

worldpay

Code of Business Conduct and Ethics

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Executive Introduction

Worldpay 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. As we continue to grow, one thing that will never change is our belief that maintaining our good reputation depends on each of us being personally responsible for our actions.

Each of us will face tough decisions and ethical dilemmas during our careers. When faced with different choices, it is not always easy to make the ethical decision. While achieving great results is important, it is even more important to focus on how we achieve them. The decisions you make each day have an impact on our 4Cs, which are our colleagues, customers, Company, and communities. Our Code of Business Conduct and Ethics provides information about your personal responsibilities, including complying with the law and applying good judgment each and every day. It's intended to give you guidance and help you make the right choices. It's based on Worldpay's values and objectives, and represents our highest level of guidance.

The Code applies to all of us, at every level of the organization. But, it's only a starting point. Of course, this Code cannot answer all of our questions or address every situation. That's why we've established resources to answer questions when challenges arise. If you're unsure of what to do in particular circumstances or concerned that the Code, our policies, or our regulations are being broken,

you have a responsibility to speak up. We want to hear from you. Remember, an issue cannot be addressed unless it is brought to someone's attention. If you are ever uncertain of the right course of action, talk to your People Leader, the Human Resources Department, the Legal Department or the other resources cited in the Code. Our culture is built on good decisions made through discussion with others, so you should never feel alone when facing an ethical dilemma.

I believe the quality of our people, and our commitment to ethics and compliance will not only enable us to succeed today, but will help us to achieve long-term success. Great companies and great brands are built by clearly articulating who they are and who they aspire to be. That's what inspires customers and partners to do business with them. With the help of this Code, we'll meet our goals and continue to be proud of how we achieve success. I'm confident that wherever you may be located, you'll share in Worldpay's commitment to creating an ethical and compliant workplace and winning together.

Thanks for bringing our vision, values, and behaviors to life each day.

Sincerely,

Charles Drucker
Executive Chairman and Chief Executive Officer

Our Values and Behaviors



We win together

We champion our 4Cs to win together
We celebrate our achievements along the way
We collaborate to build connections and foster partnerships. We assume positive intent
We support each other to reach our full potential
We seek feedback and we're not afraid to ask for help



We lead the way

We bring our best, inspiring others to do great things, thriving and growing through change
We strive to be creative and forward-thinking, always on the lookout for elegant and simple solutions
We are inclusive and value diversity
We embrace different cultures and perspectives to find new ways



We make it happen

We are passionate about what we do.
We bring a spirited, "can-do" attitude to our work
We are dynamic and move with urgency.
We know when we need to adapt to move forward
We are determined. We take initiative, own the outcome and love to win



We do the right thing

We have strength of character and the courage to share our voice
We are open with each other, always acting with integrity
We take personal accountability for what we do, and how we do it matters



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Advancing the Ways the World Pays —with Integrity

An Introduction to Our Code

Honesty and integrity define how we do business at Worldpay (or "our Company"), and our conduct reflects our commitment to these principles. We do the right thing.

The Code of Business Conduct and Ethics (or "Code") can act as a guide in any situation, especially complex ones. Making good decisions is not always easy but the Code helps us handle difficult situations and describes when we should consult with People Leaders and others within the Company. The Code describes the importance of speaking up and also includes references to policies that can provide even more specific, detailed information about how to navigate complicated scenarios. All of this information helps us do what we do best: make decisions that reflect our integrity and help Worldpay grow as a company.

All of us at Worldpay prioritize thinking before we act. We know we are accountable for not just what we do, but also how we do it. Our actions are important, and the ethical decisions each of us individually make every day play a direct role in our Company's success. Using the Code helps us do the right thing.



Personal Accountability for Integrity

At Worldpay, we're all held to the same standards, regardless of our role at the Company. Each of us is expected to act with integrity and follow the guidance in our Code.

Worldpay wants to do business with companies that meet these same commitments. We seek out business partners who meet our high standards of personal integrity and accountability in every area of their business. We expect agents, consultants, vendors, and contingent workers acting on Worldpay's behalf to follow our Code and our values, so that they are doing business the right way.

People Leaders' Responsibilities

It's true that each of us plays an important role in making sure that Worldpay's actions are always ethical, but People Leaders have additional responsibilities. People Leaders are expected to act as ethical role models and create an environment where other colleagues feel comfortable asking questions and raising concerns.

