communications and computing equipment, software, services and all information transmitted by, received from or stored in these systems, are the property of FIS and, as such, are provided for official business use only. All messages or information composed, sent, received or stored using the e-mail system, instant messaging tools, network, internet, intranet or any other company-provided or approved system or service are and **SHALL** remain the property of the Company, including passwords. All information **SHALL** be processed in line with applicable law and regulation, FIS Staff Privacy Notice and Company Policies.

Security and risk management is a critical priority for FIS Colleagues, and mitigating risk is the responsibility of every Colleague. Colleagues are responsible for the contents of their computer and any mobile storage devices, and they **SHALL** be held accountable for any violation of Company Policies. By following Company Policies and making good decisions, we can work to ensure the data entrusted to us remains secure. As stated in the Company's Information Security Policies, consumer, client and colleague data **SHOULD NOT** be stored on laptop computers or on any other type of mobile media. These policies protect information including, but not limited to, Social Security numbers, account numbers, credit card numbers, driver's license numbers, and dates of birth or any other personally identifiable information. If you cannot remove such files or if you are required to save such data in the scope of performing your job duties, you **SHOULD NOT** remove the device from the Company's secured premises. All such devices **MUST** be encrypted in accordance with Company Policies.

Colleagues who are aware of any Company or contractor computer or other mobile device that is NOT encrypted, **SHOULD** notify the Information Security Team (by using Service Now (SNOW): Technology Service Catalog > Security Services > FIS Security Incident Reporting Form to report a potential security incident. For urgent or critical security incidents, you should call +1.414.357.FSIRT (3747) (U.S. and International).

Colleagues **MAY** also anonymously report any failure to comply with Company Policies as described in the Reporting Violations section of this Code.

01.01.05.07 Electronic Communication

Colleagues **SHOULD** be aware that electronic communications may not be private unless specifically provided for by local law. Monitoring **MAY** be carried out in line with applicable law and regulation. Records of any communications **MAY** be made and used by the Company. Colleagues **SHOULD** be aware that restrictions on communicating "Insider" information for securities law purposes applies to the use of electronic media as well as all other forms of communication.

01.01.05.08 Conflicts of Interest

The Company recognizes that Colleagues have a variety of interests in their personal lives with differing social, investment and secondary business activities. Colleagues of the Company are exposed to proprietary and confidential information, business assets or work product about the Company or third parties that is not available to the public.

Colleagues are expected to avoid any activity, investment, interest or association that interferes with or may appear to interfere with the independent exercise of judgment in carrying out an assigned job responsibility or is not consistent with the best interests of the Company. For specific guidance, please see the Conflicts of Interest Standard within the Code and contact the Ethics Office at fisethicsoffice@fisglobal.com with any questions.

01.01.05.09 Document Retention and Destruction

The Company's corporate records are important assets. Corporate records include all records produced by Colleagues, whether hard copy or electronic. A record may be as obvious as a memorandum, an e-mail, a contract, or something not as obvious, such as a computerized desk calendar, computer logs, or an expense report.

The law requires the Company to maintain certain types of corporate records for a specified period. Failure to retain those records for the periods indicated could subject the Company to penalties and fines, cause a loss of rights, obstruct justice, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company has adopted a Records Management Policy and Records Retention Schedule to establish uniform guidance regarding the retention and destruction of information and records in conformity with applicable law. The policy is available on the FIS Enterprise Policy Office portion of FIS & me and is designed to provide for the retention of records of continued value, and the appropriate destruction of irrelevant or unneeded records and documents in accordance with applicable laws.

Colleagues **MUST** comply with FIS' Records Management Policy and its Records Retention Schedule. Any questions about the policy **SHOULD** be directed to the Privacy Office at PrivacyOffice@fisglobal.com.

01.01.05.10 External Communications

Occasionally, Colleagues may be contacted by outside parties requesting information about Company matters, including information regarding current or former Colleagues, Company projects, or other work related matters. In order to ensure consistency and avoid providing inaccurate or incomplete information to outside parties, and the possible negative exposure that may result from providing information about the Company and/or about current or former Colleagues to outside parties, Colleagues contacted by any outside party about the Company or any Colleague **SHOULD** immediately contact the appropriate Company official, as detailed below:

Media Contacts

Colleagues contacted by a representative from any media organization (i.e., television, radio or newspaper reporters) **SHOULD** immediately refer the media representative to Corporate Communications. Colleagues **MUST NOT** communicate with media agents regarding the business of the Company without prior authorization.

Employment References and Verifications

Colleagues contacted by outside parties requesting employment reference or employment verification for a current or former Colleague are not permitted to provide any information to the requesting individual or organization. Colleagues should refer the requesting individual or organization to the people.office@fisglobal.com. No Colleague is authorized to provide employment references or employment verifications for any current or former Colleague. The Company has a policy to disclose only dates of employment and the title of the last position held. Written authorization is required before the Company will verify other information such as salary or wage information for either former or current Colleagues.

Outside Attorneys, Law Enforcement, Private Investigators

Consumer financial information and other Company information, including records of current or former Colleagues, projects, or other workplace issues are protected under various laws. Criminals seeking to obtain such information may pose as attorneys or other officials. The centralized and coordinated response to these inquires is critical to verify the identity of parties making the inquires and to ensure accurate and timely responses. It is Company policy to require a subpoena or other legal order prior to producing any consumer or Company information. Colleagues who are contacted by individuals claiming to be an attorney, a law enforcement official or investigator, or any other individual or entity requesting Company information or information relating to current or former Colleagues, **MUST** refer the request to the Ethics Office at fishethicsoffice@fisglobal.com. If the requester is seeking information about a current or former colleague for employment verification or reference, please see the section above noting the TPO Support Center is the appropriate contact.

