

Supplier Code of Conduct

Table of Contents

upplier Code of Conduct	1
Introduction	
Purpose and Intent	2
, General Principles	
Legal, Regulatory and Ethical Compliance	
Business Practices	
Employment and Labor Practices	
Diversity and Inclusion	
Environment	0
Supplier's Sustainable Supply Chain	1
Compliance with the FIS Supplier Code of Conduct	
Reporting Compliance Issues and/or Suspected Wrongdoing1	



Introduction

Fidelity National Information Services, Inc., and its subsidiaries (collectively, "**Company**" or "**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. At FIS, we hold ourselves to the highest business standards and want to work with suppliers ("**Suppliers**") who do the same. In this document, FIS has outlined the main principles of how we expect to work with our Suppliers, as well as how Suppliers must act related to legal, regulatory, sustainability and ethical compliance standards.

Purpose and Intent

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 and sustainable business practices and behaviors are a top priority, at the core of everything we do, and woven into our daily operations through our FIS Ethics Office (fisethicsoffice@fisglobal.com). The FIS Ethics Office expects all colleagues to commit to the highest ethical, environmental, social and governance standards.

The Company has established and set out our ethical standards in the FIS *Code of Business Conduct and Ethics* (the "**Code**"), which applies to all colleagues, at every level of the organization. The *Code* incorporates standards that are an extension of FIS' core values – **Lead with Integrity, Be the Change** and **Win as One Team** and reflect our commitment to ethical business practices and legal compliance.

The FIS Code is available externally on our <u>www.fisglobal.com</u> website within the Investors / Corporate Governance— Highlights section or through the direct link here: <u>Code of Conduct | FIS (fisglobal.com</u>)

FIS' definition of good corporate ethics includes the standards set forth in this Supplier Code of Conduct ("**Supplier Code**") as a supplement to the *Code*. FIS expects that its Suppliers will share and embrace our commitments to integrity and ethics, health and safety, labor standards, environmental performance, and anti-corruption practices among others. We understand that Suppliers are independent entities; however, the business practices and actions of a Supplier may impact and/or reflect upon FIS. Therefore, FIS expects all Suppliers and their employees, agents, and subcontractors (Suppliers' employees, agents, and subcontractors shall hereinafter be referred to collectively as "**Representatives**") to adhere to this FIS Supplier Code and the Code while they are conducting business with and/or on behalf of FIS. FIS Suppliers are responsible for delivering the appropriate communications to educate and train their Representatives to ensure they understand and comply with such requirements.

This Supplier Code of Conduct sets out specific expectations of our Suppliers and is based on internationally recognized norms, including the International Labor Organization's Fundamental Conventions, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact.

We recognize that, in applying this Supplier Code, Suppliers must also be mindful of their obligations under local laws, rules regulations and other contractual arrangements. If local laws, rules, or regulations conflict with the expectations we've set forth, Suppliers are expected to work in good faith with us to reach a mutually agreeable resolution that ensures compliance with the local law(s), rule(s), or regulation(s) and, to the extent possible, the letter and spirit of this Supplier Code. In the event of conflict between the terms of a Supplier's contract with FIS and the provisions of this Supplier Code, the contract terms will prevail. This Supplier Code does not constitute an employment contract or create an employment relationship between Supplier or Representatives and the Company.

We expect all Suppliers to adhere to the standards set forth in this Supplier Code. To the extent that Suppliers subcontract any portion of their obligations, the standards set forth in this code also apply to subcontractors.



General Principles

The FIS Business Ethics Program reflects – and reinforces – FIS' culture and core values supporting the highest standards of openness, fairness, honesty, and ethical behavior. The mission of the FIS Ethics Office is to guide, inspire and support colleagues to **Lead with Integrity**.

As an extension of FIS' core values – **Lead with Integrity, Be the Change and Win as One Team**, we expect the following general principles to be at the forefront of our Suppliers and Representatives responsibility for conducting fair business and maintaining strong relationships.