A Closer Look

The Role of People Leaders

People Leaders play a key role in Worldpay's ethical culture. They should:

- Handle any questions and concerns appropriately and escalate them as needed.
- Watch out for any signs of retaliation against anyone who makes a report or asks a question.
- Never ask anyone else to do something unethical or questionable.
- Proactively address ethics questions and challenging situations with those who report to them to help them make good decisions in difficult situations.
- Clearly communicate Worldpay's ethical standards to any third parties they work with to assure they too act with integrity and honesty.

Courageously Sharing Our Voice: Asking Questions and Raising Concerns

Speaking Up

One of the most important ways we can each contribute to Worldpay's ethical culture is by speaking up when we have a question or concern about something that doesn't seem right. This isn't always easy. But by sharing our voice, we help the Company handle small issues before they become big ones, and we create an environment where we're all proud to work.

If you have a question about how to do the right thing or if you think you know about a potential problem, start by talking to your People Leader. He or she usually knows the most about you, your work, and the problems you face. If that doesn't resolve the issue or if you don't feel comfortable talking to your People Leader, you can also contact any of the following Worldpay resources:

- Any People Leader you trust
- The **Human Resources Department**
- The **Ethics Office**
- The **Legal Department**

If you have questions specifically about audit and accounting concerns, you can also contact the **Chief Financial Officer**, the Chief Legal Officer, or the Audit Committee of the Board of Directors.



When you report a concern to your People Leader or any of these resources, your personal information will be handled as discreetly as possible. If you would rather make an anonymous report (where allowed by local law), you can contact Worldpay's **Ethics & Integrity Line** by visiting Worldpay.ethicspoint.com or calling the hotline. To find dialing information for the hotline in your country, go to Worldpay.ethicspoint.com.

The **Ethics & Integrity Line** is available 24 hours a day, 7 days a week. If you choose to make a report using this option, you will receive an identification number that will allow you to follow up on your concern and provide additional information, if needed.

Courageously Sharing Our Voice: Asking Questions and Raising Concerns

(Cont.)

Our Non-Retaliation Commitment

Sharing your voice and speaking up when something isn't right takes courage. At Worldpay, we never tolerate retaliation against anyone who asks a question or reports a potential concern in good faith. "Good faith" means that you give all the information you have about the issue, and you believe your report is truthful. You will never face negative consequences for a good faith report, even if it turns out you were mistaken. Likewise, Worldpay never tolerates retaliation of any kind against someone who participates in an investigation.

Policies and Additional Information

- Ethics and Compliance Contacts
- Whistleblower Policy
- Anti-Discrimination, Harassment and Retaliation Policy

A Closer Look



What Happens When I Make a Report?

- You may feel hesitant to report a concern at Worldpay because you don't know what to expect. Here's what happens when you make a report.
- The Company will address every reported concern and investigate all reports to the fullest extent appropriate.
 - If you are ever contacted as part of an investigation, you have a responsibility to cooperate and provide truthful information.
 - If the Company determines that a violation of the Code, policy, or the law has occurred, anyone responsible will be subject to discipline, which may include termination, or legal proceedings and penalties.
 - You will receive a response regarding your report though certain information, including disciplinary action taken in response to your report, is often confidential and not shared. You can be confident Worldpay takes all reports seriously and will act in accordance with the preceding bullets.

Championing Our Colleagues



Building Connections

Harassment

Bullying and Disrespectful Conduct

Safety in the Workplace

Drugs and Alcohol

Holding Our Third Parties to Our High Standards

Building Connections

Worldpay is made up of individuals, all working toward the collective success of the Company, and always for our 4Cs. We build on the diverse ideas and perspectives that each of us possess to develop solutions to the problems we face. Our diversity is an essential key to our Company's success. When we collaborate and build connections, we win together.

We value the diversity of our workforce as a competitive advantage that we nurture and expand. Diverse perspectives are critical to collaboration and solutions. We respect and encourage open dialogue, to create a climate for frank and honest discussions. We aim to gain the trust of our 4Cs by showing care, openness and honesty, and focusing relentlessly on ethics and integrity.

