

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

Purpose and Background

Public policy decisions by government agencies can have significant impacts on the products and services offered by Fiserv. We believe that public policy engagement may help to protect and advance its interests. Accordingly, we may exercise our fundamental right to participate in the political process through political contributions where legal and appropriate. Strict laws and rules govern political contributions and may dictate when and how contributions can be made by corporations and others to candidates for elected office and political organizations.

This policy defines the framework for Company Political Contributions (as defined below), the political action committee of Fiserv, Inc. (the "PAC"), and Fiserv's industry initiatives and advocacy, including key roles and responsibilities, oversight and governance.

Scope

This policy applies to all directors, officers and associates of Fiserv, Inc. and its subsidiaries (collectively, "Fiserv").

Policy

Company Political Contributions

Fiserv may make political contributions to protect and advance its interests and further its public policy objectives provided that all political contributions made by Fiserv must comply with this policy and all applicable laws, rules and regulations.

What are political contributions?

Political contributions are the use of any Fiserv resources for any political purpose (collectively, "Company Political Contributions"). Fiserv resources include but are not limited to:

- Gifts, loans, advances or deposits of cash or anything of value
- Use of facilities, such as conference rooms, personnel, email, postage, use of corporate name or logo, mailing or contact lists, vendor discounts, photocopiers, telephones, computers, supplies or other similar office assets
- A contract, promise or agreement to make a contribution, whether express or implied and, whether or not legally enforceable
- The payment of compensation for personal services of another person which are rendered to any candidate or political party or affiliated organization without charge

- The provision of personal services

What is a political purpose?

A political purpose includes making monetary or in-kind contributions to any political campaign, campaign committee, political party committee, political committee, political organization operating under Section 527 of the Internal Revenue Code, or ballot committee. When reviewing contributions under this Policy, the Senior Vice President of Government Relations will consider, among other matters, any restrictions on the amount of money that can be contributed in a particular jurisdiction, any restrictions on the source of the campaign donation (e.g., PAC versus corporation), reporting requirements that would be triggered by the contribution, and compliance with applicable “pay-to-play” rules.

A political purpose also includes, but is not limited to, soliciting contributions for a political candidate or political committee, conveying a contribution check or contribution form to a political candidate or committee, planning or attending a fundraising event for a political candidate or committee, volunteering or providing paid services of any kind to a political candidate or political committee, or otherwise participating in or seeking to influence public opinion with respect to:

- A political campaign on behalf of or in opposition to any candidate for public office
- A ballot initiative or referendum

A political purpose also includes making a contribution to, or coordinating with, any other organization, business association, advocacy organization, educational group, any other comparable entity, whether or not it qualifies as a tax-exempt organization, in an effort to influence any election or ballot question.

What political contributions are appropriate?

Company Political Contributions shall be determined on the basis of Fiserv’s interests and not those of any individual officers, directors, associates or other parties. Fiserv funds may not be used for any unlawful, improper or unethical purpose, and no contribution may be given in anticipation of, in recognition of or in return for an official act. In addition, United States federal law currently prohibits companies from making corporate contributions or providing anything of value directly to any political candidate, campaign committee or national party committee in connection with any federal election. Accordingly, Fiserv shall not make any such contributions. Further, it will not make or fund independent expenditures for such candidates or committees.

When approved under this Policy, Fiserv may contribute corporate funds to state or local candidates and committees in the United States where permissible and within the limits designated by state and local laws and regulations, including limitations in so-called “pay-to-play” rules that may be applicable in jurisdictions where Fiserv holds or may in the future bid for a government contract.

While Fiserv does not typically make contributions to individual political candidates outside of the United States, there are situations where it may be in its interest to support the activities of foreign political parties, associations and other entities, where permitted by applicable law.

Fiserv also may make contributions when approved in accordance with this Policy: (a) to established and recognized organizations that are organized under Section 527 of the United States federal tax code and registered with the Federal Election Commission or a state equivalent regulating entity; or (b) to support or oppose state or local ballot initiatives or referendums where doing so would advance Fiserv's business interests and public policy objectives.

Initiating Company Political Contributions

Only the Chairman, Chief Executive Officer, President, an Executive Vice President or a Senior Vice President may initiate a request for a Company Political Contribution.

Company Political Contributions Approval Process

All requests for Company Political Contributions by or on behalf of Fiserv shall be made in writing to the Senior Vice President of Government Relations. If the Senior Vice President of Government Relations, working in conjunction with the Chief Executive Officer, determines that the contribution is permissible under applicable law, including under the Federal Election Campaign Act, state or local campaign finance laws, state or local "pay-to-play" rules, United States Foreign Corrupt Practices Act or equivalent local laws, and aligns with the company's public policy objectives, then the Government Relations function will work with the requesting person to fund the request. A monthly summary of all contributions will be provided to the Chief Executive Officer.

Payment of Company Political Contributions

All monetary Company Political Contributions shall be made by credit card, check or other fully auditable payment method, and must be submitted for payment in accordance with the table on [Exhibit A](#). When possible, payment should be made in a manner where receipt can be confirmed rather than hand delivered.

