

13.02 Worldpay Corporate Citizenship Policy

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13.02 Corporate Citizenship Policy

Purpose

The Corporate Citizenship Policy ("Policy") reflects Worldpay's commitment to sustainable and responsible business practices. This Policy applies to all colleagues, contractors, executives, officers, and directors of Worldpay.

Statement

Worldpay's technology and services help businesses and communities thrive. Worldpay is committed to operating with integrity, contributing to our surrounding communities, promoting inclusion for all, empowering our colleagues, and preserving our natural resources. Worldpay is also committed to data security, protecting the privacy of our clients, and promoting a global financial system that is accessible and inclusive. The Audit and Risk Committee of the Board of Directors provides oversight with respect to Worldpay's Corporate Citizenship and global sustainability programs.

To remain in compliance with Corporate Citizenship disclosure requirements and best practices and to align all Worldpay personnel with a common set of Corporate Citizenship-related aspirational goals, no colleague, line of business or corporate function may publicly disclose or publish aspirational goals, commitments, or other potentially material Corporate Citizenship metrics or data without the prior written approval of the Chief Corporate Affairs Officer. Material Corporate Citizenship information is determined through periodic materiality assessments incorporating stakeholder feedback and incorporation of the evolving sustainability risk environment.

13.02.01 Environmental

Worldpay recognizes that our planet needs to be a sustainable home for current and future generations and Worldpay is committed to managing its activities in such a way to reduce pollution and adverse impacts to the environment. A commitment to environmental stewardship is summarized on our website and in the policies posted there.

13.02.01.01 Environmental Protection and Awareness

Worldpay's environmental programs and all applicable environmental legal requirements. Worldpay commits to the continual improvement of our environmental programs including setting objectives for improving material environmental performance. Worldpay leverages numerous mechanisms for closing our environmental gaps and facilitating continuous improvement across facilities as well as maintaining compliance with applicable environmental laws and regulations. -

Worldpay seeks to protect and maintain the quality of the environment, promote environmental awareness among its colleagues, clients and the communities in which it operates and throughout our customers, suppliers, and stakeholders (Value Chain). Accordingly, colleagues are instructed to:

- Operate in compliance with environmental laws and regulations and internal environmental program requirements,
- Promptly report to management any environmental violations, and
- Consider opportunities to improve environmental programs.

Colleagues should direct any reports of actual or potential environmental violations, or any questions about responsibilities or company policies in these areas, to their supervisor, People & Culture, or the Ethics Helpline or the Ethics Office page on MyWorldpay.

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13.02.01.02 Energy Efficiency and Emissions Reduction

Worldpay supports minimizing our environmental impact through initiatives to increase energy efficiency. As a global leader in financial technology, our primary opportunities for reducing direct environmental impact are in operating our data centers and office buildings efficiently and responsibly.

Worldpay may evaluate the opportunity for certification through the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design ("LEED") program for new construction, and will include LEED certification and other environmental certifications as part of the review process when building or looking to lease new facilities. LEED is the world's most widely recognized and applied benchmark for green buildings.

Worldpay will assess the need for implementing automation and energy management systems where possible to help reduce our impact on the environment. This includes using energy-efficient LED lighting and high efficiency mechanical units, where practical.

Also, we will assess the use of energy efficient or sustainable products when equipment replacements are necessary or at end of life.

From time to time, Worldpay may perform surveys of energy usage and carbon emissions from its facilities to track Worldpay's progress in minimizing environmental impacts.

13.02.01.03 Waste Management and Recycling

As part of our efforts to minimize waste, Worldpay supports recycling programs at our facilities where it is supported by local municipalities. Our waste reduction practices include recycling computers and other technology equipment such as VPN tokens and computer printer toner cartridges, in line with international guidelines and Worldpay's security policies and practices. Confidential shred and recycle bins are available at many Worldpay locations so that paper and other materials can be shredded and recycled. Worldpay requires that any paper or materials containing sensitive information be shredded and disposed of in accordance with company policies. Worldpay partners with third parties to recycle/refurbish POS terminals as needed.

13.02.01.04 Water Usage

Worldpay supports minimizing and reducing water usage as part of our environmental protection efforts at our major existing and new-build facilities. From time to time, Worldpay may conduct a survey of water withdrawal from its major facilities to promote minimizing water usage.