We strive to create a workplace where everyone feels respected and supported to reach their full potential, where our colleagues feel like they belong and can bring their whole selves to work each and every day. We treat everyone fairly, and we never tolerate discrimination. Discrimination means treating someone differently based on a protected characteristic, like their age, gender, race, color, religion, national origin, sexual orientation, gender identity or expression, genetic information, parental status, disability, veteran status, or other inappropriate basis.

A Closer Look Discrimination

Discrimination can come in many forms, including doing any of the following based on a protected characteristic:

- Hiring, promoting, or firing someone
- Excluding someone from work meetings or events
- Paying someone more or less
- Assigning someone different projects, tasks, or shifts

These actions all have a negative effect on the inclusive, diverse, collaborative work environment we strive for at Worldpay. Speak to your People Leader, **Human Resources**, or the **Ethics Office** if you have concerns about discrimination in your workplace.

Building Connections (Cont.)

Harassment

We always treat each other with respect and, accordingly, we are committed to maintaining a harassment-free workplace. Harassment is verbal or physical conduct that disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment. No matter what form it takes, harassment isn't part of how we treat each other at Worldpay. If you have concerns about harassment in the workplace, speak to your People Leader, **Human Resources**, or the **Ethics Office**.

Policies and Additional Information

- Anti-Discrimination, Harassment and Retaliation Policy

Bullying and Disrespectful Conduct

We count on each other to act respectfully, and that means we never engage in bullying or other disrespectful, threatening, intimidating, or unprofessional behavior at work. That includes insulting someone, intentionally excluding them, sabotaging their work, or similar hurtful actions. These actions are not only harmful to our fellow colleagues, but they also create a work environment that discourages collaboration and communication—which goes against Worldpay's values and spirit. Speak to your People Leader, **Human Resources**, or another appropriate resource mentioned in this Code if you have concerns about how you or someone else are being treated in the workplace.

A Closer Look



Harassment

What is harassment? It can include many different kinds of conduct, such as:

- Making comments or jokes about someone's race, ethnicity, or other protected characteristic (whether verbally or in writing, including through texts and instant messages)
- Posting offensive photos in the workplace
- Making sexual advances
- Unwelcome or unwanted touching

Safety in the Workplace

Safety is a paramount concern when working at Worldpay. We want to keep ourselves—and everyone around us—safe at all times. We follow all applicable safety laws and regulations where we work, including labor laws that relate to forced labor, working hours, and working conditions. We respect the human rights of everyone we work with. Similarly, violence and unsafe behavior have no place at our Company, and weapons are never allowed on Worldpay premises. If there is ever a threat or unsafe situation while we're working for Worldpay, we should contact Physical Security and calmly follow all evacuation procedures and any other relevant policies.

Drugs and Alcohol

Part of working safely is also committing to working with a clear head and never working under the influence of alcohol, illegal drugs, or misused prescription or over-the-counter drugs. Likewise, we should not possess or distribute these substances while working for Worldpay. A work environment free from these distractions is key to our success.

If you have questions about how to work safely, you can speak to your People Leader or a member of the **Human Resources** department.

Policies and Additional Information

- Safety, Health and Environmental Policy
- Substance Abuse Policy

Holding Our Third Parties to Our High Standards

Every day, we expect our fellow Worldpay colleagues to demonstrate respect, ethical conduct, and integrity. When we work with third parties, we hold them to the same high standards. If we interact with third parties and business partners, we have a responsibility to make sure they are living up to our values and commitments and doing business with integrity. That means they protect Worldpay's assets, treat everyone they work

with fairly, and represent our Company positively. If you have concerns about a third party's actions, speak to your People Leader or another appropriate resource described in this Code.

Policies and Additional Information

- Supplier Management Policy
- Anti-Bribery and Corruption Policy

Championing Our Company



Using Worldpay's Assets

Computers and Electronic Resources
Confidential Information and Intellectual Property

Avoiding Insider Trading

Avoiding Conflicts of Interest

Working with Family
Outside Employment
Personal Investments
Corporate Opportunities
Board Memberships

Doing Business without Bribery

Giving and Accepting Gifts and Entertainment

Watching out for Unethical Business Practices

International Trade Laws

Modern Slavery and Human Trafficking

Speaking on Worldpay's Behalf

Using Social Media Appropriately

Keeping Records Accurate and Up to Date

Investigations and Audits

Using Worldpay's Assets

Worldpay's tangible assets—such as materials, supplies, time, and facilities—are not only valuable, but also vital to helping each of us accomplish our Company work. To steward our Company's resources and ensure we can all do our best work, we are each accountable for using these assets appropriately and carefully.

