



01.19 Enterprise Sustainable Business Policy

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01.19 Enterprise Sustainable Business Policy

1. Purpose

The Enterprise Sustainable Business Policy outlines the Company's commitments and requirements for operating as a sustainable and responsible business.

This Policy sets out overarching sustainable business principles and requirements. Where other Company policies, standards, or procedures govern a topic, those documents are definitive and will prevail in the event of any inconsistency.

2. Statement

The Company is committed to sustainable and responsible business conduct: operating ethically and sustainably, minimizing environmental impacts, respecting human rights, protecting health and safety, safeguarding data and privacy, and upholding robust governance practices. The Company prohibits violations of law or policy, including bribery, corruption, forced or child labor, unlawful discrimination, harassment, and anti-competitive conduct.

Non-compliance may result in corrective action, contractual remedies, or discipline up to and including termination.

3. Scope

This Policy applies to all employees, officers, and directors of FIS and its subsidiaries.

4. Elements

4.1 Environmental Stewardship

The Company will comply with applicable environmental laws and internal program requirements. FIS maintains an Environmental Management System (EMS) consistent with the ISO 14001:2015 Environmental Management System standard (or any successor version thereof) or with another internationally recognized environmental management standard that is substantially equivalent in scope and rigor. FIS EMS-certified sites are guided by the commitment set forth in the Environmental Policy Statement and undergo periodic internal and external audits.

The Company aims to improve energy efficiency, reduce greenhouse gas emissions, minimize waste and water use, and manage hazardous substances responsibly. Where practical, FIS will pursue recognized building and operational efficiencies for offices and data centers and support responsible and secure end-of-life management for equipment. The Company may conduct periodic assessments of energy use, emissions, water consumption, and waste to inform targets and reporting.

Employees should direct any reports of actual or potential environmental violations, or any questions about responsibilities or Company policies in these areas, to their supervisor, a People Office representative, the Ethics Helpline, or Ethics website.

4.2 Climate and Environmental Reporting

The Company assesses climate-related risks and opportunities in line with regulatory obligations. FIS reports on the Company's Scope 1, Scope 2 and relevant Scope 3 greenhouse gas emissions and will continue to seek to improve accuracy and completeness of emissions accounting and reporting.

The Company prepares Greenhouse Gas (GHG) inventories in accordance with the GHG Protocol. GHG inventories are supported by an Inventory Management Plan. Emissions data is subject to internal controls, management review, and periodic independent assurance appropriate to regulatory requirements and stakeholder expectations.

4.3 Human Rights and Labor Standards

The Company's commitment to human rights is informed by key principles recognized in international human rights standards, such as the United Nations (UN) Universal Declaration of Human Rights. FIS prohibits involuntary, forced or prison labor, child labor, and human trafficking. The Company conducts risk-based human rights due diligence and ongoing monitoring of salient risks.

FIS respects rights to freedom of association and collective bargaining consistent with law. The Company will provide fair, lawful wages and benefits; promote safe, healthy workplaces; and maintain channels for reporting concerns without fear of retaliation.

4.4 Employee Development and Non-Discrimination

The Company provides equal opportunity without regard to characteristics protected by applicable law and prohibits harassment. FIS will invest in training, skills development, and employee engagement to support career growth and client excellence.

4.5 Health and Safety

FIS maintains a safety standard for all employees. The Workplace Safety Standard outlines the programs in place at FIS that comply with the Occupational Safety and Health Administration (OSHA) requirements in the U.S. and standards in international jurisdictions. FIS partners with insurance and safety experts to conduct safety audits at select locations annually.

4.6 Political Activity

In line with the FIS Political Activities Policy, political activities, lobbying, trade association participation, and political contributions will comply with applicable laws and regulations, be centrally coordinated, and be subject to required approvals and disclosures. FIS will not use corporate funds for contributions to candidates, political party committees, and/or political action committees in any jurisdiction globally. The Company monitors political activity and lobbying through centralized registers.

