

**fiserv.**

Code of  
Conduct  
& Business  
Ethics



## Message From Our Chief Executive Officer

The way we work matters, with accountability, integrity and a straightforward approach topping the list of how we do what we do at Fiserv. Our Code of Conduct & Business Ethics (the “Code”) serves as the foundation for ethical behavior across our company and the expectations that govern associates, representatives and affiliates of Fiserv. It explains how we, through our actions, personify our Fiserv Values and interact with our clients, business partners, each other and the communities in which we operate.

We regularly review the Code and update it to ensure we continue to uphold the highest standards of conduct, which are expected of us as an industry leader. Regardless of role or location, each of us has the important responsibility to understand and comply with the letter and spirit of the Code. By doing so, we not only build trust with our clients, business partners and communities, we strengthen our global team. I encourage you to familiarize yourself with the Code and use it as you make decisions for the company.

Thank you for your continued commitment to living our Values and serving our clients with excellence, and for everything you do to help us deliver Fiserv @ Our Best.



Takis Georgakopoulos  
Chief Executive Officer

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# Our Foundation



The **Code** is our definitive guide to the expectations that govern us as associates, representatives and affiliates of Fiserv.

Our **Code**

Our **Principles**

Our **Responsibilities**

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## Our Code

Our Code applies to all Fiserv associates and board members (collectively referred to as “associates”). We expect you to read and know the Code, to follow both its letter and spirit, and to use it as your moral compass. This Code is a guide as you conduct business for Fiserv. The principles outlined in this Code are general in nature, and the Code cannot describe every situation you may encounter. Accordingly, the principles in this Code are not exhaustive, but should be used as a starting point on acceptable conduct.

Although the Code applies to Fiserv associates, Fiserv also expects its business partners, service providers and vendors to comply with the principles of this Code. The Code shall be followed globally, and its application in any particular country will be interpreted in a manner to comply with applicable local laws, directives or regulations, as necessary. Any policy subject to a Works Council’s agreement shall remain in place until it is replaced with a new agreement. Further, for U.S. associates who do not manage people, none of the principles in the Code are designed to interfere with, restrain or prevent communications regarding wages, benefits and/or terms of conditions of employment under Section 7 of the National Labor Relations Act.

The Code may not be waived or amended except by the approval of the Board of Directors. Changes in or waivers of the Code will be disclosed as required under applicable law and regulations.

The Ethics Office has accountability for promoting, monitoring and enforcing our Code. However, the ultimate responsibility for following the Code, meeting Fiserv legal requirements and maintaining our reputation rests with each of us, individually.

When you have questions about the correct course of action, seek help from one of the resources identified in this Code.

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# Our Principles

- Our Aspiration** To move money and information in a way that moves the world
- Our Purpose** To deliver superior value for our clients through leading technology, targeted innovation and excellence in everything we do
- Our Values**
- Earn client trust every day.
  - Create with purpose.
  - Inspire and achieve excellence.
  - Do the right thing.
  - Deliver on the promise of one Fiserv.
- Our Ethics** Be sure to abide by the letter and spirit of the Code and other Fiserv policies and procedures. It is always better to ask before you act, especially when you are uncertain as to the proper course of action. Contact any of these resources for additional guidance:
- The Alertline
  - The Ethics Office at [Ethics&Compliance@Fiserv.com](mailto:Ethics&Compliance@Fiserv.com)
  - A Fiserv Manager
  - Your Human Resources Representative

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## Our Responsibilities

Collectively, we are all responsible for promoting and protecting the Fiserv brand so that we continue to be recognized for our innovative financial services, technology solutions and high ethical standards. Individually, we are each responsible for understanding and abiding by the Code and all other policies.

### As an associate you must:

- Model appropriate behavior at all times; each of us, especially managers, must act with integrity and inspire trust
- Complete all required Fiserv compliance and ethics activities, including compliance training
- Seek advice from an appropriate company resource whenever you are uncertain about how to apply Fiserv standards of business conduct to a specific situation, or generally to any aspect of your work
- Follow the Code requirements to report a concern, whether you observe a potential Code violation directly or learn of it from another associate
- For manager level and above, ensure your direct reports have the resources they need to conduct business ethically
- Be forthright and honest in all of your business dealings and comply with all applicable laws



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# Speaking Up



As members of the Fiserv team, we must be accountable for our actions and decisions, and we must expect the same of others. This means speaking up if you see something wrong, or seeking advice or assistance if you are unsure. Even if you are uncertain as to whether misconduct has occurred, speaking up is always the right thing to do.

- **When should I speak up?**
- **What should I speak up about?**
- **How do I speak up?**
- **The Reporting Process**
- **No Retaliation**
- **Manager Responsibility**
- **No Contract**

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# Speaking Up

Support our Code, our policies, our procedures and our compliance with the law by reporting your concerns.

## When should I speak up?

Report possible violations of the Code immediately, so they can be addressed promptly. If you suspect that someone's actions are inappropriate, unlawful or unethical, report your concerns without delay.

## What should I speak up about?

Speak up about any known or suspected violations of:

- Our Code
- Our policies or procedures
- Applicable laws or regulations

Do not hesitate to reach out for help at any time.

## How do I speak up?

1. Contact the Fiserv Alertline. This can be done by calling the 24-hour Alertline or by accessing Ethicspoint for reporting a concern. For reporting in the U.S., Canada or Puerto Rico, call 1-888-475-0012; for reporting in other jurisdictions, go to FUEL to access country-specific international toll-free numbers.
2. Contact the Ethics Office. This can be done by sending an email to [Ethics&Compliance@Fiserv.com](mailto:Ethics&Compliance@Fiserv.com). The Ethics Office is responsible for promoting, monitoring and enforcing our Code.
3. Talk to a Fiserv manager or your Human Resources Representative. If you are more comfortable speaking with a manager or your Human Resources Representative, you are encouraged to do so. Anyone who becomes aware of a potential violation must immediately report it. Failure to report a potential or suspected violation through one of the approved channels is a violation of the Code itself.

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# Speaking Up

## The Reporting Process

1

You have many options for reporting a concern, which include reporting concerns to:

- The Fiserv Alertline at **888-475-0012** or [fiserv.ethicspoint.com](https://www.fiserv.ethicspoint.com)
- The Ethics Office at [Ethics&Compliance@Fiserv.com](mailto:Ethics&Compliance@Fiserv.com)
- Your Human Resources Representative
- A Manager

2

Your report is received:

All concerns will be tracked and managed, reviewed by the Ethics Office, and assigned to an investigator.

3

Your report will be investigated:

Reports will be assigned and investigated by a neutral, independent investigator. You may be contacted by the investigator if you disclosed your identity when making your report. If you reported anonymously, you may communicate with the investigator anonymously through the Alertline.

4

Corrective action is taken, if necessary and warranted.

5

Your case is closed out and you will be notified. Action taken in response to your report may or may not be made available to you due to the confidential nature of the information.

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Reports to the Alertline may be made anonymously and will be promptly reviewed. Investigations will be fairly and objectively conducted under the direction of the Ethics Office. If an investigation substantiates a violation has occurred, those involved may be subject to disciplinary action, up to and including termination of employment. Some examples of conduct that may lead to disciplinary action include:

- Requesting, permitting or helping others to violate the Code, laws, regulations or Fiserv policies
- Failing to promptly report a known or suspected violation of the Code, Fiserv policies or procedures or the law, whether such violation was done by the associate making the report or otherwise
- Misuse or inappropriate use of Fiserv assets
- Failing to be truthful and/or failing to cooperate with Fiserv investigations or audits
- Retaliating against another associate or a third party for either reporting a suspected violation of the Code, laws or regulations, or for cooperating during a Fiserv investigation

### No Retaliation

Fiserv prohibits retaliation against anyone who, in good faith, reports an actual or perceived Code violation or participates in and cooperates with an internal or external investigation of a violation.