Regulatory Agencies

The Company is subject to regulatory oversight by government agencies in certain jurisdictions in connection with various services it provides. The centralized and coordinated management of interactions with regulatory agencies is critical to ensuring the Company provides accurate and timely disclosure of sensitive information and protects the company from potential criminal and civil liability. Unless a Colleague is specifically authorized by the Company's Ethics Office at fishethicsoffice@fisglobal.com. Colleagues **MUST NOT** directly interact with regulatory agencies on matters related to FIS. If contacted by a government agency, Colleagues **SHOULD** direct the requestor to the Ethics Office at fishethicsoffice@fisglobal.com.

01.01.05.11 Intellectual Property

The Company's intellectual property includes inventions, improvements, ideas, information, data, software, models and programs, together with the related materials, documentation, patents, trademarks, trade secrets, know-how, copyrights, and all other related rights. The Company will normally be the exclusive owner of all rights in intellectual property developed by Colleagues and contractors in the course of their employment or service with the Company that is related to our businesses. This is true whether or not the Colleagues or contractors make the developments during working hours, on Company premises, or using Company material or resources.

The Company's intellectual property rights are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. In order to protect the Company's intellectual property, all Company Colleagues and contractors **SHOULD** use their best efforts to:

- Recognize and identify the Company's actual or potential intellectual property assets;
- Notify the Company's Chief IP Counsel or the Company's Ethics Office at fishethicsoffice@fisglobal.com of the existence and development of intellectual property assets;
- Safeguard trade secrets and other confidential intellectual property from unauthorized disclosure;
- Immediately contact the Company's Chief IP Counsel or the Ethics Office at fishethicsoffice@fisglobal.com to perform a clearance search when creating or using a new brand name for a product or service to be certain that the name is not subject to the trademark rights of a third party;
- Take great caution to avoid infringing upon the intellectual property of others. When creating a new invention, system or process, and Colleagues or contractors know of an existing third party intellectual property right in the subject area of the invention, they **MUST** contact the Company's Chief IP Counsel or Ethics Office at fishethicsoffice@fisglobal.com for assistance before proceeding;
- Assist in securing the Company's ownership of intellectual property assets;
- Use the intellectual property assets properly, including in licensing and other transactions; and
- Notify the Company's Chief IP Counsel or the Ethics Office at fishethicsoffice@fisglobal.com of any potential infringement or misuse of the Company's intellectual property, so that the Company may take appropriate action.

01.01.05.12 Code of Ethics for Senior Financial Officers

The Company's "Senior Financial Officers" (which includes the Company's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, Controller, and any other persons performing similar functions) are bound by all provisions of this Code, particularly provisions relating to honest and ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The Senior Financial Officers also have responsibility for full, fair, accurate, timely and understandable disclosure in the periodic reports and submissions filed by the Company with the U.S. Securities and Exchange Commission (SEC).

Senior Financial Officers are **REQUIRED** to be familiar with and comply with the Company's disclosure controls and procedures applicable to them to ensure that the Company's public reports and documents filed with the SEC comply in all material respects with the applicable federal securities laws and SEC rules. In addition, each such officer having direct or supervisory authority regarding these SEC filings or the Company's other public communications concerning its general business, results, financial condition and prospects **SHOULD**, to the extent appropriate within their area of responsibility, consult with other Company officers and Colleagues and take other appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely and understandable disclosure.

Each Senior Financial Officer **SHALL** bring promptly to the attention of the Audit Committee of the Board of Directors any information they may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data; or any fraud, whether or not material, that involves management or other Colleagues who have a significant role in the Company's financial reporting, disclosures or internal controls.

The Audit Committee **SHALL** determine appropriate actions to be taken in the event of violations of this Code by any Senior Financial Officer. Any waiver of or amendments to the Code with respect to any Senior Financial Officer **MUST** be approved by the Audit Committee and will be promptly disclosed to the extent required under applicable law, rule or regulation.

01.01.06 Responsibility for Fair Business

01.01.06.01 Relationships with Suppliers, Contractors, Clients and Regulatory Agencies

Dealing with suppliers, contractors with access to FIS systems, and clients may be sensitive and may involve issues of law and ethics. The Company expects all Colleagues to conduct business honestly and ethically. The following guidelines supplement, but do not replace, specific criteria in the Company's purchasing and sales policies and procedures:

- **Treatment of Others.** Colleagues **MUST** treat all suppliers, contractors and clients fairly and honestly at all times. These parties **MUST NOT** be taken unfair advantage of through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing.
- **Accepting or Giving Money, Gifts or Entertainment.** Colleagues, whether personally or on behalf of the Company, **SHALL NOT** directly or indirectly request, accept, offer or give money, gifts (of other than nominal value, usual hospitality or entertainment), loans (except from lending institutions), or anything else of other than nominal value, including giving of preferential treatment in dealing with any present or potential Company supplier, contractor, client or competitor.
- **Payments to Purchasing Agents.** Colleagues, whether personally or on behalf of the Company, **SHALL NOT** make payments to purchasing agents or other employees of any supplier, contractor or client to either obtain or retain business, or to realize higher or lower prices for the Company. Unless otherwise prohibited by law, Colleagues **MAY** give gifts of nominal value on customary gift-giving occasions.
- **Government Contracts.** Additional rules apply to products and services offered or provided under contracts with federal or state government agencies. Questions regarding government contracting, **SHOULD** be directed to the Company's Ethics Office at fisethicsoffice@fisglobal.com.
- **Relationships with Regulatory Agencies.** The Company is subject to regulatory oversight by government agencies in certain jurisdictions in connection with the various services it provides. The centralized and coordinated management of our interactions with regulatory agencies is critical to ensuring the Company provides accurate and timely disclosure of sensitive information and protects the Company from potential criminal and civil liability. Colleagues **MUST NOT** directly interact with regulatory agencies on matters related to FIS unless specifically authorized by the Company's Ethics Office at fisethicsoffice@fisglobal.com.

The Company has issued guidance with respect to what business gifts are considered of nominal value, usual hospitality or entertainment. This guidance also includes a requirement that Colleagues enter proposed gifts or offers of hospitality or entertainment into the Gifts and Entertainment Registry for approval prior to accepting any gift or offers of hospitality or entertainment. Colleagues **MUST NOT** accept a business gift until approval has been granted from the Ethics Office at fisethicsoffice@fisglobal.com. If a gift has already been received, receipt **MUST** be entered into the Gifts and Entertainment Registry. Gifts received prior to approval from the Ethics Office **MAY** need to be returned.