How do we accomplish that? By using assets only as we need them for Company work, and not wasting or misusing them. We should use Worldpay's assets to accomplish our work, not for personal purposes like an outside job or a hobby. While some limited personal use is OK, we should always use good judgment. Personal use should never get in the way of doing Company work.

Computers and Electronic Resources

Computers, software, network access, and other electronic resources are becoming ever more vital to our Company's success. They allow us to connect with each other, our customers, and our business partners. Because of the value of these assets and the risks if they are misused, we should utilize them with care and for work purposes only.

Policies and Additional Information

- Information Security Policy
- Acceptable Use and Communications Policy

A Closer Look

Using Electronic Resources Wisely

Here are some guidelines to follow when using Worldpay's electronic resources.

- **Use the internet (and other resources) appropriately.** Keep personal use to a minimum. In addition, do not access any inappropriate or unauthorized material.
- **Use authorized software.** Avoid downloading any software—even programs you use at home or have heard good things about—without approval.
- **Choose strong passwords and keep them secret.** Your password protects Worldpay's network from unauthorized access, so make sure it is complex and hard to guess, and never share it with anyone.
- **Keep Worldpay's files on Worldpay's systems.** To keep files protected at all times, do not send them to your personal email address or use unauthorized flash drives or devices to transfer them.

Confidential Information and Intellectual Property

Worldpay's confidential information and intellectual property are extremely valuable. Confidential information is a broad term that refers to any information Worldpay has that is not generally available to the public. This includes employee personal information, strategic plans, intellectual property, business records, and many other types of information related to how our Company runs and how we create innovative services.

A Closer Look Intellectual Property

Intellectual property is one specific kind of confidential information. It includes things like:

- Patents, trademarks, and copyrights
- Business plans
- Company initiatives
- Customer lists
- Methods, techniques, and trade secrets
- Innovations

Confidential information is vital to our Company's success. To help Worldpay succeed, we each have a responsibility to protect any confidential information we have access to. In particular, we should protect personal information about Worldpay colleagues, such as national identification numbers, contact information, marital status, or health information. Our colleagues count on us to keep this information confidential and to never share it with anyone who doesn't have a business need to know it.

Worldpay's confidential information is what separates our Company from the competition and helps us all succeed. We can contribute to Worldpay's business success by protecting this information and being accountable for how we use it. Speak to your People Leader or the **Legal Department** if you have questions about using confidential information.

Policies and Additional Information

- Information Security Policy
- Intellectual Property Policy
- Data Security Policy

A Closer Look Protecting Confidential Information

Because confidential information is so valuable, it is very important that we protect it. Here are some principles to remember.

- Use confidential information only as needed for your work.
- Do not share confidential information with anyone who doesn't need to know it—even other Worldpay colleagues.
- Be careful when you are accessing or discussing Worldpay's confidential information in public places, like elevators and coffee shops.
- If you are aware of a breach of confidential information or individuals misusing confidential information, you should report these circumstances immediately to the **Ethics Office** or **Global Security Services**.

Avoiding Insider Trading

One way that we do the right thing for Worldpay and our colleagues is by steering clear of insider trading. Insider trading occurs when someone uses material, nonpublic information (also called inside information) as the basis for making a stock trade.

A Closer Look

Inside Information

Inside information is information that is both material and nonpublic. "Material" means that it could affect an investment decision, and nonpublic means that it hasn't been widely announced yet. Here are some examples:

- Upcoming mergers or acquisitions
- Corporate leadership changes, such as a member of the executive team leaving the Company
- Unannounced financial results
- New products or services that are in development

One additional important note: even after this information has been publicly announced, it is still considered nonpublic until enough time has passed to allow the market to absorb it—usually, two business days.

We never buy or sell stock in any company based on inside information. Doing so would be a misuse of Company information—not to mention illegal. In that same vein, we never give inside information to anyone else so that they can make a stock trade (a practice known as "tipping"). In that situation, both the tipper and the tippee would be guilty of insider trading.

Insider trading laws are complex, and it may be hard to determine whether a specific piece of information is considered material. If you have questions, speak to the **Legal Department** before buying or selling stock in Worldpay or any of its customers or business partners.