This no-retaliation provision of the Code does not limit the company's recourse if the associate reporting the violation is ultimately found to have been a participant in the violation, or if the associate knowingly makes a false accusation, lies to an investigator or interferes with or otherwise refuses to cooperate in an investigation.

### Manager Responsibility

Managers have a special responsibility to appropriately listen to and act on concerns from associates. If a manager becomes aware of an associate's concerns, the manager must handle and/or escalate the concerns.

### No Contract

Our Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time.



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# Do the Right Thing



Doing the right thing preserves the integrity and stability of our organization. Our culture and reputation are defined by our actions and the decisions that we make every day.

- **Honest Business Dealings**
- **Avoiding Conflicts of Interest**
- **Gifts and Entertainment**
- **Competition and Antitrust**
- **Insider Trading**
- **Corporate Sustainability and Human Rights**
- **Engagement With Government Officials and Political Activities**
- **Charitable Contributions**

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# Honest Business Dealings

**Bribes, money laundering and other forms of corruption are illegal. Never compromise our reputation by conducting business in a dishonest manner.**

## Our Responsibility

It is imperative that each of us does our part to uphold and maintain the excellent reputation of our company in all of our business dealings.

Fiserv operates in multiple jurisdictions, and the laws affecting international business are complicated. Every transaction must be carefully evaluated to ensure compliance with all applicable rules and regulations. Questions about the proper course of action must always be directed to the Legal Department, and associates should report any suspicious activity consistent with Code requirements.

Fiserv also pursues business and contracts with government entities and the Government Relations and Legal Departments must be consulted on any contract with a government entity. All associates should also be mindful that special rules apply to such dealings and these rules may be stricter than rules applicable to dealings with private entities.

## Whether conducting U.S. or non-U.S. business:

- We must comply with the U.S. Foreign Corrupt Practices Act (“FCPA”) and the anti-bribery and anti-corruption laws of all countries in which we conduct business (access the Global Anti-Bribery and Anti-Corruption Policy for further reference)
- We must comply with applicable Anti-Money Laundering (“AML”), counter-terrorism and sanctions laws of the countries where we do business; associates are expected to know who our clients, agents, business partners and service providers are and to understand their use of our products and services
- We must comply with any applicable international trade laws that regulate, among other matters, with whom we may do business and the import and export of our products, services and technology

## What is it?

The **FCPA** prohibits the offering, paying, promising to pay or authorization of payment of money, gifts or anything of value to a foreign official for purposes of influencing any act or decision by the official, inducing the official to use his or her influence to affect any act or decision, or seeking any improper advantage in order to assist Fiserv in obtaining or retaining business in a foreign country. Never offer a gift, payment or anything of value to a foreign official to induce or influence a foreign official.

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- The export of certain types of technical information outside of the United States may also be prohibited by law
- Fiserv provides responsible marketing of the products and services we offer and acts in compliance with applicable laws. Fiserv is committed to being fair and truthful when marketing our services and products
- Financial transactions must be accounted for properly and in a transparent manner
- The same “Know Your Customer” guidance that applies to U.S. financial institutions is appropriate for U.S. businesses operating internationally (“Know Your Customer” guidance is designed to prevent money laundering); associates are expected to know who our prospective clients, agents, business partners and service providers are and to understand their use of our products and services to ensure their funds come from legitimate sources, and that our products and services are used for legitimate business activities
- Your participation in business dealings as a Fiserv associate is recognized to be the actions of the company



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# Honest Business Dealings

As a Fiserv associate...

I will	I will not
Contact the Legal Department for advice on a proposed foreign transaction	Offer a foreign official a meal or other benefit in contradiction of our policy
Promptly report any requests for payments, gifts or other improper exchanges consistent with the requirements of this Code	Do business with others who do not share a commitment to corruption-free business practices
Question clients' source of funds, and report any suspected money laundering or terrorist financing activity	Overlook or ignore red flags that could indicate corrupt activity taken on behalf of Fiserv by a third party



## A Valuable Asset

Global Anti-Bribery and Anti-Corruption Policy

Global Know Your Customer Policy

Global Anti-Money Laundering and Counter Terrorist Financing Policy

**Q.** One of our vendors offered to waive a transaction fee in exchange for us interviewing her very qualified son for an open position. We could save money and potentially hire a great candidate. Is this problematic?

**A.** Yes, this could be construed as a bribe. The client has offered something of value – the fee waiver – in exchange for favorable treatment – an interview. What may seem beneficial at the outset is, in fact, improper and perhaps even illegal. The best course of action would be to report the incident in accordance with the requirements of this Code.

## Avoiding Conflicts of Interest

A conflict of interest, or even the appearance of one, can have a negative impact on our reputation and our bottom line. Your personal business interests should never conflict – or appear to conflict – with the interests of Fiserv. Our company respects the personal interests and private lives of its associates, but Fiserv expects all associates to disclose actual or potential conflicts of interest.

You should avoid a conflict or an appearance of a conflict, between your personal interests and the interests of Fiserv. Avoid any activity that can pose a conflict or affect your objectivity in making business decisions on behalf of Fiserv. You are expected to put your job at Fiserv ahead of other personal business opportunities, second jobs or government service.

### Our Responsibility

Business decisions must be made objectively. Do not allow personal relationships to influence Fiserv business decisions.

If a situation could be perceived as a conflict of interest, you must disclose it to the Ethics Office, except as specifically noted below. Conflicts of interest can take many forms. The Code cannot address every potential conflict of interest situation, so use good judgment and seek guidance when in doubt.

### Outside Interests

You must not:

- Hold a significant financial interest in any Fiserv client, supplier or agent if you are in a position to affect the business relationship that Fiserv has with them, without express approval from the Ethics Office. Note: Nominal equity ownership in a client, supplier or agent by you or a family member does not generally pose a conflict of interest, unless that interest in the entity is significant or constitutes more than a small portion of your overall investment portfolio, without express approval
- Take any opportunity for business or profit that belongs to Fiserv or compete with Fiserv in any way

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# Avoiding Conflicts of Interest

## Outside Employment

You must not:

- Be employed by or receive any compensation from a Fiserv client, a potential Fiserv client, supplier or agent without express approval by the Ethics Office
- Be employed by, or receive any compensation from, any competitor of Fiserv
- Have outside employment that negatively affects your job performance, interferes with your Fiserv responsibilities or otherwise has the potential to adversely impact the business dealings or reputation of Fiserv
- Serve as an officer or director of a for-profit company without prior approval consistent with the company's policy regarding board service

## Relatives, Friends and Personal Relationships

You must disclose any of the following situations to your Human Resources Representative or the Ethics Office for further assessment:

- A relative, domestic partner or romantic partner is employed by or applies for employment with Fiserv
- A relative, domestic partner or romantic partner has a significant financial interest in, or works for, a Fiserv client, supplier or agent, if you are in a position to affect the business that Fiserv has with them

- A romantic relationship that exists between Fiserv associates if such relationship could give rise to an actual, potential or perceived conflict of interest

You must not:

- Directly or indirectly hire, supervise or otherwise have authority over a relative, domestic partner or romantic partner

The company will assess whether it deems the underlying facts of the disclosure to be a potential or actual conflict of interest under the Code. Fiserv has the right to modify job duties, change reporting lines and take any other necessary actions based on its assessment at the time of disclosure or thereafter. After you initially report the potential conflict of interest, you must continue to disclose as part of any later conflict of interest certifications.

Report any activities you believe may suggest a conflict; failing to do so is a violation of the Code.



