

worldpay

# Code of Business Conduct and Ethics

Our Code, our way: customer-centric integrity



# We are Worldpay

In today's fast-evolving world, the way people make payments is constantly changing. At Worldpay, we are at the forefront of these changes, empowering our customers' transactions and unleashing their potential.

We are more than just a service provider; we are a true partner. From large global corporations to small local merchants, we serve each one with the Worldpay commitment to care, integrity, and dedication. Our Code of Business Conduct and Ethics ("Code") is our guiding principle, ensuring we uphold these values and do the right thing in every aspect of our operations.

This Code is your guide to embracing a sense of ownership at Worldpay. It outlines our expectations for every team member and the laws and policies we must all adhere to. It also provides guidance for making sound decisions when challenges arise and finding support when needed.

Our values of **Think like a customer, Act like an owner, and Win as a team** are at the heart of everything we do. By thinking like our customers, we anticipate their needs and deliver exceptional service. Acting like owners means taking responsibility and making decisions that benefit our company and those we serve. Winning as a team emphasizes collaboration and unity, driving us toward shared success.

Remember, together, we are Worldpay. By acting with purpose and understanding the impact of our actions, we strengthen our company and the communities we serve.

Your actions matter, and you matter at Worldpay. By committing to our Code and living our values, you help ensure our continued success and readiness for the future, no matter how payment methods evolve.

**Charles Drucker**

Chief Executive Officer



# Our values in action

Our values truly set us apart. They inspire everything we do for each other and help us zero in on doing business the right way — for Worldpay and our customers. You can see these values in action all day, every day at Worldpay, because that's what we expect from ourselves and everyone we work with.



## Think like a customer

Excellence starts with understanding each other. We ask the right questions — listening and learning to get better every day. We simplify the complex and are trusted to deliver solutions that add value and create a bigger impact for our colleagues and customers.



## Act like an owner

We stay agile. Each one of us is responsible for driving success. We use our initiative, taking calculated and thoughtful risks to progress. We champion our ideas and stay flexible to make them happen. We know that every action adds up.



## Win as a team

Unlocking potential takes working as one global community. Staying united by our purpose to achieve our collective goals. We collaborate, encouraging others to perform at their best, welcoming new perspectives. We stay open — winning and growing, as a team.

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# The way we work

Worldpayers are team players —  
following shared values.

Our Code is our guide.

Getting to know the Code | Understanding our responsibilities | Choosing what is right | Sharing concerns



# Getting to know the Code

How many companies can say they power the global economy? At Worldpay, we actually do. We're the trusted partner of businesses everywhere. They look to us for the expertise and solutions that make their work simpler and more successful. The way we get those results matters — to them and to us. That's why our every action, decision, innovation and conversation must always reflect our [values](#).

To truly put our values in action, start with our Code of Business Conduct and Ethics. Read it, understand it and live it. It helps draw the connection between **what we do** and **how we do it**.

In the Code, you'll find guidance on how to work "the Worldpay way," with:

- Descriptions of everyday situations you might face
- Ethical ways to solve these dilemmas
- Simple definitions of complex terms
- Links to policies for additional information

It's not possible for the Code to cover every scenario you may face on the job. But it does provide a list of [resources](#) if you need guidance. No matter your question, there is something or someone referenced in the Code to help you find the answer.

Our Code is the foundation of Worldpay's [Business Ethics Program](#), so refer to it often. It's your best tool in our shared commitment to not just innovate, but to innovate with impact and integrity.

**Everyone** at Worldpay must follow the Code, including all:

- Worldpayers
- Directors

The spirit and principles of the Code also apply to all Worldpay relationships, including:

- Contractors
- Consultants
- Representatives
- Suppliers
- Vendors
- Merchants
- Any other third parties

In short, if you're reading this Code, chances are it applies to you!

## What if the Code is violated?

The company takes violations of the Code very seriously. Violations can lead to disciplinary action, even termination of employment, in line with local laws.

Some examples of conduct that could lead to disciplinary action include:

- Violating company policies
- Violating local laws or regulations
- Engaging in criminal conduct
- Having an interest that conflicts with Worldpay's interests
- Falsifying company records
- Engaging in abusive or retaliatory conduct, including threats, harassment or discrimination

Remember, when you agree to follow this Code, you also agree to follow Worldpay's policies.

## Did you know?

### The Code is:

- Available to Worldpayers in multiple languages
- Reviewed annually and periodically updated to align with Worldpay's policy management processes
- Occasionally revised or supplemented by Worldpay based on changing regulatory guidance or other factors affecting our business environment

# Understanding our responsibilities



## If you're a Worldpayer:

- Turn our [values](#) into actions in everything you do.
- Be accountable, always following our Code, our policies and the law.
- Understand that we expect you to uphold our values no matter your role, location, job duties or work environment.
- Ask questions if any legal or ethical responsibility isn't clear.
- [Speak up](#) about any seen or suspected violation of our Code, policies or the law.



## If you're a manager:

- Model our Code.
- Learn the Code so you can answer questions.
- Talk up the Code, or topics in the Code, whenever you can.
- Create a safe space for others to speak up.
- Escalate Worldpayers' concerns when necessary.



## If you're a financial leader, also:

- Know and follow our disclosure controls and all applicable procedures.
- Provide full, fair, accurate, timely and understandable disclosures. Consult with colleagues or seek other appropriate guidance when needed.
- Notify the [Ethics Office](#) and/or Audit Committee of the Board of Directors with concerns regarding the recording, processing, summarizing and reporting of financial data, including any:
  - Issue with the design or implementation of internal controls
  - Fraud that involves management or other colleagues with significant roles in finance

## Financial leaders include our:

- Chief Executive Officer
- Chief Financial Officer
- Chief Accounting Officer
- Controller
- Others performing similar functions

**Note:** The Audit Committee will determine appropriate actions to be taken in case a financial leader violates this Code.

Any waiver of or amendments to the Code regarding a financial leader must be approved by the Audit Committee and promptly disclosed as required under applicable law, rule or regulation.



# Choosing what is right

If you're ever unsure what to do in a certain situation, start by asking yourself:

Is this action legal?

Does it align with our Code  
and policies?

Am I putting our values  
in action?

Am I acting like an owner?

Would I be proud if this "went  
viral" on social media or  
made newspaper headlines?

If the answer to any question is  
**"no,"** stop. Don't take the action.

If you can answer **"yes"** to every  
question, then you can proceed  
with confidence.

If you're still **unsure**, pause,  
and seek guidance from the  
[Ethics Office](#).



# Sharing concerns

When you act like an owner of your company, you speak up for it. Sharing concerns is one of the best ways you can give life to our [values](#) and protect Worldpay, our customers and each other. After all, we can only address the ethical issues we know about.

Speak up about any behavior that may be violating the law or our:

- Values
- Code
- Policies
- General sense of what's right

It's not always easy to know when to speak up. But if there's ever a doubt in your mind, it's always best to say something. That's how we uphold our Code. It also helps us tackle minor issues before they become major issues and create a better workplace for us all.



## How to speak up

To report concerns or determine the right course of action, contact:

- Your manager
- The [People and Culture Team](#)
- The [Ethics Office](#)
- The Ethics and Integrity Line, which is available either:

### Online

or

**By phone.** Visit [Worldpay Ethics and Integrity Line Telephone Numbers](#) to find the best phone number for you.

Note that all calls to the Ethics and Integrity Line are answered in English, but most other languages are supported.





## How it works

All reports of violations are reviewed and evaluated by the [Ethics Office](#) so they can be addressed appropriately.

If we contact you to help with an investigation:

- Cooperate fully.
- Be truthful and forthright.
- Keep the process as confidential as possible.

Investigations help us develop new compliance initiatives, such as training, ethical risk assessments, awareness campaigns and other Worldpay programs aimed to detect, prevent and reduce misconduct.

We also share investigation metrics with the Audit Committee of the Board of Directors every quarter. The Ethics Office uses this data to track and understand global risks, trends or challenges and identify ways to mitigate them.

## No retaliation

We don't tolerate any form of retaliation (such as a demotion or firing) against anyone who participates in an investigation or speaks up in good faith.

Good faith means that, based on the information you had at the time, you had reason to believe that what you reported was true.

Sharing concerns in good faith is a great example of how you can work the Worldpay way — aligned with our values and committed to doing what's right. We also recognize it takes courage to speak up, and when you do, you deserve our gratitude and protection.

## Policy connection

[Speak-Up Policy](#)

[Corporate Citizenship Policy](#)







# The way we treat each other

People are the core of what  
we do at Worldpay.

Respect, protect and help each other.

Promoting inclusion for all | Maintaining a respectful workplace |  
Keeping our workplace healthy and safe



# Promoting inclusion for all

Being a Worldpayer means you belong. We value everything that makes you ... you. Your talents, beliefs, background and experiences — they are what makes us a winning team. We want to make sure you feel supported in what you do and who you are. That's why we're committed to fair employment practices, promoting inclusion and preventing discrimination — to create an environment where everyone has an equitable opportunity to succeed.

