



13.03 Conflict Minerals Policy

Policy Owner:	Ciafardini, Andrew
Contact:	andrew.ciafardini@fisglobal.com
Domain:	Corporate and External Affairs
Scope:	Enterprise Wide
Published Date:	May 24, 2023
Effective Date:	May 24, 2023
Mandatory Review Date:	May 24, 2024
Provision for Exception:	Exceptions require Policy Exception Committee approval unless otherwise delegated within the policy.

13.03 Conflict Minerals Policy	3
13.03.01 Supply Management.....	3

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](#).

13.03 Conflict Minerals Policy

Purpose

The purpose of this policy is to establish the company's compliance expectations regarding procurement of conflict minerals within our supply chain. Both the United States and the European Union require conflict minerals compliance from companies, suppliers, and importers within the scope of their respective laws. The purpose of conflict minerals compliance is to ensure the sourcing of conflict-free minerals from regions around the world that aim to prevent the use of minerals that directly or indirectly finance or benefit armed groups or perpetrators of human rights abuses.

Statement

FIS recognizes that the extraction, trade, handling and export of tin, tantalum, tungsten, and gold ("3TG") have contributed to armed conflicts and human rights abuses in the Democratic Republic of the Congo (DRC) and adjoining countries. As such, FIS is committed to the responsible sourcing of minerals through our global supply chain and aligning with suppliers that share our values regarding respect for human rights, integrity, and environmental responsibility.

Section 1502 of the U.S. Dodd-Frank Act requires publicly traded companies to report on their use of conflict minerals on an annual basis. If 3TG are utilized at any point in a company's manufacturing process and the minerals are "necessary to the functionality or production" of a product manufactured or contracted to be manufactured by the company, the company must file a report with the U.S. Securities and Exchange Commission (SEC).

FIS does not directly source conflict minerals from mines, smelters, or refiners and is not currently required to submit a Conflict Minerals Report per regulatory requirements. Should suppliers of FIS be subject to the annual disclosure and due diligence requirements, FIS expects suppliers to fully comply with all applicable rules, laws, and guidance regarding use of conflict minerals and maintain "conflict-free" procurement practices. FIS is committed to ensuring conflict minerals are not used in its products or supply chains.

In addition, suppliers are expected to comply with the FIS Supplier Code of Conduct and adhere to the principles within the FIS Modern Slavery Act Transparency Statement, published pursuant to the UK Modern Slavery Act 2015.

Scope

This policy applies to all FIS businesses, affiliates, vendors, and suppliers servicing or acting on behalf of FIS, unless otherwise specified.

13.03.01 Supply Management

FIS expects impacted suppliers to conduct responsible conflict minerals sourcing within their own supply chains through due diligence practices that conform to the Organization for Economic Co-operation and Development (OECD) guidance and U.S. Dodd-Frank Act. As of 2023, suppliers are expected to comply with the FIS Supplier Code of Conduct which expressly prohibits the extraction, trade, handling and export of tin, tantalum, tungsten, and gold from the Democratic Republic of the Congo (DRC) and adjoining conflict-affected countries. The Supplier Code of Conduct can be found on the Supplier Information Portal [here](#).

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.