



Guidelines on Interactions with Public Officials

FIS is committed (together with any subsidiaries, collectively "FIS" or the "Company") to the highest level of professional and ethical standards in the conduct of its business affairs. As a part of this commitment, **F.I.S. strictly prohibits bribery and corruption in all of its business activities and in all business activities of individuals and entities acting on F.I.S.'s behalf.**

These Guidelines describe, for the benefit of Directors, Officers and Employees of F.I.S. **the rules, approval and reporting processes for the giving and receiving of gifts, the performance of Public Relations initiatives and hospitality events**, the making of facilitation payments (where permitted by applicable law, on the assumption that this form of payment can constitute bribery under the laws of, for instance, Italy, UK, Japan, and the PRC, as well as laws and regulations applying to interactions with USA Public Officials).



Each employee who in the performance of his or her duties is involved in interactions with Public Officials **shall be thoroughly familiar with these Guidelines**. Any questions shall be addressed to the Legal Department or Internal Audit, depending on the nature of the question.

- ✔ All necessary reviews, clearances and approvals must be obtained before the receipt/donation of the gift.
- ✔ All gifts, entertainment and hospitality events in favor of Public Officials, must be submitted to the review, clearance and approval process, and must be reported following the principles contained in the Guidelines and in particular in the Approval Matrix
- ✘ The **giving of gifts and/or receiving to/from Public Officials** in the form of cash, commissions, loans, co-interests, securities or equivalent values are prohibited.
- ✘ Company Personnel **may not use gifts or entertainment** as an improper quid pro quo, bribe, or to otherwise improperly influence, induce, or reward business decisions.
- ✘ The Public Official's dining, if any, at the company canteen – provided it is of modest value and within the limits of normal courtesy relations – during the entire duration of the visit/inspection is not counted for the purpose of the request for permission.

National or sector-specific laws and regulations, as well as codes of conduct adopted by particular Public Authorities, **may provide for further limitations to a Public Official's ability to accept gifts or anything of value**. When in doubt or unfamiliar with the Public Official's home authority, please contact the Legal Department and the Internal Audit.

For more information refer to the complete Policy PA 1012 in the "Policies and Procedures" section of the intranet.

Non-compliance with applicable Anti-Corruption Laws could result in severe consequences to both F.I.S. and its employees, including criminal prosecution, substantial fines, and debarment, plus imprisonment, termination and/or internal disciplinary action for employees.