## Focus on fair treatment and full participation.

Every Worldpayer is unique — each with their own combination of **characteristics, including those protected by law**. These differences inform how we look at the world and how we think and approach problems. To bring out the best in our team:

- Welcome different viewpoints and perspectives.
- Base **employment decisions** on objective criteria.
- Help ensure reasonable accommodations for:
  - Religious beliefs and practices
  - Disabilities
  - Pregnancy, childbirth and related medical conditions

### Protected characteristics include:

- |                         |   |
|-------------------------|---|
| • Race and/or ethnicity | • National origin or ancestry               |
| • Color                 | • Veteran or military status                |
| • Gender                | • Pregnancy                                 |
| • Gender identity       | • Physical or mental disability             |
| • Gender expression     | • Genetic information                       |
| • Sexual orientation    | • Any other characteristic protected by law |
| • Age                   |   |
| • Religion or belief    |   |

### Employment decisions include:

- |                |                |
|----------------|----------------|
| • Recruitment  | • Development  |
| • Selection    | • Evaluations  |
| • Hiring       | • Advancement  |
| • Promotion    | • Demotions    |
| • Transfer     | • Discipline   |
| • Compensation | • Terminations |



## Include everyone and help them thrive.

Inclusion is about fairness, respect and trust. To promote it at Worldpay:

- Practice empathy and understanding in your everyday actions.
- Work to uncover and correct any personal bias, whether conscious or unconscious. Base your decisions on legitimate business reasons.
- Celebrate your colleagues' achievements. Remember, **we win as a team**.
- Build your own skills through internal training and related programs.



### Reality check

**Q:** My team is interviewing two candidates with similar qualifications. My coworker suggested we select the applicant whose personality is a better fit. Good idea?

**A:** It depends. Worldpay is committed to providing an inclusive environment. Make sure bias isn't steering your coworker in the wrong direction. Belonging at Worldpay isn't about fitting in. It's about being accepted for who you are. When we build an inclusive workforce that fully reflects the markets we serve, we better champion our clients' needs. Base your decision on legitimate business reasons.

### Policy connection

Refer to your country Employee Handbook

Refer to your country Employee Handbook's Equal Employment Opportunity (EEO) Policy Statement

[Corporate Citizenship Policy](#)



# Maintaining a respectful workplace

Every day you work at Worldpay, you should feel safe, valued and respected, so we never tolerate **harassment**, bullying or abuse.

To protect all Worldpayers and ensure a safe and productive environment, we respond quickly and consistently to concerns of mistreatment. **We win as a team.**



## Be kind and courteous.

You can help Worldpay promote respect:

- Show consideration, no matter our differences.
- Use care in your interactions and treat everyone with dignity.
- Avoid harassment in all its forms. Harassment:
  - Can be verbal, visual, physical or sexual
  - Can be aimed at someone of the same or a different sex or gender
  - May occur either directly or indirectly, or in person or online
  - Could involve coworkers or anyone who works with us or on our behalf
  - Could happen on company property or at work-related functions

**Harassment** is conduct that's so intimidating, hostile or offensive, it could either:

- Interfere with how someone does their job, or
- Create a hostile work environment

### What can harassment look like?

- Inappropriate communications (such as insults, ridicule, slurs, etc.)
- Yelling or emotional outbursts
- Profanity
- Throwing objects
- Slamming doors
- Physical or any form of intimidation or aggression
- Inappropriate gestures
- Threats made against others





## Take a stand.

You have the power to stop harassment — when you speak out against it. If you're ever in a situation where you see, suspect or experience mistreatment, don't ignore it — speak up. Ask the person to stop.

While speaking directly to the person is a powerful first step, we know it may not be easy. If you prefer, you may also reach out to our People and Culture Team or the [Ethics and Integrity Line](#) for support.

### Reality check

**Q:** One of my colleagues repeatedly compliments my appearance. I know there is no harm meant, but I don't feel comfortable. Am I just being too sensitive?

**A:** No, you're not. Try speaking to your colleague and explaining that these compliments make you feel uncomfortable, and you want them to stop. If the situation continues or if you're uncomfortable addressing the concern directly, report the problem.

### Policy connection

#### [Speak-Up Policy](#)

Refer to your country Employee Handbook's Harassment and Discrimination Free Workplace Policy Statement

# Keeping our workplace healthy and safe

We believe a safe workplace is a must-have for everyone at Worldpay. For us, that means helping Worldpayers adopt safe and healthy habits. It also means taking ownership and speaking up about any situation that could put you or anyone else at risk.

A critical first step is following all applicable safety laws, regulations and policies to maintain a workplace where each of us can be productive and successful.

## Make safety your responsibility.

We're all accountable for safety at Worldpay. To do your part:

- Get to know our emergency preparedness plans.
- Complete any required safety or security training.
- Follow the safety and security requirements that apply to you and your job.
- Watch for, and speak up about, any hazards.

## Stop violence in its tracks.

Violence has no place at our company. We don't tolerate it. Strengthen our physical security by reporting any strangers, suspicious activity or threats in the workplace to Corporate Security Team.

## Come to work, ready to work.

If you're not at your best, you're not giving our customers your best. Substance abuse can compromise your performance and put everyone at risk. Never work under the influence of alcohol or illegal drugs.

### Reality check

**Q:** I noticed that one of my colleagues has started regularly slurring their words. They don't normally talk this way, and I'm starting to wonder if substance abuse is involved. I don't want to get them in trouble, but I feel like I should say something to my manager. Should I?

**A:** Yes. Speak to your manager, another manager or another company resource such as the People and Culture Team or the [Ethics Office](#) about the situation. As needed, they can bring together the right resources and take the appropriate steps to address the issue. While Worldpay permits anonymous reports through the [Ethics and Integrity Line](#), as per local laws, we encourage you to share your identity if you're comfortable doing so. We investigate sensitively with appropriate confidentiality. And we have zero tolerance for retaliation.

### Policy connection

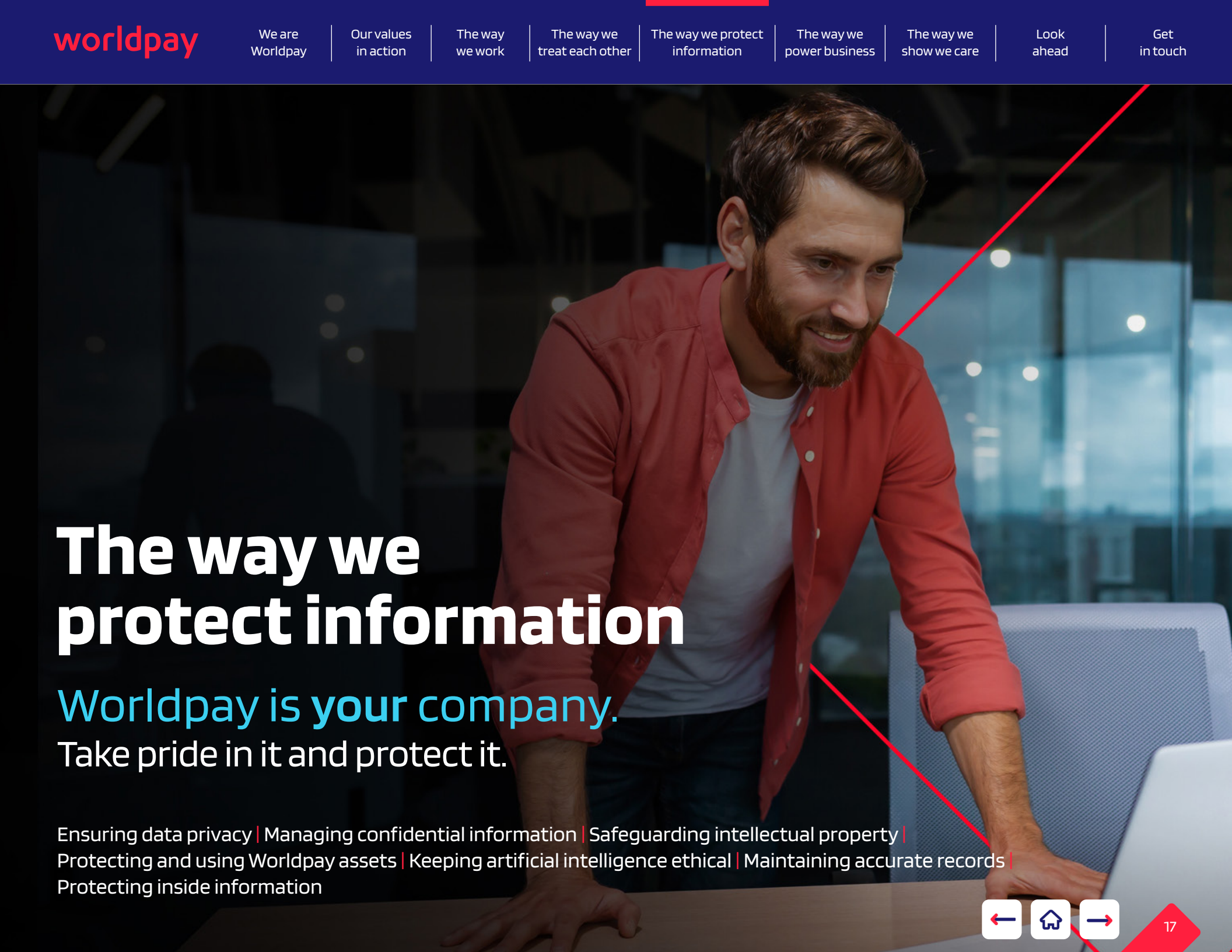
#### [Speak-Up Policy](#)

Refer to your country Employee Handbook's Drug and Alcohol Policy Statement

Corporate Safety Policy

Corporate Security Policy





# The way we protect information

Worldpay is **your** company.