For further information on gift giving and receiving, and the Gifts and Entertainment Registry please refer to the Gifts and Entertainment Standard in the FIS Anti-Bribery Anti-Corruption Policy (“FABAC Policy”), the Conflicts of Interest Standard within this Code, and the FIS Travel and Entertainment Policy. Questions relating to gift giving and receiving **SHOULD** be directed to the FIS Ethics Office at fisethicsoffice@fisglobal.com.

01.01.06.02 FIS Anti-Bribery and Anti-Corruption (FABAC) Program

The use of FIS funds, or any other funds or anything of value given by an individual or entity for the benefit or on behalf of FIS, for any unlawful or unethical purpose is strictly prohibited. FIS expects every colleague, officer and director to read the FIS Anti-Bribery and Anti-Corruption Policy (“FABAC Policy”) and Engagement of Third-Party Standard (“Third-Party Standard”) to understand their application to the performance of their business responsibilities. The [FABAC Policy](#) is also available on our external website www.fisglobal.com within the Investors / Corporate Governance – Highlights webpage.

FIS is committed to preventing bribery and corruption. The FABAC Policy offers guidance for the complex legal and business issues which Colleagues may face. While managers are expected to ensure that all third-parties with whom FIS conducts business conform to the requirements of the FABAC Policy and Third-Party Standard, it is the responsibility of every FIS Colleague to ensure that no one, either from FIS or those acting indirectly on behalf of FIS, is engaging in conduct prohibited by the FABAC Policy or the Third-Party Standard, and to report such suspected conduct. “Third-Parties” means any individual or organization that acts on behalf of FIS, including contractors and resellers.

An ethical culture is important to FIS and is an integral part of our Core Values. This is why the FIS Anti-Bribery Anti-Corruption (FABAC) Committee reviews selected third-parties (i.e., resellers, etc.) with whom FIS does business outside of the United States, Canada, the United Kingdom, and Ireland. If you have any questions or need to determine if a third-party should be reviewed by the Committee, contact the FABAC Team via antibribery.anticorruption.team@fisglobal.com or at CorporateCompliance@fisglobal.com

Colleagues and third-parties engaged by FIS or with whom FIS does business **SHALL NOT** offer, give, or cause others to offer or give bribes, kickbacks or illegal payments to any person in order to advance, promote, expedite or influence as well as retain or obtain FIS business. Such prohibited payments include but are not limited to money, charitable or political donations made on behalf of any third-party, favors, costly entertainment or gifts. All payments and disbursements **MUST** be properly recorded in the company’s related books and records to ensure funds are not disbursed for inappropriate purposes. The FIS Anti-Bribery and Anti-Corruption Policy does not prohibit the offering of reasonable business meals or entertainment to third-parties, although meals and entertainment should never be offered where it could be perceived as a means of inducing any particular action by such third-party. Accordingly, care **SHOULD** be taken to ensure that such payments or expenses are in compliance with all applicable local laws and regulations in jurisdictions where such payments or expenses are contemplated or incurred.

Generally, FIS Colleagues or third-parties engaged by FIS or with whom FIS does business **SHOULD NOT** provide any gifts to government officials or prospective clients. This does not preclude the giving of gifts that are of nominal value, are for the purpose of maintaining goodwill towards FIS, and are given in accordance with local laws, so long as they are not given for the purpose of inducing any particular action by the recipient and are properly documented and recorded in the Gifts and Entertainment Registry found on FIS & me under Workplace Services within the Ethics Central section.

As stated above, we all need to use our best efforts to ensure that third-parties engaged by FIS or with whom FIS does business do not violate the FABAC Policy. To do this:

- Colleagues **MUST NOT** ignore suspicious behavior by third-parties engaged by FIS or with whom FIS does business. Colleagues **MUST** promptly report suspicious behavior by these third-parties by calling the Ethics Helpline (See *Appendix A for country numbers*) or by entering the concern on the website at www.fnisethics.com.
- Colleagues **MUST NOT** authorize, permit or encourage any person or entity to make any payments to third-parties for the purpose of securing or maintaining business. The Company expects that Colleagues will not condone these payments and will refuse to do business with any person or entity who appears to be making these payments, and will immediately report such conduct to the Ethics Office at fisethicsoffice@fisglobal.com or by calling the Ethics Helpline (See *Appendix A for country numbers*) or by entering the concern on the website at www.fnisethics.com.

Colleagues **MUST** receive prior written approval of the FIS Anti-Bribery and Anti-Corruption Committee before engaging in a business relationship with a third party based outside of the United States, Canada, the United Kingdom or Ireland. For further information on giving and receiving gifts, please refer to the Gifts and Entertainment Standard, within the FIS Anti-Bribery Anti-Corruption (“FABAC”) Policy, the Conflicts of Interest Standard within this Code and the FIS Travel and Entertainment Policy. Colleagues are strongly encouraged to direct questions regarding the FABAC Policy to the FIS Chief Compliance Officer at CorporateCompliance@fisglobal.com. Colleagues who are uncertain about whether the giving or receiving of a gift or offer of entertainment or hospitality is acceptable under Company policy **SHOULD** contact the Ethics Office at fisethicsoffice@fisglobal.com for guidance.

It is particularly important that Colleagues use their best judgment at all times and ask for advice from the Ethics Office at fisethicsoffice@fisglobal.com before taking any action that they feel could be a violation of Company Policies or could be perceived as being a violation. When in doubt, Colleagues **SHOULD** always err on the side of caution and seek guidance about the situation.

If a co-worker or another third-party engaged by FIS or with whom FIS does business engages in suspicious conduct, such conduct **SHOULD** be reported in accordance with the Reporting Violations section of this Code.