13.02.01.06 Climate-Related Risk Management

Worldpay may assess Worldpay's environmental practices by conducting internal and external data audits and climate risk assessments. From time to time, we may conduct surveys of major Worldpay facilities around the world to measure energy usage (including energy derived from renewable sources), GHG emissions (Scope 1 and Scope 2) and water usage. This and other data from our Corporate Citizenship program audits are reported periodically to senior management and/or to the Audit and Risk Committee of the Worldpay Board. Some of these results are also reported in our sustainability report.

These reporting efforts provide transparency to our internal and external stakeholders and will also help measure our future progress in supporting global efforts to combat climate change, including the United Nations Sustainable Development Goals (SDGs).

13.02.02 Social

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Worldpay seeks to earn the trust of our stakeholders by operating our global business in a responsible way to ensure the sustainability of our colleagues (including colleagues, vendors, and suppliers), our clients, and our communities.

13.02.02.01 Human Rights and Labor Management

Worldpay endeavors to:

- protect the fundamental human rights of all individuals;
- observe fair and ethical labor practices in our business and our communities, including our relationships with third-party vendors and suppliers;
- respect the human rights of minority and disadvantaged groups;
- and promote fair and ethical labor relations with all our colleagues.

Worldpay has zero tolerance regarding illegal and immoral practices involving child labor, forced labor and modern slavery, including human trafficking. This important subject matter is addressed within Worldpay's annual mandatory ethics and compliance training program as well as within our Worldpay Anti-Bribery Anti-Corruption ("ABAC") and Conduct Risk training. Worldpay supports transnational doctrines concerning fundamental human rights, including the United Nations Universal Declaration of Human Rights. Worldpay has implemented an Ethics and Integrity Line by which potential human rights violations can be reported. All potential violations that are reported are investigated and resolved.

Additionally, please see the section *Modern Slavery, Human Trafficking, Forced Labor and Child Labor* for more information within this policy.

13.02.02.02 Inclusion and Diversity

Worldpay supports equal opportunity in its employment practices, including the selection, hiring, promotion, compensation, benefits, discipline, transfers, promotions, lay-offs, leaves of absence, terminations, and participation in company-administered, or sponsored, activities of qualified applicants and colleagues without regard to any characteristic protected by applicable law. These protected characteristics include, but are not limited to race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information. Further, Worldpay requires its suppliers to: (i) share in Worldpay's commitment to human rights and equal opportunity in the workplace, and (ii) conduct their employment practices in compliance with applicable employment and labor laws and regulations.

Worldpay does not tolerate harassment of any of its colleagues, applicants, vendors or customers, and seeks to maintain a work environment free from harassment. Any form of harassment related to the protected characteristics outlined above and/or any other characteristic protected by applicable law is a violation of our Equal Employment Opportunity and Affirmative Action Policy and is treated as a disciplinary matter.

13.02.02.03 Health and Safety

Worldpay is focused on the health, safety and well-being of our colleagues. We provide Worldpay colleagues with a comprehensive package of health care benefits and free access to an Assistance Program and a Well-Being Program.

Worldpay is committed to providing a safe workplace for all colleagues at all company facilities. Worldpay will comply with all applicable workplace health and safety requirements in our facilities, Worldpay has a Worldpay Corporate Safety Policy with controls and procedures designed to keep colleagues safe and in line with human rights best practices.

13.02.02.04 Colleague Development, Training and Engagement

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Worldpay is focused on creating a workforce that is ready for the future, where our colleagues are inspired to grow their careers and create exceptional experiences for our clients. As such, we invest in our colleagues' ongoing professional development. More details about our colleague development, training and engagement programs can be found in the Global Sustainability Report.

Worldpay values engagement with our colleagues and has implemented several engagement mechanisms such as an annual feedback survey and focus groups. Results of these and other engagement techniques are utilized to support development, establishment, and promotion of our company culture.