Take pride in it and protect it.

Ensuring data privacy | Managing confidential information | Safeguarding intellectual property |  
Protecting and using Worldpay assets | Keeping artificial intelligence ethical | Maintaining accurate records |  
Protecting inside information



# Ensuring data privacy

Privacy is not optional. Anyone who shares personal data with Worldpay, whether it's our customers, colleagues or third parties, should be able to trust us to protect it. Many of us may have access to personal data through our jobs, and we have an obligation to keep it safe from unauthorized use and disclosure and always follow the law and our policies to protect the privacy of those whose data we handle.

## Know what's personal.

We use our customers' personal information to help them choose the best services for their organizations and make smarter decisions. We use Worldpay's personal information to support their employment at Worldpay. And we use third parties' personal information to build our partnerships. In every case, for every individual, we honor, respect and protect their **personal data**.

## Handle with care.

Personal data is **confidential information**, so treat it with the same high standard of care. Whether you're collecting, accessing, using, sharing, storing, retaining or deleting personal data, always follow applicable data privacy laws, regulations and Worldpay policies. For more information on how Worldpay processes personal data, please visit our Worldpay [Privacy Center](#).

## Let us know about privacy incidents.

We need to know when personal data has been either:

- Used for an unauthorized purpose, or
- Accessed by an unauthorized person

**Personal data** is any information that can directly or indirectly identify a person, including:

- A phone number
- An employee ID number
- A bank account number
- A credit card number
- An email or IP address

Privacy incidents are serious — they can lead to accidental or illegal destruction, loss, alteration or disclosure of personal data. If you're aware of a possible privacy incident, report it immediately to the Privacy Incident Response Team (PIRT).

## Reality check

**Q:** I received an email that wasn't meant for me. It includes a list of colleague names and salary information. I don't want to get anyone in trouble, but I know this is personal data that was sent to the wrong person. What should I do?

**A:** Don't read it or share it with anyone else. Let the sender know the email went to the wrong recipient and delete it. Also, immediately report the privacy incident (and any actual or potential privacy incident you become aware of) through the PIRT form here. If you have any general privacy-related questions, you may email the Privacy and Data Protection Office directly.

## Policy connection

Acceptable Use Policy

Privacy and Data Protection Policy

[Corporate Citizenship Policy](#)

Enterprise Data Policy

Data Retention Policy

Records Retention Schedule

# Managing confidential information

Confidential information isn't just a secret — it's a critical asset at Worldpay. When we manage it responsibly and protect it, we also protect our competitive advantage in the marketplace. We need to know what kind of information is confidential and how to keep it safe.

If confidential information is compromised, it can harm our reputation and relationships. For that reason, we learn to recognize confidential information, ask questions, and until we know for sure if something is confidential, we treat it as though it is.

## Know what's confidential.

Confidential information is nonpublic information about Worldpay and other third parties. It includes:

- [Intellectual property](#)
- [Personal information of customers, Worldpayers and third parties](#)
- Business and marketing plans and client lists
- Business records, financial forecasts and pricing data

**Intellectual property** includes: inventions, improvements, ideas, information, data, software, models and programs together with the related materials, documentation, patents, trademarks, trade secrets, know-how, copyrights and all other related rights.

## Keep it confidential.

Follow our policies and procedures to lock down confidential information. This includes safeguards such as:

- Labeling it properly
- Using it only as needed for your work at Worldpay
- Sharing it only with those who are authorized to see it and have a legitimate business need for it
- Never discussing or displaying confidential information in public places (such as elevators, restaurants and public transportation)

## Use your voice.

If you suspect that confidential information has been compromised or mismanaged in any way, report it immediately to your manager, the Privacy and Data Protection Office, the [Ethics Office](#) or here to report a privacy incident.

### Reality check

**Q:** One of my colleagues used to work for a competitor and offered to tell me about some new services their former employer is developing. Is that OK?

**A:** No, it's not. It's OK to share general knowledge and skills learned from an old job. But new product or service ideas (including things like data, documentation and ideas, together with the related materials — called "work product") would be confidential. Your new colleague has a responsibility to protect that information — just as you would have a responsibility to protect our confidential information should you ever leave Worldpay.

### Policy connection

Acceptable Use Policy  
Privacy and Data Protection Policy  
Enterprise Data Policy  
Data Retention Policy  
Records Retention Schedule

# Safeguarding intellectual property

One of the things that makes Worldpay unique and competitive is our intellectual property ("IP"), which is vulnerable to unauthorized use or disclosure. Our [values](#) call on each of us to become good stewards of this intangible and valuable information and do our part to keep it secure. This means following Worldpay's policies and procedures to identify and safeguard IP.

## Recognize IP.

Be able to identify the company's actual or potential IP, keeping **common examples** shown on this page in mind, so you can look out for it and protect it.

## Lock down IP.

You can help protect our IP by:

- Notifying our IP Counsel about the existence and development of IP assets and notifying our IP Counsel or the [Ethics Office](#) about any potential infringement or misuse of IP assets
- Preventing unauthorized use and disclosure by never transferring IP to a personal account or any other third-party account
- Using IP properly, including in licensing and other transactions
- Immediately requesting a clearance search from our IP Counsel when creating or using a new brand name for a product or service to make sure that name doesn't already belong to a third party
- Contacting our IP Counsel for assistance before creating a new invention, system or process, when we know a third party already has IP rights related to that invention
- Protecting the intellectual property of others as if it were our own

### Common examples of IP include:

- Inventions
- Improvements
- Ideas
- Information
- Data
- Software
- Models and programs, together with the related materials
- Documentation
- Patents
- Trademarks
- Trade secrets
- Know-how
- Copyrights and all other related rights

## Respect IP rights.

Understand when Worldpayers or contractors develop IP as a part of doing business, Worldpay usually owns those IP rights exclusively. This is true whether or not the IP was developed during working hours, on company premises or using company material or resources. Also remember that you have a responsibility to respect third parties' IP rights as well as ours.

### Reality check

**Q:** Another colleague in my department has a software application that I need to do my work. Since there's a freeze on asset purchases right now, can I just copy the software application and then buy it when the freeze is lifted?

**A:** No. We don't permit any unauthorized copying of software.

# Protecting and using Worldpay assets

It takes a vast array of assets to help Worldpay run our business and keep us winning as a team. Office supplies, furniture, equipment, computer hardware and software — even our access to the internet, the Worldpay intranet and business software programs — are all company assets that we must use properly and protect from fraud, waste and abuse.

Our good stewardship of these assets today helps ensure they'll be there for us tomorrow and beyond.

## Protect our physical assets.

For us, being a good steward means using Worldpay assets to carry out Worldpay work, not using them for personal interests. It doesn't matter where you are working (whether remotely or in a Worldpay facility), your use of these assets should never put them at risk, violate the law or our policies or interfere with your work.

Be aware that Worldpay may access and use any colleague communication records. You should have no expectation of privacy when communicating through Worldpay systems, including but not limited to computers, mobile devices, email, and the internet. All activities conducted on company systems may be monitored, recorded, and subject to review. Exceptions may apply where prohibited by applicable law.

## Protect our electronic assets.

Staying connected to our clients, third parties and each other is essential at Worldpay. Our hardware, software and network access are the tools that keep us connected. Safeguard them by practicing good cybersecurity:

- Create strong passwords, and don't share them with anyone inside or outside of Worldpay.
- Use only software that's been properly licensed.
- Don't download any applications or programs without approval.

- Be alert to phishing attacks; don't open email attachments from unknown senders or click on suspicious links.
- Don't send Worldpay confidential data to your personal email or use unauthorized flash drives or devices to transfer them. If you have any questions, contact the Information Protection and Insider Risk (IPIR) Team.
- Don't let others, including colleagues or family members, use the assets assigned to you.
- Lock your computer anytime you step away and log off at the end of your workday.
- Immediately report a lost or stolen device to the Corporate Security Team.

### Reality check

**Q:** Sometimes at lunch, I visit websites that some people might consider obscene or inappropriate, but I never let this activity interfere with my work, and I would never forward a link or information about these websites to any of my colleagues. Is that OK?

**A:** No. It's never OK (at lunch or at any other time) to use Worldpay computers or network systems to visit or view inappropriate content. We count on every Worldpayer to use our systems responsibly.

### Policy connection

Acceptable Use Policy

Corporate Security Policy

Refer to your country Employee Handbook's Virtual Working Policy Statement

Open Source Software Policy



# Keeping artificial intelligence ethical

Artificial intelligence ("AI") is evolving rapidly. As it works its way into our lives and our business at Worldpay, we welcome the possibilities it brings to better serve our customers. At the same time, we're approaching AI with caution, using and developing AI tools, including Generative Artificial Intelligence ("Gen AI"), with a focus on responsible and ethical use to protect our customers, our information and our reputation.



## What is Generative AI?

It's a form of AI that can create original, creative content using computer algorithms and data. We only use Gen AI tools to enhance our work at Worldpay — not to completely do it for us. We see Gen AI as a supplement — not a replacement for people or human oversight.