01.01.06.03 Political Contributions

U.S. federal and state laws, as well as laws within certain countries, limit or prohibit the nature and extent of individual and corporate political participation. For example, U.S. federal law as well as the laws in several states prohibit corporate contributions to political candidates or officeholders. The Company **SHALL NOT** reimburse anyone for personal political contributions. The Company also **SHALL NOT** alter personal compensation in any way under any circumstances to reflect personal political contributions. For additional information, please review FIS’ Political Activities Policy.

01.01.06.04 Insider Trading

The stock of the Company is publicly traded on the New York Stock Exchange (NYSE). Accordingly, the Company **MUST** comply with U.S. federal and state securities laws and the regulations of the NYSE. Securities markets, such as the NYSE, assume that all important information about a company is publicly available to potential investors at the same time. The Company, in turn, respects this assumption by communicating to financial markets through press releases or earnings releases with broad distribution so that information is uniformly, rather than selectively, communicated.

From time to time Colleagues may become aware of material information about the Company, which is not yet publicly known. Examples of material, non-public information include impending legal or regulatory proceedings or settlement or a pending earnings release. Insider trading occurs when someone uses material, non-public information as the basis of making a stock trade. Colleagues **SHOULD** avoid engaging in trading of company securities on the basis of this inside information. The Company has published a Policy Governing Insider Trading and Tipping which is available on FIS & me. Colleagues **MAY** also consult the Corporate Secretary or Ethics Office at fisethicsoffice@fisglobal.com Colleagues for guidance on whether certain information is deemed to be material, non-public information.

If a Colleague learns of material, non-public information about another company while in the course of employment, trading in securities of such company on the basis of the “inside” information is likewise prohibited. Securities laws also prohibit passing along insider information to third parties, or recommending to a third party the purchase or sale of a security based on such information. A person **MAY** be held responsible for trading activity by a friend or relative if the person is the source of insider information.

The Securities and Exchange Commission and the NYSE take securities law violations seriously and are able to monitor trading activity through computerized records. Violations of law **MAY** result in civil and criminal penalties against both the Company and individual Colleagues. If you are not certain about the application of the rules to a particular situation, seek the advice of the Company’s Corporate Secretary or Ethics Office at fisethicsoffice@fisglobal.com. Do not take the chance of engaging in any illegal securities transactions as there may be serious repercussions.

EXAMPLE

Q: *I saw some documents at the printer that showed the Company was going to purchase a large, publicly-held company. Can I tell my father to trade securities in our Company or in the other company?*

A: *No. Trading based upon material, nonpublic information is illegal and against the Code, whether you are trading in the Company’s securities or those of another company. Your father could also be guilty of insider trading.*

01.01.06.05 Copyright Compliance

The Company respects all intellectual property laws, including laws governing the use of copyrights. Colleagues **SHOULD NOT** create unauthorized copies of software, documents, or other copyrighted materials. Appropriate licenses **SHOULD** be acquired in all cases unless the Company is exempt. When licensed software is acquired, evidence of the purchase **SHOULD** be maintained in the form of invoices, user manuals and/or license copies as available. Colleagues who intend to use copyrighted work, unless the use is considered a “fair use” (a technical defense to copyright infringement), **MUST** obtain appropriate written permission. Without written permission, Colleagues expose themselves and the Company to legal risks. Colleagues with questions regarding copyright protection **SHOULD** contact the Company’s Ethics Office at fisethicsoffice@fisglobal.com.

EXAMPLE

Q: *Another colleague in my department has a software application that I need to perform my work. There is a freeze on all asset purchases, so can I just copy the software application and then buy it when the freeze is lifted?*

A: *No. Unauthorized copying of software is not permitted.*

01.01.06.06 Antitrust and Trade Regulation

The Company complies fully with the letter and the spirit of all applicable laws governing antitrust and trade regulation. Such laws are designed to ensure free and open competition in the marketplace by prohibiting any activities that unfairly or unreasonably restrict normal competition. Antitrust violations **MAY** subject both the Colleague and the Company to civil and criminal penalties. Colleagues who engage in anti-competitive activities are subject to disciplinary action up to and including termination of employment. Although it is impossible to list all possible examples of antitrust violations in this Code, the following rules demonstrate the types of activities that Colleagues **SHOULD** avoid:

- **Relations with Competitors.** Colleagues **MUST NOT** participate in any arrangement with competitors to fix prices. Examples of price fixing include rigged or coordinated bidding and the systematic exchange of price information. Colleagues **MUST NOT** take any action with competitors to divide or allocate markets, or to mutually refuse to deal with third parties. To avoid the appearance of these activities, Colleagues **MUST** be careful to limit the exchange of information with competitors of FIS.

- **Relations with Clients.** Colleagues **MUST NOT** require our clients to resell FIS' products or services at specified resale prices or at prices exceeding specified minimums. This restriction generally does not apply to agents selling our products or services on behalf of the Company. Under certain circumstances it **MAY** be unlawful to prohibit clients from buying products or services from other suppliers. Although the Company has a broad right to select the clients with whom it wants to do business, that right **MUST** be exercised with caution, and any refusal to deal with a particular client **MUST** be evaluated carefully.
- **Relations with Suppliers.** Colleagues **MUST NOT** enter into agreements with suppliers to resell their products or services at specified resale prices or at prices exceeding specified minimums. Colleagues also may not enter into agreements with suppliers prohibiting them from selling to competitors of the Company.
- **Trade Associations.** When representing the Company in trade association activities, Colleagues **MUST** be careful not to share pricing or other non-public competitive information, or engage in any other activity that could reasonably be construed as price fixing or in restraint of trade.

In addition to complying with U.S. and foreign antitrust laws, Colleagues **MUST** comply with laws governing trade regulation in the jurisdictions where the Company conducts business. Such laws require that all Colleagues refrain from any unfair or deceptive methods of competition, including false or misleading advertising, making false statements concerning competitors or their products, or inducing competitors' clients or Colleagues to breach their contracts with competitors of the Company. Contact the Company's Ethics Office at fisethicsoffice@fisglobal.com if you have any questions about what type of activities would violate antitrust or trade regulation laws.