**A Valuable Asset**

**Board Service Policy**

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## Avoiding Conflicts of Interest

### Putting Conflicts of Interest Concepts Into Practice

To determine if you have a conflict of interest that should be disclosed, ask yourself these questions:

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions?
- Do I stand to benefit from my involvement in this situation? Does a friend or relative of mine stand to benefit?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of the interests of Fiserv?
- If the situation became public knowledge, would I be embarrassed? Would Fiserv be embarrassed?

If you answer “yes” or even “maybe” to any these questions, it is a signal to stop and seek advice or ask questions. Contact the Alertline or the Ethics Office for additional guidance.



# Gifts and Entertainment

**Exchanging gifts and offers of entertainment can create an actual or perceived conflict of interest. Only give and accept items in situations where doing so is legal, ethical and consistent with this Code.**

## Our Responsibility

### Gifts

You may ONLY give or accept gifts from Fiserv associates and individuals or entities outside of Fiserv with whom we conduct or plan to conduct business with when:

- The cost or value of the gift is nominal and consistent with local standards (but not to exceed \$200 or equivalent in local currency); gifts of cash and gift cards are never permitted to or from individuals or entities outside of Fiserv without the express written approval of the Ethics Office
- The gift is not likely to influence – or appear to influence – your business judgment, or otherwise be viewed as compromising our company’s commitment to conducting business in a legal and ethical manner
- The giving and receiving of gifts is customary and part of normal business (such as holidays)
- The gift has not been solicited by a Fiserv associate
- You disclosed the gift to your manager, who may provide more restrictive expectations for which you must abide based on your specific role and responsibilities in the company

**Q.** What should I do if I receive an unsolicited basket of fruit and chocolate from a vendor as a holiday gift?

**A.** Inform your manager that you received the gift. If the gift is extravagant, contact the vendor and inform them that you cannot accept it and make arrangements to return the gift. If the basket is of nominal value, then put it out in your workplace where it can be shared by all associates.

# Gifts and Entertainment

## Entertainment

While we do not prohibit giving or accepting offers of entertainment, you must consider and abide by the following rules:

- The entertainment should be usual, customary, and nominal (but not to exceed \$200 or equivalent in local currency)
- There must be a valid business purpose for giving or accepting the offer of entertainment
- Giving or accepting entertainment to or from a particular individual or company should be infrequent
- You should not have solicited the offer of entertainment

If your role involves receiving or providing business meals, such entertainment must be limited to what is reasonable and customary under the circumstances. If entertainment falls outside of the rules listed above (such as trips, theater tickets and exclusive events like the Super Bowl, the Masters and so on), you must seek prior approval from the Ethics Office and your manager.

Outside of the United States, special care must be paid to the matter of giving and receiving gifts and entertainment, as local customs and laws vary significantly from each other and from what you may be used to. It is imperative that you closely consider the circumstances of the proposed gift or entertainment – and seek advice from the Fiserv Legal Department – in order to comply with the law and the Global Anti-Bribery and Anti-Corruption Policy.

**Q.** A supplier gave me a gift card in a small amount. Can I accept it?

**A.** No. Because a gift card is the equivalent of cash, and receiving cash or cash equivalents is prohibited under the Code. No matter the amount, associates may not accept gift cards as gifts.

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# Gifts and Entertainment

## Entertainment

**Know our policies.** We have rules in place to ensure gifts and entertainment are not used as a means to inappropriately exchange favorable business outcomes. Make sure you know and follow the Code requirements. If you have any questions, contact your manager or the Ethics Office.

**Know their policies.** Understand the potential recipient's rules about gifts and entertainment before making any such offers. Only make offers that are consistent with a recipient's policies and considered modest by their local standards.

**Know when to say, "No."** Do not provide or accept gifts or entertainment that could embarrass Fiserv, could be construed as a bribe or kickback or are in exchange for preferential treatment in any business dealing. If you believe a person or entity has offered you something that could reflect negatively on the parties involved, refuse the offer with an explanation of our policies. To be clear, we do not offer or accept entertainment that is sexually oriented or is otherwise indecent or inconsistent with our Values.

**Q.** A supplier offered me a gift that is in excess of the monetary limit. What action should I take?

**A.** Explain to the supplier that accepting the gift would violate Fiserv policy and politely decline the gift.

# Competition and Antitrust

We are committed to free and fair competition, profiting only from delivery of superior value for our clients through leading technology, targeted innovation and excellence in everything we do. Fiserv prohibits anticompetitive activities, and our commitment is aligned with federal and state antitrust laws.

## Our Responsibility

Avoid conduct that could compromise our standing in the industry by making sure your actions are in line with competition and antitrust laws.

Competition and antitrust laws have three main objectives:

- To prohibit harmful anticompetitive behavior by dominant companies, as defined by the market share
- To prohibit agreements or understandings between competitors that could undermine competition
- To require prior review and, at times, clearance by government regulators for certain transactions that might substantially impact competition

Never enter into an agreement with a competitor, client or supplier – whether formal or informal – that is anti-competitive or relates to the exchange of competitively sensitive information of Fiserv or its competitors. The laws associated with antitrust and competition can be complex, and the consequences of violating these laws can be severe. It is critical to know our policies and consult the Legal Department before taking any of the following actions:

- Contracting with competitors
- Obtaining or handling confidential data about competitors
- Engaging in discussions with competitors about the pricing or confidential business plans of Fiserv

**Q.** A neighbor of mine works as a sales associate at one of our competitors. He wants more information about a discount program we plan to offer, so that his company could offer something similar. Without my help, his sales may go down which could jeopardize his job. What should I do?

**A.** You should excuse yourself from the conversation. What your neighbor has recommended is an unethical form of competition that violates our Code and potentially, antitrust/competition laws. Improper exchange of competitive information can be an antitrust violation even if no agreement is reached. Do not give him any information and immediately follow up with the Legal Department.

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# Insider Trading

**As a Fiserv associate, you may possess information that could have an impact on the value of the stock of Fiserv or other companies. Therefore, you must comply with applicable securities laws and Fiserv policy when dealing in securities.**

## Our Responsibility

In the course of your job, you may possess inside information about Fiserv or other companies with whom we deal. Inside information is information that is both material and nonpublic.

If you possess material, nonpublic information about Fiserv or other companies, you may not trade while in possession of the information or share that information with others.

Common examples of material, nonpublic information may include information about anticipated or actual:

- Mergers or acquisitions
- Earnings results
- Financial forecasts
- Significant corporate events (example, dividends or stock splits)
- Changes to the executive management team
- Pending or threatened lawsuits
- Significant cybersecurity events

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# Insider Trading

As a Fiserv associate...

 I will	 I will not
Trade stock only after material information in my possession has become publicly available	Trade stock while in possession of material, non-public information of Fiserv or another company
Consult with our Chief Legal Officer if I have questions about a proposed transaction and preclear if I am so required	Share material, nonpublic information with associates who do not need such information
Ask the Ethics Office if information is public before sharing it	Disclose confidential information outside of Fiserv without an appropriate confidentiality agreement in place unless I am reporting a suspected violation of the law to any U.S. government enforcement agency or cooperating with a U.S. government investigation



A Valuable Asset

Securities Trading Policy

## What is it?

**Material** information is information that a reasonable investor would consider important in deciding whether to buy, hold or sell a security.

**Non-public** information is information that has not yet become widely available to the public.

When in doubt, or if you are subject to preclearance in accordance with Fiserv policy, contact the Chief Legal Officer.

# Corporate Sustainability and Human Rights

Corporate sustainability is inextricably linked to societal and environmental sustainability. Fiserv is committed to integrating positive societal and environmental practices into all aspects of our work so that we uphold our basic responsibilities to the company and community.

## Our Responsibility

Corporate sustainability starts with our values and principled approach to doing business. Fiserv follows our Code and the 10 principles of the United Nations Global Compact. As a Fiserv associate, you have a duty to meet responsibilities in the areas of human rights, labor, environment and anti-corruption.