Integrity

FIS and Suppliers will be honest and fair with each other and will practice and encourage open communication. They will be trustworthy, reliable, responsible, and accountable for their actions. Both parties will act based on values and ethics, rather than personal interests.

Communication

Communication between FIS and Suppliers will be clear, unambiguous and fact based. Feedback given to either party will be done respectfully and received assuming positive intent. Communication will be timely and at regular intervals when things are going well and more frequently when issues need to be addressed.

Value-Driven

The ultimate goal of FIS' relationship with Suppliers is to drive value to FIS, its clients and other stakeholders. FIS is continuously looking to improve the value of our products and services and expects Suppliers to support and facilitate those endeavors. We look to our suppliers to help us innovate, improve efficiency, and avoid waste, which is at the center of sustainability.

Respect

FIS Suppliers and Representatives will respect each person's right to their opinion. The parties will refrain from bullying behaviors and from any form of harassment. The parties will respect and protect each other's physical and intellectual assets as well as the supplier's autonomy.

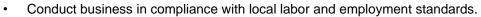
Health & Safety

Inclusive of any local, industry and governmental regulations, Suppliers and FIS will provide a safe and hazard free working environment. Both parties will minimize exposure to health risks and will prioritize physical safety above any other needs of the organizations.

Legal, Regulatory and Ethical Compliance

Suppliers and their Representatives are expected to conduct their business in compliance with the applicable laws and regulations of the countries where they conduct business with, or on behalf of, FIS. In addition to any specific obligations under any agreement with FIS, all Suppliers are expected to comply with the following legal and ethical standards:

- Communicate with honesty and with full candor.
- Be forthright with FIS, Representatives, regulators, and other government officials and never engage in misleading communications. This obligation does not require the Supplier to give up legal protections or legally privileged communication.



- FIS expressly prohibits any such participation in, support of, or association with the illegal and immoral practices of trafficking in persons, forced labor and slavery. Without limiting the foregoing, Suppliers agree not to source any products from the Xinjiang Province of China, or any other products produced using the forced labor of Uyghurs or other persecuted ethnic minorities in China.
- FIS is committed to a high ethical standard in its daily business practices and will continue to act in accordance with all applicable laws. Our Code requires that FIS and its employees not only obey company policies and all laws in any country where FIS operates, but also all transnational doctrines concerning fundamental human rights.
- FIS expects Suppliers to maintain responsible supply chain practices that respect human rights and avoid contributing to conflict through their mineral and/or metal purchasing decisions and practices. Pursuant to the Organization for Economic Co-operation and Development ("OECD") Guidance, FIS expressly prohibits Suppliers from extraction, trade, handling, or export of tin, tantalum, tungsten, and gold from the Democratic Republic of the Congo (DRC) and adjoining conflict-affected regions.
- Conduct business in full compliance with all applicable anti-bribery and anti-corruption laws, including the United States Foreign Corrupt Practices Act and the UK Bribery Act ("Anti-Corruption Laws"). Specifically, Suppliers agree to not make any direct or indirect payments or promises of payments to any person, including but not limited to businesspeople, employees of government agencies, state-owned or controlled businesses, government officials or any other person to induce the individual to misuse his or her position to obtain or retain business or any other improper advantage.
- Maintain accurate books, records, and accounts in reasonable detail such that they fairly reflect all transactions and dispositions of assets as required under the record-keeping provisions of Anti-Corruption Laws.
- Prohibit the mischaracterization or omission of any transaction on books and records or fail to maintain proper accounting controls that result in such a mischaracterization or omission.
- Maintain detailed and accurate descriptions of all payments and expenses to ensure compliance with Anti-Corruption Laws.
- Adhere to the FIS Anti-Bribery Anti-Corruption ("FABAC") Policy, which can be found on our <u>www.fisglobal.com</u> website within the Investors / Corporate Governance — Highlights section or through the direct link here: <u>FABAC</u> <u>Policy</u>.
- Comply with all applicable trade control, sanctions, export, re-export, and import requirements laws and regulations ("Trade Controls"). For the avoidance of doubt, Trade Controls means includes any laws, administrative regulations, and executive orders of the United States and any other applicable legal jurisdiction relating to the control of imports and exports of commodities, software, and technical data, the use or remote use of software and related property or services, and embargo of or restrictions on goods or services, and includes the Export Administration Regulations, administered by the of the U.S. Department of Commerce, and the regulations and executive orders administered by the Office of Foreign Assets Control of the U.S. Department of the Treasury.
- Suppliers comply with U.S. anti-boycott laws and regulations must not participate in any national or international boycott that is not sanctioned by the United States government.
- Conduct business in full compliance with fair competition laws.
- Conduct business in compliance with intellectual property protections, including patent, design, trademark, trade dress, copyright, trade secret and other common law intellectual property rights including all international conventions and country specific laws governing the rights of intellectual property owners.
- Comply with applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials. FIS encourages the Supplier's responsible use of raw materials and natural