01.01.06.07 Email and Fax Advertising

There have been U.S. federal and state as well as international laws and regulations passed to stem perceived abuses in using email and facsimile transmissions to advertise products and services. In promoting the Company's products and services, Colleagues **MUST** comply with those laws to avoid significant exposure for non-compliance.

Email that is meant to advertise or promote a product or service **MUST** accurately disclose who it is from, **MUST** have an accurate subject line that is not misleading, **MUST** state that it is an advertisement and contain the business address of the sender. Additionally, most non-U.S. locations and certain U.S. states require consent or authorization from the recipient prior to transmission of the email advertisement. Email messages **MUST** inform the recipient of a right to opt out of future email advertisements and provide a mechanism for doing so. Opt out requests **MUST** be honored as required by law.

Facsimile advertisements **MUST** be sent with the express consent of the recipient or to certain clients with which the Company has a prior existing business relationship. Facsimile advertisements **MUST** be labeled as an advertisement, contain the date and time the fax was sent, the name of the business sending the fax, and the telephone number of the sending machine or business. Additionally, such advertisements **MUST** inform the recipient of a right to opt out of future facsimile advertisements.

Colleagues must comply with Company Policies and the laws relating to advertising.

01.01.07 Responsibility to Other Colleagues

01.01.07.01 Environment, Health and Safety

The Company is committed to protecting and maintaining the quality of the environment and to promoting the health and safety of Colleagues, clients and the communities where it operates. To meet that commitment, Colleagues **MUST**:

- Operate in full compliance with both the letter and the spirit of environmental, health and safety laws and regulations;
- Immediately report any environmental, health or safety concerns;
- Consider opportunities to improve environmental, health and safety programs; and
- Be prepared to observe emergency preparedness plans.

Colleagues **SHOULD** direct any reports of actual or potential environmental, health or safety concerns or any questions about their responsibilities in this regard or Company Policies in covering these subjects to their managers, the People Office representative, the Ethics Helpline by calling the Helpline (*see Appendix A for country numbers*) or by entering the concern at www.fnisethics.com.

01.01.07.02 The People Office

The relationship between the Company and its Colleagues involves rights, obligations and expectations as set forth elsewhere in this Code, in written benefit plans, in various People Office policies, and procedures manuals, and in Employee Handbooks. It is important for Colleagues to read and understand written materials made available to them so that they can understand the full extent of benefits available as well as understand expectations of the Company as they relate to performance and behavior.

Employee Handbooks provide guidance and information related to the Company's values, policies, and procedures and other matters of importance to the Colleague's employment relationship. A copy of the Employee Handbook is available on the Company's intranet site FIS & me. Colleagues are expected to read and understand the Employee Handbook and utilize it as guidance on Company policies and procedures.

The Company is committed to providing equal employment opportunity in all of its employment practices including selection, hiring, promotion, transfer, and compensation to all qualified applicants and Colleagues without regard to race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information, and/or any other characteristic protected under the law. For more information, please refer to the Company's Equal Employment Opportunity (EEO) Policy in the Employee Handbook.

The Company does not tolerate harassment of any of its Colleagues, applicants, vendors or clients. It is the Company's policy to maintain a working environment free from harassment. Any form of harassment related to an individual's race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information, and/or any other characteristic protected under the law is a violation of Company policy. If a colleague is deemed to have engaged in harassment in violation of Company policy, the employee **SHALL** be subject to disciplinary action up to and including termination of employment. For more information, please refer to the Company's Harassment and Discrimination Free Workplace Policy in the Employee Handbook.

The Company cannot address concerns relating to harassment unless such concerns are brought to its attention. Therefore, you **MUST** bring any such concerns to the Company's attention so that it can take appropriate steps to correct any issues. Any concerns relating to sexual harassment **SHOULD** be reported in accordance with the policies and procedures in the Employee Handbook, using [TPO Support Center \(Raise a Concern, Grievance or Complaint - Employee Service Center \(service-now.com\)\)](#), or in accordance with local grievance policies and procedures. Colleagues can also report concerns through the FIS Ethics Helpline which provides an option to report anonymously, where permitted under local law. Colleagues can call the Ethics Helpline (see *Appendix A for country numbers*) or enter a matter on the website at www.fnisethics.com.

01.01.08 Responsibility to Report Wrongdoing

01.01.08.01 Reporting Violations

This Code is designed to encourage the prompt internal reporting of actual or suspected violations of the Code and of any applicable laws, rules and regulations. In making a good faith report, you should not fear dismissal or retaliation of any kind. The Company has zero tolerance for retaliation.

For purposes of reporting actual or suspected violations of the Code or any applicable law, rule or regulation, "good faith" is defined as having reasonable grounds at the time a report is made, based upon the circumstances and information available, to believe that the information in the report is true.

COLLEAGUES ARE RESPONSIBLE FOR REPORTING, AS PROVIDED IN THIS CODE, ANY AND ALL EVENTS, PRACTICES OR CIRCUMSTANCES THAT THEY SUSPECT MAY VIOLATE THE CODE.

01.01.08.02 What to Report

Colleagues **SHOULD** be alert and sensitive to situations that could result in legal, regulatory, reputational, or financial risk to the Company and situations that are in violation of the Code. Colleagues who believe that conduct has occurred, may be occurring, or may be about to occur that is in violation of the Code or may violate the Code are **REQUIRED** to bring the matter to the attention of the Company. This includes any actions that violate or would violate applicable laws, rules or regulations.

01.01.08.03 How to Report

Colleagues **SHOULD** generally first bring the matter to the attention of their manager. However, if a colleague does not feel that the matter can be discussed with the manager, the colleague **MAY** raise the matter to the next level of management. Colleagues **MAY** also report such conduct to the Ethics Office at fisethicsoffice@fisglobal.com, by calling the Ethics Helpline (see *Appendix A for country numbers*) or by reporting the concern through the website at www.fnisethics.com. The Ethics Helpline provides the option to report such conduct anonymously, unless prohibited by local laws. In addition, Colleagues also have the option of raising employee relations matters using [TPO Support Center \(Raise a Concern, Grievance or Complaint - Employee Service Center \(service-now.com\)\)](#).

