



# 13.01 FIS Political Activities Policy

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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](#).

## 13.01 FIS Political Activities Policy

### Purpose

The Political Activities Policy (the "Policy") establishes the enterprise-wide approach for Fidelity National Information Services, Inc., and its subsidiaries and affiliates (collectively, the "Company" or "FIS") on political and public policy activities, including lobbying, and the political action committee of FIS (the "PAC"). This approach ensures the Company engages in these activities in a responsible and transparent manner and in full compliance with applicable laws and regulations.

### Statement

Political risk is defined as risks brought by governments of all levels and jurisdictions through their legislative, executive and regulatory processes and actions. These risks may significantly affect FIS' ability to operate freely and efficiently and may impact the Company's anticipated earnings. Risks may also come from employees who engage in unauthorized political and public policy activities on behalf or in the name of FIS. These risks include unregistered lobbying activities as well as financial donations to political campaigns, which in certain jurisdictions are often prohibited by companies that are government contractors.

FIS believes that active engagement in public policy and political activities is an important part of responsible corporate citizenship and the democratic process, which ensures the sustainability of the Company's business model and the success of its stakeholders. The Company engages with policymakers, public officials and regulators at the national/federal, provincial/state, and local levels to strengthen the financial system, reduce systemic risk, and to support dynamic, healthy markets, competition and innovation. The Company **may** also engage in public policy to advance environmental, social and governance issues important to its stakeholders.

FIS is committed to transparency in its lobbying and political activities, including disclosing all political campaign donations by the Company's PAC, known as the FIS Good Government Fund.

### 13.01.01 Global Public Policy Organizational Structure and Governance

The FIS Global Public Policy ("Public Policy") team, within the Legal, Compliance and Corporate Affairs function, **shall** develop and manage relationships with elected officials, political appointees and other government policymakers (including officials designated in the United States as Covered Public Officials "CPO") and communicate with all levels of government (national/federal, provincial/state and local). It is also responsible for managing the Company's relationships with political candidates for elective office and the Company's political action committee.

Public Policy, in coordination with line of business and other functional leaders, **shall** develop public policy strategies related to emerging legislation, executive actions and regulatory issues. These strategies focus on protecting the Company's permissions to operate efficiently and effectively and on expanding business opportunities brought by changes in public policy.

In partnership with Compliance and Legal, Public Policy **shall** be responsible for ensuring all employees remain in compliance with lobbying and other political activity laws. Public Policy **shall** also support Regulatory Relations and Legal with respect to relationships with regulatory agencies and facilitating communications with agency personnel in connection with operational issues, examinations and/or any other reporting and communications required under various laws and regulations.

Additional information can be found in FIS' [Anti-Bribery and Anti-Corruption Policy](#) (FABAC) and [Code of Business Conduct and Ethics](#).

### 13.01.02 Lobbying Engagements, Registration and Reporting

FIS' ability to participate in debates on public policies or advocacy for issues of interest to the Company (e.g. "lobbying" activities) **may** be subject to various laws and regulations at the local, state/provincial, and federal levels, including anti-bribery and anti-corruption laws around the world which are applicable to the Company. Generally, "lobbying" is defined as an interaction with a covered government official (including regulators) to influence their position on a public policy matter (e.g. law or regulation).

It is the policy of the Company to comply with the laws concerning lobbying activities. For example, within the United States, there are federal, state and local reporting and/or registration/disclosure requirements prior to engaging in any such activities. Failure to register and/or report lobbying activities in accordance with the relevant laws can result in fines and penalties for the Company in addition to individual liability.

Consequently, the centralized and coordinated management of these activities is critical to the organization's compliance with these laws. Public Policy **shall** be responsible for coordinating all lobbying registrations (entities and/or individuals) and reporting requirements – including the retention of outside lobbyists or public affairs consultants. In certain jurisdictions, Legal **may** help lead these efforts in coordination with Public Policy.