This means that our policies and practices address four key areas:

## Human Rights

- Support and respect the protection of internationally proclaimed human rights
- Never be complicit in human rights abuses (examples include slavery, torture, human trafficking)

## Labor

- Respect diversity
- Stand up against forced and compulsory labor
- Stand up against child labor
- Eliminate workplace discrimination

## Environment

- Work to prevent environmental damage
- Promote greater environmental responsibility
- Encourage environmentally friendly technologies

## Anti-Corruption

- Work against corruption in all its forms, including extortion and bribery, and follow the Code and Fiserv policies and procedures at all times

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# Corporate Sustainability and Human Rights

As a Fiserv associate...

 I will	 I will not
Respect all associates; honor diversity and inclusion; refuse to work with human rights abusers	Take shortcuts that could knowingly result in damage to our environment or violate environmental laws
Support sustainability efforts at my work location and in my community	Be silent if I witness corruption or human rights/labor abuses by a colleague or a supplier
Collaborate to reduce carbon footprint and greenhouse emissions	Forget that sustainability and human rights are, and must always be, a priority

## What is it?

For purposes of the Code, the **10 principles** refer to the United Nations Global Compact. This is an initiative that encourages businesses all over the globe to operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.

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# Engagement With Government Officials and Political Activities

As a responsible and engaged corporate citizen, Fiserv may choose to speak out on policy issues of importance to the company. The Government Relations Department is responsible for formulating the political advocacy plans for the company and for hiring and registering any personnel who represent Fiserv or lead the company's engagement on public policy matters with government policymakers.

## Our Responsibility

If we are aware of a political issue where advocating our position may be appropriate, we must obtain approval from the Government Relations Department before contacting a government official, before publicly speaking on behalf of Fiserv on a political issue or before retaining a political consultant or lobbyist to speak on our company's behalf.

The Senior Vice President of Government Relations must approve all legislative and lobbying activity. All lobbying activities, by or on behalf of Fiserv, shall be consistent with the highest ethical standards and comply with all applicable laws, regulations, rules and requirements.

Approval by the Government Relations Department is required for associate meetings with any elected official that may arise in the normal course of business – not necessarily related to a lobbying matter. Approval is not required for engagement with government officials pursuant to a subpoena or federal regulatory supervision activities.

Because discussions with elected officials can trigger lobbying disclosures in the United States as well as outside of the United States (and violations can result in criminal penalties), appropriate notice and approval must be obtained to ensure we are operating at the highest level of integrity and transparency.

## Political Contributions

The Government Relations Department must provide approval before any political contributions are made on our company's behalf and prior to joining a trade association or similar organization that uses Fiserv member dues to lobby in any capacity. Political contributions are the use of any Fiserv resources for any political purpose and includes gifts, use of facilities, a promise or an agreement to make a contribution, the provision of personal services and so on.

Fiserv is not permitted to reimburse individual associate contributions to any campaign.

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# Engagement With Government Officials and Political Activities

Under United States federal law, Fiserv may not use general treasury funds to make or provide contributions, payments, loans, gifts, services, facilities or other items of value to federal political candidates, campaign committees or national party committees, although federal law does allow contributions to federal candidates through a political action committee.

Fiserv has established a federal political action committee – Fiserv PAC – and all contributions to and expenditures on behalf of the Fiserv PAC are approved by the Fiserv PAC Board as permitted by the bylaws.

As U.S. state law and non-U.S. laws on contributions vary widely, the Government Relations and the Legal Departments must be engaged before any other contributions are made in order to verify whether or not it is permissible in that jurisdiction.

## Political Activities

Fiserv encourages all associates to participate individually in the political process and respects each associate's right to do so. Any such activity must not be carried out in our company's name or the name of business units or subsidiaries, and cannot be carried out during working hours or in Fiserv offices without prior approval from the Senior Vice President of Government Relations and must be consistent with the Political Contributions and Expenditures Policy.



## A Valuable Asset

### Political Contributions and Expenditures Policy

**Q.** I am considering a run for public office. Is that allowed under Fiserv policies?

**A.** Inform your manager of your intentions in order to discuss whether the activity might affect your employment.

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# Engagement With Government Officials and Political Activities

As a Fiserv associate...

 I will	 I will not
Clearly identify individual, personal political views as personal to me and not those of Fiserv	Use my work email to solicit political votes
Respect a colleague's different viewpoint	Request Fiserv pay or reimburse me for time spent supporting political candidates and issues or for my personal political contributions
Inform my manager if I am considering a run for public office	Carry out any political activity during my working hours or in Fiserv offices without approval

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## Charitable Contributions

**Fiserv supports a variety of charitable activities that are undertaken ethically, in accordance with the values of Fiserv and in compliance with applicable laws and regulations. Personal involvement in charitable activities is also encouraged (but not required), but personal involvement must remain separate from your association with Fiserv.**

As a company, we support initiatives focused on financial literacy, education, environmental stewardship and health and wellness. We believe that public policy engagement helps protect and advance the interests of Fiserv.

You are also encouraged, but not required, to participate in the Fiserv Gives Back program through our volunteer portal. Doing so enables us to evaluate our community engagement opportunities and better understand which causes Fiserv associates wish to support.

If you take on a role with a charity (not-for-profit or nongovernmental organization), you should clearly communicate that you are doing so as an individual. Outside pursuits should be conducted on your own time, using your own resources.

### **Our Responsibility**

If you would like Fiserv to consider participating in a charitable cause at a corporate level, speak to your manager or contact Fiserv Gives Back about ways to give back. Any Fiserv charitable donations above \$1,000 must be reported to Fiserv Gives Back prior to making the contribution on behalf of Fiserv.

*Giving With Purpose*



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# Charitable Contributions

As a Fiserv associate...

I will	I will not
Contribute to or volunteer for causes that matter to me	Pressure colleagues to donate money or buy goods or services
Keep my personal involvement in charitable activities separate from my association with Fiserv	Pursue outside interests on company time, using company resources
Remember that public policy engagement helps protect and advance Fiserv interests	Commit donations above \$1,000 before reporting it to Fiserv Gives Back

**Q.** I have been asked to sponsor a table on behalf of Fiserv for an organization I feel strongly about. What should I do?

**A.** Any charitable donations made on behalf of Fiserv above \$1,000 must be reported to Fiserv Gives Back prior to the donation. If sponsoring the table is less than \$1,000, we still encourage you to contact Fiserv Gives Back prior to making a commitment to ensure the organization's mission aligns with our corporate social responsibility priorities.



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Fiserv Gives Back

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# Inspire and Achieve Excellence



Creating an inclusive culture in and of itself is not enough – we all have a duty to work every day to protect that culture. When we nurture a safe, respectful workplace environment where all associates feel valued and can focus on being at their best every day for our clients, then we set ourselves and our organization up for success.

- **Respectful Environment**
- **Anti-Discrimination**
- **Anti-Harassment**
- **Substance-Free Workplace**
- **Workplace Safety and Security**

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# Respectful Environment

**Positive and productive relationships with co-workers, clients, vendors and other stakeholders are the foundation of our success. Effective relationships deliver innovative ideas, increase productivity, generate sales and drive the satisfaction and commitment of every individual. It is essential to create an environment in which relationships can thrive and associates can contribute to their fullest potential.**

## Our Responsibility

Building the value of the Fiserv brand and preserving our reputation is the responsibility of every associate. Any instance of disrespectful, offensive or hostile behavior puts our standing as a preferred employer or partner at risk. The subsequent impact on areas such as recruitment, retention or client loyalty, combined with possible financial penalties if the behavior is unlawful, could impede our business success.