resources, and efforts to reduce the consumption of these materials in line with recognized sustainability practices and carbon reduction frameworks.

Business Practices

Suppliers and their Representatives are expected to conduct their business with integrity and in accordance with their obligations under any specific agreements with FIS or, if no such agreement exists, in accordance with FIS <u>Standard Terms</u> and <u>Conditions of Purchase</u>. In addition to any specific obligations under the Supplier's agreement with FIS, all FIS Suppliers are expected to comply with the following business practices.

Business Records

- Record and report all business information honestly and accurately and comply with all applicable laws regarding their completion and accuracy.
- Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Systems, Security, Technology & Property

- Protect and responsibly use both the physical and intellectual assets of FIS including property, supplies, consumables, and equipment when authorized by FIS to use such assets.
- Use FIS provided information technology and systems (including e-mail) only for authorized FIS business-related purposes. FIS strictly prohibits Suppliers and their Representatives from using FIS provided technology and systems to create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate and/or to send any false, derogatory, or malicious communications using FIS provided information assets and systems. To the extent FIS e-mail and systems are made available to Suppliers and their Representatives such use must comply with the FIS Acceptable Use Policy.
- Comply with all FIS requirements for maintenance of passwords, confidentiality, security, and privacy procedures as a condition of receiving access to FIS' internal corporate network, all systems, and buildings. Unless otherwise explicitly stated in a Supplier agreement with FIS, all data stored or transmitted on FIS owned or leased equipment is to be considered the property of FIS. Suppliers must inform its Representatives that FIS legitimately monitors use of the corporate networks and all systems (including e-mail) and has a right to access all data stored or transmitted using the FIS network.
- Co-operate with FIS in maintaining strict confidentiality standards and protecting FIS data in the possession of the Supplier or its Representatives. Suppliers must assist FIS in the secure return or destruction of any FIS data to prevent the unauthorized use or disclosure of FIS data.
- Comply with the intellectual property ownership rights of FIS and others including but not limited to patents, designs, copyrights, trademarks, trade dress, trade secrets and other common law intellectual property rights. Use software, hardware, and content only in accordance with their associated license or terms of use. Prohibit the illegal use of materials protected by intellectual property rights, including the illegal download of music, internet games and movies, use of brand names and logos without permissions/ licenses from the owners, etc.

Gifts & Entertainment

FIS selects its Suppliers based on capability, quality, service, cost, and other business-related factors. Any exchange of gifts or entertainment - regardless of amount - that is intended or appears intended to buy influence with a FIS employee or representative will be viewed as a serious violation of this FIS *Supplier Code* and with the company's Gifts and Entertainment Standard.