Policies and Additional Information

- Insider Trading and Disclosure Policy

Avoiding Conflicts of Interest

One of the most important ways we do the right thing for Worldpay is by making sure we are acting without any conflicts of interest. A conflict of interest is any situation that could force us to make a choice between doing what is best for us (or a family member or close friend) and what is in Worldpay's best interest. To ensure we are always acting with integrity, we should avoid conflicts of interest when possible and disclose them to our People Leader immediately if they arise.

Read on to learn more about several common types of conflicts of interest.

Working with Family

One of the most common conflicts of interest can occur when we work with a friend or family member. In most cases, it is fine for our friends and family members to work at Worldpay. However, we should never supervise a friend or family member, as it may be difficult to judge them impartially. Likewise, it is usually fine if a friend or family member works for a company that Worldpay does business with, but we should not have any influence over decisions about whether to do business with that company.

Outside Employment

In general, Worldpay discourages full-time employees from taking on outside jobs, as this can make it difficult to devote enough time and energy to our Company responsibilities. However, if you do wish to take on an outside job, speak to **Human Resources** before doing so. Remember that you have a responsibility to do the right thing for Worldpay, so the outside position should not bring criticism on Worldpay or detract from your Company work. In addition, in order to allow us to make fair and clear choices for the Company, it is never appropriate to work for a Worldpay supplier, customer, or competitor, or to compete with Worldpay.

Personal Investments

To minimize any financial conflicts of interest, we should not hold a substantial investment in a company that competes or does business with Worldpay, unless the company is publicly traded on a national exchange and there is no possibility of a conflict. The investment should not be large enough to give the impression that we would try to take action to help the other company at Worldpay's expense.

Avoiding Conflicts of Interest (Cont.)

Corporate Opportunities

While working for Worldpay, we may learn of business opportunities that we would like to take for ourselves. In these situations, it's important to remember that we have a responsibility to act with integrity and put Worldpay's interests first. We should never take such an opportunity for ourselves without first offering it to Worldpay. If the Company passes on the opportunity, we can then discuss with the Chief Legal Officer the possibility of taking advantage of it ourselves—while making sure that we do not use any of the Company's assets or confidential information inappropriately.

Board Memberships

Worldpay encourages all of us to be active in our communities, and there is generally no problem with serving on the board of directors of a nonprofit organization—as long as we discuss it with the **Legal Department**. But we should not serve on the board of directors of any company that competes or does business with Worldpay, or is a for-profit company, unless we have permission from Worldpay's **Legal Department**. In all instances, these outside activities should not interfere or detract from your work for Worldpay.

Policies and Additional Information

- Conflicts of Interest and Corporate Opportunities Policy

A Closer Look

What Should I Do If I Might Have a Conflict of Interest?

Conflicts of interest are common, and you may even encounter some that aren't described here. If you think you might have a conflict of interest, the best thing to do is disclose it to one of these resources:

- Your People Leader
- Human Resources
- The Legal Department

They can help you find a way to resolve your conflict of interest. Remember: having a conflict of interest isn't necessarily a problem, but failing to disclose it could be.

Doing Business without Bribery

We do business the right way: without bribery or corruption. Accordingly, we never try to gain any undue advantage by giving or receiving a bribe, kickback, or any other corrupt payment.

A bribe can be anything of value that is given to get or keep a business advantage—for example, a gift, a job offer, use of a vacation home, school tuition, or even donations to specific charitable organizations. No matter what form a bribe takes, our stance is always the same: we never offer or accept them. We also steer clear of kickbacks, which are payments made after a deal is finalized.

While bribery can happen in any context, we should be especially careful when dealing with government officials. We must always follow the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and any local anti-bribery laws that apply to working with others including foreign officials. When we work with government officials, we never offer facilitation payments. These are small payments, usually made in cash, to government officials in exchange for routine government services, such as obtaining permits or utility service. No matter how small these payments are, and no matter how customary they may be in some locations, we do not make facilitation payments. In extraordinarily rare circumstances involving imminent threats to life or safety, it may become necessary for you to make a payment to a government official or other person. Providing payments under these circumstances is not considered a violation but must be reported as soon as possible to **Global Compliance**.