## Innovate ethically.

Not every Worldpayer may use or develop AI or Gen AI. If you are authorized to use AI for your work, it is essential that you only use Worldpay-provided accounts and tools. Before implementing and using a new AI tool, you must:

- Get approval from the Data and AI Use Review (DAR) Committee

Your use must also:

- Reflect our [values](#)
- Comply with the law and Worldpay's policies and ethical principles

## Watch what you put into AI.

AI and Gen AI tools are always learning and consuming any information they're given. We need to make sure AI tools are trained with reliable information. If you ever put information into a public AI tool, you also run the risk of it being seen by others, so never put [confidential information](#), [intellectual property](#) or [personal data](#) into such a tool.

## Check what AI produces.

Having human oversight helps us ensure that we're using Gen AI tools ethically, they're continuing to provide accurate output, and they're not built with or showing bias. Check to make sure AI output is accurate. If you write code or develop software for Worldpay, never input AI-generated code into a Worldpay solution.

## Reality check

**Q:** I'm writing content for a press release about a new Worldpay solution, but I'm stuck on what to say. If I remove references to Worldpay and the new solution, would it be OK to input what I've written into a public AI tool and see other suggestions?

**A:** No, it is prohibited to input any Worldpay internal or confidential information into a public AI tool or on a personal device. On a Worldpay device, Worldpay blocks unauthorized AI tools. Remember, you have a responsibility to protect Worldpay's information from unauthorized disclosure. For questions on permitted AI tools, please contact the DAR Committee. Further, if a tool you use adds an AI feature, also contact the DAR Committee before using.

## Policy connection

Enterprise AI and Model Policy



# Maintaining accurate records

Our records provide critical evidence of Worldpay's operations, get us asking the right questions, give us a better understanding of our customers and help us comply with policies and laws.

Every Worldpayer is responsible for handling company records with care and ensuring they accurately reflect the work we do.

## Make every entry accurate.

To help ensure our records are accurate and reliable:

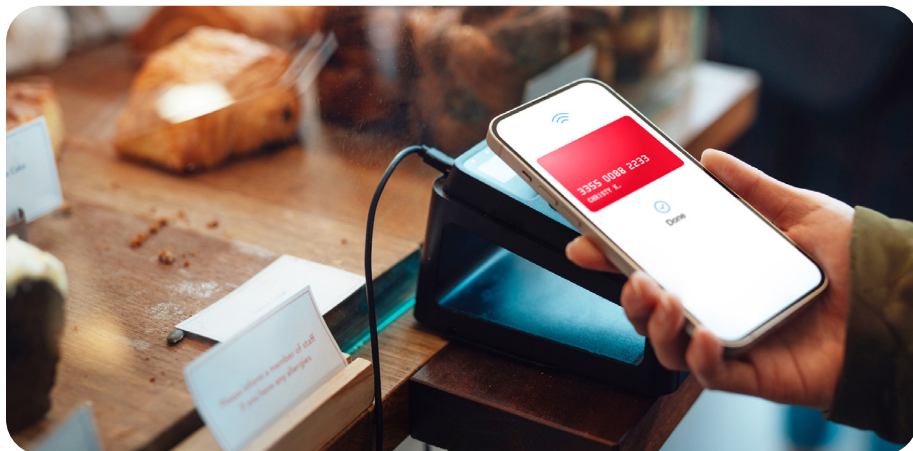
- Record entries accurately (including time, cost or expenses).
- Follow generally accepted accounting practices.
- Never alter, destroy or falsify any record or make misleading entries.
- Be ready to support your entries with documentation, including receipts or invoices.
- Watch for and speak up to the [Ethics Office](#) immediately if you see suspicious activity, such as:
  - False entries
  - Unrecorded funds or payments
  - Omissions
  - Misleading statements

### What are our records?

Records take many different forms, but they include:

- |                                 |                      |
|---------------------------------|----------------------|
| - Invoices                      | - Regulatory filings |
| - Purchase orders               | - Time sheets        |
| - Capital expenditure approvals | - Sales data         |
| - Expense reports               | - Quality reports    |





## Make honest disclosures.

If you are responsible for providing information to government or regulatory authorities:

- Follow our policies and internal controls.
- Make sure any information you provide gives an accurate picture of our financial position.
- Ensure our disclosures are complete, fair, accurate, timely and clear.
- Cooperate fully with any government audit or investigation.

## Manage our records with care.

To help make sure our records are readily available when we need them:

- Carefully follow our policies and schedules for storing, retaining and disposing of our records, no matter what form they take.
- Properly destroy documents that are scheduled for disposal.
- Give special consideration to documents that are subject to a legal hold and retain them in a secure place. Never dispose of these documents unless you are authorized. Contact the [Ethics Office](#) for guidance.
- Remember, the law requires us to maintain certain types of records for certain periods of time. If you're not sure about which records to retain or how long to retain them, ask your manager.

## Reality check

**Q:** I pointed out an accounting irregularity to a colleague — payments being made to a supplier without corresponding invoices. My colleague offered to take care of it and told me to forget about it. Should I?

**A:** No, you shouldn't. It's possible you have uncovered activity that violates our policies and the law, and it's important we know about it. Don't ignore this. [Speak up](#) immediately to your manager and contact the Ethics Office.

## Policy connection

[Speak-Up Policy](#)

[Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#)

Data Retention Policy

Refer to your country Employee Handbook





# Protecting inside information

A thriving marketplace is a fair marketplace, where everyone has equal access to investing information. We foster trust in the marketplace by never buying, selling or holding ("trading") securities (such as stock) when we have inside information. We also never share ("tip") inside information with others so they can trade.

## Understand inside information.

Your work at Worldpay can expose you to inside information, which is both:

- Material, meaning it could affect the price of a security (often stock) of a company, and
- Nonpublic, meaning it hasn't been released to the public

Trading and tipping on inside information, whether it deals with Worldpay or another company, are illegal forms of insider trading.

The first step in avoiding insider trading is learning to spot inside information. Some examples include nonpublic information about pending:

- Legal proceedings
- Earnings releases
- Changes in leadership
- New services or solutions
- Updates to rates

Keep in mind, these are just a few examples. Inside information can take many forms. If you are unsure if something is inside information, treat it as though it is until you confirm otherwise. You may also ask the [Ethics Office](#) for assistance.



## Reality check

**Q:** I have learned from one of our vendors that it is about to acquire another one of our vendors. While I know I can't use this information to buy securities in this vendor, would it be OK to advise my spouse to invest?

**A:** No. The vendor has given you material, nonpublic information. You may not trade in securities of that vendor or "tip" anyone else to do so. This would violate both securities laws and our policy. You can only trade securities after the information about the acquisition is made public.

# The way we power business

We power transactions.

You power Worldpay. Give us your best.

Avoiding conflicts of interest | Ensuring ethical communications | Marketing and advertising responsibly |  
Preventing bribery and money laundering | Exchanging gifts and entertainment responsibly | Competing fairly |  
Doing business around the world | Building strong third-party relationships |  
Cooperating with investigations and audits



# Avoiding conflicts of interest

What makes our culture great? The diverse strengths and passions of our workforce. Each of us has different interests and personal pursuits, but we make sure our outside interests never interfere with our business decisions because that would be a conflict of interest. Even the appearance of a conflict violates our Code and our sense of what's right.



## Is this a conflict? Learn to spot them.

Acting as an owner of our company means being accountable to it and protecting it. To avoid conflicts of interest, keep your personal business separate from Worldpay's business and make all work decisions without outside influence.

It's impossible to list every situation that might lead to actual, perceived or potential conflicts of interest, but they often occur in situations like:

- **Business opportunities** – competing with Worldpay or taking advantage of opportunities discovered through your connection with us
- **Company assets** – using company property, information, logos or other assets for your personal advantage
- **Financial interests** – having a financial interest other than as a minor shareholder or doing outside work with a third party, competitor or any other entity that does, or hopes to do, business with us
- **Business Gifts and Entertainment** – exchanging business gifts or other offers meant to influence someone
- **Outside employment** – second jobs that interfere with your ability to perform your work for Worldpay
- **Outside leadership** – acting as a member of a board, panel, directorship or advisory membership for another organization
- **External communications** – participating in consulting engagements or speaking opportunities (e.g., podcasts) or writing industry articles or books for external publications
- **Personal relationships** – supervising or making employment decisions about a relative or someone else with whom you have a close personal relationship
- **Improper benefits** – using the services of a business owned by a relative or someone else with whom you have a personal relationship, or when you, a friend or a relative receives improper benefits through your work with Worldpay



## Have a conflict? Let us know.

The moment you become aware of a conflict or potential conflict of interest, disclose it by filling out the Disclosure Application for actual, perceived or potential conflicts. The Ethics Office will review it and work with you to attempt to mitigate any actual, perceived or potential conflict. Visit our [Ethics Office page](#) for more information. If you're not sure if a situation is a conflict, reach out to the [Ethics Office](#) for guidance.

### Reality check

**Q:** Through my role at Worldpay, I have recognized that our company needs more specialized technology talent. I have a lot of friends in the industry and could start my own business to provide top-notch talent to the company as a vendor at a lower cost. Wouldn't this be a great way to help Worldpay?