- The Company has a zero-tolerance policy for giving or receiving Business Gifts and entertainment when any question exists that the purpose is to improperly influence the recipient, violate the Company's policies, or violate the law.
- Never offer anything of value regardless of amount to a government official, including state-owned entities, without
 permission from the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>. For the purposes of this Supplier Code, a
 "term government official" means:
 - o any officer or employee of a state, local or federal official includes employees of government,
 - or any department, agency, or instrumentality thereof (which includes a government- owned or government-controlled state enterprise),
 - or of a "public international organization," which includes such organizations as the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank,
 - or any person acting in an official capacity for or on behalf of a government or government-owned entity or public international organization,
 - or any political party or party official, or any candidate for political office thus, government officials include not only elected officials, but also consultants who hold government positions,
 - or any colleagues of companies owned or controlled by governments, political party officials and others., even if they are operated as a commercial business.
- Gifts offered to FIS employees or representatives should be rare and always modest in cost; only inexpensive business-related items are acceptable. Examples of acceptable gifts are an inexpensive writing pen, or inexpensive business card holder.
- Gifts in excess of the local buying equivalent of \$75.00 USD are prohibited without prior approval from the FIS Ethics Office. Currency (cash) and currency equivalents such as gift vouchers, gift cards, and similar stored value cards are never permitted regardless of the value of the gift.
- Entertainment and hospitality that are not included as unacceptable within the <u>FABAC Policy may</u> be provided on behalf of FIS to persons who are not government officials so long as they are reasonable, proportionate given the parties involved and not lavish. Business hospitality and entertainment should never improperly influence, or ever appear to improperly influence, FIS' business relationships. If a Supplier has any question on whether the entertainment or hospitality, they are planning will be considered excessive or inappropriate they must contact the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> for guidance. FIS Suppliers must not solicit business courtesies. FIS Suppliers may accept unsolicited meals, refreshments, and tickets to cultural and sporting events provided that they attend such events with existing or prospective requester and such attendance at these types of events is only occasional. If the aggregate value of the event meets or exceeds the equivalent of \$75.00 USD (including taxes, shipping, and/or other fees) individually or collectively, the FIS Supplier must contact the FIS Ethics Office at <u>fisethicsoffice@fislgobal.com</u> to register their receipt through the FIS Gifts and Entertainment Registry.
- Entertainment and hospitality that are not included as unacceptable within the <u>FABAC Policy</u> may be provided on behalf of FIS to persons **who are not government officials** so long as they are reasonable, proportionate given the parties involved and not lavish.
- Business hospitality and entertainment should never improperly influence, or ever appear to improperly influence, the business relationships. If a Supplier has any question on whether the entertainment or hospitality, they are planning will be considered excessive or inappropriate they must contact the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> for guidance.
- Suppliers must never provide entertainment that is sexually oriented or otherwise in bad taste or which would be embarrassing to FIS or inconsistent with FIS' brand image as a professional, ethical, and responsible corporate citizen.



- Reasonable meals provided by or paid for by vendors or suppliers during traditional business hours where business discussions or negotiations are the main purpose.
- Invitations to Industry events and marketing where multiple clients or potential clients are invited, or which are open to the public.
- Having lunch or dinner with a person with whom an employee or contractor is discussing a business transaction for FIS.
- Inviting a client or vendor to join an employee or contractor for a sporting or cultural event.
- Hosting a meeting between an employee's or contractor's team and a client's team to celebrate a project completion.
- Hosting a representative of a client or vendor for a round of golf, a tennis match or similar.
- The Supplier should be cognizant not to offer an excessive number of gifts within a calendar year even if they are at \$75.00 USD or under.
- Contact the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> to submit a request for review into our FIS Gift and Entertainment Registry if the proposed gift or entertainment exceeds \$75.00 USD. Such gift or entertainment shall not be provided until an "approved" decision has been received from the FIS Ethics Office.
- Gift giving and entertainment practices may vary in different cultures, but the limits in the policy are applicable globally and regardless of local business culture.
- For further details, please consult the *Gifts and Entertainment Standard* within the *FABAC Policy*. NOTE: FIS Rules
 for China as well as Brazil may have in-country specific requirements. Please request guidance for these countries
 through the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>.
- Political contributions must not be made on behalf of, or as a representative of FIS; contributions made in an effort to influence a business relationship or to request influence of a political figure in favor of the company are strictly prohibited. Please see the FIS Political Activities Policy to determine acceptable political activities.
- FIS prohibits facilitation payments or "grease payments" offered to a person in government or other individual to secure or speed up a routine, discretionary government process or decision, such as expediting a license or permit. However, a narrow exception for facilitating or expediting payments exists if it's made to further a routine government action that involves non-discretionary acts, such as expediting a passport. Contact the FIS Ethics Office or submit any questions regarding this narrow exception to the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>.