When a colleague submits a report directly to a manager, the manager **SHOULD** consider whether the report involves a potential violation of the Code and if so, they **MUST** report it immediately to the Ethics Office at fisethicsoffice@fisglobal.com or to the Company's Ethics Helpline.

Colleagues MAY report concerns to the Company's Ethics Helpline by calling a toll-free number (see *Appendix A for country numbers*) or by accessing the website at www.fnisethics.com. A call center specialist SHALL capture the colleague's concerns and provide the report to the Ethics Office for review and investigation. The Helpline is available 24 hours a day, 7 days a week. Colleagues may choose to remain anonymous when submitting their

concerns to the Helpline unless prohibited by local laws; however, doing so MAY limit the ability to conduct a thorough investigation into the concerns.

Toll-free numbers for each country are provided in Appendix A to this Code, or may be obtained on www.fnisethics.com. All calls to the Helpline are answered in English; however, most other languages are supported.

A confidential, formal investigation will be conducted and any substantiated or partially substantiated violations of the Code and/or other Company Policies **MAY** result in disciplinary action up to and including termination of employment in accordance with local laws. Examples of corrective disciplinary actions other than termination **MAY** include but are not limited to a verbal warning, written warning, counseling and training. In addition, the matter will be reviewed to identify any process improvements, educational opportunities, potential risks, or control enhancements.

Colleagues **MUST NOT** use the FIS Ethics Helpline to make false or frivolous reports. Further, personal concerns or grievances which do not involve actual or suspected violations of the Code or any applicable law, rule or regulation **SHOULD** be raised to The People Office. Personal concern or grievance **MAY** be raised by using [TPO Support Center \(Raise a Concern, Grievance or Complaint - Employee Service Center \(service-now.com\)\)](#).

01.01.08.04 Principles Applicable to Seeking Advice and Reporting

To encourage Colleagues to seek guidance before engaging in behavior that is inconsistent with Company Policies or the Code and to report violations of Company Policies or the Code, the following principles **SHALL** apply:

- **Anonymity.** Colleagues who seek advice or report violations have the option of remaining anonymous. If an employee requests anonymity, the Company **SHALL** use reasonable efforts to keep the identity of the reporter confidential. Colleagues **SHOULD** be aware that in instances where reports are made anonymously, it **MAY** be more difficult (if not impossible) for the Company to fully investigate the allegations of misconduct and to remedy the alleged wrongdoing as thoroughly as it would otherwise be able to do with full information.
- **Confidentiality.** The Company will undertake measures to conduct all investigations in as confidential a manner as possible; however, in order to fulfill its duty to conduct thorough investigations into allegations of wrongdoing, it may not always be possible to keep information relating to the allegations confidential. In instances where it is necessary to disclose the name of a Colleague for purposes of the investigation, such disclosure will not be undertaken without the consent of the Colleague where required under applicable law, specifically including the EU Whistleblowing Directive.
- **No Retaliation for Reports.** FIS has a strict no retaliation policy. This means Colleagues **SHALL NOT** be subject to discipline or other consequences for reporting their concerns in good faith. Retaliation against an individual for reporting a potential violation of this Code or other conduct or for participating in the related investigation is a serious violation of FIS policy and will not be tolerated. Colleagues who engage in retaliatory behavior **SHALL** be subject to disciplinary action up to and including termination of employment.

01.01.08.05 Applicability and Duty to Report Violations

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 fnisethicsoffice@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.fnisethics.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.

01.01.08.06 Consequences

Colleagues will be held accountable for engaging in conduct in violation of the Code, Company Policies, the law, or regulations. Colleagues **MAY** be subject to a full range of disciplinary actions up to and including termination of employment. Disciplinary actions **MAY** also include, without limitation, oral or written warnings, training or re-training, demotion or re-assignment, or suspension with or without pay or benefits in accordance with Company Policies, laws and regulations. In determining the appropriate disciplinary action, the Company **MAY** take into account all relevant information, including the nature and severity of the misconduct.

01.01.09 Appendix A to the Code of Business Conduct and Ethics | Public Use

01.01.09.01 Procedure for Raising Concerns to the Ethics Helpline

Calls to the FIS Ethics Helpline **SHOULD** be made in good faith. FIS has a strict no retaliation policy. This means Colleagues **SHALL NOT** be subject to discipline for reporting concerns in good faith or for participating in an investigation. Personal grievances or concerns which do not involve actual or suspected violations of the Code or any applicable law, rule or regulation **SHOULD** be raised to The People Office. For purposes of reporting actual or suspected violations of the Code or any applicable law, rule or regulation, “good faith” is defined as having reasonable grounds at the time a report is made, based upon the circumstances and information available, to believe that the information in the report is true.

Calls to the Helpline are answered in English. If a colleague wishes to proceed in another language, the colleague **SHOULD** state the preferred language in English and an interpreter will be located to join the call.

Country	Toll-free Number	Special instructions
Australia	1-800-339276	
Austria	0800-291870	
Argentina – English	0-800-444-8084	
Argentina – Spanish	0-800-555-0906	
Barbados	1-800-5343352	
Belgium	0800-77004	
Brazil	0800-8911667	
Canada	1-855-350-9393	
Chile	1230-020-5771	
Channel Islands	0800-032-8483	
China (Northern)	10-800-712-1239	Northern China Includes: Beijing, Tianjin, Heilongjiang, Jilin, Liaoning, Shandong, Shanxi, Hebei, Henan, and Inner Mongolia.