13.02.02.05 Modern Slavery, Forced Labor and Child Labor

We maintain high ethical standards in our daily business practices and will continue to act in accordance with all applicable laws. Worldpay expressly prohibits any participation in, support of, or association with the illegal and immoral practices of trafficking in persons, forced labor, child labor and slavery. Worldpay is opposed to forced labor, child labor and modern slavery, including human trafficking, in any form not only with our colleagues but with our suppliers and third-party vendors as well.

Worldpay includes this important topic in trainings and has controls to assist our business in compliance with these laws and human rights commitments. For more information outlining the steps we have taken and our ongoing planned efforts to prevent modern slavery in our organization and supply chain, please review Worldpay's Modern Slavery Act Transparency Statement posted on our external website www.worldpay.com within the Governance – Policies webpage.

In addition, our colleagues are reminded through our dedicated Speak-Up Policy, mandatory trainings and other educational awareness material that it is their responsibility, per the Code of Business Conduct and Ethics, to report any suspected or actual misconduct, which includes any incident relating to modern slavery, so that appropriate remedies can be taken.

13.02.02.06 Fair Wages

It is the policy of Worldpay to comply with applicable laws and regulations concerning fair or minimum wages.

Worldpay understands the importance of offering a competitive and comprehensive total compensation and benefits package to attract and retain talented, high-performing colleagues globally. Our benefits programs include health and welfare plans in most countries and other programs where local laws and regulations permit.

13.02.02.07 Community Giving and Involvement

Worldpay supports giving back to the communities where we live and work. Worldpay provides financial support to our communities through donations to qualified organizations operating in our areas of focus. Worldpay reports on community giving in its Global Sustainability Report

Worldpay's individual business units and colleagues provide both donations and volunteer time to non-profit and community development groups in our local communities.

In the aftermath of natural disasters such as earthquakes, flooding and hurricanes, Worldpay colleagues also often aid our communities through donations of money and supplies and by volunteering with relief organizations.

Worldpay supports financial giving and solicitation in accordance with our Corporate Social Responsibility framework.

Worldpay seeks to have a positive impact on communities.

13.02.02.08 Fostering Colleague Volunteerism

The Worldpay Volunteer Policy encourages community involvement by providing eligible colleagues up to eight hours per year as paid time off for volunteering. The policy encourages many types of civic involvement, including volunteer work,

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committee and board of director positions, and participation in fundraising events. Colleagues may request time off to volunteer for charities of their choosing, and the charity does not need to be a Worldpay-sponsored or coordinated volunteer event.

13.02.02.09 Political Activities, Lobbying and Trade Associations

Worldpay's ability to participate in debates on public policies or advocacy for issues of interest to Worldpay (e.g. "lobbying" activities) may be subject to various laws and regulations at the local, state/provincial, and federal levels, including antibribery and anti-corruption laws around the world which are applicable to Worldpay. Generally, "lobbying" is defined as an interaction with a covered government official (including regulators) to influence their position on a public policy matter (e.g., law or regulation).

It is the policy of Worldpay to comply with the laws concerning lobbying activities. For example, within the U.S., there are federal, state and local reporting and/or registration/disclosure requirements prior to engaging in any such activities. Failure to register and/or report lobbying activities in accordance with the relevant laws can result in fines and penalties for Worldpay in addition to individual liability.

Consequently, the centralized and coordinated management of these activities is critical to the organization's compliance with these laws. Worldpay's Government Affairs team shall be responsible for coordinating all lobbying registrations (entities and/or individuals) and reporting requirements – including the retention of outside lobbyists or public affairs consultants. In certain jurisdictions, Legal may help lead these efforts in coordination with Government Affairs.

Worldpay belongs to various trade associations that advocate for public policy issues of importance to Worldpay and industry peers. Worldpay corporate membership in trade associations or similar organizations that actively engage in advocacy for public policy issues must be reviewed and approved by Government Affairs to ensure Worldpay's participation is consistent with relevant public policy objectives and with Compliance and Legal to ensure compliance with the Worldpay Anti-Bribery and Anti-Corruption (wABAC) Policy. However, Worldpay's membership in such trade associations does not necessarily mean Worldpay endorses or supports all public policy positions or issues that these associations support. In addition, colleagues who wish to accept a board-level or leadership position with a trade association must first obtain approval from Government Affairs.