**A:** No. You have discovered a business opportunity through your role and are starting a business to take advantage of this information for personal gain as a Worldpay vendor.

### Policy connection

[Conflicts of Interest Policy](#)

Refer to your country Employee Handbook





# Ensuring ethical communications

Worldpay's brand is our identity. Acting like an owner means taking personal responsibility to help build it and preserve it, along with our reputation. One way we do this is by not speaking on Worldpay's behalf and using care on social media and in other communications when we share information or communicate publicly about our company.

## Let Worldpay do the talking.

We know you're proud to be a Worldpayer and may sometimes talk or share comments about our company outside of work. If you do, always remember to:

- Allow designated representatives to speak publicly for Worldpay.
- Never falsely claim to represent Worldpay, either online, in writing or in person.
- Send all media inquiries to Corporate Communications.
- Get prior authorization before discussing Worldpay nonpublic information with anyone in the media.
- Reach out to the People and Culture Team if you receive requests for information about current or former Worldpayers. Never provide employment references or verifications for any current or former colleague.
- Seek approval from Corporate Communications for references for third parties.
- Immediately refer any legal, law enforcement or investigative requests to the Senior Vice President of Commercial Litigation.

## Share with care.

Social media posts can take on a life of their own and be seen by anyone. That's why we (as individuals and as a company) must maintain a responsible social media presence. If you ever comment about Worldpay on social media:

- Make it clear that you are a Worldpayer, but your views are your own — you're not speaking for our company.
- Safeguard all company confidential information.
- Make sure your social media posts comply with Worldpay's Social Media Policy.

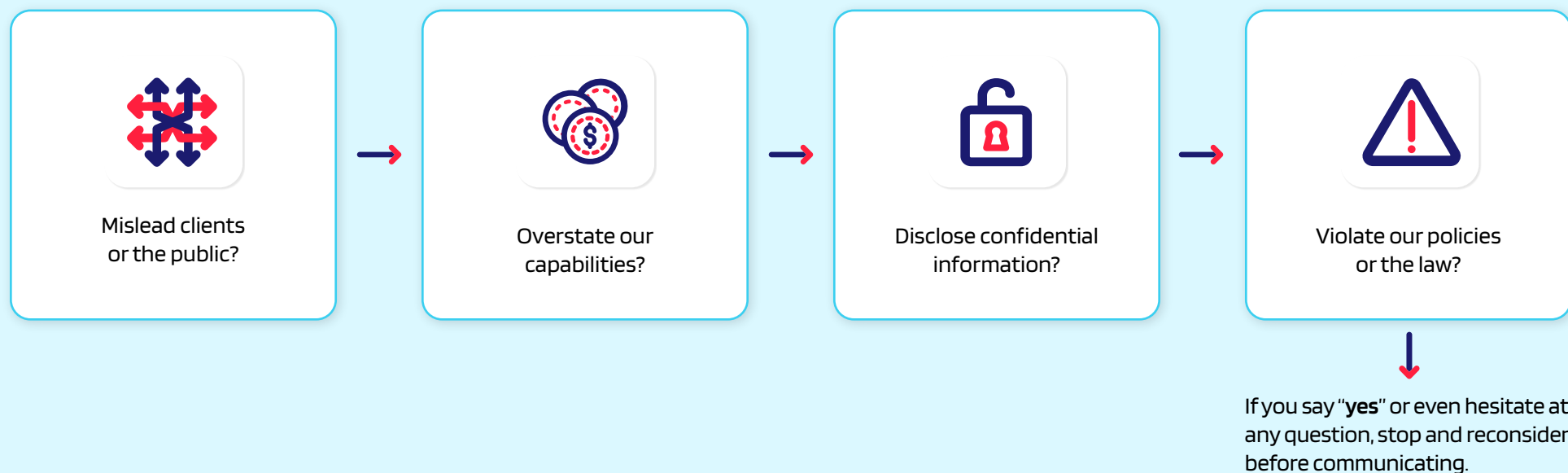
## Protect confidential information.

If you have access to [confidential information](#), or [nonpublic information](#) about Worldpay or any other company, never share it with anyone outside of our company. That includes [personal information](#) about our colleagues, clients or third parties.



## Should I share it?

When in doubt, ask yourself: could my communication:



### Reality check

**Q:** A reporter called me looking for some basic information about our company. May I answer their questions?

**A:** No. Even simple questions should be rerouted to Corporate Communications. We want to avoid any unintentional consequences, such as releasing information at the wrong time or disclosing something confidential. Forward your inquiry to be sure we're communicating responsibly.

### Policy connection

Brand Policy

Media and News Release Policy

Social Media Policy

# Marketing and advertising responsibly

At Worldpay, our word means something. We know our customers count on us to deliver on our promises and stay true to our word. We also know we won't earn anyone's trust if we're not honest in our promotions.

That's why we take an approach to marketing and advertising that reflects our **values** and beliefs. We communicate openly and honestly, back up the claims we make and make sure everything Worldpay says is truthful.

## Advertising formats include:

- Digital marketing
- Television
- Radio
- Worldpay-sponsored websites
- Endorsed bloggers and brand ambassadors
- Email blasts
- Social media
- Brochures

Pay special attention to email and fax advertising, as special rules apply.

## Practice truth in advertising.

Everything we say about Worldpay reflects on us as a company. It also impacts our relationships with customers, stakeholders and the public. To help strengthen those relationships and our reputation:

- Follow applicable advertising laws and regulations.
- Never say anything false about our services, products, or competitors.
- Be helpful — never defamatory, misleading or malicious.
- Never exaggerate or make promises we can't keep.

## Promote us the Worldpay way.

Careful promotion is effective promotion. For every advertisement, claim or promotion for Worldpay, regardless of the advertising format, be sure to:

- First obtain proper reviews and approvals.
- Be able to back up any claims you make with solid, unbiased documentation.
- Work with the proper internal stakeholders to verify facts and answer questions.



## Reality check

**Q:** I am interested in promoting our new services via email. Are there any special considerations to keep in mind?

**A:** Yes, any email advertisement must accurately disclose who it is from and what it is for, as well as the sender's business address and inform the recipient of the right to opt out. In many jurisdictions, you also must get consent or authorization from the recipient before distributing an advertisement. Refer to the Brand Policy, and also work with the Corporate Communications team for additional guidance.

## Policy connection

Brand Policy

# Preventing bribery and money laundering

Nothing good comes from corruption. It harms people and communities around the world, so we are committed to combating acts like bribery and money laundering. Worldpayers lead with integrity and work together to vet all our third parties carefully.

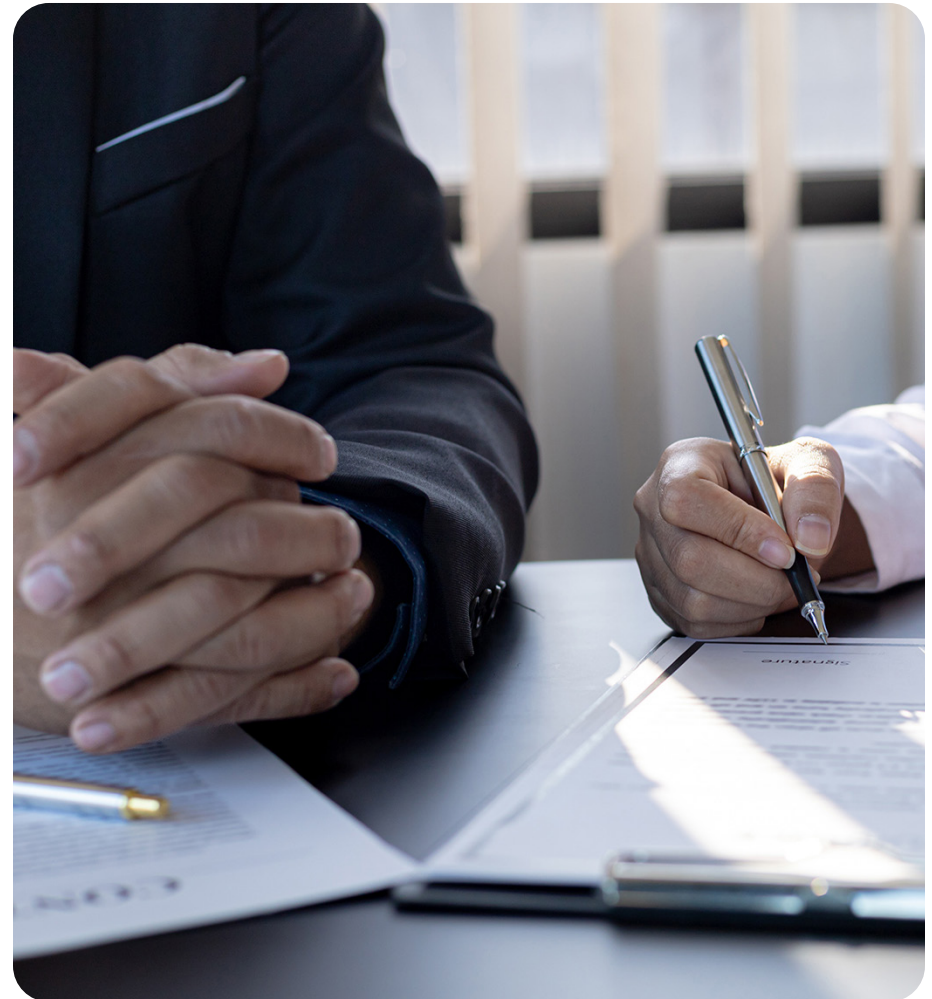
## Avoid bribes and kickbacks.