There are no loopholes or exceptions to Worldpay's anti-bribery stance. We cannot ask a third party to make a bribe

A Closer Look Government Officials

A government official could be any of these:

- Anyone employed by a government agency or acting on a government agency's behalf
- A member of a royal family
- An employee of state-owned or -controlled businesses
- A political party official or candidate for political office
- Anyone employed by an international agency like the United Nations

Because it's such a broad term, it can be hard to know who is considered a government agent. If you have any questions, contact **Global Compliance** for guidance.

on our behalf, nor can we use our personal funds instead of Company money. No matter what, we never offer bribes to anyone. Anti-bribery laws can have very severe penalties for both our Company and the individuals involved, and it is vital that we understand how to do the right thing when it comes to steering clear of corruption. Speak to your People Leader or **Global Compliance** if you have questions.

Policies and Additional Information

- Anti-Bribery and Corruption Policy



Giving and Accepting Gifts and Entertainment

When we interact with suppliers, customers, and other business partners, we speak for Worldpay. In these business dealings, it is important that our actions always demonstrate our deep sense of integrity and our commitment to doing the right thing. Accordingly, we should always act with the greatest care when offering or accepting a gift or an offer of entertainment.

Gifts and entertainment can be a great tool for building a business relationship, but they should never be—or even seem to be—an attempt to influence a business decision. When offering or accepting gifts or entertainment, keep the following guidelines in mind:

- Only offer or accept items of reasonable value, such as a small holiday gift or an occasional modest meal.
- Never offer or accept anything that could appear to create an obligation for either person.
- Do not exchange gifts with anyone who represents a company that is currently in contract negotiations with Worldpay.
- Never offer or accept cash or cash equivalents (like gift cards).
- Before offering a gift, be sure that it follows the policies of the recipient's company.
- Do not offer anything to a government official, including state-owned entities, without permission from **Global Compliance**.
- If you are attending an industry event, it is generally fine for the sponsor to pay for your travel and lodging, with approval of an executive officer or in the case of the Chief Executive Officer, with approval of the Board.

- All Gifts or Hospitality over \$50/£50 (or local currency equivalent) in value, whether given or received, must be recorded to assist in evidencing that it was not linked to any improper influence in relation to a person carrying out his/her duties and obligations.

If you have questions about how to do the right thing when it comes to gifts and entertainment, speak to your People Leader, **Global Compliance** or the **Ethics Office**.

Policies and Additional Information

- Gifts and Hospitality Policy

A Closer Look

Gifts and Entertainment

The rules around giving and receiving gifts and entertainment can be complicated. Before offering or accepting a business courtesy, ask yourself these questions to determine if it's a good idea:

- Does the other person represent a company that Worldpay is currently in contract negotiations with?
- Is this item in line with the other company's policies?
- Is the gift or offer of entertainment modest and appropriate?
- Could this create—or appear to create—any sense of obligation or unfair advantage?



Watching out for Unethical Business Practices

Doing the right thing for the Company means doing our part to make sure all our customers and third parties are also holding themselves to high standards. When we work with customers, we should always be on the lookout for signs of illegal activity and fraud. If you notice payments to or from suspicious parties, or if something just doesn't seem right, speak to your People Leader or **Global Compliance**.

In particular, we should be aware of the signs of money laundering or transactions with potentially sanctioned parties. Money laundering is a process that seeks to hide money that was made illegally and make it seem like it comes from a legal source. Indications of money laundering include cash payments, making many small payments instead of one large one, overpaying and asking for a partial refund, or purchasing unusual combinations of items. Because of the large number of international companies Worldpay works with, we are in a unique position to notice patterns of transactions that may be signs of money laundering or transactions that may involve potentially

sanctioned entities. If you see something that doesn't seem right, say something.

Policies and Additional Information

- Anti-Money Laundering Policy
- Customer Due Diligence Policy

International Trade Laws

Even though Worldpay does not import or export physical products, we should all know and follow international trade laws that apply to us. Transferring software or certain information to another country may require us to complete import or export paperwork. In addition, we should be aware of trade embargoes or boycotts that may prohibit us from doing business with certain countries or individuals. It's up to us to perform proper due diligence on our international customers, follow all applicable policies, and ask questions if we're not certain what to do.