Government Affairs shall maintain a list of the trade associations for these compliance purposes and may be required to provide an accounting of membership costs used toward association lobbying activities. Certain jurisdictions, including the United States, require disclosure of these expenses.

13.02.02.10 Political Contributions and Donations

In accordance with our Political Activities Policy, Worldpay may not use corporate funds to contribute to candidates, political party committees or political action committees, including Super PACs and political committees organized under Section 527 of the U.S. Internal Revenue Code (IRC) to promote the election or defeat of candidates for office in the United States as well as globally.

Worldpay is committed to compliance with all laws on political contributions and has various policies that address these activities, including the Worldpay Political Activities Policy, Code of Business Conduct and Ethics and our Colleague Handbooks.

Worldpay maintains a federal, state and local political action committee in the U.S. (the "PAC"), which is registered with the Federal Election Commission. The PAC, designated as the Worldpay Good Government Fund, is funded through eligible colleagues' voluntary personal contributions and makes contributions on a bipartisan basis in support of public policy consistent with Worldpay's interests.

As required by law, all political contributions accepted or made by the PAC must be reported to relevant federal, state and local campaign finance agencies and must be publicly available.

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Government Affairs is responsible for administration of the PAC and works closely with Worldpay's Finance and Legal Departments to ensure all PAC contributions and disbursements are made in accordance with applicable laws and company policies.

13.02.03 Governance

Worldpay is committed to operating with integrity and the highest ethical standards and has implemented comprehensive governance structures and practices that meet or exceed the requirements of applicable laws, regulations, and rules. Included in our governance is board of directors oversight of our sustainability program with periodic reviews of the program by the Board.

13.02.03.01 Corporate Governance

Worldpay maintains robust corporate governance policies to ensure accountability and transparency, manage operational risks and uphold compliance with applicable laws, regulations and rules governing business conduct and ethics.

Our company governing documents, conflicts of interest policy and the charters of the committees of the board of directors, provide a framework for the functioning of the board and its committees. Our governing documents, policies and charters address, among other things, the composition of the board, the selection of directors, the functioning of the board, the committees of the board, the evaluation and compensation of directors and the expectations of directors, including ethics and conflicts of interest.

13.02.03.02 Compensation and Succession Oversight

Worldpay's Board proactively oversees executive compensation by reviewing executive compensation trends, listening to stakeholder feedback, and considering current best practice recommendations, with the goal of continually improving our approach to executive compensation.

Worldpay is committed to a compensation approach that enables Worldpay to attract and retain talented and high-performing executives and colleagues. Our approach aligns the total compensation of our executive officers with our focus on achieving long-term financial performance and increasing the return of our stakeholders. The board of directors is focused on insuring that individual economic interests align with the interests of our stakeholders. Worldpay reserves the right to recover any incentive-based compensation from our current or former executive officers if we are required to prepare a restatement of financials due to material noncompliance where the incentive-based compensation paid during the preceding three-year period would have been lower had the compensation been based on the restated financial results.

The board of directors is committed to director succession and refreshment, as well as succession planning for the CEO and other members of the executive management team.

13.02.03.03 Engagement with Stakeholders Regarding Corporate Citizenship issues

Worldpay maintains proactive engagement efforts with a wide range of stakeholders, including colleagues, Corporate Citizenship rating firms, proxy advisory firms, fixed income investors, prospective shareholders, rating agencies and thought leaders, among others. Through this engagement, we discuss topics of interest to our stakeholders, including our performance, strategy, Corporate Citizenship program, executive compensation and corporate governance. We continue to emphasize discussions around our commitment to Corporate Citizenship matters and our efforts to advance sustainability.

Our executive management team and board of directors regularly consider feedback from our stakeholders and, as deemed appropriate, incorporate this feedback in the design and implementation of our strategy, programs and practices.

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13.02.03.04 Ethics and Compliance

Ethics and Compliance is at the core of what we do. It is the culture that defines how we operate. Worldpay takes seriously its reputation for honest, fair and ethical business dealings around the world. We seek customers and business partners whose ethical standards mirror our own and decline to do business with unethical entities and individuals.