At Worldpay, we never bribe — or accept bribes — and we avoid even the appearance of anything improper. We also steer clear of kickbacks — something of value offered after a deal is finalized. To avoid improper offers, learn to spot them (and remember, they're not always cash). Watch for offers such as:

- Business gifts
- Entertainment or hospitality
- Meals
- Discounts
- Favors
- Jobs or internships
- Cash or cash equivalents (like gift cards or gift certificates)
- Charitable or political contributions

**Bribery** is offering, giving, receiving, soliciting or accepting anything of value to get or keep a business advantage.

**Money laundering** happens when criminals move funds made from illegal activities through a legal business (like ours).



## Use special care with government officials.

When government officials and their relatives are involved, the rules for what we can offer them become very strict. Before you offer anything of value to government officials, you must receive approval from the [Ethics Office](#).

At Worldpay, we do not believe in or allow making facilitation or “grease” payments to government officials. These are payments made to speed up routine, discretionary government processes or decisions, like expediting receipt of a license or permit. In some cases, payments are allowed if they are openly made to speed up routine government actions that involve non-discretionary acts, such as expediting a passport.

### Did you know?

The term “government official” is broad. It can apply to both elected officials and employees of government agencies and government-controlled companies or entities. This can include public schools and other entities as described in our [Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#).

## Know your customers.

To prevent money laundering, make sure payments come from legitimate sources and are used for legitimate business purposes. Be sure you:

- Understand how clients use our services and solutions.
- Know who’s behind every transaction and only do business with those who are reputable.
- Report any suspicious activity or **questionable transactions**.

**Questionable transactions** can include:

- Attempts to pay in cash
- Requests to ship to a country other than where the payment originated
- Attempts to avoid recordkeeping requirements
- Payments made by individuals or companies who are not parties to the transaction
- Any suspicious change in the pattern of a customer’s transactions

## Reality check

**Q:** A seemingly unrelated third party recently began making payments on behalf of one of our long-time distributors. I don’t want to accuse the distributor of wrongdoing, but I’m concerned about the payments. What should I do?

**A:** Contact the distributor for details. If the responses you receive don’t make sense or are unsatisfactory, report it to your manager or the [Ethics Office](#).

## Policy connection

[Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#)

For questions about our ABAC policy, reach out to the Anti-Bribery Anti-Corruption Team

Anti-Money Laundering Policy

[Corporate Citizenship Policy](#)

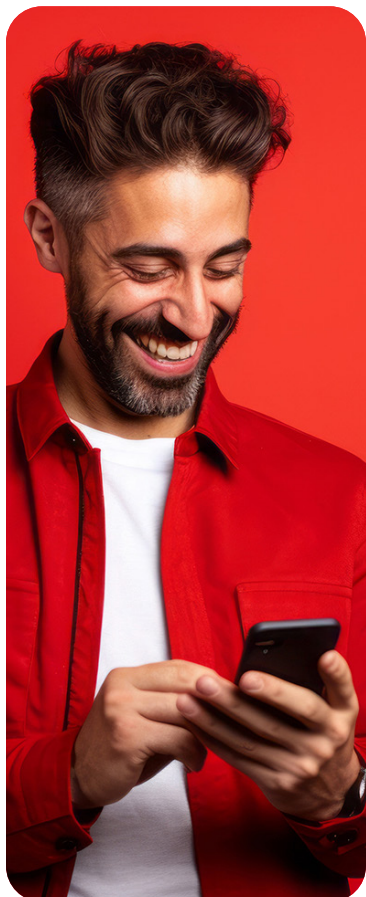
Sanctions Compliance Policy

[Speak-Up Policy](#)



# Exchanging gifts and entertainment responsibly

Giving and receiving gifts in business can help build positive relationships. However, gifts that are too frequent or lavish can be misinterpreted as bribes. We want to ensure that our exceptional people and performance are never overshadowed by unethical practices. Therefore, we exercise good judgment and ensure that any gifts we give or receive comply with Worldpay policies and applicable laws in all jurisdictions where we operate.



## Defining business gifts or entertainment and hospitality

**Business gifts** are items of monetary value given to or received from a current or potential client, customer, supplier, business partner or other third party, including trade and professional associations and others who interact with the company on business matters.

**Business entertainment and hospitality** are occasional experiences or activities including, but not limited to, business meals, tickets or access to sporting events, concerts or cultural events, or leisure activities. They also include the offering of travel and accommodations — including the use of personal accommodations. Business entertainment and hospitality should build goodwill and business relations without creating obligations or [conflicts of interest](#).

## Know what's acceptable.

Only offer or accept business gifts or entertainment and hospitality when it's legal, ethical, customary, and consistent with company policy. This includes items of nominal value, such as promotional items, candy, flowers, and other minor gifts unlikely to influence professional judgement.

## Know when to disclose offers.

It is your obligation, prior to giving or accepting, to let Worldpay know about the following offers of business gifts, entertainment, or hospitality through our Disclosure Application:

- For non-government officials: any business gift that exceeds 100.00 USD, or entertainment and hospitality exceeding 250.00 USD per person inclusive of all related benefits.
- For government officials: **any item, regardless of value.**

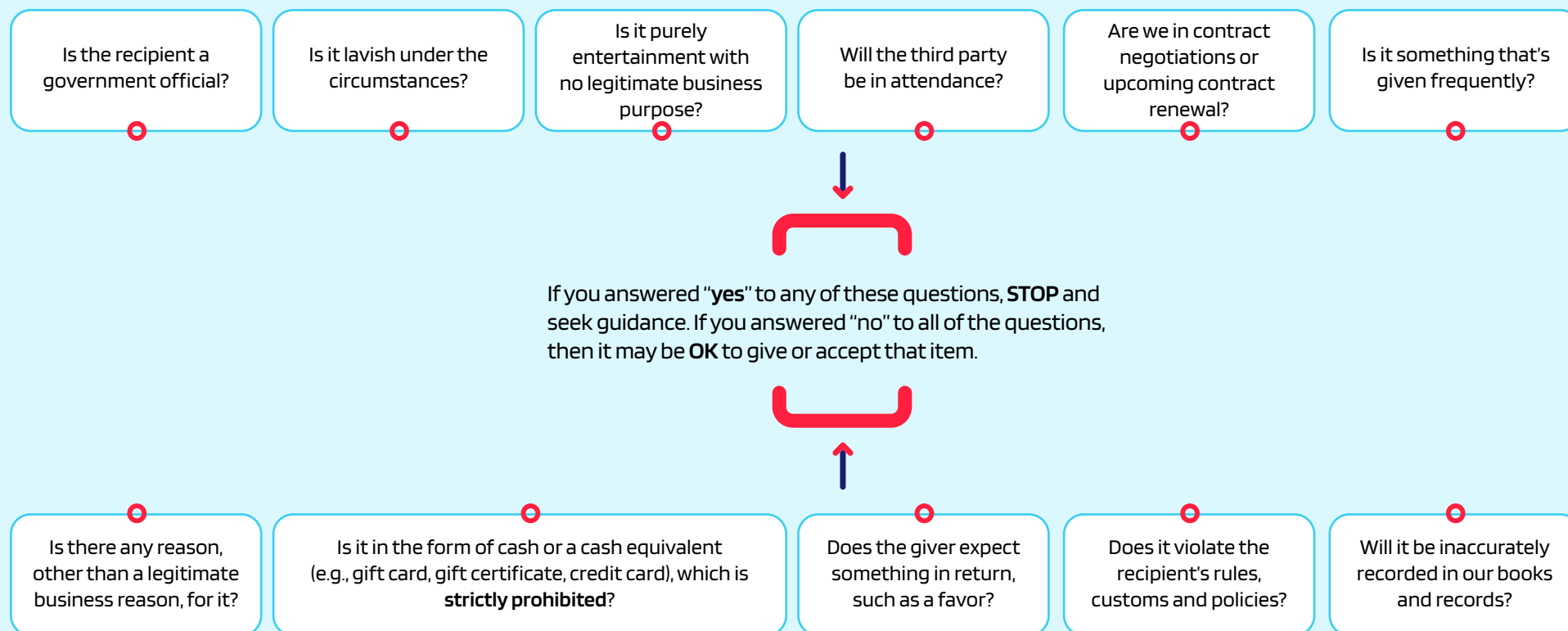
Never offer **anything** of value to a government official, including state-owned entities, without obtaining permission from the [Ethics Office](#) first.

For additional guidance, review the Worldpay [Business Gifts and Entertainment Policy](#).



## Is this an appropriate offer?

If you're not sure whether giving or accepting a gift, offer of entertainment or other item of value would be appropriate, ask yourself:



Visit our [Ethics Office page](#) for more information including how to register business gifts or entertainment and hospitality in our Disclosure Application. Reach out to the [Ethics Office](#) if you're still unsure.