Modern Slavery and Human Trafficking

Worldpay is committed to preventing the use of slave labor or human trafficking in any part of our business, including in the third parties that support our organization. Worldpay will not condone actions that could contribute to human

rights violations by our own colleagues or our third parties. As part of its Third Party Due Diligence processes, Worldpay assesses the risk of Modern Slavery and Human Trafficking with its third parties.

Speaking on Worldpay's Behalf

As an innovative, industry-leading, global Company, it's natural that Worldpay is often featured in the media and discussed online. It is important that the information Worldpay provides to the public is consistent and appropriate. At times, we may be contacted by an analyst or a member of the media and asked about our work for the Company or other matters related to Worldpay. Rather than providing any information ourselves, we should refer the request to the **Corporate Communications** or **Investor Relations** Department.

Policies and Additional Information

- Speaking with the Media Policy
- Media Inquiries Policy
- Press Release and Public Statement Policy

Using Social Media Appropriately

Many of us are active on social media, utilizing it as a tool for finding information, staying in touch with friends, and connecting with people around the world. However, we should be cautious when speaking about Worldpay online. We should remember to help Worldpay maintain a consistent image online and protect the Company's information.

Policies and Additional Information

- Social Media Policy

A Closer Look

Social Media

It's not always easy to know what is OK to post on social media. Here are some rules to follow.

- It is fine to discuss general information about your job, but be careful not to reveal any confidential information. That includes information about Worldpay's financial performance, customers, or new innovations, just to name a few examples.
- Avoid speaking on behalf of the Company, and do not correct any misconceptions or false information about Worldpay—even if you are sure you have the right information.
- If you are posting about topics related to Worldpay or the work you do for our Company, specify that your opinions are your own and do not represent Worldpay.

Keeping Records Accurate and Up to Date

Business records tell the story of our Company. Records include any documents we create as part of our work for Worldpay, such as financial statements, timesheets, expense reports, invoices, emails, and many others. Our Company uses these records as the basis for its business decisions, so it is important that they are always accurate, honest, and up to date. We should never create dishonest or false records of any kind, whether that means falsifying financial earnings or simply adding a few extra hours to our timesheet. No matter what work we do for the Company, the records we create are key to the Company's success, and they must be accurate.

Keeping accurate records also means managing those records correctly. We should keep records for as long as they are needed, according to our records management policies, and then destroy them correctly. Doing so makes it easier to find information when we need it.

Policies and Additional Information

- Document Retention Policy
- Records Retention Schedule
- Email, IM, and Voicemail Retention Policy



Investigations and Audits

At times, we may be asked to provide records as part of an investigation or audit, or we may receive a records hold request. We want to provide complete and honest information in these situations. If you have received this type of request, contact your People Leader or the **Legal Department** for guidance, and never destroy or alter any records related to an investigation, audit, or hold.

Championing Our Customers



Bringing Our Best and Competing with Integrity
Honesty in Sales and Marketing

Protecting Customers' Information
Providing Outstanding Services

Bringing Our Best and Competing with Integrity

Around the world, our customers count on us to help them break through borders and obstacles to help their businesses grow. We are passionate about this mission, and we are determined to help our customers succeed. As part of this commitment, we support fair competition in the marketplace so that our customers can have excellent services and an outstanding experience. We bring our best, and we want everyone to do the same.

We believe that we offer the best services, and we compete vigorously to win customers—but always within the bounds of antitrust laws. Antitrust laws (also called competition laws) can vary based on where we work, but they generally forbid any activity that limits competition in the marketplace.

We should carefully avoid discussing anti-competitive actions—or anything else that would unfairly manipulate the market—with a competitor. Be especially careful at trade conventions or industry meetings. If you find yourself in a conversation about an anti-competitive topic, make it clear that you don't agree with what is being discussed—and leave immediately and report the incident to the Legal Department.

Antitrust laws are very serious, and just the appearance of an agreement to do something illegal, even if no action is taken, may have consequences. Speak to the **Legal Department** if you have questions about antitrust laws.

Policies and Additional Information

- Antitrust and Fair Competition Policy
- Competition Law Policy
- Fair Dealing Policy

A Closer Look

Competing with Integrity

Antitrust laws prohibit anti-competitive activities—but what does that mean? Here are some examples of activities that violate antitrust laws.