IMPORTANT: Suppliers and their Representatives must report any suspected misconduct including but, not limited to a request for or offer of a bribe, kickback, grease payment, facilitation payment or other offer intended to buy influence as well as any conflicts of interest, violation of our Code, other company policies or the law to the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> and/or our FIS Ethics Helpline <u>www.fnisethics.com</u>.

For more information on reporting suspected wrongdoing, please see the reporting section at the end of this policy for further details as well as our Code of Business Conduct and Ethics. FIS does not tolerate any retaliation against anyone who, in good faith, reports a violation of FIS policy or law or cooperates with an investigation.

Conflict of Interest, Insider Trading & the Press

- Suppliers and their Representatives must take all appropriate action to avoid conflicts of interest and the appearance of conflicts of interests. For further information on conflicts, please see our Conflicts of Interest Standard within our Code available externally on our <u>www.fisglobal.com</u> website within the Investors / Corporate Governance
 — Highlights section or through the direct link here: <u>Code of Conduct | FIS (fisglobal.com</u>).
- Suppliers and their Representatives are not permitted to deal directly with any FIS representative whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier (above 2%)

threshold). If such a relationship exists, the conflict of interest must be disclosed to the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> and resolved appropriately before the Supplier may become a supplier to FIS.

- Suppliers should disclose to your FIS Representative any conflict of interest as soon as a Supplier becomes aware of such conflict after initiating a relationship and then engage the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>.
- Contact your FIS Representative to submit the actual or potential conflict into our FIS Conflicts of Interest Registry for review and a decision from the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>.
- Supplier must prohibit insider trading of any company's stock when in the possession of information that is not available to the investing public and that could influence an investor's decision to buy or sell stock.
- No Supplier should speak to the press on FIS' behalf unless expressly authorized to do so in writing by FIS. For inquiries, please contact the FIS Corporate Communications team at:
 - FIS.Corporate.Communications@fisglobal.com.

Data Protection and Data Privacy

- If Supplier processes or has access to any personal data regarding employees or other contractors of FIS, then Supplier shall treat such personal data as FIS' confidential information and only process it for legitimate purposes in accordance with all applicable laws. Such personal data shall not be used for any purpose except as necessary to implement, perform or enforce the Supplier's contract with FIS.
- Supplier must use the same reasonable efforts as it uses to protect its own confidential and proprietary information (but in any event not less than a reasonable standard of care) to protect the confidentiality and security of data shared by FIS (personal and non-personal data) and must delete or destroy the personal data when it is no longer needed in relation to the Supplier's relationship with FIS.
- Suppliers processing personal data must have a process for responding to data breaches and notifying FIS when a data breach has occurred.
- FIS will apply the same standards with respect to any personal data regarding employees of Supplier that FIS may access or process with respect to its relationship with Supplier. See the FIS *Privacy Policy* and the *Controlled Personal Data Privacy Notice*, which can be found at https://www.fisglobal.com/privacy.

Employment and Labor Practices

FIS Suppliers must share in FIS' commitment to human rights and equal opportunity in the workplace. FIS Suppliers shall conduct their employment practices in full compliance with local employment and labor laws and regulations.

We expect our Suppliers to develop policies and procedures that apply to all Supplier operations and their extended supply chains, consistent with the International Labor Organization's (ILO) Fundamental Conventions, the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact, to ensure adherence with the following standards. This includes implementing appropriate due diligence and testing measures, training staff, and tracking indicators of effectiveness.

In addition, all FIS Suppliers are expected to comply with the following:

- Provide employees with a workplace that is free of harassment and unlawful discrimination. FIS Suppliers are
 expected to comply with all applicable labor and employment laws in hiring, compensation, access to training,
 promotion, termination, and retirement and Suppliers shall not discriminate based on race, color, national origin,
 religion, age, disability, gender, marital status, sexual orientation, gender identification, protected veteran status or
 any other protected category.
- Provide a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations, and practices.