4.7 Governance, Ethics, and Compliance

The Company maintains compliance programs, risk management practices and robust governance practices, including Board oversight of sustainability. FIS maintains a Code of Business Conduct and Ethics and provides an Ethics Helpline for individuals to report concerns or seek guidance. The Company prohibits

retaliation and offers whistleblower protections to those who raise concerns or assist in the reporting process. The Company prohibits bribery and corruption and requires compliance with applicable antitrust and trade regulation laws. FIS conducts required training in anti-bribery/anti-corruption, antitrust, privacy, and information security.

4.8 Product Responsibility, Data Security, and Business Resilience

The Company will market and deliver products and services responsibly and prohibit unfair, deceptive, or abusive practices. FIS will protect personal and confidential information, comply with applicable cybersecurity and privacy laws, and maintain programs for business continuity, general incident management, and disaster recovery. Third parties must adhere to equivalent data security and privacy standards where applicable.

4.9 Supply Chain Management

FIS is committed to responsible supply chain management and expects suppliers to uphold the standards set forth in the FIS Supplier Code of Conduct. The Company requires suppliers to comply with applicable laws and recognized international standards, including those relating to anti-bribery and anti-corruption, fair labor and human rights, non-discrimination, health and safety, environmental stewardship, data privacy, and information security.

5. Roles and responsibilities

Corporate Governance, Nominating and Sustainability Committee of the Board of Directors: Provides oversight of FIS' global sustainability programs.

Executive Leadership: Set sustainability strategy, approve any public commitments and disclosures, allocate resources, and ensure integration of sustainability with risk management and business planning where applicable.

Sustainability Program Office: Maintains this Policy; coordinates sustainability programs, reporting, and stakeholder engagement; supports environmental management and climate risk assessment; maintains an Inventory Management Plan with defined methodologies and assumptions for greenhouse gas reporting.

Compliance, Ethics, Legal and Public Policy: Oversee compliance programs, investigations, training, and regulatory adherence; manage anti-bribery/anti-corruption, antitrust, ethical standards, sanctions, lobbying, and political activity.

Supply Chain Management and Vendor Risk Management: Implement supplier due diligence, contracting, ongoing monitoring, and remediation; administer the Supplier Code of Conduct and responsible supply chain controls.

Privacy and Cybersecurity: Enforce privacy, cybersecurity, and data protection requirements, third-party security standards, and incident management.

The People Office: Lead labor, human rights, health and safety, and employee development programs; maintain reporting channels and non-retaliation policies. Investigate and remediate reported concerns, including concerns about potential discrimination, harassment, health and safety incidents, and violations of labor standards, in coordination with Compliance and Legal as appropriate.

Employees: Comply with this Policy, complete required training, and report suspected violations.

6. References

- FIS Proxy Statement
- FIS Code of Business Conduct and Ethics
- FIS Conflicts of Interest Policy
- FIS Directors Code of Business Conduct and Ethics
- FIS Environmental Policy Statement
- FIS Modern Slavery Act Transparency Statement
- FIS Political Activities Policy
- FIS Privacy Policy and Privacy Center
- FIS Procurement Policy
- FIS Speak-Up Policy
- FIS Supplier Code of Conduct
- FIS Global Anti-Bribery and Anti-Corruption Policy
- Global Business Resilience Standards (Business Continuity, General Incident Management, and IT Disaster Recovery)
- Applicable laws and regulations (environmental, labor and employment, health and safety, anti-bribery/anti-corruption, competition, privacy/cybersecurity)
- International frameworks (e.g., UN Global Compact, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, ILO core conventions)

7. Definitions

Acronym/Term	Meaning	Description
EMS	Environmental Management System	A structured framework to manage environmental obligations, reduce impacts, and drive continual improvement

This Policy supersedes the prior Environmental, Social and Governance (ESG) Policy and must be read together with the references above. The Company will review this Policy at least annually and update it as necessary to reflect evolving laws, standards, and stakeholder expectations.