For these reasons, as well as fostering a supportive and respectful work environment to ensure associates reach their full potential, respectful behavior is not optional – it is an expectation of all associates. All associates should act in a way that will be seen as respectful and responsible from the perspective of the people with whom they interact. This responsibility applies equally, whether the interactions are occurring at a Fiserv office or at any other location where Fiserv responsibilities are carried out or business relationships may occur.

For non-people managers in the U.S., nothing in our Code prohibits or restricts associates from exercising rights under Section 7 of the National Labor Relations Act, including language that may otherwise not comply with our Code. Our Code is not intended to interfere with such protected activity and Fiserv will not apply it to penalize associates for engaging in such protected activity.

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# Respectful Environment

Respectful behaviors include, but are not limited to:

- Creating an environment where associates feel comfortable to respectfully tell one another if they have been offended
- Treating people professionally and respectfully
- Listening to and seeking to understand the views of others
- Raising awareness of diversity issues in the workplace, while creating a space where everyone feels valued through the use of the Fiserv Employee Resource Groups
- Being aware of the sensitivities of others and the potential impact of your actions (for example, one should never assume, because you're comfortable with the content of a joke, that others in the work group have the same comfort level)
- Reporting, rather than ignoring, instances of inappropriate conduct that jeopardize the well-being of the work environment

Unacceptable behaviors include, but are not limited to:

- Using offensive language, including jokes that make fun of or belittle an individual based on personal characteristics
- Pressuring or requesting a subordinate, co-worker, contractor or other business associate to engage in conduct they are uncomfortable with or is inappropriate, such as excessive drinking, inappropriate touching and so on
- Intimidating or sabotaging the work of team members or other associates, or excluding individuals, without a legitimate job or business-related purpose to do so, from participating in work-related activities
- Destroying or defacing Fiserv property or a co-worker's personal property, whether intentionally or as a result of playing pranks or jokes

**Q.** Most of my colleagues laugh when my manager shares jokes from a popular podcast. But I find the content to be offensive toward women. Should I say something?

**A.** Yes. Offensive speech is strictly prohibited. Start by letting your manager know that you find the jokes inappropriate. If, for some reason, you do not feel comfortable speaking to your manager directly, then call the Alertline or speak to another Fiserv manager, the Ethics Office or someone from the Human Resources Department.

# Anti-Discrimination

**Fiserv is committed to equal opportunity and fair treatment of all associates. Decisions about hiring, training, promotions, pay, benefits and other employment-related actions should be based on merit, qualifications and job-related factors, and not on any characteristic protected by law or our ethical standards**

## Our Responsibility

Fiserv prohibits discrimination or unfair treatment based on race, religion, color, age, sex (including pregnancy), national origin, ancestry, physical or mental disability, genetic information, marital or familial status, gender identity and gender expression, sexual orientation, military or veteran status or any other characteristics protected by law. Making employment decisions based on any of these personal characteristics is always against our policies and is illegal under the laws of many countries.

### As a Fiserv associate...

I will	I will not
Be inclusive of others regardless of backgrounds	Refuse to hire someone based on a protected characteristic
Promote someone based on performance and job-related factors	Make offensive remarks or slurs, including inappropriate jokes
Report behavior I consider unfair or disrespectful	Offer a job to someone who is under-qualified because they are from my home country

**Q.** I want to hire a candidate who recently welcomed twins into their family, but I am concerned about the candidate's ability to be successful in the role due to family obligations at home. What should I do?

**A.** When making any employment-related decision, focus on the legitimate, job-related qualifications and factors when making the decision. Never make an employment decision based on a protected characteristic or your belief that someone cannot perform a job due to a protected characteristic. Be clear about the job duties and expectations of the role on the front end to avoid any disconnects in the future.

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# Anti-Harassment

We strive to create an environment of mutual respect that is free from harassment of any kind. Fiserv complies with all country and local laws prohibiting harassment; our Code expressly prohibits harassment in the workplace.

## Our Responsibility

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by geography, we consider the following non-exhaustive list to be unacceptable behavior:

- Sexually harassing a co-worker or other business associate
- Making offensive or derogatory comments, nicknames or slurs
- Engaging in negative stereotyping
- Engaging in physically threatening, intimidating or humiliating actions
- Showing hostility toward others because of individual characteristics

You should never act in a harassing manner or tolerate harassing behavior of others. It is important to remember that harassment, sexual or otherwise, is determined by actions and how they impact others, regardless of intentions.

If you witness or are subjected to any of the described behaviors or anything else that feels similarly inappropriate, our Code requires you to report it. We take all allegations of harassment seriously. For more information on country- and state-specific laws around anti-harassment, please refer to the Global Anti-Harassment Policy.



## A Valuable Asset

Global Anti-Harassment Policy

## What is it?

Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable. It can take many forms, such as sexual advances, requests for sexual favors or unwelcome demands for dates, sexually oriented jokes, pictures, text or email messages, explicit or degrading comments about appearance or a display of sexually suggestive pictures or pornography.

# Substance-Free Workplace

The use of drugs, tobacco, alcohol and other controlled substances can place you and other associates at risk. Help maintain a substance-free workplace that promotes a culture of health, safety and responsible performance.

## Our Responsibility

Associates are expected to work free from the influence of any substance that could impair job performance. Fiserv, therefore, strictly prohibits the use, abuse, possession, sale, conveyance, distribution or manufacture of illegal drugs, intoxicants or controlled substances in any amount or in any manner. In addition, Fiserv strictly prohibits the use or possession of alcohol on Fiserv premises, unless use is associated with a pre-approved company function. Fiserv is a smoke- and tobacco-free workplace in all locations, except where prohibited by local law.

Fiserv may, at its discretion, require a drug or alcohol screening, and necessary follow ups, at any time when an associate's behavior causes reasonable suspicion.

Examples of policy violations include, but are not limited to:

- Working while under the influence of alcohol or drugs
- Possessing open alcohol containers or consuming alcohol while on Fiserv premises (unless use is associated with a pre-approved company function)
- Possessing, selling, distributing, manufacturing, using, transporting or purchasing illegal drugs or unauthorized controlled substances while on Fiserv premises
- Using or abusing prescription or over-the-counter drugs in a way that impairs your judgment while working or while on Fiserv premises
- Using tobacco products in locations where smoke-free workplaces are protected by local law

**Q.** A co-worker keeps coming back from lunch slurring her words. She always says she's fine, but I'm starting to get worried about her. What should I do?

**A.** You should contact the Alertline or speak with a manager, the Ethics Office or your Human Resources Representative about your concerns. They can address the concern in a way that will keep her and others around her safe.

# Workplace Safety and Security

**Our most valuable assets are our associates, and their safety and security is one of our highest priorities. Fiserv will not tolerate acts of violence, including verbal or physical threats, intimidation, harassment and coercion.**

## Our Responsibility

As Fiserv associates, we share a commitment to a safe and secure workplace for all associates and visitors. This means following all workplace rules related to physical security and safety, including our Workplace Safety Standards.

## Physical Security and Safety

To promote physical security and safety, follow all workplace rules including those related to:

- Use of safety equipment and procedures
- Timely reporting of work-related injuries
- Proper use of Fiserv equipment
- Access, including identification and building access
- Cooperation with building and parking facilities rules
- Completing required training

## Weapons and Workplace Violence

Regardless of whether an individual possesses a concealed weapons permit (CCW) or is allowed by law to possess a weapon, the carrying of a weapon of any kind while inside a company building or leased space, on company property, inside a company-owned vehicle or while conducting company business, on- or off-site, is strictly prohibited and is a violation of company policy. Firearms stored in privately owned, personal vehicles require strict adherence to all requirements under applicable state and local laws. Weapons include, but are not limited to:

- Guns
- Electroshock weapons (example, tasers)
- Swords or knives with blades greater than 4 inches
- Explosives or fireworks
- Caustic or other dangerous chemicals (other than those used exclusively for facilities repair and maintenance)

## What is it?

Required training may include:

- Security awareness
- Your facility's business resiliency plan
- Your facility's emergency response procedures

Be sure you know the kinds of safety and security training that are required given your role and responsibilities.