## Reality check

**Q:** I'm hosting an event where government officials will be in attendance, and I want to provide lunch to everyone at the event. I don't want to violate our policies. What should I do?

**A:** You should seek guidance from the [Ethics Office](#). The rules that apply to giving business courtesies to government officials can get complicated. Remember, ask for help any time government officials are involved in an offer of any value (even under 100.00 USD). In general, if you're not sure what to do, you should always ask the Ethics Office for guidance before proceeding.

## Policy connection

[Business Gifts and Entertainment Policy](#)

Employee Gifts, Prizes and Awards Policy

Travel Policy

[Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#)



# Competing fairly

Winning as a team also means competing fairly. Fair competition allows merit — not unethical business practices — to rise to the top.

Being a Worldpayer means competing for clients with everything we've got, but doing so fairly. We stay laser-focused on continuously improving the quality of our services and solutions. We also avoid engaging in conduct that could be viewed as improper.

That way, it's clear that the true source of our success is our drive and innovation — nothing more, nothing less.

## Reality check

**Q:** I'm at an industry conference, and a couple of our competitors have invited me to have dinner with them later. They said it's a good chance for us to talk "pricing strategy" so we can get through a current slump in sales. Should I accept?

**A:** No, you shouldn't. Discussing pricing or other nonpublic competitive information with competitors violates both our policies and the law. Turn down the invitation and tell the competitors why you can't have a discussion like this. Then, report their request to your manager or the [Ethics Office](#).



## Maintain a level playing field.

We promote fair competition by avoiding any activity that could restrict it.

In your conversations with competitors, avoid agreements or even conversations about:

- Fixing or "rigging" prices or bids
- Divvying up clients, markets or territories
- Mutually refusing to deal with third parties
- Preventing others from entering the market

Instead:

- Stay objective and fair.
- Document significant third-party interactions.
- Protect our competitive information — don't share it.
- Only use public sources to learn about the competition.
- Reach out to the [Ethics Office](#) for guidance before considering any business agreement with a competitor.

## Policy connection

Enterprise Conduct Risk Policy  
Unfair, Deceptive, or Abusive  
Acts or Practices (UDAAP) and  
Unfair or Deceptive Acts or  
Practices (UDAP) Policy



# Doing business around the world

At Worldpay, we're changing the way the world does business. Being a global market leader brings us exciting new opportunities and also comes with responsibility.

That's why, wherever in the world we do business, we stay on top of all import, export and other trade compliance laws that apply. It helps us expand our global operations and advance the way the world pays.

## First, follow the law.

We take global trade regulations seriously, and for good reason. Non-compliance with import or export rules, regulations, and protocols can result in delays, confiscation, or even destruction of goods. Trade violations can also cause reputational damage and lead to fines and other penalties. In severe instances of non-compliance, the company or individuals involved may face substantial fines or imprisonment.

## Focus on accuracy.

No matter your role at Worldpay, you have a responsibility to enter accurate data in our databases. Use special care when entering client and supplier names. Enter them legally and properly, along with accurate countries of origin, prices, and other relevant information.

## Work the Worldpay way.

Always follow our policies and procedures — no excuses, no exceptions. They're here to protect you and the company.



### Reality check

**Q:** We received a purchase order that looks OK, but it comes from a company based in a country that I think is subject to trade sanctions. Can we accept the order?

**A:** It depends. Trade sanctions are always evolving. To ensure compliance with the latest regulations, we need to screen the proposed transaction first. While most countries are not subject to trade embargoes, specific individuals, businesses or industries within those countries may be subject to sanctions. Reach out to the Sanctions and Export Control Compliance Team for next steps.

### Policy connection

Enterprise Conduct Risk Policy

[Corporate Citizenship Policy](#)

Sanctions Compliance Policy

# Building strong third-party relationships

Making Worldpay successful is a team effort that combines the contributions of our clients, customers, vendors, suppliers, business partners and other third parties. We all impact our business and our reputation, so we focus on building positive and productive relationships with every partner. That's how we make sure they uphold our high standards and the laws that apply to us.

## What should I watch for?

Stay alert for anything that goes against our [values](#) or policies, including violations of:

- Financial integrity
- Data privacy
- Bribery or conflicts of interest
- Human rights
- Child labor
- Environmental protection
- Anti-harassment or bullying



## Choose third parties that share our values.

If your job involves choosing third parties for Worldpay:

- Evaluate all parties fairly and without bias.
- Base your selection on:
  - Our business needs
  - The third party's reputation and track record
  - The specific products and services offered
  - Quality and price

## Watch what you say and do.

When working with our partners:

- Be fair and honest in every interaction.
- Avoid even the appearance of [conflicts of interest](#).
- Never accept business gifts, entertainment, hospitality or favors from third parties that violate our policies or theirs.

## Stay alert and engaged.

We can be held responsible for the actions our third parties take. To make sure they represent Worldpay with integrity:

- Regularly monitor their work.
- Help them understand what's required and uphold our policies.
- If you see a third party doing something that could violate our Code or policies, [speak up](#) immediately.



## Reality check

**Q:** My good friend owns a company that I believe would be a great vendor for us. As a decision maker, and given our urgent need for their services, I plan to give them our business. Because I know them personally and can vouch for their reliability, is this a good business decision?

**A:** No. This may be a conflict of interest. You can suggest the vendor, but you need to remove yourself from the decision-making process and disclose your relationship with the vendor. Our vendor selection process must always follow Worldpay policy. Report this situation to the [Ethics Office](#) before engaging the procurement team to initiate discussions with this vendor. Further, this must be disclosed within our Disclosure Application.

## Policy connection

[Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#)

[Corporate Citizenship Policy](#)

Vendor Risk Management Policy

Brand Policy

Procurement Policy

[Conflicts of Interest Policy](#)



# Cooperating with investigations and audits

If something or someone violates our Code, policies or the law, we need to find out about it. That's why we work quickly to uncover issues through investigations and audits.

When we investigate, we're better able to address misconduct, minimize potential damage and demonstrate Worldpay's commitment to conducting business ethically and with integrity.

## Lend a hand.

Whether you are a Worldpayer, contractor or director, you have a responsibility to:

- Cooperate with any internal or external investigation, audit, or review.
- Recognize that refusing to cooperate may lead to disciplinary action — even termination.
- Immediately notify your manager if you have been asked to participate in a government investigation or inquiry.

### If misconduct is occurring ...

We need to know:

- Who was involved
- What happened
- When it happened
- Where it occurred
- How we can prevent it in the future

An investigation or audit helps us gather those facts and get to the bottom of the situation.

### Keep in mind ...

Unless you are specifically authorized to do so, don't interact directly with regulatory and all other outside agencies, including law enforcement, on Worldpay matters.

Instead, direct all regulatory and other outside agency requests to the Senior Vice President of Commercial Litigation.

Keeping our interactions with regulatory agencies centralized and well-coordinated is critical to ensuring timely and accurate disclosure of sensitive information.

## Give us the full picture.

To help ensure effective and transparent investigations:

- Never make false or misleading statements related to:
  - Audits or reviews of our financial statements
  - Internal or external audits of our company
  - Activities of auditors or investigators
  - Publicly filed documents
  - Reported concerns, including reports to the [Ethics and Integrity Line](#)
- Give complete information — never omit details that are relevant to an auditor or investigator.
- Never pressure others to give incomplete, false or misleading statements.

## Reality check

**Q:** What if I didn't report any concern but am asked to help with an internal investigation? Do I have to participate?

**A:** Yes. We may sometimes need to reach out to witnesses or other parties with potential knowledge about an incident to gather necessary information. As a Worldpayer, you are obligated to cooperate in all internal investigations so that these investigations can be conducted thoroughly and with full and accurate information.

## Policy connection

[Speak-Up Policy](#)



# The way we show we care

Our world is our responsibility.  
The more we care, the better we make it.

Protecting human rights | Being good environmental stewards | Participating in political activities |  
Promoting philanthropy and volunteerism





# Protecting human rights

At Worldpay, people are at the heart of everything we do. Our goal is to improve their lives through our work. We are dedicated to ensuring that their work environments are the best they can be. This commitment includes upholding human dignity and fair employment practices across all areas of our business. We also expect our third-party partners to adhere to these same high standards. We won't do business with any individual or company that participates in human rights abuses.

## Join us in defending human rights.

Human rights abuses happen around the world, and we are committed to preventing them. We prohibit all forms of slavery, including involuntary, forced or prison labor, child labor and human trafficking. [Speak up](#) if you see or suspect any abuse of human rights, whether it happens in our workplace or a third-party workplace.

## Carefully follow labor laws.

We believe every person deserves fair treatment, respect and safety at work, and for this reason, we always follow the employment laws of the countries where we do business, including those related to pay, benefits and working conditions. We expect no less from those with whom we do business. Speak up about possible violations anywhere we do business or with anyone with whom we do business.



## Reality check

**Q:** I saw an article online about a company that Worldpay is considering partnering with. It talks about this company's "questionable labor practices." I'm not part of the selection process, but I think those who are should be aware of this information. Should I say something?

**A:** Yes. Let your colleagues who are involved in the decision know what you've learned so they may investigate further. Doing our homework is critical when we choose third parties to ensure that they meet our high standards. You should also raise your concern to the [Ethics Office](#).