Worldpay seeks to:

- Protect our reputation by operating our business with the highest ethical standards and in compliance with all applicable laws and regulations. Our Code of Business Conduct and Ethics applies to our directors, executive officers, contractors and colleagues globally and addresses various subject areas such as but not limited to compliance with applicable laws, conflicts of interest, business gifts/entertainment, use and protection of company assets, confidentiality, privacy, fair dealing, discrimination, harassment, and health and safety.
- Uphold ethical behavior and a culture of compliance through our Code of Business Conduct and Ethics and all company policies. In furtherance thereof, Worldpay has a Business Ethics Program (“Program”) led by our Chief Ethics Officer. The Code of Business Conduct and Ethics, related policies and the Program’s operating guidelines are evaluated at least annually and are updated throughout the year, as necessary. Various risk assessments are an integral part of our evaluation including ethical risks. The program includes the following essential elements: Clear Accountability, Risk Assessments, Written Policies and Standards, Training and Education, Operational Controls, Monitoring and Reporting, Independent Testing, Investigations and Response, Anonymous Reporting Mechanisms, and a prohibition on non-retaliation as outlined in our Speak-Up Policy.

In addition, we maintain the following measures to deter non-compliance and reduce exposure to unethical opportunities:

- An Ethics Office with a mission to guide, inspire, educate and support colleagues by reinforcing the highest standards for openness, fairness, honesty and ethical behavior. Colleagues are encouraged to contact the Ethics Office for further guidance when faced with ethical dilemmas.
- A dedicated Speak-Up Policy directing the reporting of any unethical business practices that violate Worldpay’s policies or the law.
- Worldpay Ethics Office’s intranet resources to provide colleagues with valuable information, links to policies and guidance.
- Training and awareness campaigns throughout the year for colleagues and contractors on various policies and subject matters;
- Anonymous reporting mechanism as part of Worldpay’s Ethics and Integrity Line with a prohibition on non-retaliation as set out in our Speak-Up Policy;
- Regular reviews of our Ethics and Integrity Line cases and trends to assist in identifying new and emerging risks and;
- Self-Identified Finding (SIF) which is utilized by colleagues to self-report any potential risks to Worldpay’s business, colleagues, clients or products and services.

In addition to our Business Ethics Program, Worldpay’s Corporate Compliance program is overseen by our Chief Compliance Officer. The team’s objective is to ensure that Worldpay, its board members, associates, contractors, vendors and clients are regulatorily compliant with the letter and spirit of all applicable laws, and conduct business with honesty and integrity. Should potential business conduct issues become known, Worldpay is committed to investigating these potential issues promptly, independently, and objectively.

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Our commitment, as illustrated in our programs, to ethical behavior and compliance is overseen and regularly monitored by the board and Executive Management. The board's Audit and Risk Committee provides oversight of Worldpay's compliance with our Code of Business Conduct and Ethics as well as legal and regulatory requirements.

13.02.03.05 Ethical Staff Behavior and Whistleblower Protections

Our Corporate Governance Guidelines, Code of Business Conduct and Ethics and overall corporate governance structure reflect our commitment to a robust Corporate Compliance Program and Business Ethics Program with whistleblower protections as outlined in our Speak-Up Policy. In addition to our open door approach, potential or suspected colleague misconduct can be raised to management, the People & Culture Team, and/or the Worldpay Ethics Office. We also provide colleagues, through a third-party, a Worldpay Ethics and Integrity Line (telephonically and a website) to report anonymously, unless prohibited by local laws, any potential or suspected misconduct as well as suggestions or concerns. Worldpay does not tolerate any retaliation against anyone who, in good faith, reports a violation of the law or Worldpay policy or cooperates with an investigation.

13.02.03.06 Anti-Bribery and Anti-Corruption

Worldpay operates its business ethically and in compliance with all applicable global laws and regulations, including compliance with applicable anti-bribery and anti-corruption laws including stringent regulations such as the Foreign Corrupt Practices Act and the UK Bribery Act. The use of Worldpay funds, or any other funds or anything of value given by an individual or entity for the benefit of or on behalf of Worldpay, for any unlawful or unethical purpose including facilitating payments is strictly prohibited.