China (Southern)	10-800-120-1239	Southern China Includes: Shanghai, Jiangsu, Zhejiang, Anhui, Fujian, Jiangxi, Hubei, Hunan, Guangdong, Guangxi, Hainan, Chongqing, Sichuan, Yunnan, Tibet Autonomous Region, Shaanxi, Gansu, Qinghai, Ningxia, Xinjiang and Autonomous Region.
Denmark	80-882809	
Colombia	01800-9-155860	
Czechia (Czech Republic)	800-142-550	
France	0800-902500	
Germany	0800-1016582	
Hong Kong	800-964214	
India	000-800-001-6112	
Indonesia	007-803-011-0160	
Ireland	1-800-552-070	
Israel	1-809-21-4405	
Italy	800-786907	
Japan	(KDDI) 00531-11-0271 (Softbank Telecom) 0066-33-830499 (NTT) 0034-800-600131	
Kenya	503-748-0646	
Korea, Republic Of	00308-13-2890	
Luxembourg	800-27-114	
Malaysia	1-800-80-8641	
Mexico	001-855-329-8182	
Netherlands	0800-0226174	
New Zealand	0800-447737	
Pakistan	1-877-364-7384	From outside line dial 00-800-01-001, at the prompt dial toll-free shown here
Peru	0800-52116	
Philippines	1-800-1-114-0165	
Poland	0-0-800-1211571	
Portugal	800-8-11470	
Romania	0808-03-4288	
Russia	8-10-8002-6053011	

Saudi Arabia	888-309-1552	From outside line dial 1-800-10, at the prompt dial toll-free shown here
Senegal	503-748-0646	
Serbia	800190799	
Singapore	800-1204201	
Slovakia	0800-001-544	
Slovenia	503-748-0646	
South Africa	080-09-92604	
Spain	900-991498	
Sweden	020-79-6282	
Switzerland	0800-562907	
Taiwan	00801-13-7956	
Thailand	001-800-12-0665204	
Tunisia	503-748-0646	
Turkey	0811-288-0001	From outside line dial 0811-288-0001, at the prompt dial toll-free shown here
Ukraine	1-877-364-7384	From outside line dial 0-800-502-886, at the prompt dial toll-free shown here
United Arab Emirates (du)	8000-555-66	
United Arab Emirates	8000-021	
United Arab Emirates (U.S. Military Bases)	8000-061	
United Kingdom	08-000328483	
United States	1-877-364-7384	
Vietnam	120-11067	

01.01.10 Conflicts of Interest Standard

This Standard is designed to provide guidance on how to identify an actual, potential, or perceived conflict of interest and sets out the Company's expectations for self-disclosure into the Conflicts of Interest Registry (the "Registry"). Because conflicts of interest take many forms, it is important to understand what constitutes a conflict of interest.

A conflict of interest is created when Colleagues have competing interests and may not be able to exercise independent or objective judgment or effectively undertake their duties for the Company as a result of those competing interests. Generally, a conflict of interest occurs where a Colleague promotes personal interests over what is best for the company or where a situation prevents a Colleague from making an objective, unbiased decision. A conflict of interest can exist even if a situation can only be perceived by others as a possible conflict, and sometimes, even when no unethical or improper conduct has occurred.

FIS requires that all Colleagues avoid any activity, investment, interest, or association that interferes or appears to interfere with the independent exercise of judgment in carrying out an assigned job responsibility or is contrary to the interests of FIS.

01.01.10.01 Types of Conflict of Interest

To assist in avoiding a conflict of interest, it is important to understand the following types of conflicts:

- **Actual conflict of interest:** There is a direct conflict between current duties or responsibilities and existing private interests.
- **Perceived conflict of interest:** It appears that private interests are improperly influencing the performance of duties, regardless of whether or not this is the case.
- **Potential conflict of interest:** In the future, a situation could develop where personal interests would affect Company responsibilities.

Specific examples of situations that may create actual, perceived, or potential conflicts **MAY** include, but are not limited to the following:

- **Outside Financial Interests:** Colleagues **MUST NOT** have a financial interest in a company that competes with or does business with FIS, other than as a minor shareholder. A minor shareholder is defined as someone having less than 2 percent ownership. This includes any direct or indirect interests in any FIS vendor, third-party supplier, contractor, client, or competitor of the Company. Any such business transactions **MUST** be fully disclosed to and approved by the Ethics Office at fisethicsoffice@fisglobal.com by disclosing such interests in the Conflicts of Interest Registry.
- **Doing Business with Relatives:** Colleagues **MUST NOT** engage in any business transaction on behalf of the Company with a firm in which a relative (by blood or by marriage) or close personal relationship is a principal, officer, representative, or direct or indirect manager of services performed for the Company or is involved in any negotiations with the Company. If you have questions regarding a relationship, contact your People Office Representative or submit it to the Ethics Office at fisethicsoffice@fisglobal.com.
- **Corporate Opportunities:** Directors and Colleagues owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Directors and Colleagues are prohibited from: (a) taking for themselves personally any opportunity which FIS could reasonably expect to obtain and develop that is discovered through the use of Company property, information or position; (b) using Company property, information, or position for personal gain; or (c) competing with the Company.
- **Outside Employment:** The Company recognizes a colleague's right to engage in activities outside of the employment relationship which are of a private nature and unrelated to Company business. Colleagues **MUST** submit all outside employment opportunities – including consulting opportunities – to the Ethics Office via the Conflicts of Interest Registry for review and approval. Colleagues whose outside employment or consulting opportunities are approved **MAY** continue to hold such outside employment or consulting opportunity so long as the opportunity does not interfere with the performance of Company responsibilities and is not performed while on Company time or using Company resources. If the Company determines that the outside employment or consulting opportunity interferes with performance or the ability to meet Company requirements, the colleague **MAY** be asked to terminate the outside employment or consulting arrangement to remain employed by the Company. Colleagues will generally be prohibited from engaging in outside employment or consulting opportunities that create a conflict of interest, including but not limited to accepting employment or consulting opportunities with a current or potential competitor, supplier, vendor or client.
 - In certain countries, such as India, this approach regarding outside employment **MAY** be modified to comply with local law. Please contact the Ethics Office at fisethicsoffice@fisglobal.com, if you have any questions.
- **Board Memberships:** FIS encourages all Colleagues to be active in local communities as reflected in the core value to Be the Change. Colleagues **MUST** submit all board memberships whether with a for-profit or not-for-profit

entity to the Ethics Office via the Conflicts of Interest Registry for review and approval to confirm no conflict exists. Such opportunities must be disclosed and approved by the Ethics Office prior to commencing service on any such board. Colleagues are not permitted to serve on the board of directors of any company that competes or does business with FIS. As with outside employment opportunities, board memberships should not interfere with a colleague's performance or job responsibilities. If it is determined that the board membership interferes with performance or the ability to meet Company requirements, the Colleague **MAY** be asked to resign from the board.