If you have questions regarding whether an interaction with a public official is permitted or **may** be considered "lobbying", please contact Public Policy (FISPublicPolicy@fisglobal.com).

### 13.01.03 Trade Association Activities

FIS belongs to various trade associations that advocate for public policy issues of importance to the Company and industry peers. FIS corporate membership in trade associations or similar organizations that actively engage in advocacy for public policy issues **must** be reviewed and approved by Public Policy to ensure FIS' participation is consistent with relevant public policy objectives and with Compliance and Legal to ensure compliance with the FABAC Policy. However, FIS' membership in such trade associations does not necessarily mean the Company endorses or supports all public policy positions or issues that these associations support. In addition, employees who wish to accept a board-level or leadership position with a trade association **must** first obtain approval from Public Policy.

Public Policy **shall** maintain a list of the trade associations for these compliance purposes and **may** be required to provide an accounting of membership costs used toward association lobbying activities. Certain jurisdictions, including the United States, require disclosure of these expenses.

### 13.01.04 Government Contracts

Various jurisdictions **may** have laws that limit or restrict contracts that a business **may** have with government officials, particularly those that are engaged in bidding on public contracts. In connection with a bid or the award of a contract, these laws **may** require the business to disclose if an employee or other family member serves as an elected or appointed official in that jurisdiction. These bidding processes **may** also trigger a blackout period where lobbying activity related to this issue is prohibited. Consequently, employees **must** disclose these relationships and contract bidding activities to the Public Policy and Legal functions to ensure government contracts are secured in full compliance with applicable laws and regulations.

### 13.01.05 Corporate Contributions for Political Activities

In accordance with our internal policies, FIS **must not** use corporate funds to contribute to candidates, political party committees and/or political action committees in any jurisdiction globally, including Super PACs and political committees organized under Section 527 of the U.S. Internal Revenue Code (IRC).

All requests for sponsorships or contributions for political-related activities or organizations, based in any country, **must** be submitted for review and approval to Public Policy, Compliance and the Legal department to determine if they are consistent with these policies and are consistent with the Company's public policy goals.

### 13.01.06 FIS' Political Action Committee

FIS maintains a federal, state and local PAC in the U.S., which is registered with the Federal Election Commission (FEC). The PAC, designated as the FIS Good Government Fund, is funded through eligible employee voluntary personal contributions. as required by law, political contributions accepted or made by the PAC **must** be reported to relevant federal, state and local campaign finance agencies and **must** be publicly available. Reports filed with [the FEC](#) are available online to the public.

FIS makes political contributions as permitted under federal, state and local laws on a nonpartisan basis in support of public policy consistent with FIS' interests.

The Vice President of Corporate Affairs is responsible for administration of the PAC and works closely with FIS' Finance and Legal departments to ensure all PAC contributions and disbursements are made in accordance with applicable laws and Company policies.

### 13.01.07 Personal Political Activities

FIS recognizes the right of individuals to voice their opinions on political issues of interest and encourages its employees to participate in governmental, regulatory and election processes. When engaging in political activities, employees **must** make it clear that they are acting in their individual capacity and not as a representative of the Company unless specifically authorized to do so by the Public Policy team.

Employees engaging in personal political activities **must not** use Company resources for such activities, including use of Company facilities to host political events and/or use of resources such as telephones, copy machines or email for political advocacy. All personal political activities, aside from FIS responsibilities, **must** occur outside the normal working hours of the individual employee.

Employees who wish to become a candidate for political office **must not** use their affiliation with FIS or their role as a central basis of their political campaign for office. Before beginning a campaign for political office, an employee **should** discuss the potential impact of such activity and subsequent government service with their manager to ensure it does not create a conflict of interest, violate Company policy or violate applicable laws and regulations. Employees who **may** work in a role engaged in securing government contracts **must** also discuss any potential candidacy with both their manager and the Legal department to ensure FIS remains in compliance with applicable laws.

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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 [fisethicsoffice@fisglobal.com](mailto:fisethicsoffice@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](http://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 \(service-now.com\)](https://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.