- Prohibit the use of alcohol and the abuse of prescription medication while on FIS or FIS customer owned or leased property and while conducting FIS business.
- Prohibit use, manufacture, possession, distribution, and/or sale of illegal drugs.
- Prohibit the possession of weapons and dangerous substances on FIS or FIS customer owned or leased property.
- Provide a work environment that is free from human trafficking and slavery, which includes forced labor and unlawful child labor. Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by a FIS Supplier and/or its subcontractors is prohibited.
- 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 and Suppliers are encouraged to immediately report any incident relating to modern slavery so that appropriate remedies can be taken. Please see our section on reporting within this policy.
- For more information outlining the steps we have taken and our ongoing planned efforts to prevent modern slavery in the Company cand its supply chain, please review <u>FIS' Modern Slavery Act Transparency Statement</u> posted on our external website <u>www.fisglobal.com</u> within the Investors / Corporate Governance – Highlights webpage.
- Employees and people hired as contract or temporary labor should not be required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice without penalty.
- Comply with all local minimum working age laws and requirements and under no circumstances use child labor in any capacity or employ people under the age of 16 years, or the legal minimum working age, whichever is higher.
 FIS supports legitimate workplace apprenticeship programs provided that the programs are for educational purposes and exclusively for the benefit of under-age people employed.
- Provide a workplace free from physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation, or measures that compromise the individual's mental integrity.
- Pay all workers in accordance with the applicable wage laws.
- Strictly adhere to working hours or labor hour statutes. Overtime pay must be paid in accordance with applicable law. No employee shall be required to work more than the maximum hours permitted by applicable law.
- No deduction from wages not permitted by applicable law shall be permitted without the express permission of the worker concerned.
- All disciplinary measures should be recorded and administered in accord with applicable local labor and employment law.
- Keep employee records in accordance with applicable local law.
- Provide periodic opportunities for workers to provide feedback on key topics affecting their work experience and have processes in place to evaluate and respond to feedback provided.
- Provide their workers with access to skills development, training, apprenticeships (if applicable) and opportunities for career advancement at all stages of their work experience.

Diversity and Inclusion

Being a diverse and inclusive workplace is core to who we are as a company and how we drive responsible growth. Our diversity makes us stronger and the value we deliver as a company is strengthened when we bring broad perspectives together to meet the needs of our diverse stakeholders. We firmly believe all employees should be treated with respect, live free of discrimination and be able to bring their whole selves to work. To help drive a culture of inclusion, we have developed a variety of resources and programs to attract, retain and develop diverse talent and, as a result, have strong representation at all levels.



In addition to our focus on workplace diversity, we recognize the value of having and promoting diversity in our supply chain and actively seek to do business with certified diverse businesses either directly or indirectly through our Supplier Diversity Program. Examples of diverse Suppliers include companies owned by women, underrepresented minorities, individuals with disabilities, veterans, and lesbian, gay, bi-sexual, or transgender individuals; or businesses in the United States that are certified as part of a Historically Under-utilized Business Zone (HubZone). We're committed to investing in diverse businesses to drive sustainable growth and create shared success in the communities we serve.

We expect our Suppliers to have similar policies and practices. Specifically, we expect our Suppliers to:

- Provide programs to recruit, develop and retain diverse talent. We expect Suppliers to actively promote a diverse and inclusive environment through specific programs and initiatives to recruit, develop and retain diverse talent of all types.
- Drive inclusion of diverse suppliers in your supply chain. We expect our Suppliers to drive and report on inclusion of certified diverse-owned businesses in their supply chains. This includes having policies and procedures geared toward supply chain inclusion and doing business both directly and indirectly with diverse businesses.