- Price fixing
- Dividing or boycotting customers or suppliers
- Tying or bundling products or services
- Bid rigging
- Taking advantage of a dominant market position

At Worldpay, we hold ourselves to even higher standards for fairness and integrity when we deal with suppliers, customers, competitors, and anyone else. We never engage in any of the following practices:

- Manipulating anyone
- Concealing or abusing information
- Using any dishonest or deceptive practice to gain or keep business. We are determined to do business fairly

Bringing Our Best and Competing with Integrity

(Cont.)

Honesty in Sales and Marketing

Our commitment to fair and honest business practices also extends to how we talk about our Company and our services. Our sales and marketing materials should present the true benefits of Worldpay services without speaking unfairly or untruthfully about our competitors. In our sales and marketing activities, we are always honest, and we never make untrue statements to try to win business. Likewise, we always act ethically in our sales activities, and we never try to unfairly influence a customer or business partner. We strive to offer our customers services that are the best fit for their needs, and speaking honestly is the best way to make sure we can do that.

In this same spirit, we do not misuse any competitors' confidential information we may have access to, such as information about their products or services that isn't available to the public. That includes information given to us by a current or former employee of a competitor. We can never use this information in our marketing materials or in our business decision-making process. If you receive another company's confidential information, speak to your People Leader or the **Legal Department** immediately.



Protecting Customers' Information

Many of us have access to confidential information about our customers, such as their contact information or details about their business. We use this information to help customers utilize our services and make good decisions for their organizations—never for any unauthorized purpose. If you have access to a customer's confidential information, protect it like you would Worldpay's information. Never allow anyone to access it who doesn't have a business need to know it, and do not use it for any unintended purpose.

Just as Worldpay's confidential information is key to our Company's success, the same is true for our customers and their information. To help them succeed, we must make sure their information is safe.

Policies and Additional Information

- Global Data Privacy Policy
- Privacy Notice

Providing Outstanding Services

Customers count on Worldpay to be their partner for connected commerce and help them make and accept payments around the world, and we are determined to live up to that expectation. We ensure that our services are

always of the highest quality and always appropriate for the customer. We work diligently to find the best solution for each customer's needs.

Championing Our Communities

Supporting Our Communities
Participating in the Political Process



Supporting Our Communities

Just as we use our talents and abilities to make Worldpay a great place to work, many of us also invest time to inspire change and growth in our communities. Worldpay encourages us to volunteer for and donate to causes and organizations in our communities that interest us.

Worldpay provides the opportunity to participate in approved volunteer and donation programs. Unless done in accordance with an approved program, we should use our own time and resources for such activities, never Company resources. We should follow all Company policies that apply to us and never give the impression that our activities represent Worldpay, unless we have permission to do so.

Just as we can each make a difference in our communities, we each have the power to make a positive impact on our environment. We do our part to protect the environment and use resources wisely. We dispose of any hazardous materials according to local laws, and we strive to decrease our environmental impact in every way we can. We're always looking for simple, elegant solutions to solve environmental problems and reduce our resource consumption where we can. If you have an idea for making Worldpay more environmentally conscious, speak to your People Leader.

A Closer Look



Volunteering in Our Communities

When we volunteer for charitable causes, we should avoid using Company resources without permission. Here are a few ways to do that.

- Avoid using Worldpay's assets for your volunteer activities, such as making copies of fliers or using your work phone to make calls related to your volunteer activity.
- Do not collect donations for your organization in the workplace, unless you have permission in advance.
- When volunteering, do not say or imply that you are working on behalf of Worldpay or with Worldpay's endorsement unless you have permission.

Participating in the Political Process

Just as we may be deeply involved in charitable activities in our communities, Worldpay knows that many of us also choose to participate in the political process through volunteering, making donations, or other activities. It is fine to do this on our own time and with our own resources, but we should not use Company resources to support any candidate or cause or give the impression that our personal involvement indicates Worldpay's endorsement, unless we have permission from Worldpay. Worldpay does have a Political Action Committee (PAC) which colleagues are welcome to contribute to. However, no colleague is obligated to contribute to the PAC. If you work with government officials on Worldpay's behalf, be sure that you know and follow all laws related to lobbying, anti-bribery, and limits on gifts and entertainment. If you have questions about lobbying, political involvement or the PAC, speak to your People Leader or the **Legal Department**.

Policies and Additional Information

- Political Activity Policy