The PAC

Fiserv, Inc. sponsors a non-partisan federal political action committee pursuant to the Federal Election Campaign Act and the regulations promulgated by the Federal Election Commission. Eligible associates of Fiserv, Inc. and its subsidiaries who are U.S. citizens or green-card holders have the opportunity to voluntarily contribute to the PAC, and to have those voluntary contributions donated, by approval of the PAC board, to federal candidates and office holders ("[PAC Contributions](#)").

While not an exhaustive list, the PAC may consider the following factors when making contributions to a candidate: voting record on issues of importance to Fiserv; committee assignments and the relevance of such committees to Fiserv's business; representation where Fiserv maintains an office or business concentration; support for the business sectors in which Fiserv operates; voting record on regulations relevant to Fiserv's businesses. The PAC does not make contributions to state or local officeholders or candidates for state or local office, including federal officeholders running for state or local office; or candidates for federal office that are concurrently holding a seat as a state or local officeholder in any capacity – in a given state or locality.

All contributions to the PAC are maintained in a separate, segregated fund. PAC Contributions are paid from such fund and are publicly disclosed on government-agency websites, including the Federal Election Commission's website.

Personal Political Activities

Individuals covered by this Policy are, subject to compliance with applicable pay-to-play laws, free to engage in personal political activities in their individual capacities and on their own time. No individual covered by this Policy is required to engage in such activities and no individual covered by this Policy will be advantaged or disadvantaged on the basis of a decision to engage or not to engage in personal political activities. An individual covered by this Policy may engage in personal political activity during working hours only if such activity (i) is consistent with Fiserv's human resource policies, including the restrictions on the use of company resources described herein and (ii) does not prevent the individual from completing the normal amount of work that the individual usually carries out during the same work period.

No individual covered by this Policy may engage in political activities during working hours or in Fiserv offices for more than one hour per week or four hours per month without approval from the Senior Vice President of Government Relations or his or her designee. Individuals covered by this Policy are also encouraged to use their private email accounts for any personal political activities. Without approval, individuals covered by this Policy should never indicate in any email that they are conducting political activities on behalf of Fiserv.

No individual covered by this Policy may ask or instruct a subordinate employee to assist with personal political activity. This includes asking a subordinate employee to collect, deliver or mail any personal contribution checks or contribution forms.

No personal political contributions, including in-kind contributions, will be reimbursed by Fiserv. Furthermore, associates are prohibited from charging a personal political contribution to a corporate charge card or seeking reimbursement for a personal political contribution on a company expense report.

Other Company Expenditures

Fiserv belongs and pays membership dues to various trade associations across the world. Fiserv's public policy positions are often communicated through the lobbying efforts of these organizations, which may enable the company to reach its audience more efficiently and in concert with industry peers. Fiserv's participation as a member of these trade associations comes with the understanding that it may not always agree with all the positions of an organization or its members. A decision to join, and pay customary dues to, a trade association or similar organization must be approved by the Senior Vice President of Government Relations or his or her designee. All dues for membership in trade associations must be submitted for payment in accordance with the table on Exhibit A.

Fiserv may support groups organized under Section 501(c)(4) of the Internal Revenue Code and other tax-exempt organizations, but Fiserv does not support Section 501(c)(4) groups for electoral purposes (unless related exclusively to support of or opposition to a particular ballot initiative in which Fiserv has an interest). A decision to contribute to a 501(c)(4) organization must be approved by the Senior Vice President of Government Relations and the Senior Vice President of Government Relations or his or her designee. All funds to support groups organized under Section 501(c)(4) of the Internal Revenue Code must be submitted for payment in accordance with the table on Exhibit A.

Reporting Process

The Senior Vice President of Government Relations or his or her designee shall be responsible for: (1) ensuring that all Company Political Contributions and PAC Contributions are reported as and when required by applicable law; and (2) preparing periodic reports of Company Political Contributions, PAC Contributions and other expenditures allowed under this Policy, including the recipient, amount, and date, for review by the Nominating and Corporate Governance Committee of the Board of Directors.

Oversight

The Nominating and Corporate Governance Committee of the company's board of directors is responsible for overseeing Fiserv's political activities and political contributions and expenditures to ensure consistency with Fiserv's business objectives and public policy priorities. The Nominating and Corporate Governance Committee shall discuss Fiserv's political activities and political contributions and expenditures with the Senior Vice President of Government Relations at least annually. The Nominating and Corporate Governance Committee shall review this Policy with the company's management at least annually.

Fiserv conducts periodic training, compliance system reviews, and internal audits to ensure all PAC and Company Political Contributions are made in accordance with the law and company policies.

Escalation and Questions

Contact the Senior Vice President of Government Relations for escalations or questions regarding this Policy.

Enforcement

Failure to comply with this Policy will be deemed to be a violation of the code of conduct and may lead to disciplinary action up to and including termination of employment or engagement and pursuit of appropriate legal remedies.

Exceptions

There are no exceptions to this Policy unless permitted by law and as approved by the Policy Owner. Exceptions must be sought by contacting the Policy Owner.

EXHIBIT A

[Corporate Accounting Policies]