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## Workplace Safety and Security

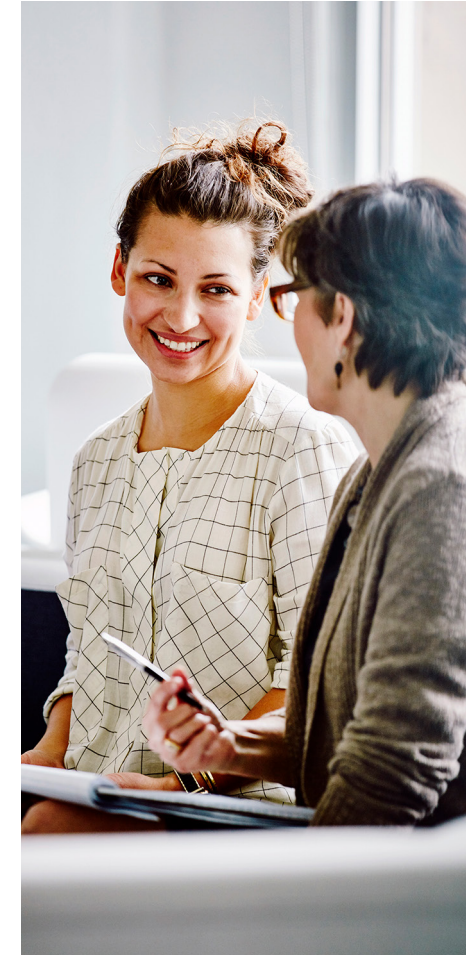
Possession of a weapon may be authorized under certain circumstances by the Chief Legal Officer to allow security personnel or law enforcement to have a weapon on company property when this possession is determined necessary to secure the safety and security of company associates.

Fiserv does not tolerate any type of workplace violence committed by or against associates. If you experience, witness or fear threatening or intimidating behavior, call 911 immediately.

Once it is safe to do so, be sure to also report any threat or instance of violence to the Fiserv Alertline.

As a Fiserv associate...

 I will	 I will not
Act in a manner that promotes a safe and respectful workplace for all associates	Engage in incidents or threats of workplace violence or intimidation on company property or while conducting company business, regardless of the location
Report any conduct, behavior or communication that is violent or may lead to workplace violence	Possess or brandish anything threatening
Actively identify hazards, prevent and correct unsafe conditions and demonstrate safe behaviors at all times	Fail to promptly report or misrepresent the occurrence or severity of a safety incident



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# Earn Client Trust Every Day



The world has changed the way we engage with our clients. We need to think, lead and operate differently through better alignment, more collaboration and more effective and faster communication.

- **Accurate Recordkeeping**
- **Product and Service Compliance**
- **Travel and Expense Reimbursement**
- **Handling of Records**
- **Background Screening**
- **Media and Investor Relations**
- **Social Media**

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# Accurate Recordkeeping

Keeping accurate business and financial records is essential to the success of Fiserv. The integrity and accuracy of our records guide internal decision making and are the basis on which we report to our shareholders, investors, creditors, government agencies and other stakeholders.

## Our Responsibility

Fiserv is a reporting company under federal securities laws and is subject to rules governing public disclosure of material information. Fiserv also operates in various jurisdictions around the world that require statutory audits and other government reporting. Fiserv adheres to a policy of full, fair, accurate, timely and understandable disclosure in all reports and documents that we file with or submit to the Securities and Exchange Commission, in other compliance reporting and in our public communications.

We all have a responsibility to keep accurate business records in ways that are legally compliant and are consistent with our internal controls and policies. As a Fiserv associate, you have a responsibility to:

- Create accurate, timely and complete records that represent the true state of affairs and nature of activities; never intentionally misrepresent facts, omit material information or otherwise mislead readers
- Never create or approve any false, misleading or fraudulent records or cause any other person to do so

- Never cause or influence any other person to mislead any accountant, auditor or other person in connection with the preparation, audit, review or examination of financial statements or records of Fiserv, and/or in connection with any document or report required to be filed with the U.S. Securities and Exchange Commission or any other governmental authority
- Know and follow all other relevant Fiserv policies

If you become aware of an error or learn that any record is missing, inaccurate or misleading, or that material information has not been disclosed in connection with a financial report or an audit, review or examination of the financial condition of Fiserv, raise the concern to the Ethics Office, Chief Financial Officer, the Alertline, a Fiserv manager or your HR Representative. If your concern relates to financial fraud, internal controls or auditing records, you are strongly encouraged to report the concern directly to the Chief Risk Officer.

## What is it?

**Business records** include any document or data with information related to our company's activities. Examples may include meeting minutes, financial or accounting documents, contracts, bids and proposals, client reports, system reports, emails and other correspondence, timesheets, invoices, expense reports, performance evaluations and regulatory filings.

**Q.** I am not in the Finance organization. Can I be held responsible for failing to report Fiserv information accurately?

**A.** Yes. Although senior management must sign off on financial records for Fiserv, every associate creates business records and these all can impact our financial records. Take the time to be sure every business record you record is accurate.

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# Product and Service Compliance

All Fiserv associates have an affirmative obligation to design, deliver and support our products and services in a manner that continuously complies with applicable laws and regulations, including but not limited to federal consumer financial laws.

## Our Responsibility

Because the principal market for our products and services is the regulated financial services industry, providing offerings that do not comply with applicable regulations could seriously damage our reputation and financial interests. Fiserv expects associates to design, deliver, and support Fiserv products and services that enable our clients to comply with the law and that avoid consumer harm. Fiserv also expects associates to help our clients to avoid consumer harm and to investigate claims that our products or services may harm consumers or fail to comply with federal consumer financial laws. Finally, Fiserv expects associates to design, deliver, and support Fiserv products and services with consideration of equitability and fairness to consumer end users and, where required, to meet guidelines intended to accommodate the needs of users with differing abilities, such as Web Content Accessibility Guidelines.



## A Valuable Asset

- Global Compliance  
Fairness Policy
- Global Product  
Accessibility Policy



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# Travel and Expense Reimbursement

**Expense reimbursement policies protect our assets, protect our reputation and prevent fraud and abuse. To comply with our policies, only claim expenses that are reasonable, appropriate and serve a legitimate business purpose.**

## Our Responsibility

In the course of your job, you may incur business expenses for travel, entertainment and other forms of hospitality. You must ensure these expenses align with the Fiserv Global Travel, Expense and Corporate Card Policy, and that they are properly supported and authorized. Only use a Fiserv-provided corporate card for business expenses, and submit accurate documentation and receipts to support your claims. Managers must review and ensure all expenditures adhere to the Global Travel, Expense and Corporate Card Policy prior to approving the expense reports.



## A Valuable Asset

Global Travel, Expense and Corporate Card Policy

**Q.** I was at dinner with my manager and when the bill came to the table, she told me to pay the bill with my Fiserv credit card, so she would not have to obtain approval for the meal from her manager. Is this permissible under the Global Travel, Expense and Corporate Card Policy?

**A.** No. Your manager should use her credit card for the meal expense, because she is the most senior associate at the table, and the appropriate review and approval process would not otherwise be followed.

**Q.** What if I would prefer to use my personal credit card for business travel and purchases, so I can collect points for personal use?

**A.** Use of a personal credit card for business or business travel related purposes is prohibited. Fiserv policy states all qualifying business and/or business travel related purchases are to be placed on the Fiserv corporate card.

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# Handling of Records

**Retaining the records we need helps us make responsible business decisions, protects our legal interests and preserves client trust.**

## Our Responsibility

From creation to disposal, we must handle business records appropriately at every stage. You must familiarize yourself and adhere to the Fiserv Record Retention Policy.