All Worldpay colleagues are required to complete mandatory anti-bribery and anti-corruption training and testing upon being hired and annually thereafter. This training and testing, which covers receiving and giving gifts, conflicts of interest and proper record-keeping, as well as regular related awareness campaigns executed throughout the year, promotes Worldpay's cultural commitment to ethical behavior and compliance. Worldpay expects every colleague, officer and director to read the Worldpay Anti-Bribery and Anti-Corruption Policy, Conflicts of Interest Policy, Business Gifts and Entertainment Policy, and Engagement of Third-Party Standard to understand their application to the performance of their business responsibilities. The Code of Business Conduct and Ethics and Anti-Bribery, Anti-Corruption Policy are also available on our external website within the Governance – Policies webpage.

13.02.03.07 Anti-Competitive Behavior

Worldpay supports free and open competition in the marketplace by complying with applicable laws governing antitrust and trade regulation. The Code of Business Conduct and Ethics requires colleagues to comply with all applicable antitrust laws and to avoid certain types of activities with competitors, customers, suppliers or trade associations that could lead to antitrust violations.

Worldpay is committed to competing fairly and promoting ethical behavior in our industry. In addition to complying with U.S. and foreign antitrust laws, colleagues must comply with a number of laws governing trade regulation in general. Those laws require that all colleagues refrain from any unfair, deceptive, or abusive acts or practices, including false or misleading advertising, making false statements concerning competitors or their products, or inducing our competitors' customers or colleagues to breach their contracts with our competitors.

Our commitment to ethical practices and policies regarding anti-competitive behavior is supported by a mandatory training course for all colleagues.

13.02.03.08 Product Responsibility

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Worldpay supports having a positive impact on our clients and communities, and as such, we monitor the responsible use of our products.

Worldpay seeks to provide products and services that enable access to the financial service ecosystem by working in partnership with our clients and community partners to promote financial inclusion and ensure that underserved populations have education and access to financial tools.

Worldpay supports responsible marketing of our products and services. The Code of Business Conduct and Ethics requires colleagues to comply with laws governing trade regulation. Such laws require that all colleagues refrain from any unfair or deceptive methods of competition, including false or misleading advertising, making false statements concerning competitors or their products, or inducing competitors' clients or colleagues to breach their contracts with competitors of Worldpay.

13.02.03.09 Data Security and Privacy

Worldpay respects the right to privacy and is committed to being a trusted steward of client, colleague, and consumer information. Worldpay complies with all applicable cybersecurity, data protection and privacy laws wherever we do business. Worldpay obtains user data solely through legal and appropriate means, seeking explicit consent where required. All Worldpay colleagues and contractors with system access are required to complete annual Information Security and Privacy Awareness Training, which includes specific education on personal data protection, compliance, and risk management topics. Worldpay is committed to making strategic investments in information security to protect our clients and our information systems. Worldpay has formal processes in place to be able to notify clients in the event of a breach of personal data following determination of such breach, and in compliance with all federal and state laws regarding personal data. We also participate in industry and governmental initiatives to improve information security for our clients. This commitment and strategy are overseen by the board's Risk and Technology Committee and Audit and Risk Committee.

Worldpay recognizes that any failure to deliver reliable, effective and secure services to our clients exposes us to significant business risks, including additional development and remediation costs, potential loss of clients, negative impact to our reputation, and potential liability claims. Worldpay is committed to limiting our exposure to these risks through the implementation of our Global Business Resilience (GBR) program, which encompasses Business Continuity Plans, Crisis Management Plans, and Information Technology Disaster Recovery Plans. Worldpay is further committed to controlling risks related to disruption of operations through programs to provide system redundancies and security controls, to regularly measure and assess our capabilities to recover critical operations, and to provide mandatory colleague training on business continuity and disaster recovery procedures. Worldpay expects third-party partners to comply with Worldpay's data security and privacy policies and maintain the same standards.

13.02.03.10 Supply Chain Management

Worldpay is committed to managing and mitigating operational and reputational risk associated with third-party vendors. Worldpay has a Supplier Code of Conduct that all suppliers must follow. We implement a Vendor Risk Management program with key elements, including due diligence review, contract establishment, ongoing monitoring practices related to third-party relationships, and adequate risk assessment activities at all stages of the vendor life cycle. Environmental impacts, labor practices, and sustainability programs are considered prior to entering into third-party relationships.
