

FIS Supplier Code of Conduct

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PURPOSE AND INTENT

FIS is committed to the highest ethical, environmental, social and governance standards. We have established and set out our ethical standards in the *FIS Code of Business Conduct and Ethics*, which applies to all employees, officers, subcontractors and, to the extent relevant, directors of the Company. The *Code of Business Conduct and Ethics* incorporates standards that are an extension of FIS' core values and reflect our commitment to ethical business practices and legal compliance. The *FIS Code of Business Conduct and Ethics* can be found at: http://www.investor.fisglobal.com/phoenix.zhtml?c=180304&p=irol-govconduct_pf.

FIS' definition of good corporate ethics includes the standards set forth in this *Supplier Code of Conduct* as a supplement to the *Code of Business Conduct and Ethics*. FIS expects that its suppliers ("**Suppliers**") will share and embrace our commitments to integrity and ethics, health and safety, labor standards, environmental performance, and anti-corruption practices. 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 of Conduct* and the *Code of Business Conduct and Ethics* 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.

LEGAL, REGULATORY AND ETHICAL COMPLIANCE

FIS 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 FIS Suppliers are expected to comply with the following legal and ethical standards:

- To communicate with honesty and with full candor.
- Be forthright with FIS, 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.
- To conduct business in compliance with local labor and employment standards.
- FIS expressly prohibits any such participation in, support of or association with the illegal and immoral practice of trafficking in persons, forced labor and slavery. 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 of Business Conduct and Ethics 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
- To conduct business in full compliance with all applicable anti-bribery and anti-corruption laws and with the United States Foreign Corrupt Practices Act and the UK Bribery Act. Specifically, Suppliers agree to not

make any direct or indirect payments or promises of payments to 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.

- To keep its books, records and accounts in reasonable detail, accurately and such that they fairly reflect all transactions and dispositions of assets as the record-keeping provisions of Anti-Corruption Laws require.
- Also, to prohibit the mischaracterization or omission of any transaction on a company's books or any failure to maintain proper accounting controls that result in such a mischaracterization or omission.
- Keeping detailed, accurate descriptions of all payments and expenses is crucial for compliance purposes as Anti-Corruption Laws require.
- Adhere to the FIS *Anti-Bribery Anti-Corruption Policy*, which can be found at:
<http://www.investor.fisglobal.com/phoenix.zhtml?c=180304&p=irol-govconduct>
- To comply with all applicable trade control, export, re-export and import requirements. For the avoidance of doubt, trade control means any laws, administrative regulations and executive orders of any applicable legal jurisdiction relating to the control of imports and exports of commodities and technical data, use or remote use of software and related property or services, and embargo of goods or services, and includes the Export Administration Regulations of the U.S. Department of Commerce and the regulations and executive orders administered by the Office of Foreign Asset Control of the U.S. Department of the Treasury.
- While conducting business for or on behalf of FIS, Suppliers must not participate in any national or international boycott that is not sanctioned by the United States government.
- To conduct business in full compliance with fair competition laws.
- To conduct business in compliance with copyright protections including all international conventions and laws governing the rights of copyright owners.
- Suppliers will 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. We encourage the Supplier's responsible use of raw materials and natural resources, and efforts to reduce the consumption of these materials.

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 Standard Terms and Conditions of Purchase*. 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

- Honestly and accurately record and report all business information, 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. Comply with the *FIS Acceptable Use Policy* to the extent FIS e-mail and internet is made available.
- 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 private and is the property of FIS. Suppliers must inform its Representatives that FIS monitors all use of the corporate networks and all systems (including e-mail) and accesses all data stored or transmitted using the FIS network.
- Comply with the intellectual property ownership rights of FIS and others including but not limited to copyrights, trademarks, and trade secrets. Use software, hardware and content only in accordance with their associated license or terms of use. Prohibit the illegal use of copyrighted materials including the illegal download of music, internet games and movies.

Gifts and Entertainment

FIS selects its Suppliers based on cost, quality and service. 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 of Conduct*.

- 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 \$US 75.00 are prohibited without prior approval having been obtained by the FIS employee or representative. Currency 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 offered should never exceed the local buying equivalent of \$US 75.00 per person without prior approval having been obtained by the FIS employee or representative. 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. Examples of acceptable entertainment are, a business lunch at a local restaurant without alcohol, a business dinner with limited alcohol, and a local hosted cultural or social event lasting a few hours.
- The Supplier should be cognizant not to offer an excessive number of gifts within a calendar year even if they are at \$US 75.00 or under.
- Contact your FIS representative to submit a request for review into our FIS Gift and Entertainment Registry if the proposed gift or entertainment exceeds \$US 75,00 for a decision.
- 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 FIS Anti-Bribery Anti-corruption Policy. NOTE: FIS Rules for China may have additional requirements. Please request guidance for this country from your FIS representative.

Suppliers and their Representatives must to report to FIS' Corporate Compliance Office and/or our FIS Ethics Hotline any request for or offer of a bribe, kickback, grease payment, facilitation payment or other offer intended to buy influence as well as conflicts of interest.

Report by email to corporatecompliance@fisglobal.com. For additional reporting mechanisms, please see the reporting section at the end of the policy for further details.

Conflict of Interest, Insider Trading & the Press

- Suppliers and their Representatives must take all appropriate action to avoid actual conflicts of interest and the appearance of conflicts of interests.
- 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. If such a relationship exists, the conflict of interest must be disclosed and resolved appropriately before the Supplier may become a supplier to FIS.
- Contact your FIS representative to submit the actual or potential conflict into our FIS Conflicts of Interest Registry for review and a decision.
- 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 the expressly authorized to do so in writing by FIS.

Personal 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 such 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.
- 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.

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. Regardless of cultural differences, 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.
- 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 labor and employment law.
- Keep employee records in accordance with applicable law.

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 of Conduct* and to inform its FIS contact,

the FIS Compliance Office at corporatecompliance@fisglobal.com, or a member of FIS Management if any situation develops that causes the Supplier to operate in violation of this *FIS Supplier Code of Conduct*.

- FIS Suppliers are expected to self-monitor their compliance with FIS' *Supplier Code of Conduct*. Provided the violation does not result in illegal conduct, a Supplier who self-reports a violation of this *Supplier Code of Conduct* 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 any Representative who behaves in a manner that is disruptive, unlawful, or inconsistent with this *Supplier Code of Conduct* or any other public FIS policy.

REPORTING COMPLIANCE FAILURES OR QUESTIONABLE BEHAVIOR

You are encouraged to work with your primary FIS contact to resolve any business-related issues. However, if you suspect a violation of policy or law, or suspected violation, compliance failures or any questionable behavior/misconduct you need to take immediate action to report the concern(s) to the Chief Compliance and Customer Advocacy Officer via corporatecompliance@fisglobal.com.

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

Chief Compliance and Customer Advocacy Officer

Fidelity National Information Services, Inc.

601 Riverside Avenue

Jacksonville, Florida 32204

If you prefer to remain anonymous (with certain exceptions in some European countries), FIS provides toll-free Ethics Hotline numbers (877.364.7384 for U.S. or Canada) for each country and an Ethics Website www.fnisethics.com 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 of Business Conduct and Ethics found externally on the FIS Global website Corporate Governance page: <http://www.investor.fisglobal.com/phoenix.zhtml?c=180304&p=irol-govHighlights>

You may also obtain the toll-free numbers from the Ethics Website.

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.