If you are unsure about which records to retain or how long to retain them, seek guidance from a Fiserv manager.

Give special consideration to documents that may be subject to a litigation hold notice and retain them in a secure place. Never dispose of such documents unless you have been instructed by the Legal Department to do so.

As a Fiserv associate...

I will	I will not
Follow all directions in a litigation hold notice	Toss out records on my last day of work
Create a filing system for both hard and digital copies, and store paper files in a fire-resistant filing cabinet	Haphazardly label any records I intend to keep
Review and follow our record retention policy	Over-save or over-delete documents

## What is it?

A **litigation hold notice** is a written instruction to preserve certain documents in the event that there is future litigation.



## A Valuable Asset Record Retention Policy

# Background Screening

**Background screening and verification of required licenses or certifications is required when associates are initially hired and on a recurring basis during employment. Your participation in periodic screenings is required and will help us ensure we create safer, more secure work environments staffed by qualified associates.**

## Our Responsibility

Certain background checks are required to protect Fiserv from potential risks and to meet legal and contractual requirements. To the extent permitted by country, federal, state or local laws, screenings may include:

- Criminal conviction history
- Education verification
- Professional licensure and status
- Drug testing
- Credit checks
- Employment history
- Reference verification

During the course of employment, associates are required to report any serious offense for which they are charged, arrested or convicted. This includes felonies or misdemeanors that relate to financial impropriety, breach of trust, and physical or domestic violence even if classified as a misdemeanor, as well as driving while intoxicated. This requirement does not apply to minor traffic violations such as speeding. If required, the report must be made by the Fiserv associate to Office of Global Security at 1-800-368-1000 or [GSOC@Fiserv.com](mailto:GSOC@Fiserv.com), and to the Human Resources Department within three days of the arrest or charge.

**Q.** I remember undergoing a pre-employment screening before being hired, but I have just been asked to undergo another background check. Should I be worried?

**A.** No. It is Fiserv policy to verify an associate's background throughout his or her time with Fiserv. It is the standard and not the exception, so you should not feel singled out. This process is one of the many ways we work to keep our associates and our business safe and comply with contractual and legal obligations.

# Media and Investor Relations

**Building the value of the Fiserv brand and preserving our reputation is the responsibility of every associate and involves careful consideration when sharing information and communicating publicly about our business.**

## Our Responsibility

Our media relations programs at Fiserv are managed by the Corporate Communications Department within Global Brand. Because we may receive inquiries from reporters about our business or financial performance, it is important all Fiserv associates, especially those who answer incoming calls, understand our media relations guidelines and response process. Referring calls promptly and politely to the Corporate Communications Department, without engaging in discussion, assures our communication professionals are aware of all media activity and requests and can respond accurately and appropriately.

If you are contacted by a member of the media regarding Fiserv:

- Kindly inform the caller you are not the appropriate person to respond to their inquiry, and our Fiserv Corporate Communications Department can best assist
- Ask for the caller's name, media outlet, deadline, contact phone number and email address, and

advise the caller that someone from our Corporate Communications Department will reply to them as soon as possible

- Promptly provide the details of the media contact to the Corporate Communications Department

Questions from a member of the investment or analyst community should be directed to our Investor Relations Department as follows:

- Politely inform the caller that our Fiserv Investor Relations Department handles all investment-related questions and a representative from Investor Relations will reply to them as soon as possible
- Ask for the caller's name, firm and contact information
- Promptly provide contact details to Investor Relations

All other investor inquiries related to basic investor information should also be referred to Investor Relations.

**Q.** I recently saw an article in the newspaper with information about our company that I know is incorrect. Would it be appropriate for me to contact the author of the article and provide the correct information?

**A.** No. Please share this information promptly with a Corporate Communications Department associate to coordinate any changes or notifications and ensure the information about our business is communicated accurately to all entities and individuals outside of Fiserv.



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### Public Relations at Fiserv

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## Social Media

**Social media, which includes but is not limited to Facebook, Instagram, LinkedIn, X (formerly Twitter), blogs and forums, is an established part of many people’s personal and professional lives – and the lines have blurred.**

The principles below, rooted in the Fiserv Values, highlight the responsibilities of all associates when engaging in social media.

### Our Responsibility

Associates are accountable for their actions and words online. Your social media activity, including liking and commenting on private posts, must comply with the Code and our policies, including any applicable laws and regulations. Always be respectful of others and never post anything that would constitute a threat or harassment.

Corporate social media channels are viewed as official information channels for publicly-traded companies. Do not disclose confidential Fiserv information. Understand that information you receive not explicitly labeled as confidential, such as a conversation about a new client, may be non-public and not appropriate to share. If you are not sure, ask a manager or the Corporate Communications Department.

Understand and follow the Acceptable Use and Secure Computing Standards and other policies set forth by the Global Cyber Security Services.

Like email, social media is an active target for malicious activity. Do not use Fiserv assets for personal or third-party business/commercial use, including social media.

When sharing content from the company or opinions related to Fiserv or the industry, be transparent about your role and affiliation with Fiserv. In any communications, it must be clear that the information you share is personal and not an official company communication.

Global Brand maintains policies for approval of blogs and other content meant to market Fiserv services and solutions, which may also require legal review. Do not establish social media accounts or groups using Fiserv trademarks or logos or use Fiserv as part of individual user profile names for business or commercial purposes. Do not create or alter content (example, blogs, images or videos) using Fiserv trademarks or logos.

### Final Word

Before posting anything, use common sense and understand the implications for your reputation and, potentially, how it reflects on the company.



### A Valuable Asset

### Social Media Standards

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# Create With Purpose



Fiserv may have legal, regulatory and contractual obligations to safeguard the confidential and sensitive information we possess. This includes information pertaining to our products, clients, associates, business and consumers. It may include specific information such as account numbers, social security numbers, client lists, source code and proprietary processes, financial and business performance data and other information that we develop through our hard work and which gives us a competitive advantage.

- Confidential Information and Privacy
- Intellectual Property
- Protecting Our Assets

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# Confidential Information and Privacy

It is our responsibility to safeguard confidential information when it is collected, used, transmitted and stored to prevent any unauthorized disclosure. It is also our responsibility to ensure that confidential information in any form, whether electronic or paper, is disposed of in a secure manner. Any information that is not generally known to the general public is considered confidential information. In addition, all data processed by us must be handled in compliance with our Data Ethics Framework and, for personal data, our Global Privacy Policy.

## Our Responsibility

Within the scope of your job, you may come into contact with confidential information and personal data that relates to our:

- Company
- Associates
- Products and services
- Business partners
- Service providers
- Clients
- Clients' customers

Personal data includes names, addresses, tax identification numbers and any other information relating to a person. If you have access to any confidential information or personal data, it is your obligation to safeguard it from any unauthorized use or disclosure, using it only to the extent necessary to perform your assigned job

duties. Confidential information and personal data must not be shared or discussed outside of Fiserv, except where necessary for business needs of Fiserv or its clients; as permitted by contracts; as required by applicable law or regulation; pursuant to a subpoena or order issued by a court of competent jurisdiction; or as requested by a judicial, administrative or legislative body having jurisdiction over Fiserv.

The classification and appropriate use of information is detailed in our Information Classification Policy and Data Classification and Handling Standard. Ensure that information you handle is properly labeled and handled in accordance with that labeling.

Neither this Code nor any agreement with or other policy of Fiserv prohibits you from sharing information about suspected violations of law (other than information that is protected by the attorney-client privilege or work product doctrine) with any U.S. government enforcement agency or from cooperating with any U.S. government investigation without Fiserv approval or fear of retaliation.