Environment

FIS Suppliers must share in FIS' commitment to the environment. We expect our Suppliers to measure, disclose and mitigate any potential negative impacts on the environment associated with their operations, products and services including energy and water consumption, greenhouse gas emissions, waste and, if applicable, air and water pollution, nature loss and hazardous materials. Furthermore, we expect Suppliers to evaluate the potential adverse impacts of climate change, nature loss and water stress on their operations and their financial results and ensure that associated risks are properly managed. Suppliers are encouraged to publish their own ESG Policy and consider the following actions:

Energy Consumption & GHGs

• Establish processes to understand their energy consumption and Greenhouse Gas (GHG) emissions, and where possible take steps to reduce emissions across Scopes 1, 2 and 3.

Biodiversity

• Take steps to protect the environment and restore natural habitats and the various functions and services that ecosystems provide (such as food and water, climate regulation, soil formation and recreational opportunities) in their operational sites.

Product Use

• Have a clear understanding of their role in applicable product life cycles (manufacturers, retailers, users, and disposers).

Product End-of-Life

• Reduce the environmental impacts of products they use (e.g., recycling).

Environmental Services & Advocacy

• Promote the actions they are taking to reduce their environmental impact to customers and suppliers to increase awareness.

Supplier's Sustainable Supply Chain

Suppliers should consider labor practices and human rights issues and environmental considerations in their procurement processes, for example as part of supplier selection.

Compliance with the FIS Supplier Code of Conduct

It is the responsibility of the Supplier to ensure that its Representatives understand and comply with this FIS *Supplier Code* and to inform its FIS representative, FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u> or a member of FIS management if any situation develops that causes the Supplier to operate in violation of this FIS *Supplier Code*.

• FIS Suppliers are expected to self-monitor their compliance with FIS' *Supplier Code*. Provided the violation does not result in illegal conduct, a Supplier who self-reports a violation of this *Supplier Code* will be permitted a reasonable time to correct its non-compliance.

In addition to any other rights FIS may have under its agreement with the Supplier, FIS may request the immediate removal of Representatives who behave in a manner that is disruptive, unlawful, or inconsistent with this *Supplier Code* or any other FIS policy.

We reserve the right to monitor compliance with this Supplier Code using a reasonable and risk-based approach and framework that is suitable for small and diverse-owned businesses as well as larger businesses with more mature compliance programs. This may include verification through self-assessment questionnaires, on-site audits and/or other means of due diligence. We recognize that small and diverse-owned businesses may be challenged to meet some of the expectations we have set forth. We're committed to working with these businesses to achieve a reasonable level of compliance given their unique circumstances. If requested, Suppliers are expected to provide written information, including, policies, procedures, and data regarding the topics included in this Supplier Code.

Reporting Compliance Issues and/or Suspected Wrongdoing

You are encouraged to work with your primary FIS contact to resolve any business-related issues. However, if you suspect a violation of policy, law, or compliance requirements or become aware of any questionable behavior or misconduct you need to take immediate action to report the concern(s) to the FIS Ethics Office at <u>fisethicsoffice@fisglobal.com</u>.

If you do not have internet access – send your concerns to:

Fidelity National Information Services, Inc. c/o FIS Ethics Office 347 Riverside Avenue Jacksonville, Florida 32202

If you prefer to remain anonymous, as in accordance with local law, FIS provides toll-free Ethics Helpline numbers (877.364.7384 for U.S. or Canada and for additional countries see below*) and an Ethics Helpline Website <u>www.fnisethics.com</u> that are available 24 hours a day, 7 days a week.

*Toll-free numbers for each country are provided in Appendix A to the *Code* found externally on our <u>www.fisglobal.com</u> website within the Investors / Corporate Governance— Highlights section or through the direct link here: <u>Code of Conduct</u> <u>FIS (fisglobal.com</u>). You may also obtain the toll-free numbers from the Ethics Helpline Website.



Ultimately, FIS expects all Suppliers to act with integrity, follow the guidance in accordance with the Supplier Code, which is an extension of the FIS Code, and applicable laws and regulations in all jurisdictions in which FIS operates to **Win as One Team** in an ethical and legally compliant manner.

FIS IS A ZERO RETALIATION ZONE.

FIS does not tolerate any retaliation against anyone who, in good faith, reports a violation of FIS policy or law or cooperates with an investigation.