## Policy connection

[Modern Slavery Act Transparency Statement](#)

[Corporate Citizenship Policy](#)

Procurement Policy

Refer to your country Employee Handbook

# Being good environmental stewards

Our planet is our home, and we must all take ownership to ensure its sustainability for future generations. At Worldpay, we understand the significant responsibility and influence we hold as a leader in our industry. We are committed to preserving and protecting the environment.

Worldpay's environmental strategy is built on important initiatives and aspirational goals designed to prevent pollution and reduce the environmental impact of our operations. All Worldpayers, contractors, directors and third-party partners can support our initiatives.

## Help us cut down on waste.

To reduce what goes into landfills, we reduce what we send into them. That includes providing recycling programs at our facilities wherever we can.

Watch for and support these initiatives in your workplace. They may include recycling reclaimable material (like paper and plastic) and computers and other technology equipment (like Virtual Private Network tokens and printer toner cartridges), in line with international guidelines and our policies.

Also, use the confidential shred and recycle bins found at many Worldpay locations. Remember, we expect you to follow our policies to properly shred and dispose of paper or materials containing sensitive information.

## Limit third-party waste, too.

Help us encourage the third parties with whom we do business to use sustainable materials. Promote the use of recycled plastic, digital wallets and eDelivery to reduce plastic production and paper statements.

## Be watchful and accountable.

Comply with all environmental laws and regulations that apply to us and immediately report any suspected or actual environmental violations.



### Reality check

**Q:** I received a questionnaire from a client regarding Worldpay's environmental strategy. Who can I reach out to for guidance on these topics?

**A:** Worldpay has resources dedicated to handling Environmental, Social and Governance (ESG) matters. Contact the Corporate Citizenship Team to assist with responding to this questionnaire.

### Policy connection

[Corporate Citizenship Policy](#)

# Participating in political activities

Politics shape our world and ignite passions. At Worldpay, we respect political engagement, but we believe in keeping it separate from our work. Any support for candidates or campaigns is done on our own time. We make it clear that our personal political views and actions are our own and do not represent the views of Worldpay, and we never use company resources to support our political activities.

## Keep politics personal.

Never give the impression that Worldpay endorses your personal political activities. Make sure:

- Your actions are lawful.
- You don't use Worldpay time, your position or our assets (including the Worldpay name) to support your political activities.
- Your activities don't suggest even the appearance of a conflict with your role at Worldpay, especially if you are planning to seek, accept or hold any political office.

## Know what's permitted.

Worldpay has a Political Action Committee (PAC) that you are welcome, but not required, to contribute to. Here are some important points to keep in mind:

- There are strict rules and reporting requirements for contributions. Please contact the Government Affairs Team to understand the process fully.
- If you choose to contribute, note that Worldpay will not reimburse you for any contributions. Contributions are entirely voluntary and will be used for political purposes.
- You have the right to refuse to contribute without any reprisal. Worldpay will not favor or disadvantage anyone based on their decision to contribute or the amount contributed.
- Contributions to the Worldpay PAC are not tax deductible.

Speak to the Government Affairs Team if you have any questions about political involvement, the PAC or lobbying.



## Reality check

**Q:** I'm considering running for public office. Is that allowed under our policies?

**A:** Let your manager know your intentions so you can discuss whether this might present a conflict of interest or violate our policies. Then ask the Government Affairs Team for guidance and fill out the Disclosure Application for review by the Ethics Office. Contact the [Ethics Office](#) with any questions.

## Policy connection

[Conflicts of Interest Policy](#)

[Corporate Citizenship Policy](#)

Political Activities Policy



# Promoting philanthropy and volunteerism

When you joined Worldpay, you became part of a global team. We're all interconnected — with each other and with the world. Our commitment goes beyond doing what is right for today; we are dedicated to building a better tomorrow for everyone.

This is why we support philanthropy and volunteerism, both as a company and as individuals. We invest resources where and when they're needed most, and we serve where and when we are needed most.



## Help us build stronger communities.

There's strength in numbers. There's also so much more we can do when we pool our time, talent and resources together as a team. You can help communities thrive by supporting Worldpay's efforts to:

- Advance financial inclusion and literacy
- Promote STEM education
- Protect our planet
- Improve health and human services
- Combat hunger
- Support community development

To find out more about how you can get involved, contact Worldpay Gives.

## Make your own impact.

We're a diverse group, and we all have different interests. That includes charitable causes. Worldpay encourages us to support the causes we care about, but when you do, be sure to:

- Avoid [conflicts of interest](#).
- Use your own time and resources.
- Never pressure coworkers.
- Make it clear your views are your own.

### Reality check

**Q:** I'm planning to attend a town meeting with members of a charity for which I volunteer. I'd like to ask the town's mayor a question and identify myself as a representative of Worldpay to get his attention. Is this OK to do if it's for a good cause?

**A:** No. If Worldpay isn't directly involved with this charity, and you're not an authorized representative of Worldpay, it would be dishonest to present yourself as such. Speak for yourself (and not us) when it comes to personal charitable activities.

### Policy connection

[Corporate Citizenship Policy](#)

Refer to your country Employee Handbook's Volunteer Policy Statement

# Look ahead



You've reached the end of our Code of Business Conduct and Ethics. We've covered a lot of ground together. You've learned about the challenges we face and the values we uphold:



**Think like a  
customer**



**Act like an owner**



**Win as a team**

We've also learned how to turn these values into actions to ensure the Worldpay name is always associated with integrity and ethical business practices.

We encourage you to refer to this Code whenever you are uncertain about the appropriateness of your actions. Navigating the complexities of the global economy involves numerous laws and potential challenges. This Code provides a guide, ensuring that every Worldpayer adheres to the same standards and remains united in our commitment to uphold these principles.

This Code is yours, and this company is yours, too. It's built by and piloted by each of us and our daily actions. Embrace your role as an ethical, dynamic and accountable owner.

We know Worldpay's future is in good hands — yours. Now, go unleash its potential ethically and with integrity.

# Get in touch

## Find help:

For questions or concerns regarding any subject matter in the Code of Business Conduct and Ethics

For any urgent or critical information security incidents

To report a security incident

For questions about insider trading or tipping

For urgent or critical information-security incidents

To discuss IP assets

To report a privacy incident

For questions on privacy and record retention

For any questions about Environmental, Social and Governance (ESG)/environmental impact and Corporate Social Responsibility (CSR)/community impact programs

For general inquiries, RFPs, client questions, and other questions surrounding engagement with policymakers

When considering engagement with policymakers and any interaction with public officials

For questions about benefits or colleague performance and behavior

For questions about whether a third party should be reviewed by the Anti-Bribery Anti-Corruption ("ABAC") Team

For compliance-related issues including anti-bribery, anti-corruption, conduct risk, policy and training, financial crime, country risk, and regulatory compliance

For questions about security regarding protecting people, physical assets and information

For questions to Corporate Communications

For regulatory, law enforcement or investigative requests

For any questions about implementing/using an AI tool, building/buying a model or making significant changes to a model

## Contact:

[Ethics Office](#)

[Ethics and Integrity Line](#)

[Country-specific Ethics and Integrity Phone Numbers](#)

Please contact Technology Operations Centre or the toll-free phone number at +1 866-299-8835 or, for the UK, +44 208 712 5708 Option 1

Cyber Incident Response Team (CIRT)

[Visit our Ethics Office page](#) or [Contact the Ethics Office](#)

+1 414.357.FSIRT (3747) (U.S. and International)

IP Counsel

Submit a PIRT form

For privacy-related questions, email the Privacy and Data Protection Office. Otherwise, privacy incident related questions can be sent to [privacyincidents@worldpay.com](mailto:privacyincidents@worldpay.com). For more information on how Worldpay processes data, please visit our [Privacy Center](#).

The Corporate Citizenship Team

The Government Affairs Team

Public Officials Engagement

[The People and Culture Team](#)

ABAC Team

The Corporate Compliance Team

The Corporate Security Team

The Corporate Communications Team

Senior Vice President of Commercial Litigation

[Data and AI Use Review \(DAR\) Committee](#)





## Country-specific **Ethics and Integrity Line** Numbers

Country	Ethics and Integrity Line Phone Number
Argentina	0800-345-2406
Australia	1800497139
Austria	0800 298901
Brazil	0800 762 0030
Canada	8337856552
China	4001209304
Colombia	01-800-5189878
France	0800 90 45 96
Germany	0800 181 3733
Hong Kong	800902138
India	022 5097 2942
Ireland	1800 849 246
Italy (includes San Marino, Vatican City)	800819525
Japan	0800-600-0104
Korea, Republic of South	080-880-0333
Malaysia	01546000433
Mexico	8008801694
Netherlands	0800 2500103
New Zealand	0800 870 015
Romania	0800 890 256
Singapore	8004922783
Spain	900751380
Sweden	020 79 00 08
Thailand	1800018165
United Arab Emirates	8000120218
United Kingdom & Northern Ireland	0808 196 5652
United States	833-785-6297

**Important:** Nothing in this Code prohibits any colleague from reporting possible violations of law or regulation to any governmental agency or law enforcement, or making other disclosures that are protected under the whistleblower provisions of any applicable law or regulation. Worldpayers are not required to notify the company that they have made such reports or disclosures or obtain authorization from the company prior to making such reports or disclosures..