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# Confidential Information and Privacy

The proper handling, use and protection of data of all types is the responsibility of every associate who must adhere to our Data Ethics Framework and Global Privacy Policy at all times. The financial institutions, businesses and consumers around the world for whom Fiserv handles data trust every associate to uphold the highest ethical and legal standards in the handling of that data.



## A Valuable Asset

Acceptable Use Policy

Information Classification Policy

Fiserv Data Ethics Framework

Global Privacy Policy

The Fiserv Data Ethics Framework defines the foundational principles and standards to which we hold ourselves when handling data. It requires associates to:

- **Know** the data they access and use
- **Be Accountable** for their handling of data
- **Be Transparent** about what we do with data
- **Take Action** to uphold our ethical standards

Some Fiserv subsidiaries have also committed to “Binding Corporate Rules” (BCRs) which express their collective pledge to the protection of Personal Data obtained and processed in the course of their business. The BCRs and a list of affected subsidiaries can be found at [fiserv.com/bcr](https://www.fiserv.com/bcr). If you work for any of the listed subsidiaries, you must comply with the BCRs.

**Q.** I often work in client offices. I usually have an assigned space. Do I still need to secure my laptop when I am away from my desk?

**A.** Yes. Associates who work from alternative locations must ensure that their workspace is just as secure as it would be at a Fiserv office. You should lockdown your computer whenever you are not at your desk, and take it with you at the end of the day regardless of where you work. If you do not work in a secure area while away from a Fiserv office, you should avoid leaving your laptop and work items unattended.

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# Intellectual Property

It is important that you not only protect Fiserv intellectual property (IP), but that you respect the intellectual property of others. Intellectual property includes inventions, discoveries, ideas, improvements, software programs, artwork and works of authorship. These items are Fiserv property if they are created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information. Fiserv IP may be protected under patent, trademark, copyright and/or trade secret law.

## Our Responsibility

As an associate, you are required to protect all Fiserv intellectual property from misuse, theft or other infringement. Information regarding Fiserv strategy, product development and the like may be considered a trade secret and is similarly subject to protection. You are required to sign a Confidentiality and Development Agreement or agree to equivalent terms and conditions, as a condition of employment. You are required to assign to Fiserv full rights to all intellectual property you may develop on company time, using company equipment or using proprietary information acquired through Fiserv employment.

You must also comply with all laws, regulations and contractual commitments regarding the intellectual property rights of third parties, including patents, trademarks, copyrights, trade secrets and other proprietary information. You must not knowingly infringe on or misuse the valid and enforceable intellectual property rights of third parties.

If you have a question about the use of legally protected intellectual property or other proprietary information, including computer software of third parties, you should contact the Legal Department.

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# Intellectual Property

As a Fiserv associate...

 I will	 I will not
Read, sign and abide by the Fiserv Confidentiality and Development Agreement	Share nonpublic IP internally with those who do not need it to do their jobs
Work with the Legal Department to ensure IP we are creating is properly protected	Share nonpublic IP externally without permission
Only seek access to Fiserv IP I need for my work responsibilities	Use or share Fiserv IP beyond what is needed for my work



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## Protecting Our Assets

**As an associate, you will have access to physical and electronic assets, and you will be responsible for the use and the safeguarding of those assets. Ensure that you only use them for their intended purpose and you work to protect them from misuse, theft, carelessness and waste.**

### Our Responsibility

Use good judgment when handling Fiserv assets. Our assets include everything that Fiserv owns or uses to conduct business, including physical property, electronic systems, plans and other business papers. Our work product, and that of our colleagues, may also be considered a Fiserv asset and thus subject to the same protection as other assets.

### Physical Property

Physical assets, such as office furnishings, equipment and supplies may be provided in order for you to perform your job. Physical property should be used and maintained properly, and associates are expected to speak up if Fiserv property is damaged, lost or stolen. In order to enhance workplace security, you should be familiar with and follow any work safety information and training provided to you.

You are expected to follow all safety and security rules and practices; cooperate with those who enforce these rules and practices; take necessary steps to protect yourself and others; attend required safety training; and immediately report all accidents, injuries or unsafe practices or conditions.

Keep secure areas locked, and avoid using or removing property unless you have a legitimate business reason for doing so.



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# Protecting Our Assets

## Computer and Messaging Systems

The nature of our business requires that all Fiserv computer systems and networks that process financial transactions and store financial data operate with the availability, efficiency, reliability and integrity that are expected of systems that process financial transactions and store financial data. The company is firmly committed to operating and maintaining its technology assets in a manner that merits the trust and confidence of the clients and consumers we serve.

Accordingly, all Fiserv associates are required to operate both internal and client-facing computer systems for their intended business purposes and in full accordance with the Fiserv Cyber Security Policy and Standard Change Summary and other applicable enterprise policies and standards. When using equipment or technology provided by Fiserv, you should not expect that your usage or the information you send or receive is private from Fiserv or its authorized representatives. Fiserv reserves the right to monitor all activity on its devices and networks.

Keep the following requirements in mind:

- Always use VPN when connecting to a public Wi-Fi network and only connect to legitimate public networks; this is particularly important for associates who travel or work remotely
- Your communications, whether by email or messaging systems, should be courteous, accurate, professional and complete
- Personal use of any Fiserv-issued asset, including electronics, must be strictly limited and will be monitored; it is never appropriate to allow an unauthorized third party to use Fiserv equipment for any purpose
- Use of a Fiserv device to access any explicit or offensive material is strictly prohibited, regardless of work hours or location, and is grounds for termination
- Return all Fiserv equipment when it is replaced or when your employment ends
- Retain emails in ways that align with our Record Retention Policy

**Q.** I found this great new online decorating service that I want to use for my apartment. May I use my Fiserv email address as the login?

**A.** No. You should only share your Fiserv email address for Fiserv business purposes. Using it as a username for personal accounts could create a distraction for you and a risk for Fiserv if that information is overused or shared.

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# Protecting Our Assets

As a Fiserv associate:

I will	I will not
Carefully scrutinize a link before clicking on it, especially links found in email messages	Allow someone to enter secure areas without appropriate access
Limit personal emails sent from or received by my Fiserv email address	Instant message inappropriate or offensive content
Shut down my computer during travel	Install unauthorized software onto Fiserv devices

**Q.** I left the office and plan to continue working when I get home. Is it okay to leave my laptop on in my bag while I drive home?

**A.** No, you should always shut down your laptop while in transit or when not in use outside a Fiserv facility to ensure encryption is enabled.



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Acceptable Use Policy

Cybersecurity General Computing Standard

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# Deliver on the Promise of One Fiserv

Our  
Aspiration

To move money and information in a  
way that moves the world

Our  
Values

Earn  
client trust  
every  
day.

Inspire  
& achieve  
excellence

Create  
with purpose.

Do the right thing.

Deliver on the promise of  
one Fiserv.

Our  
Purpose

To deliver superior value for our clients through leading technology,  
targeted innovation and excellence in everything we do

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## Helpful Resources

Resource:	For help with:	Contact:
The Fiserv Alertline	Concerns, questions or reports about suspected violations of the Code, law or our policies.	Call the 24-hour Alertline or access Ethicspoint. For reporting in the U.S., Canada or Puerto Rico, call 1-888-475-0012; for reporting in other jurisdictions, access country-specific international toll-free numbers.
The Ethics Office	Concerns, questions or reports about suspected violations of the Code, law or our policies.	<a href="mailto:Ethics&amp;Compliance@Fiserv.com">Ethics&amp;Compliance@Fiserv.com</a>
Chief Privacy Officer and Data Protection Officer	Concerns, questions or reports about privacy issues.	<a href="mailto:DPO@Fiserv.com">DPO@Fiserv.com</a>
The Global Security Operations Center (GSOC)	Concerns, questions or reports about suspected violations of the Code, law or our policies.	<a href="mailto:GSOC@Fiserv.com">GSOC@Fiserv.com</a>