01.01.10.02 Disclosure of Conflicts of Interest

FIS recognizes that Colleagues have a variety of interests outside of work. At the same time, Colleagues, are often exposed to proprietary and confidential information, business assets or work product relating to the Company, its vendors, suppliers, or clients which is not generally available to the public. Colleagues **MUST** avoid any activity, investment, interest, or association that interferes or gives the appearance of interfering with the independent exercise of judgment in carrying out assigned job responsibilities or that may conflict with the business interests of the Company.

For this reason, Colleagues are required to submit any activity or interest that is a conflict of interest or perceived or potential conflict of interest to the Ethics Office via the Conflicts of Interest Registry (FIS & me under Workplace Services > Ethics Central section) for review and approval. Colleagues **SHOULD NOT** engage in the activity or interest prior to receipt of approval and conformation from the Ethics Office that there is no actual, perceived, or potential conflict. FIS Colleagues and contractors are **REQUIRED** to strictly abide by the Code, Company Policies, and applicable Employee Handbooks regarding conflicts of interest.

Examples of activities or interests that **MUST** be submitted to the Conflicts of Interest Registry for approval prior to engaging in the activity or interest or continuing with such activity or interest include, but are not limited to, the following:

- Having an direct or indirect interest in a company vendor, supplier, contractor, client or competitor of the Company;
- Accepting outside employment;
- Holding board, panel, or advisory memberships or directorships;
- Offering employment to a relative (by blood or by marriage) or a close personal relationship;
- Using the services of a business owned by a relative (by blood or by marriage) or close personal relationship; or
- Participating in consulting engagements or speaking opportunities or writing industry articles or books for external publication, or appearing on podcasts

The above provides examples of those activities or interests that **MUST** be submitted to the Conflicts of Interest Registry (FIS & me under Workplace Services > Ethics Central section). These examples are by no means an exhaustive representation of activities or interests that must be submitted to the Conflicts of Interest Registry for review and approval by the Ethics Office. Failure to submit an actual conflict, or perceived or a potential conflict to the Conflicts of Interest Registry **MAY** subject an employee to disciplinary action up to and including termination, as per local law.

01.01.10.03 Avoiding Conflicts of Interest

Although not all conflicts of interest are necessarily prohibited or interfere with the business of FIS, Colleagues **MUST** provide full disclosure of all actual and perceived or potential conflicts of interest to their manager and the Ethics Office at fisethicsoffice@fisglobal.com in a timely manner by submitting the actual, perceived or potential conflict into the Conflicts of Interest Registry (FIS & me under Workplace Services > Ethics Central section). This disclosure is **REQUIRED** to determine whether a conflict of interest does exist and if so, how to avoid, resolve or mitigate the conflict. Failure to submit an actual, perceived or potential conflict **MAY** subject a colleague to disciplinary action up to including termination, as per local law.

01.01.10.04 Gifts and Entertainment

Gifts and entertainment can be a great tool for building a business relationship, but they should never be—or even appear to be—an attempt to influence a business decision.

When offering or accepting gifts or entertainment, Colleagues **MUST** keep the following guidelines in mind:

- Never offer or accept anything that could appear to create an obligation for either person
- Only offer or accept items of reasonable value, such as a small holiday gift or an occasional modest meal
- Gifts should never be exchanged with anyone who represents a company that is currently in contract negotiations with the Company
- Never offer or accept cash or cash equivalents (like gift cards)
- Before offering a gift, confirm that it follows the policies of the recipient's company

Never offer anything of value to a government official, including state-owned entities, without permission from the Ethics Office.

A conflict of interest can occur if an exchange of gifts or gratuities can be reasonably perceived as an inducement to secure preferential treatment. Colleagues **MUST NOT** provide or accept any gift, favor, business courtesy or entertainment that may create a feeling of obligation, compromise your judgment or lend the appearance of trying to influence the recipient.

Gift giving and receiving with vendors, suppliers, or clients may also involve complex legal, ethical, and cultural issues. In some cases, inappropriate or excessive gifts, entertainment and gratuities may be viewed as commercial bribery or be in violation of other laws, and may create legal, financial, regulatory, or reputational risks for the Company. Colleagues **MUST** record all business gifts and entertainment that exceed \$75.00 (USD or the equivalent) in the Gifts and Entertainment Registry (FIS & me under Workplace Services > Ethics Central section) to assist in evidencing that the gift or offer of entertainment was not linked to any improper influence in relation to a colleague carrying out Company duties and obligations.

There is a distinction between **Business Gifts** (gifts given to or received from suppliers, vendors, clients, or other parties with whom the Company does business) and **Colleague Gifts** (gifts given to Colleagues by the Company that are purchased with Company funds). Colleagues are not required to record **Colleague Gifts** in the Gifts and Entertainment Registry; however, these gifts **SHOULD** be reasonable and not excessive. Similarly, if a gift is given by one FIS colleague to another FIS colleague and is purchased with personal funds, the gift is not required to be entered in the Gifts and Entertainment Registry. Colleagues **SHOULD** consult the Employee Gifts, Prizes, and Awards Policy, the Gifts and Entertainment Standard within the FIS Anti-Bribery Anti-Corruption and the FIS Travel and Entertainment Policy for further guidance on gift giving and receiving. Colleagues **SHOULD** contact the Ethics Office at fisethicsoffice@fisglobal.com with any questions relating to gift giving and receiving.

IMPORTANT: Nothing in this Code prohibits any employee from reporting possible violations of 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. equivalent law enforcement agencies, or making other disclosures that are protected under the whistleblower provisions of any applicable law or regulation. Colleagues are not required to notify the company that they have made such reports or disclosures or obtain authorization from the Company prior to making such reports or disclosures.

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.